

Section 106 Documentation

This page intentionally left blank.

Section 106 Documentation

Table of Contents

	Page
<u>Request to be Consulting Party and Response</u>	
February 22, 2014 – Citizens of Ebey’s Reserve – Request for Consulting Party Status.....	11
May 20, 2014 – Letter to Mr. Monson and Mr. Pickard.....	13
<u>Definition of Undertaking and Invitations to Participate as Consulting Parties and Responses</u>	
October 10, 2014 – Letter to Advisory Council on Historic Preservation (ACHP).....	15
October 10, 2014 – Letter to Washington State Historic Preservation Office (SHPO).....	17
October 10, 2014 – Letter to Federally Recognized American Indian Tribes and Nations.....	21
- Jamestown S’Klallam Tribe (letter provided)	
- Lummi Tribe of the Lummi Reservation	
- Samish Indian Nation	
- Stillaguamish Tribe of Indians of Washington	
- Suquamish Indian Tribe of the Port Madison Reservation	
- Swinomish Indian Tribal Community	
- Tulalip Tribes of Washington	
- Upper Skagit Indian Tribe	
October 20, 2014 – Letter to Interested Parties	25
- Mayor Conrad, Town of Coupeville (letter provided)	
- Mr. David Day	
- Mayor Dudley, City of Oak Harbor	
- Ms. Helen Price Johnson, Island County Commissioner	
- Ms. Jill Johnson, Island County Commissioner	
- Island County Historical Society	
- Mr. Michael Monson and Ms. Maryon Attwood	
- Operations Manager, National Park Service, Fort Casey	
- PBY Memorial Foundation	
- Seattle Pacific University – Camp Casey	
- Trust Board of Ebey’s Landing National Historical Reserve	
- Mr. Aubrey Vaughan, Island County Commissioner	
- Washington State Parks – Northwest Region Office	
October 23, 2014 – SHPO Response Letter to Captain Nortier.....	29
October 23, 2014 – Mr. David Day Response Letter to Captain Nortier.....	33
October 28, 2014 – Samish Indian Nation Response Email to K. Campbell.....	35

October 28, 2014 – Mr. Michael Monson and Ms. Maryon Attwood Response Letter to Captain Nortier	37
October 30, 2014 – Mr. Michael Monson and Ms. Maryon Attwood Response Letter to Captain Nortier	39
November 3, 2014 – National Park Service Operations Manager Response Letter to Captain Nortier	41
November 3, 2014 and November 4, 2014 – Trust Board of Ebey’s Landing National Historical Reserve Response Email to K. Campbell and Letter to Captain Nortier	43
November 4, 2014 – Email Response on Behalf of Commissioner Jill Johnson to K. Campbell	47
November 5, 2014 – Email Response on Behalf of Commissioner Price Johnson to K. Campbell	49
November 25, 2014 – Seattle Pacific University, C. Kispert Response Letter to K. Campbell	51

Proposed Area of Potential Effect Letters/Emails and Responses

June 30, 2016 – Letter to ACHP	53
June 30, 2016 – Letter to SHPO	61
June 30, 2016 – Letter to Federally Recognized American Indian Tribes and Nations.....	69
- Jamestown S’Klallam Tribe (letter provided)	
- Lummi Tribe of the Lummi Reservation	
- Samish Indian Nation	
- Stillaguamish Tribe of Indians of Washington	
- Suquamish Indian Tribe of the Port Madison Reservation	
- Swinomish Indian Tribal Community	
- Tulalip Tribes of Washington	
- Upper Skagit Indian Tribe	
June 30, 2016 – Letter to Interested Parties	77
- Citizens of Ebey’s Reserve (letter provided)	
- Mayor Hughes, Town of Coupeville	
- Mr. David Day	
- Ms. Helen Price Johnson, Island County Commissioner	
- Ms. Jill Johnson, Island County Commissioner	
- Operations Manager, National Park Service, Fort Casey	
- Seattle Pacific University – Camp Casey	
- Trust Board of Ebey’s Landing National Historical Reserve	
- Washington State Parks – Northwest Region Office	
July 5, 2016 – Email from K. Campbell to Consulting Parties.....	85
July 5, 2016 – August 6, 2016 – Email Correspondence between NAS Whidbey Island and Town of Coupeville	87
July 6, 2016 – SHPO Correspondence	89
- Letter to SHPO to confirm entry into Washington Information System for Architectural and Archaeological Records Data (WISAARD) from T. Schwartz	

- Email from SHPO to K. Campbell and Email from K. Campbell Noting Receipt of Letter from WA SHPO
- Letter from SHPO dated 7 July 2016 (*Please note – this was part of an email dated July 6, 2016.)
- Email from K. Campbell Providing Information to Team Members

July 12, 2016 – Letter to Interested Parties..... 99

- Mr. Richard Hannold, Island County Commissioner (letter provided)
- Jefferson County Historical Society
- Mayor Stinson, City of Port Townsend

July 22, 2016 – Citizens of Ebey’s Reserve Response Letter to Captain Moore..... 107

August 1, 2016 – Jamestown S’Klallam Tribe Response Letter to K. Campbell 109

August 10, 2016 – ACHP Response Letter to Captain Moore 111

August 16, 2016 – City of Port Townsend Response Letter to Captain Moore..... 113

August 25, 2016 – Town of Coupeville Response Letter to Captain Moore 117

September 1, 2016 – Citizens of Ebey’s Reserve Response Letter to K. Campbell..... 119

September 28, 2016 – Trust Board of Ebey’s Landing National Historical Reserve to K. Campbell..... 147

Clarification of Section 106 Process Letters/Emails and Responses

August 31, 2016 – Letter to ACHP..... 149

August 31, 2016 – Letter to SHPO 171

August 31, 2016 – Letter to Federally Recognized American Indian Tribes and Nations and Interested Parties..... 193

Federally Recognized American Indian Tribes and Nations

- Jamestown S’Klallam Tribe (letter provided)
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

Interested Parties

- Citizens of Ebey’s Reserve
- Mayor Hughes, Town of Coupeville
- Mr. David Day
- Mr. Richard Hannold, Island County Commissioner
- Ms. Helen Price Johnson, Island County Commissioner
- Ms. Jill Johnson, Island County Commissioner
- Operations Manager, National Park Service, Fort Casey
- Seattle Pacific University – Camp Casey

- Mayor Stinson, City of Port Townsend
- Trust Board of Ebey’s Landing National Historical Reserve
- Washington State Parks – Northwest Region Office

September 1, 2016 – Email from K. Campbell to Consulting Parties 215

September 30, 2016 – SHPO Response Letter to K. Campbell 217

Public Involvement in Section 106 for the Continuation and Increase of EA-18G Operations at Naval Air Stations Whidbey Island, Island County, Washington

November 10, 2016 – Letter to ACHP 221

November 10, 2016 – Letter to SHPO..... 223

November 10, 2016 – Letter to Federally Recognized American Indian Tribes and Nations..... 225

- Jamestown S’Klallam Tribe (letter provided)
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

November 10, 2016 – Letter to Interested Parties 227

- Mr. Pickard, Citizens of Ebey’s Reserve (letter provided)
- Mayor Hughes, Town of Coupeville
- Mr. David Day
- Mr. Richard Hannold, Island County Commissioner
- Ms. Helen Price Johnson, Island County Commissioner
- Ms. Jill Johnson, Island County Commissioner
- Mr. Roy Zipp, Operations Manager, National Park Service, Fort Casey
- Mr. Darrell Jacobson, Seattle Pacific University – Camp Casey
- Mayor Stinson, City of Port Townsend
- Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve
- Washington State Parks – Northwest Region Office

November 14, 2016 – Email to SHPO from T Schwartz noting letter dated November 10, 2016 229

January 3, 2017 – National Park Service Email and Letter to K. Campbell 231

January 25, 2017 – SHPO Response Letter to Rear Admiral Mayes and transmittal email 235

Continuing Section 106 Consultation on the Definition of the Area of Potential Effect for the Proposed Increase in EA-18G Growler Operations

May 1, 2017 – Letter to ACHP 241

May 1, 2017 – Letter to SHPO 251

May 1, 2017 – Letter to Federally Recognized American Indian Tribes and Nations 261

- Jamestown S’Klallam Tribe (letter provided)
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

May 1, 2017 – Letter to Interested Parties 271

- Mr. Pickard, Citizens of Ebey’s Reserve (letter provided)
- Mayor Hughes, Town of Coupeville
- Mr. David Day
- Mr. Richard Hannold, Island County Commissioner
- Ms. Helen Price Johnson, Island County Commissioner
- Ms. Jill Johnson, Island County Commissioner
- Jefferson County Historical Society
- Mr. Roy Zipp, Operations Manager, National Park Service, Fort Casey
- Mr. Darrell Jacobson, Seattle Pacific University – Camp Casey
- Mayor Stinson, City of Port Townsend
- Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve
- Washington State Parks – Northwest Region Office

May 10, 2017 – SHPO Response Letter to Captain G.C. Moore..... 281

June 14, 2017 – Letter to SHPO from Ms. Campbell 283

July 14, 2017 – Letter to SHPO from Captain G.C. Moore..... 285

July 14, 2017 – SHPO Response Letter to Ms. Campbell 295

Continuing Section 106 Consultation on the Definition of the Area of Potential Effect for the Proposed Increase in EA-18G Growler Operations – Identification of Historic Properties

July 19, 2017 – Letter to ACHP 299

July 19, 2017 – Letter to SHPO 407

July 19, 2017 – Letter to Federally Recognized American Indian Tribes and Nations 409

- Jamestown S’Klallam Tribe (letter provided)
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation

- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

July 19, 2017 – Letter to Interested Parties..... 411

- Mr. Pickard, Citizens of Ebey’s Reserve (letter provided)
- Mayor Hughes, Town of Coupeville
- Mr. David Day
- Mr. Richard Hannold, Island County Commissioner
- Ms. Helen Price Johnson, Island County Commissioner
- Ms. Jill Johnson, Island County Commissioner
- Jefferson County Historical Society
- Mr. Roy Zipp, Operations Manager, National Park Service, Fort Casey
- Mr. Darrell Jacobson, Seattle Pacific University – Camp Casey
- Mayor Stinson, City of Port Townsend
- Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve
- Washington State Parks – Northwest Region Office

Continuing Section 106 Consultation for the Proposed Increase in EA-18G Growler Operations at Naval Air Station Whidbey Island, Island County, Washington

October 2, 2017 – Letter to ACHP 413

October 2, 2017 – Letter to SHPO..... 415

October 2, 2017 – Letter to Federally Recognized American Indian Tribes and Nations..... 417

- Jamestown S’Klallam Tribe (letter provided)
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

October 2, 2017 – Letter to Interested Parties 419

- Mr. Pickard, Citizens of Ebey’s Reserve (letter provided)
- Mayor Hughes, Town of Coupeville
- Mr. David Day
- Mr. Richard Hannold, Island County Commissioner
- Ms. Helen Price Johnson, Island County Commissioner
- Ms. Jill Johnson, Island County Commissioner

- Jefferson County Historical Society
- Mr. Roy Zipp, Operations Manager, National Park Service, Fort Casey
- Mr. Darrell Jacobson, Seattle Pacific University – Camp Casey
- Mayor Stinson, City of Port Townsend
- Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve
- Washington State Parks – Northwest Region Office

Request for Section 106 Consultation on the Finding of Adverse Effect to Historic Properties for the Proposed Increase in EA-18G Growler Operations at Naval Air Station Whidbey Island, Island County, Washington

June 25, 2018 – Letter to SHPO 421
 June 27, 2018 – SHPO Response Letter to Ms. Campbell..... 423

Continuing Section 106 Consultation on the Finding of Adverse Effect to Historic Properties for the Proposed Increase in EA-18G Growler Operations at Naval Air Station Whidbey Island, Island County, Washington

June 25, 2018 – Letter to ACHP 425
 June 25, 2018 – Letter to Federally Recognized American Indian Tribes and Nations..... 427

- Jamestown S’Klallam Tribe (letter provided)
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

June 25, 2018 – Letter to Interested Parties 429

- Ms. Maryon Attwood, Citizens of Ebey’s Reserve (letter provided)
- Mayor Hughes, Town of Coupeville
- Mr. David Day
- Mr. Richard Hannold, Island County Commissioner
- Ms. Helen Price Johnson, Island County Commissioner
- Ms. Jill Johnson, Island County Commissioner
- Jefferson County Historical Society
- Mr. Roy Zipp, Operations Manager, National Park Service, Fort Casey
- Mr. Darrell Jacobson, Seattle Pacific University – Camp Casey
- Mayor Stinson, City of Port Townsend
- Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve
- Washington State Parks – Northwest Region Office

Section 106 Determination of Effect for the EA-18G “Growler” Airfield Operations at the Naval Air Station Whidbey Island Complex

Attachment to June 25, 2018 consultation letters 431

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

Office of the Chief of Naval Operations
Admiral Jonathon Greenert
2000 Navy Pentagon, Washington, D.C. 20350-2000

Admiral Bill Gortney
Commander, Fleet Forces Command
1562 Mitscher Ave., Suite 250, Norfolk, VA 23551-2487

Rear Admiral Bette Bolivar
Navy Region Northwest
1100 Hunley Road, Silverdale, WA 98315

Commander Mike Nortier
whdb_naswi-pao@navy.mil
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue, Oak Harbor, WA 98278-5000

Ms. Kendall Campbell, Cultural Resources, U. S. Navy
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

FEBRUARY 22, 2014

RE: CONSULTING PARTY REQUEST FOR 106 PROCESS

Transition of Expeditionary EA-6B Prowler Squadrons to EA-18G Growler at NAS Whidbey Island

Dear Sirs and Madams:

Our group, Citizens of Ebey's Reserve (COER), is a Washington non-profit corporation based in Central Whidbey Island, Washington. COER would like to officially request 'consulting party' status within the Section 106 process in regard to the consultation involving the transition to, and expansion of, the use of the EA-18G (Growler) relative to the impact on the historical and cultural landscape within Ebey's Landing National Historical Reserve and other historical properties within the flight paths of the aircraft including properties in Island, Jefferson, San Juan, and Skagit Counties.

Our request is, respectfully, made on the grounds that opportunity for public input into this matter under the 106 process has been made virtually unavailable to this point. Our group represents the interests of more than 3,000 concerned citizens throughout the region. We believe that we have significant factual material pertinent to the effects of the undertaking, and we believe that we can offer important input, information and interest into the resolution of this consultation and a satisfactory memorandum of agreement.

Regards,



Michael Monson,
COER President, Board of Directors

Regards,



Ken Pickard
Education & Outreach Chair, COER

Incoming
MAR 04 2014

1

cc:

Allyson Brooks
State Historic Preservation Officer
Washington State Department of Archaeology and Historic Preservation

Kelly Yasaitis Fanizzo
Program Analyst
Advisory Council on Historic Preservation;

John M. Fowler
Executive Director
Advisory Council on Historic Preservation

Post Office Box 202, Coupeville WA 98239 citizensofthebeysreserve.com
Email – citizensofthebeysreserve2@gmail.com



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/0667
May 20, 2014

Mr. Michael Monson
Mr. Kenneth Pickard
Post Office Box 202
Coupeville, WA 98239

Dear Mr. Monson and Mr. Pickard:

Thank you for your letter dated February 22, 2014 requesting consulting party status in the Navy's section 106 consultation under the National Historic Preservation Act (NHPA) in support of the upcoming EA-18G Growler Environmental Impact Statement (EIS).

The Navy will open this process to the public and interested parties such as your organization, the Citizens of Ebey's Reserve (COER), when we initiate section 106 consultation for this EIS under NHPA and governing regulations (36 C.F.R. Part 800).

My point of contact in this matter is Kendall Campbell, NAS Whidbey Island Cultural Resources Program Manager, and can be reached at kendall.campbell1@navy.mil or at (360) 257-6780.

Sincerely,

A handwritten signature in black ink, appearing to read "M. K. NORTIER".

M. K. NORTIER
Captain, U.S. Navy
Commanding Officer



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1506
10 October 2014

Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, D.C. 20004

Dear Mr. Nelson:

SUBJECT: PROPOSED INCREASE OF AIRCRAFT AND AIRCRAFT OPERATIONS
AND DEVELOPMENT OF SUPPORT FACILITIES, NAVAL AIR STATION
(NAS) WHIDBEY ISLAND, WASHINGTON

The Navy requests the Advisory Council on Historic Preservation's (ACHP) participation in the consultation on the proposed action to increase the number of aircraft, the number of air operations, and develop support facility on NAS Whidbey Island, Washington. This undertaking is a type of activity that has the potential to cause effects on historic properties. The Navy is currently preparing an Environmental Impact Statement (EIS) for the EA-18G Growler Airfield Operations to support this proposed action, and the Navy's intent is to coordinate its Section 106 responsibilities per 36 CFR 800 with the NEPA EIS process.

The Navy believes ACHP's participation in the 106 process will ensure its successful application. Based on our ongoing experience with addressing the Section 106 process on an undertaking on OLF Coupeville, which ACHP is actively participating in, consultation on this new undertaking may present unique challenges that the Counsel's participation can help to resolve.

I look forward to ACHP's participation in assisting the Navy in fulfilling its Section 106 responsibilities. If you require additional information, my point of contact is Ms. Kendall Campbell, Naval Air Station Whidbey Island Cultural Resources Manager. Ms. Campbell can be reached at 360-257-6780.

Sincerely,

M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. NAS Whidbey Island Location Map

Copy to: Ms. Katharine Kerr

NAS WHIDBEY ISLAND LOCATION MAP



Enclosure (1)



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1505
10 October 2014

Dr. Allyson Brooks
State Historic Preservation Officer
Washington State Department of Archaeology & Historic
Preservation
P.O. Box 48343
Olympia, WA 98504

Dear Dr. Brooks:

SUBJECT: PROPOSED INCREASE OF EA-18G GROWLER AIRCRAFT AND
AIRCRAFT OPERATIONS AND DEVELOPMENT OF SUPPORT
FACILITIES, NAVAL AIR STATION (NAS) WHIDBEY ISLAND,
WASHINGTON

In accordance with Section 106 of the National Historic Preservation Act, the Navy would like to initiate consultation on the proposed increase of EA-18G Growler aircraft and aircraft operations, and development of support facilities, on NAS Whidbey Island, Washington. This undertaking is a type of activity that has the potential to cause effects on historic properties. The Navy is currently preparing an Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations to support this proposed action. Therefore, the Navy requests to enter into consultation in defining the appropriate Area of Potential Effects (APE) and meeting our Section 106 obligations as defined by the National Historic Preservation Act (NHPA) and its implementing regulations 36 CFR 800.

In 2013, the Department of Defense (DoD) identified a need to increase electronic attack capability and Congress authorized the procurement of additional aircraft to meet new mission requirements. The primary aircraft that supports electronic attack capability in the DoD is the Navy's EA-18G Growler aircraft. NAS Whidbey Island is the home to the Navy's tactical electronic attack community and the infrastructure that supports them. The Navy initiated an EIS in September 2013 to analyze increasing the number of EA-18G aircraft (addition of 13 aircraft) at NAS Whidbey Island, along with a corresponding increase in training operations.

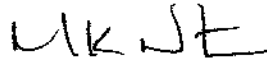
Since then, the Navy revised the scope of the ongoing EIS to analyze the potential increase in EA-18G aircraft from 13 to

5090
Ser N44/1505
10 October 2014

up to 36 aircraft. The number of EA-18G aircraft ultimately procured will be determined by Congress. Nonetheless, the Navy has elected to include the potential increase in the ongoing EIS in order to be transparent and to ensure a holistic analysis of environmental impacts from the proposed action. In support of the EIS process, the Navy will hold public scoping meetings on October 28, 29, and 30. You will be receiving the Notice of Intent to revise the EIS shortly, which includes detailed information about the scoping meetings. Per 36 CFR 800.8(a), the Navy intends to utilize the EIS public scoping meetings to partially fulfill the Section 106 public notification and consultation requirements.

I look forward to consulting with you on this project to fulfill our Section 106 responsibilities. If you require additional information, my point of contact is Kendall Campbell, NAS Whidbey Island Cultural Resources Manager. Ms. Campbell can be reached at (360) 257-6780.

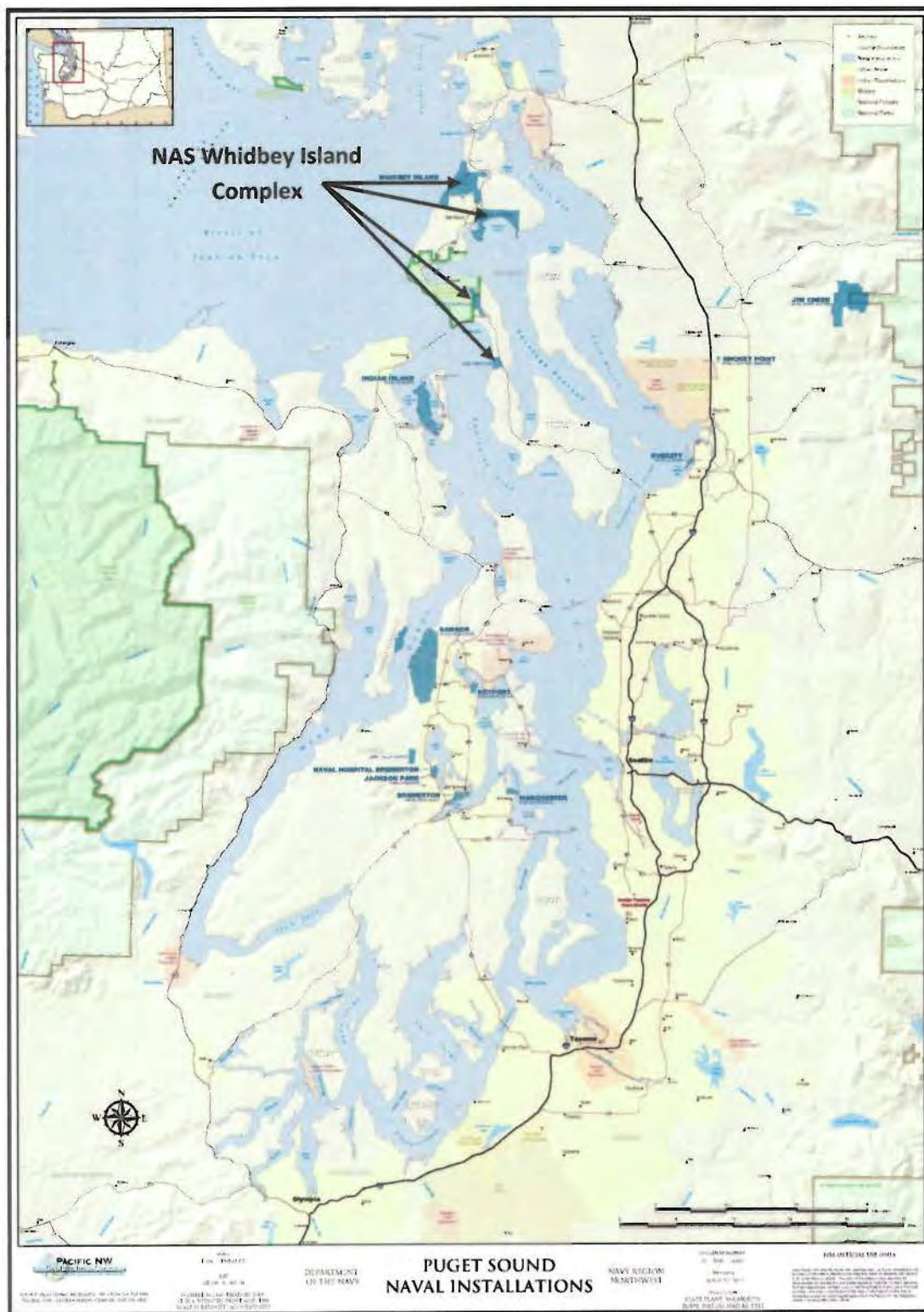
Sincerely,



M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. NAS Whidbey Island Location Map

NAS WHIDBEY ISLAND LOCATION MAP





DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1504
10 October 2014

The Honorable W. Ron Allen
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382

Dear Chairman Allen,

SUBJECT: NOTIFICATION OF PROPOSED INCREASE OF THE EA-18G
GROWLER AIRCRAFT AT NAVAL AIR STATION (NAS) WHIDBEY
ISLAND IN OAK HARBOR, WASHINGTON

I would like to inform you that the Department of the Navy (Navy) is preparing an Environmental Impact Statement (EIS) for the proposed increase of EA-18G Growler aircraft and aircraft operations, and development of support facilities, at Naval Air Station Whidbey Island, Washington. The Notice of Intent to study the environmental effects of this proposed action will be published in the Federal Register on October 10, 2014 and additional information is available on the project website at www.whidbeyeis.com.

Although in the preliminary stages of development, I would like to invite you to review the enclosed information on the proposed action to be studied in the EIS and evaluate whether you believe there may be a potential for this action to significantly affect tribal treaty harvest rights, resources or lands. This invitation is made pursuant to the Navy's policy for government-to-government consultation with American Indian and Alaska Native tribes.

In 2013, the Department of Defense (DoD) identified a need to increase electronic attack capability and Congress authorized the procurement of additional aircraft to meet new mission requirements. The primary aircraft that supports electronic attack capability in the DoD is the Navy's EA-18G Growler aircraft. NAS Whidbey Island is the home to the Navy's tactical electronic attack community and the infrastructure that supports them. The Navy initiated an EIS in September 2013 to analyze increasing the number of EA-18G aircraft (addition of 13 aircraft) at NAS Whidbey Island, along with a corresponding increase in training operations.

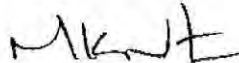
5090
Ser N44/1504
10 October 2014

Since then, the Navy revised the scope of the ongoing EIS to analyze the potential increase in EA-18G aircraft from 13 to up to 36 aircraft. The number of EA-18G aircraft ultimately procured will be determined by Congress. Nonetheless, the Navy has elected to include the potential increase in the ongoing EIS in order to be transparent and to ensure a holistic analysis of environmental impacts from the proposed action. In support of the EIS process, the Navy will hold public scoping meetings on October 28, 29, and 30. You will be receiving a separate notification letter inviting you and your staff to attend these meetings if you would like to ask questions in person.

If you would like to initiate government-to-government consultation, please provide the name(s) and title(s) of the tribal officials to contact to coordinate our first meeting. I look forward to discussing your questions and concerns about this proposed project.

If you have questions or concerns, or require further information regarding the proposed undertaking please contact me directly at michael.nortier@navy.mil, or (360)257-2037, or, have your staff contact Ms. Kendall Campbell the installation Cultural Resources Program Manager at kendall.campbell1@navy.mil or (360) 257-6780.

Sincerely,



M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. Description of Proposed Action and Proposed Alternatives

Copy to:
Mr. Gideon U. Cauffman
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

ENCLOSURE 1. DESCRIPTION OF PROPOSED ACTION AND PROPOSED
ALTERNATIVES

Naval Air Station (NAS) Whidbey Island is located in Island County, Washington, on Whidbey Island in the northern Puget Sound region. The main air station (Ault Field) is located in the north-central part of the island, adjacent to the Town of Oak Harbor. Outlying Landing Field (OLF) Coupeville is located approximately 10 miles south of Ault Field in the Town of Coupeville. OLF Coupeville is primarily dedicated to Field Carrier Landing Practice (FCLP) operations.

NAS Whidbey Island is the only naval aviation installation in the Pacific Northwest and has supported the electronic attack (VAQ) community for more than 35 years. It is the only home base location for the VAQ community in the United States and provides facilities and support services for: nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron and one Fleet Replacement Squadron (FRS).

The Navy proposes to support and conduct VAQ airfield operations and provide facilities and functions to home base additional VAQ aircraft at NAS Whidbey Island. No changes to existing ranges or airspace are proposed. The proposed action includes the following:

- Continue and expand the existing VAQ operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;
- Increase VAQ capabilities and augment the VAQ FRS (an increase of between 13 and 36 aircraft) to support an expanded DoD mission for identifying, tracking and targeting in a complex electronic warfare environment;
- Construct and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station ~~up to 860~~ additional personnel ~~at~~ and ~~relocate~~ ~~approximately 2,150~~ ~~their~~ family members ~~at~~ ~~the~~ NAS Whidbey Island and the surrounding community.

The purpose of the proposed action is to improve the Navy's electronic attack capability and to provide the most effective force structure and tactical airborne electronic attack capabilities to operational commanders.

The action alternatives represent force structure changes that support an expanded DoD mission for identifying, tracking and targeting in a complex electronic warfare environment. This EIS will address the No Action Alternative and four alternatives:

No Action Alternative: Implementing the No Action Alternative, or taking "no action," means that legacy EA-6B Prowlers would

continue to gradually transition to next generation EA-18G Growler aircraft (82 aircraft) and annual EA-18G Growler airfield operations would be maintained at levels consistent with those identified in the 2005 and 2012 transition EAs. Under the No Action Alternative the Navy would not improve the Navy's Electronic Attack capability by adding VAQ squadrons or aircraft. While the No Action Alternative does not meet the purpose and need of the proposed action, it serves as a baseline against which impacts of the proposed action can be evaluated.

The Navy will analyze the potential environmental impacts of airfield operations, facilities and functions at NAS Whidbey Island associated with the following four force structure alternatives:

Action Alternative 1: Expand EXP capabilities by establishing two new EXP squadrons and augmenting FRS by three additional aircraft (a net increase of 13 aircraft);

Action Alternative 2: Expand CVW capabilities by adding two additional aircraft to each existing CVW squadron and augmenting FRS by six additional aircraft (a net increase of 24 aircraft);

Action Alternative 3: Expand CVW capabilities by adding three additional aircraft to each existing CVW squadron and augmenting FRS by eight additional aircraft (a net increase of 35 aircraft); and

Action Alternative 4: Expand EXP and CVW capabilities by establishing two new EXP squadrons, adding two additional aircraft to each existing CVW squadron, and augmenting FRS by eight additional aircraft (a net increase of 36 aircraft).

The environmental analysis in the EIS will focus on several aspects of the proposed action: aircraft operations at Ault Field and OLF Coupeville; facility construction; and personnel changes. Resource areas to be addressed in the EIS will include, but not be limited to: air quality, noise, land use, socioeconomic, natural resources, biological resources, cultural resources, and safety and environmental hazards.

The analysis will evaluate direct and indirect impacts, and will account for cumulative impacts from other relevant activities near the installation. Relevant and reasonable measures that could avoid or mitigate environmental effects will also be analyzed. Additionally, the DoN will undertake any consultation applicable by law and regulation. No decision will be made to implement any alternative until the EIS process is completed and a Record of Decision is signed by the Assistant Secretary of the Navy (Energy, Installations and Environment) or designee.



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1547
October 20, 2014

The Honorable Nancy Conard
Mayor of Coupeville
PO Box 725
Coupeville, WA 98239-0725

Dear Mayor Conard:

SUBJECT: PROPOSED INCREASE OF AIRCRAFT AND AIRCRAFT OPERATIONS
AND DEVELOPMENT OF SUPPORT FACILITIES, NAVAL AIR
STATION WHIDBEY ISLAND, WASHINGTON

In accordance with Section 106 of the National Historic Preservation Act, the Navy has initiated consultation with the Washington State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) on the proposed increase of aircraft, increase in aircraft operations, and development of support facilities on Naval Air Station (NAS) Whidbey Island, Washington. As a potential interested party per Section 106's enabling regulation 36 CFR § 800.2(d), we would like to ascertain whether you wish to participate in the Navy's historic properties review process.

Section 106 requires federal agencies to consider what effects its projects may have on historic properties. A historic property is defined as any prehistoric or historic property included in or determined eligible for inclusion in the National Register of Historic Places (NRHP). This undertaking is a type of activity that has the potential to cause effects on historic properties.


At this point, the Navy invites The Town of Coupeville to participate as a consulting party in the Section 106 process and requests you to let us know if you wish to participate. If you choose to be a consulting party in the Section 106 process, simply respond to this letter requesting the Navy consider you as a consulting party per 36 CFR 800.3(f). Alternatively, if you would like to comment on the proposed action, but prefer not to participate as a consulting party, there are a number of additional opportunities for concerned parties or individuals to provide input and comments to the Navy.

5090
Ser N44/1547
October 20, 2014

The Navy is preparing an Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations, and intends to coordinate its Section 106 responsibilities per 36 CFR 800 with the NEPA EIS process. In support of the NEPA process, the Navy will be holding public scoping meetings on October 28, 29, and 30, 2014 in Coupeville, Oak Harbor, and Anacortes, respectively, between 4:00pm and 8:00pm each night. These scoping meetings will also serve as an opportunity to ask questions specific to the Section 106 process and how public comments on historic properties may be provided to the Navy for consideration.

Regardless of whether you elect to become a consulting party under Section 106 or to participate in the EIS scoping meetings, the Navy values your comments and input at this early stage in development of the EIS. I look forward to hearing of concerns that you may have in regards to the potential impact of this undertaking on historic properties per 36 CFR Part 800. If you require additional information, my point of contact is Kendall Campbell, NAS Whidbey Island Cultural Resources Manager. Ms. Campbell can be reached at (360) 257-6780.

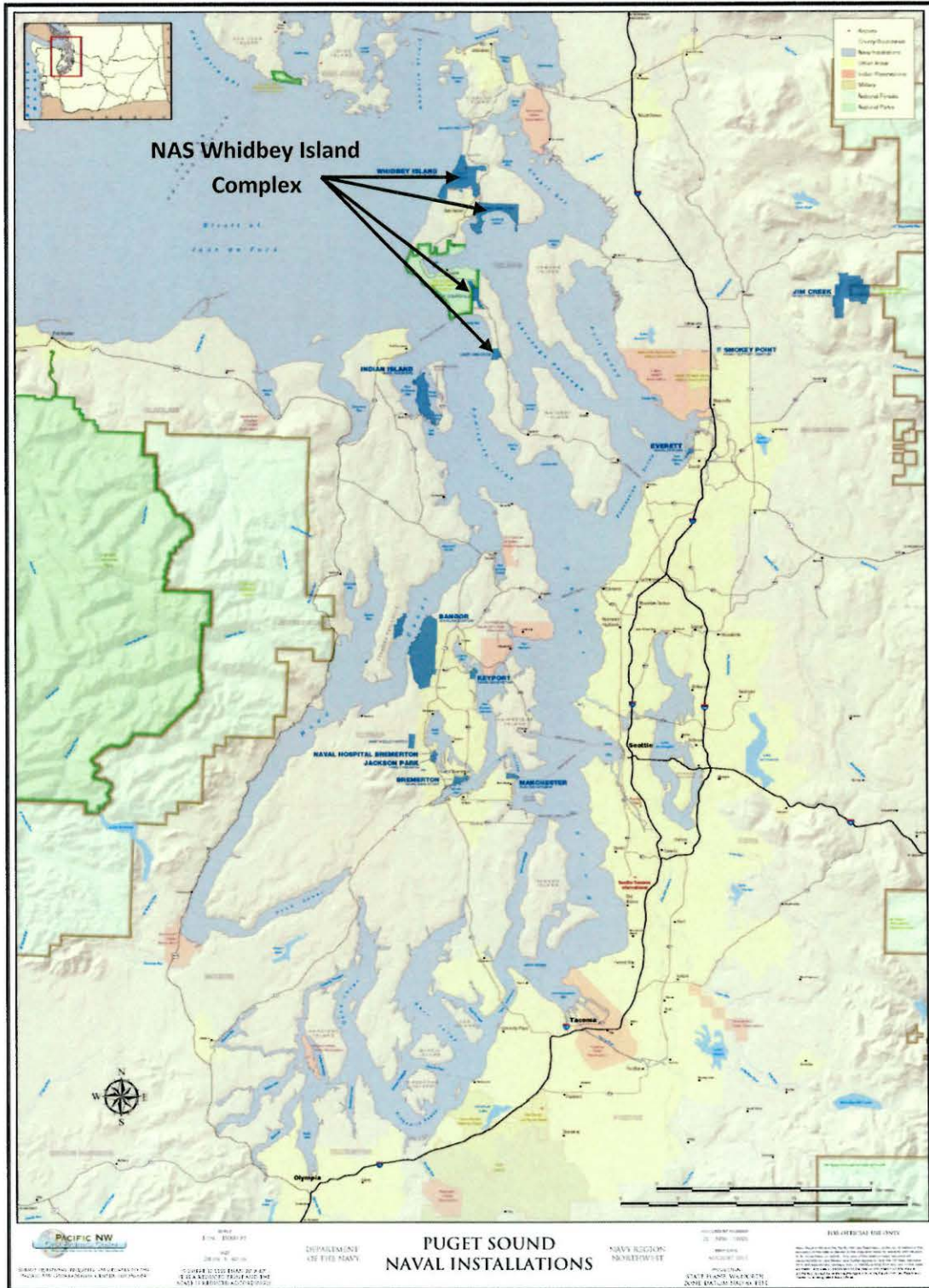
Sincerely,



M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. NAS Whidbey Island Location Map

NAS WHIDBEY ISLAND LOCATION MAP



Enclosure (1)

From: [Holter, Russell \(DAHP\)](#)
To: [Campbell, Kendall CIV NAVFAC NW, PRW4](#)
Cc: kristin_griffin@partner.nps.gov; [Chris Moore \(cmoore@preservewa.org\)](mailto:Chris Moore (cmoore@preservewa.org))
Subject: NAS Whidbey and Areas Associated with Flight Paths
Date: Thursday, October 23, 2014 16:25:15
Attachments: [102214-23-USN_102314.pdf](#)

For you!

Russell Holter

Project Compliance Reviewer

Department of Archaeology and Historic Preservation

360-586-3533

Office hours are from 8am to 5pm M-F

My hours are 7am to 5:30 M-Th



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

October 23, 2014

Capt. M. K. Nortier
Captain, US Navy
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

In future correspondence please refer to:

Log: 102214-23-USN
Property: NAS Whidbey and Areas Associated with Flight Paths
Re: Proposed Increase in EA-18 Growler Operations

Dear Captain Nortier:

We have reviewed the materials forwarded to the Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. Thank you for the opportunity to comment on the project. Based upon your letter, we understand the proposal to entail an increase in training sorties and other flight operations in the vicinity of Naval Air Station Whidbey.

Our concerns center on this proposal's effects to cultural and historic resources and how the impact of increased noise levels and the frequency of elevated sound levels might have to these resources in the Puget Sound Basin. Our interest is upon the following potential effects:

- 1) Effects to historic buildings, structures, objects, and districts from the vibration of sound waves to the short and long-term structural soundness of these historic property types. A related concern is the effect of resulting sound-proofing activities at historic properties that if undertaken could adversely affect historic character.
- 2) Effects on the public's experience of using cultural and historic resources, particularly traditional cultural properties, historic districts, and landscapes such as the Ebey's Landing National Historic Reserve and the Port Townsend National Historic Landmark District. The jarring effect of frequent and high noise levels on the feeling and association of cultural and historic resources are of concern.
- 3) Effects on the long-term viability of historic properties. Our concern is the increased and frequent noise levels on the long-term viability of historic resources as places to live, work, and recreate.

In defining the Area of Potential Effects, we recommend the Navy conduct a day and night noise level assessment for flight patterns across the entire region where Growler flights will be conducted. Such an assessment would help the Navy while considering the indirect effects posed by increased Growler operations on cultural resources.

We look forward to the results of your cultural resources survey efforts, your consultation with the concerned tribes, and receiving the survey report when it is available. We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4). These comments are



based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to comment. If you have any questions, please contact me.

Sincerely,



Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov

Cc: Kristen Griffin (Ebey's Landing)
Chris Moore (WA Trust)



23 October
320 Crown Avenue
Coupeville, Washington 98239-3604

M. K. Nortier
Captain, United States Navy
Commanding Officer
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

Captain Nortier,

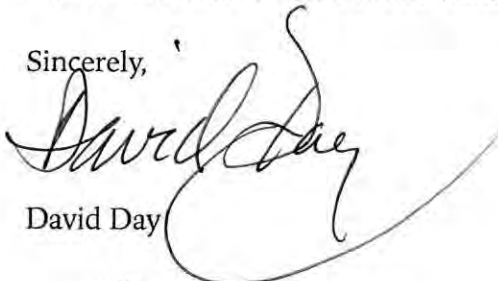
Thank you for your letter dated 20 October, 2014 informing me of the initiation of consultation within the 106 process for the proposed **“increase of aircraft and aircraft operations and development of support facilities at NAS Whidbey Island”**, and for the corresponding invitation from the Navy to participate as a consulting party in the process.

In response to your letter, and in accordance with the Code of Federal Regulations cited in your letter, I respectfully accept the Navy’s invitation to participate, and officially request the Navy to consider me as a consulting party in regard to this undertaking per Title 36 CFR 800.3(f).

I will look forward to further information as to the manner and timeframe in which this consultation process will unfold, and ask that sufficient notice be provided so as to reasonably facilitate the inclusion of this in my calendar as the process progresses.

Once again, thank you for this opportunity to become a participant in this serious, necessary and important process to protect the historical cultural landscape of Ebey’s Landing National Historical Reserve and Central Whidbey Island.

Sincerely,



David Day

coupevillan@mac.com
360.672.0252 cellular

cc: Kendall Campbell
Cultural Resources Manager
NAS Whidbey Island
kendall.campbell1@navy.mil

From: [Campbell, Kendall CIV NAVFAC NW, PRW4](#)
To: [Roll, Marilyn M CIV NAVFAC NW, PRW41](#)
Subject: FW: Notification of Proposed Increase of the EA-18G Growler Aircraft
Date: Tuesday, October 28, 2014 12:11:21

-----Original Message-----

From: Jackie Ferry [<mailto:jferry@samishtribe.nsn.us>]
Sent: Tuesday, October 28, 2014 8:49 AM
To: Campbell, Kendall CIV NAVFAC NW, PRW4
Subject: Notification of Proposed Increase of the EA-18G Growler Aircraft

Hi Kendall,

At this time, we are not interested in consulting for cultural resources on the EIS.

Thanks,

Jackie

Tribal Historic Preservation Office, Samish Indian Nation
2918 Commercial Ave, Anacortes, WA 98221 | 360-293-6404

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

October 28, 2014

M.K. Nortier
Captain, United States Navy
Commanding Officer
Naval Air Station Whidbey Island
3730 North Charles Porter Ave.
Oak Harbor, WA 98278-5000

Dear Captain Nortier:

Thank you for your letter dated October 20, 2014 informing us of the initiation of the 106 process for the proposed "increase of aircraft and aircraft operations and development of support facilities at NAS, Whidbey Island," and for the invitation from the Navy to participate as a consulting party in the process.

In response to your letter, and in accordance with the Code of Federal Regulations cited in your letter, we respectfully accept the Navy's invitation to participate, and officially request the Navy to consider us as consulting parties in regard to this undertaking, per Title 36 CFR 800.3(f).

We look forward to further information as to the manner and timeframe in which this consultation process will unfold, and ask that sufficient notice be provided so as to reasonably facilitate the inclusion of these consultations in our calendars as the process progresses.

Once again, thank you for this opportunity to become participants in this serious, necessary, and important process to protect the cultural landscape and significant heritage resources of Ebey's Landing National Historical Reserve and Central Whidbey Island.

Sincerely,

Michael Monson
President

Maryon Attwood
Director

cc: Kendal Campbell
Cultural Resources Manager
NAS Whidbey Island
kendall.campbell1@navy.mil

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

October 30, 2014

M.K. Nortier
Captain, United States Navy
Commanding Officer
Naval Air Station Whidbey Island
3730 North Charles Porter Ave.
Oak Harbor, WA 98278-5000

Dear Captain Nortier:

Thank you for your letter dated May 20, 2014 informing us of the initiation of the 106 process "to develop a Memorandum of Agreement (MOA) to resolve potential visual effects to historic properties from the Outlying Landing Field (OLF) Coupeville Security Enhancements Project" and for the invitation from the Navy to participate as a consulting party in the process representing the Citizens of Ebey's Reserve.

In response to your letter, and in accordance with the Code of Federal Regulations cited in your letter, we respectfully accept the Navy's invitation to participate, and officially request the Navy to consider us as consulting parties in regard to this undertaking, per Title 36 CFR Part 800.

We look forward to further information as to the manner and timeframe in which this consultation process will unfold, and ask that sufficient notice be provided so as to reasonably facilitate the inclusion of these consultations in our calendars as the process progresses.

Once again, thank you for this opportunity to become participants in this serious, necessary, and important process to protect the cultural landscape and significant heritage resources of Ebey's Landing National Historical Reserve and Central Whidbey Island.

Sincerely,

Michael Monson
President

Maryon Attwood
Director

cc: Kendal Campbell
Cultural Resources Manager
NAS Whidbey Island
kendall.campbell1@navy.mil



NATIONAL PARK SERVICE
Ebey's Landing National Historical Reserve
Reuble Farmstead
593 Fort Casey Road
Coupeville, Washington 98239

November 3, 2014

Captain M. K. Nortier, U.S. Navy
Commanding Officer
Naval Air Station, Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

RE: Review under Section 106 of the National Historic Preservation Act of the Proposed Increase of Aircraft and Aircraft Operations and Development of Support Facilities, Naval Air Station Whidbey Island, Washington

Dear Captain Nortier:

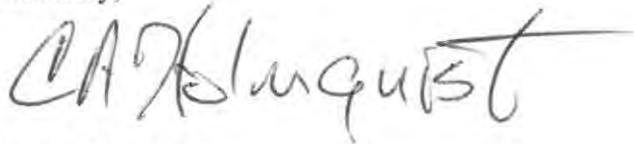
Thank you for notifying the National Park Service (NPS) of the Navy's intent to conduct Section 106 Review of the proposed increase in aircraft and aircraft operations and development of support facilities on Naval Air Station (NAS), Whidbey Island, Washington.

The NPS accepts the invitation to formally participate as a consulting party in the Section 106 Review process for this undertaking under 36CFR800.2 and 36CFR800.3(f). Please be aware that other units of the NPS system may also have concerns about the effects of increased aircraft and aircraft operations on historic properties within their jurisdictions. Therefore, Ebey's Landing National Historical Reserve is accepting this invitation on behalf of the National Park Service as a whole.

Ebey's Landing National Historical Reserve (NHR) is comprised of a large Historic District listed in the National Register of Historic Places in 1973. The boundaries of Ebey's Landing NHR coincide with those of the Historic District. A significant portion of the Navy's Outlying Landing Field (OLF) lies with the boundaries of the NHR. The remainder of the OLF has a common boundary with the NHR along Keystone Hill road.

Thank you for the opportunity to serve as a consulting party. The National Park Service looks forward to working with the U.S. Navy.

Sincerely,

A handwritten signature in black ink that reads "Craig Holmquist". The signature is written in a cursive style with a long horizontal stroke extending from the end of the name.

Craig Holmquist
National Park Service Operations Manager
Reuble Farmstead
593 Fort Casey Road
Coupeville WA 98253

Cc:

NPS - David Louter, Chief of Cultural Resources, Pacific West Region

NPS - Karen Taylor-Goodrich, Superintendent, North Cascades National Park Service Complex

Campbell, Kendall CIV NAVFAC NW, PRW4

From: Griffin, Kristen <kristen_griffin@partner.nps.gov>
Sent: Monday, November 03, 2014 14:53
To: Campbell, Kendall CIV NAVFAC NW, PRW4
Subject: Accept invitation to consult on EA18G undertaking

Hi Kendall. The Trust Board does wish to be a consulting party for the Section 106 Review on the NAS 2014 Whidbey EA18G Operation undertaking. I'll have a letter out to you asap. Thanks,

--

Kristen P. Griffin
Reserve Manager
Ebey's Landing National Historical Reserve P.O. Box 774 Coupeville, WA 98239
360.678.6084
www.nps.gov/ebla



November 4, 2014

Captain M. K. Nortier
Naval Air Station Whidbey Island
3730 N. Charles Porter Ave.
Oak Harbor, WA 98278-5000

Trust Board Members

Lisa Meserole, Chair
Jan Pickard, Vice Chair
Al Sherman, Treasurer
Molly Hughes, Secretary
Fran Einterz
Hank Florence
Wilbur Bishop
Eric Wutilo
Jon Roberts

Kristen Griffin,
Reserve Manager

Trust Board Partners

National Park Service
Washington State Parks
Island County
Town of Coupeville

Dear Captain Nortier:

On behalf of the Trust Board of Ebey's Landing National Historical Reserve, I accept your invitation to participate as a consulting party, per 36 CFR 800.3(f), in the Section 106 Review of the following federal undertaking: *Proposed Increase of Aircraft and Aircraft Operations and Development of Support Facilities, Naval Air Station Whidbey Island, Washington.*

The Trust Board is charged with administering and managing Ebey's Landing National Historical Reserve as a unit of the National Park system, and in a manner consistent with its enabling legislation (1978 National Parks and Recreation Act, P.L. 95-625) and the Interlocal Agreement of July 26, 1988 between the National Park Service, Washington State Parks and Recreation Commission, Island County, and the Town of Coupeville.

In light of these responsibilities, the Trust Board and I look forward to working with the Navy during the review process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kristen Griffin".

Kristen Griffin
Reserve Manager
Trust Board of Ebey's Landing National Historical Reserve

file

Post Office Box 774
Coupeville, WA 98239
Phone (360) 678-6084
Fax (360) 678-7490

Campbell, Kendall CIV NAVFAC NW, PRW4

From: Debbie Thompson <DebbieT@co.island.wa.us>
Sent: Tuesday, November 04, 2014 11:47
To: Campbell, Kendall CIV NAVFAC NW, PRW4
Cc: Jill Johnson
Subject: Section 106 - Participation Process

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Purple Category

Proposed Increase of Aircraft and Aircraft Operations and Development of Support Facilities, Naval Air Station Whidbey Island, WA

Thank you for the invitation to participate as a consulting party in this Section 106 process. On behalf of Commissioner Jill Johnson, please consider her as a consulting party per 36 CFR 800.3(f). We will await notice of the consultation meetings which I understand will occur after the first of the year.

Should you need anything further, just let me know.

Kind Regards,

Debbie

Debbie Thompson

Clerk of the Board/Administrative Assistant to

Jill Johnson, Chair

Board of Island County Commissioners

(360) 679.7385

debbiet@co.island.wa.us

Campbell, Kendall CIV NAVFAC NW, PRW4

From: Nicole Tesch <N.tesch@co.island.wa.us>
Sent: Wednesday, November 05, 2014 12:23
To: Campbell, Kendall CIV NAVFAC NW, PRW4
Cc: Helen Price Johnson
Subject: Section 106 - Participation Process

Categories: Purple Category

Proposed Increase of Aircraft and Aircraft Operations and Development of Support Facilities, Naval Air Station Whidbey Island, WA

Thank you for the invitation to participate as a consulting party in this Section 106 process. On behalf of Commissioner Price Johnson, please consider her as a consulting party per 36 CFR 800.3(f). We will await notice of the consultation meetings which I understand will occur after the first of the year.

Nicole Tesch

Administrative Assistant to

Commissioner Helen Price Johnson, District 1

Board of Island County Commissioners

1 NE 7th Street, PO Box 5000

Coupeville, WA 98239

Phone: 360.679.7354

Email: n.tesch@co.island.wa.us <<mailto:n.tesch@co.island.wa.us>>

Note: email correspondence to this account is a matter of public record and subject to release under the Public Records Act.



November 25, 2014

Department of the Navy
Naval Air Station Whidbey Island
Attn: Ms. Kendall Campbell, NAS Whidbey Island Cultural Resources Manager
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Re: Proposed Increase of Aircraft and Aircraft Operations and Development of Support
Facilities, Naval Air Station Whidbey Island, Washington – Consulting Party

To Whom It May Concern:

Thank you for extending an invitation to Seattle Pacific University (SPU) to participate in the Navy’s historic properties review process related to the proposed increase in aircraft and aircraft operations and the development of support facilities at Naval Air Station Whidbey Island. SPU would like to accept this invitation and provide a representative to be considered as a consulting party in the Section 106 process described in the letter to SPU dated October 20, 2014. Darrell Jacobson, the Site Manager of the Camp Casey Conference Center, will serve as the University’s representative for this process. Darrell’s contact information follows below.

Darrell Jacobson, Site Manager
Camp Casey Conference Center
1276 Engle Road
Coupeville, WA 98239
360-678-1187
djacob@spu.edu

SPU has operated the Camp Casey Conference Center since the 1950s and the site hosts 30,000 visitors a year for both indoor and outdoor athletic, educational and retreat type activities. The facilities have the capacity to lodge 642 people a day in historic buildings which feature single pane windows and uninsulated walls. As a result, the Conference Center operations can be very sensitive to the activities that go on around facility by land, sea and air.

The University is very interested to participating in the Navy’s process and hopes that Mr. Jacobson will be strongly considered for participation as a consulting party through this process.

Sincerely,

Craig Kisper
Vice President for Business and Finance



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WA 98278-5000

5090
Ser N44/1445
30 Jun 16

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: REQUEST FOR SECTION 106 COMMENTS ON THE PROPOSED DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE CONTINUATION AND INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station Whidbey Island (NAS Whidbey Island) is continuing consultation first requested on 10 October 2014 and asks for your comments on the Navy's proposed definition of the Area of Potential Effect (APE) for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosures 1 and 2).

Over the last 74 years, NAS Whidbey Island has been home to a variety of evolving naval aircraft that have addressed the technological and military demands of their time. These aircraft and their missions have played critical roles in events that have shaped our nation's history, including the rearming of Seaplanes in World War II, the introduction of Tactical Electronic Warfare during the Cold War, and the modern technological era of electronic attack and the EA-18G Growler. NAS Whidbey Island has made critical contributions to these historic events and has been on the forefront of the evolution of electronic attack technology, supporting the Department of Defense's (DoD) electronic attack mission, training, and operations.

As the home of the electronic attack aviation community for the United States Navy, NAS Whidbey Island currently provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS). To continue support of the electronic attack mission at NAS Whidbey Island, the U.S. Navy proposes to:

- Continue and expand the existing electronic attack operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;

- Increase electronic attack capabilities and augment the EA-18G Growler FRS to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;
- Construct, demolish, and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

The above actions are the type of activities that have the potential to effect historic properties both directly and indirectly. The Navy proposes to define the direct effects component of the Area of Potential Effect (APE) as those areas where construction will occur on the installation. Maps indicating the direct effect component will become available as the Draft Environmental Impact Statement (DEIS) matures and will be used to define the proposed APE.

Consistent with historical practice, the Navy proposes to define the indirect effects component of the APE as those areas on and off the installation within the 65 dB DNL noise contours that result from air operations at NAS Whidbey Island. The DNL is the federally-accepted metric used by the Federal Aviation Administration (FAA), Environmental Protection Agency (EPA), DoD, and other federal and state agencies to assess noise effects on communities. The 65 dB DNL is used to assess compatible land uses within the DNL contours. The threshold of 65 dB DNL or less is considered to be "acceptable" for most land uses and not expected to affect historic properties.

In order to facilitate this initial discussion, we have included the most current noise contours for Ault Field and OLF Coupeville. Specifically, Enclosure 3 represents the DNL contours developed for Ault Field in the 2014 Supplemental EIS for the introduction of the P-8A aircraft, and Enclosure 4 represents the DNL contours developed for OLF Coupeville as part of the 2005 Environmental Assessment for the replacement of EA-6B aircraft with EA-18G aircraft at NAS Whidbey Island. The enclosed noise contours are the most current noise contours available. The Navy is preparing an updated noise modeling study with DNL contours for this undertaking and for the DEIS process. When updated DNL contours become available, the Navy will define the proposed APE boundaries accordingly and continue consultation.

The Navy recognizes that the proposed APE may include historic properties of interest to state and federal agencies, local governments, community groups, and individuals on and near Whidbey Island. In accordance with 36 CFR Part 800.3(f), the Navy has identified and invited the following interested parties to participate as consulting parties:

- Washington State Historic Preservation Office
- Island County Commissioners (Districts 1 and 2)

- Town of Coupeville
- National Park Service
- Trust Board of Ebey's Landing National Historical Reserve
- Washington State Parks
- Seattle Pacific University
- David Day
- Citizens of Ebey's Reserve (COER)

The Navy also understands that the APE may include properties of cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the following tribes:

- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation
- Tulalip Tribes
- Suquamish Tribe
- Jamestown S'Klallam Tribe

The Navy will take into consideration the results of consultation with all identified parties in defining the APE.

If you require additional information, please contact NAS Whidbey Island Cultural Resources Program Manager, Kendall Campbell, at (360) 257-6780 or kendall.campbell1@navy.mil, or Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or at tracy.schwartz.ctr@navy.mil.

We look forward to continued consultation and appreciate your comments on the proposed definition of the Area of Potential Effect for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island.

Sincerely,



G. C. MOORE
Captain, United States Navy
Commanding Officer

5090
Ser N44/1445
30 Jun 16

- Enclosures:
1. NAS Whidbey Island Site Locations
 2. NAS Whidbey Island Ault Field and Seaplane Base
 3. 2013 Navy Noise Study DNL Contours
 4. 2005 Navy Noise Study DNL Contours

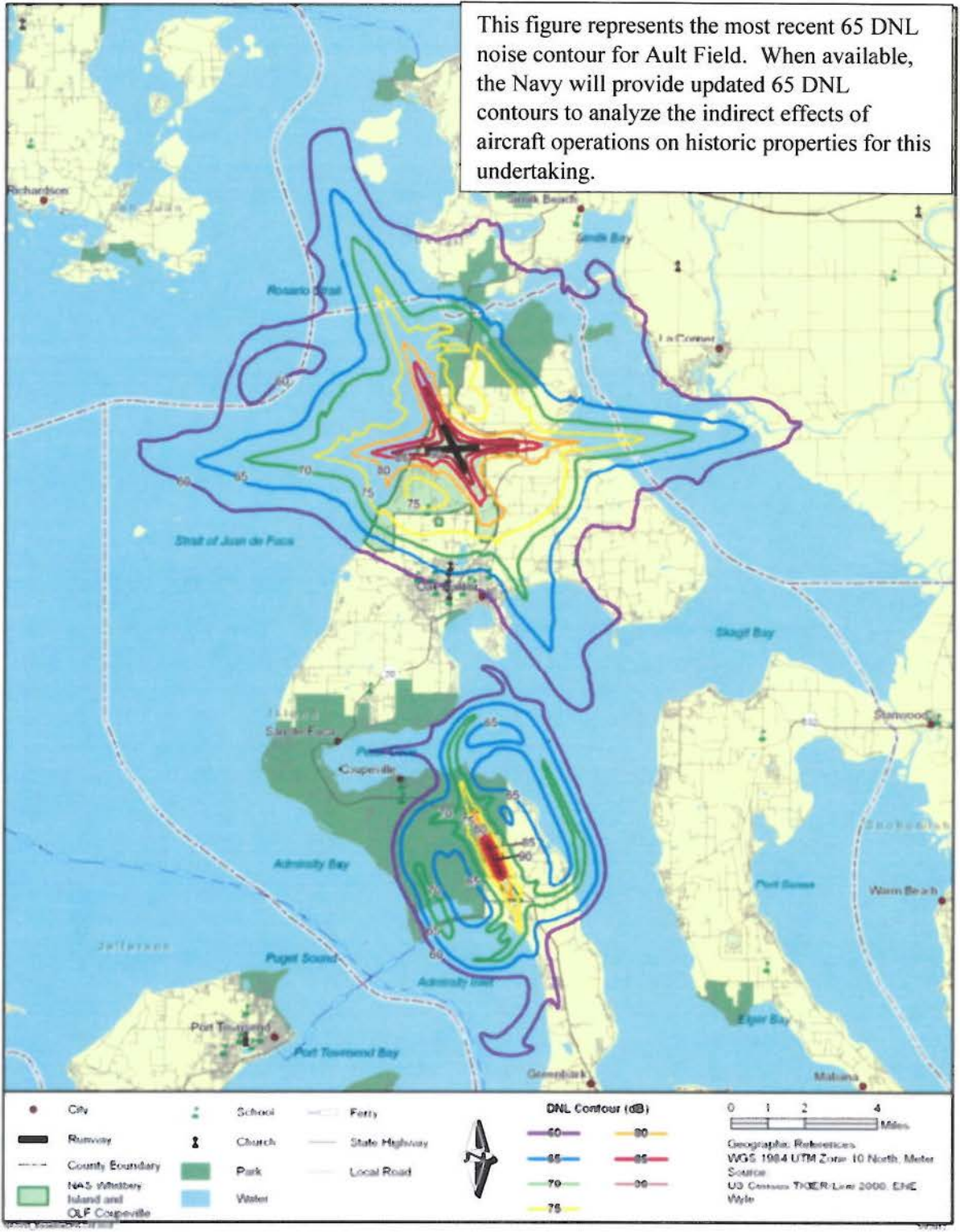


Enclosure (1)

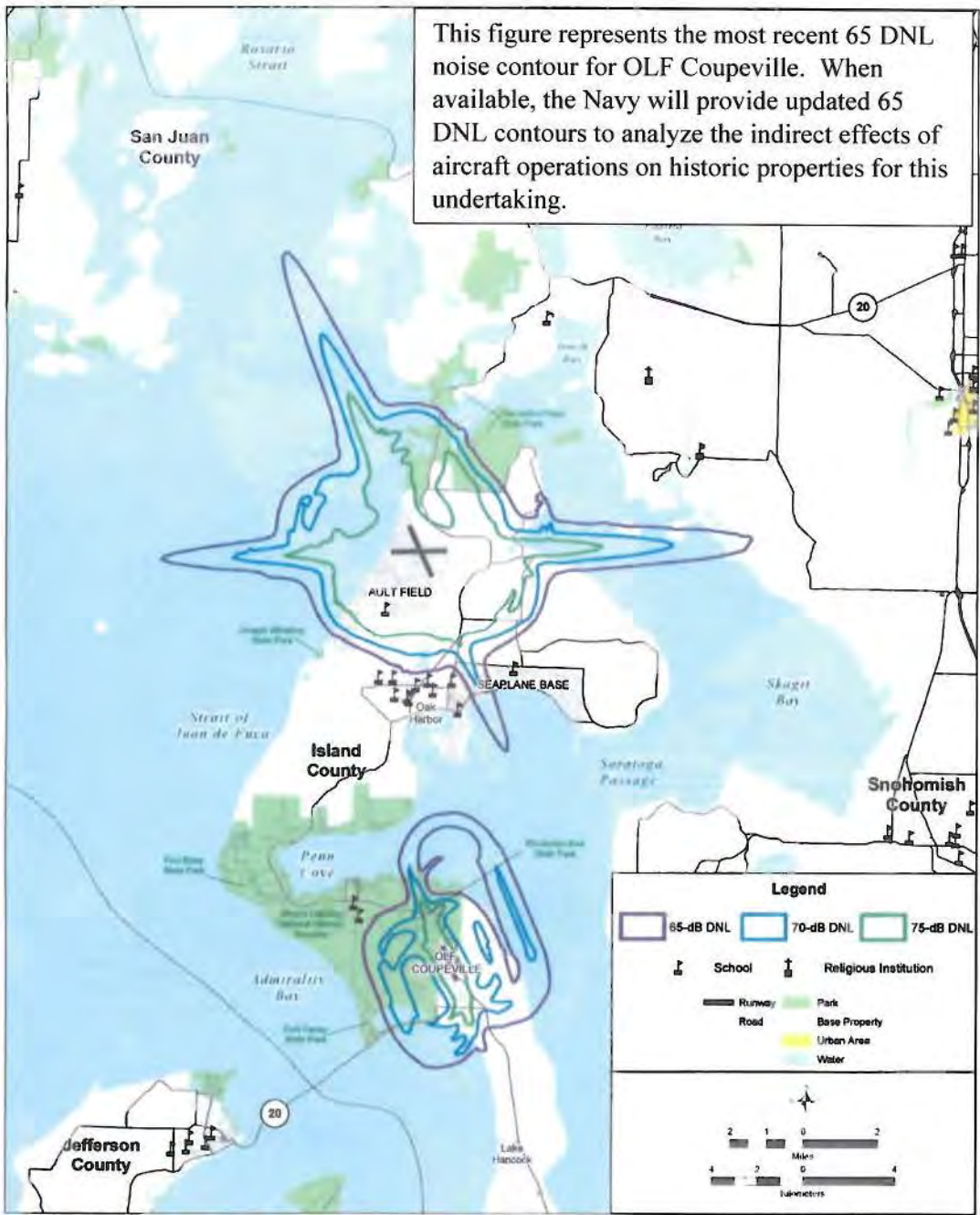


Enclosure (2)

This figure represents the most recent 65 DNL noise contour for Ault Field. When available, the Navy will provide updated 65 DNL contours to analyze the indirect effects of aircraft operations on historic properties for this undertaking.



Enclosure (3)



Source: Wyle Laboratories Inc. 2004.

Enclosure (4)



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WA 98278-5000

5090
Ser N44/1451
30 Jun 16

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1063 South Capital Way, Suite 106
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: REQUEST FOR SECTION 106 COMMENTS ON THE PROPOSED DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE CONTINUATION AND INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station Whidbey Island (NAS Whidbey Island) is continuing consultation first requested on 10 October 2014 (DAHP Log No. 102214-23-USN) and asks for your comments on the Navy's proposed definition of the Area of Potential Effect (APE) for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosures 1 and 2).

Over the last 74 years, NAS Whidbey Island has been home to a variety of evolving naval aircraft that have addressed the technological and military demands of their time. These aircraft and their missions have played critical roles in events that have shaped our nation's history, including the rearming of Seaplanes in World War II, the introduction of Tactical Electronic Warfare during the Cold War, and the modern technological era of electronic attack and the EA-18G Growler. NAS Whidbey Island has made critical contributions to these historic events and has been on the forefront of the evolution of electronic attack technology, supporting the Department of Defense's (DoD) electronic attack mission, training, and operations.

As the home of the electronic attack aviation community for the United States Navy, NAS Whidbey Island currently provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS). To continue support of the electronic attack mission at NAS Whidbey Island, the U.S. Navy proposes to:

- Continue and expand the existing electronic attack operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;

- Increase electronic attack capabilities and augment the EA-18G Growler FRS to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;
- Construct, demolish, and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

The above actions are the type of activities that have the potential to effect historic properties both directly and indirectly. The Navy proposes to define the direct effects component of the Area of Potential Effect (APE) as those areas where construction will occur on the installation. Maps indicating the direct effect component will become available as the Draft Environmental Impact Statement (DEIS) matures and will be used to define the proposed APE.

Consistent with historical practice, the Navy proposes to define the indirect effects component of the APE as those areas on and off the installation within the 65 dB DNL noise contours that result from air operations at NAS Whidbey Island. The DNL is the federally-accepted metric used by the Federal Aviation Administration (FAA), Environmental Protection Agency (EPA), DoD, and other federal and state agencies to assess noise effects on communities. The 65 dB DNL is used to assess compatible land uses within the DNL contours. The threshold of 65 dB DNL or less is considered to be "acceptable" for most land uses and not expected to affect historic properties.

In order to facilitate this initial discussion, we have included the most current noise contours for Ault Field and OLF Coupeville. Specifically, Enclosure 3 represents the DNL contours developed for Ault Field in the 2014 Supplemental EIS for the introduction of the P-8A aircraft, and Enclosure 4 represents the DNL contours developed for OLF Coupeville as part of the 2005 Environmental Assessment for the replacement of EA-6B aircraft with EA-18G aircraft at NAS Whidbey Island. The enclosed noise contours are the most current noise contours available. The Navy is preparing an updated noise modeling study with DNL contours for this undertaking and for the DEIS process. When updated DNL contours become available, the Navy will define the proposed APE boundaries accordingly and continue consultation.

The Navy recognizes that the proposed APE may include historic properties of interest to state and federal agencies, local governments, community groups, and individuals on and near Whidbey Island. In accordance with 36 CFR Part 800.3(f), the Navy has identified and invited the following interested parties to participate as consulting parties:

- Advisory Council on Historic Preservation
- Island County Commissioners (Districts 1 and 2)
- Town of Coupeville
- National Park Service

- Trust Board of Ebey's Landing National Historical Reserve
- Washington State Parks
- Seattle Pacific University
- David Day
- Citizens of Ebey's Reserve (COER)

The Navy also understands that the APE may include properties of cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the following tribes:


- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation
- Tulalip Tribes
- Suquamish Tribe
- Jamestown S'Klallam Tribe

The Navy will take into consideration the results of consultation with all identified parties in defining the APE.

If you require additional information, please contact NAS Whidbey Island Cultural Resources Program Manager, Kendall Campbell, at (360) 257-6780 or kendall.campbell1@navy.mil, or Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or at tracy.schwartz.ctr@navy.mil.

We look forward to continued consultation and appreciate your comments on the proposed definition of the Area of Potential Effect for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island.

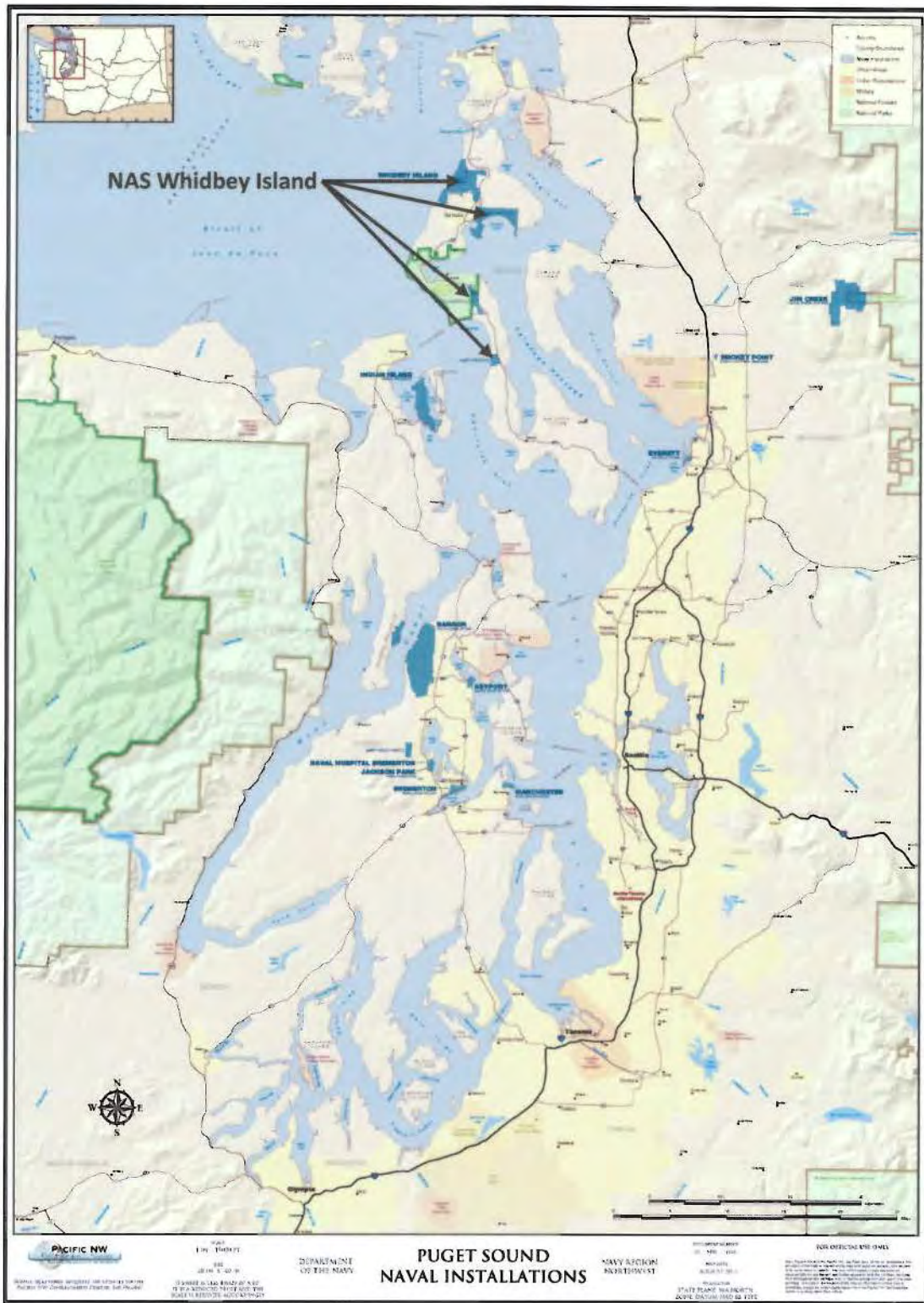
Sincerely,



G. C. MOORE
Captain, United States Navy
Commanding Officer

5090
Ser N44/1451
30 Jun 16

- Enclosures:
1. NAS Whidbey Island Site Locations
 2. NAS Whidbey Island Ault Field and Seaplane Base
 3. 2013 Navy Noise Study DNL Contours
 4. 2005 Navy Noise Study DNL Contours

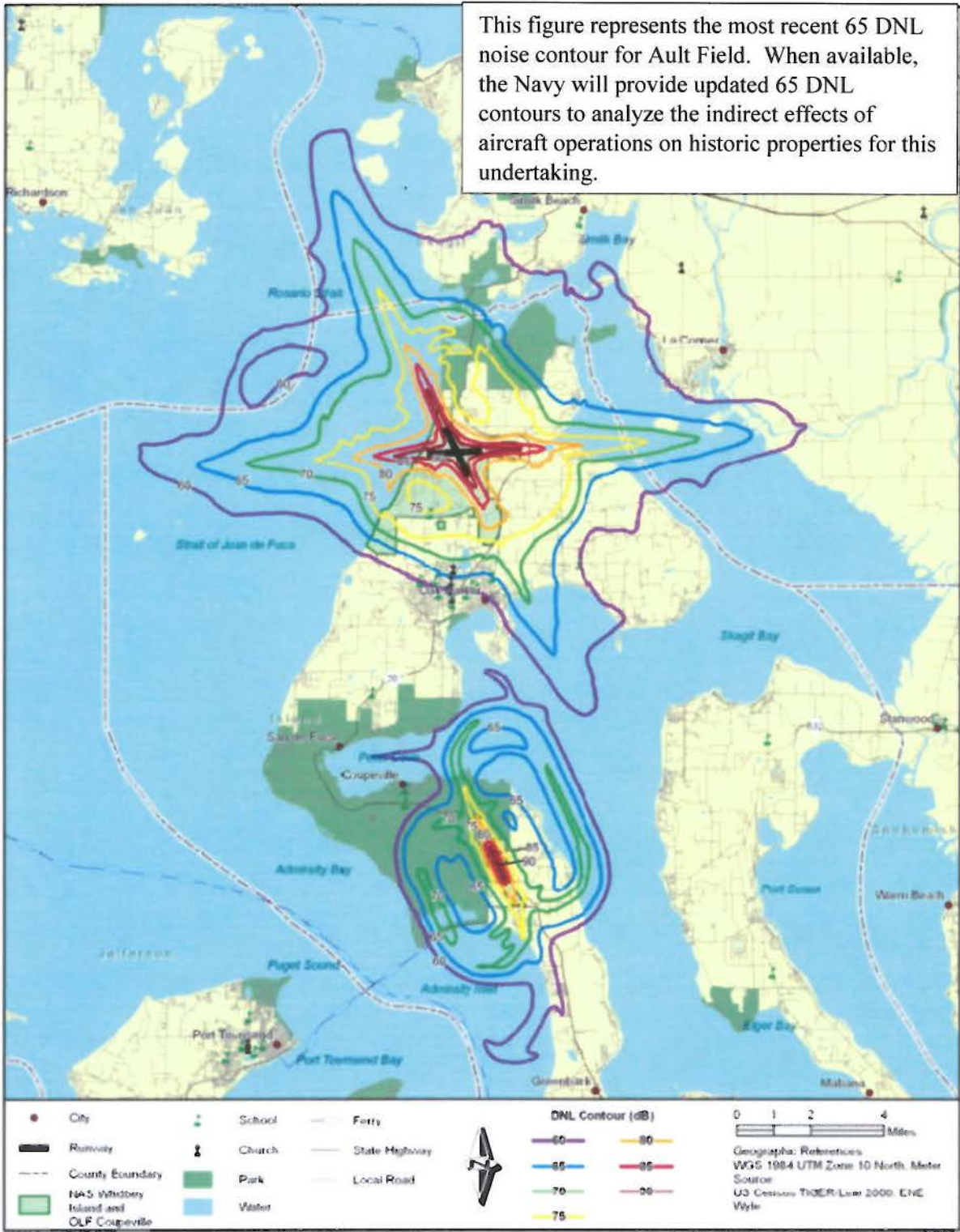


Enclosure (1)

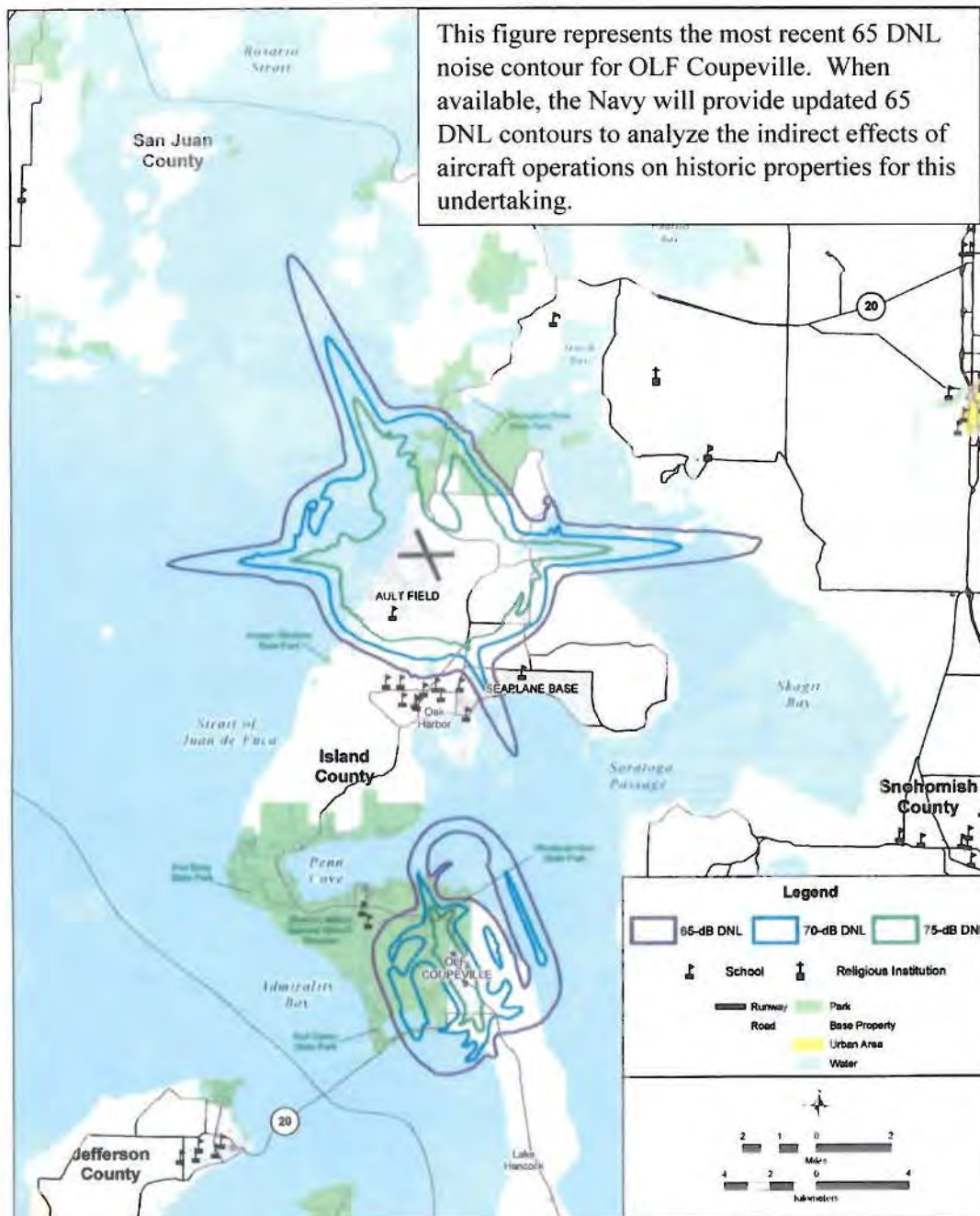


Enclosure (2)

This figure represents the most recent 65 DNL noise contour for Ault Field. When available, the Navy will provide updated 65 DNL contours to analyze the indirect effects of aircraft operations on historic properties for this undertaking.



Enclosure (3)



Source: Wyle Laboratories Inc. 2004.

Enclosure (4)



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WA 98278-3000

5090
Ser N44/1446
30 Jun 16

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: REQUEST FOR SECTION 106 COMMENTS ON THE PROPOSED DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE CONTINUATION AND INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station Whidbey Island (NAS Whidbey Island) is asking for your comments on the Navy's proposed definition of the Area of Potential Effect (APE) for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosures 1 and 2).

Over the last 74 years, NAS Whidbey Island has been home to a variety of evolving naval aircraft that have addressed the technological and military demands of their time. These aircraft and their missions have played critical roles in events that have shaped our nation's history, including the rearming of Seaplanes in World War II, the introduction of Tactical Electronic Warfare during the Cold War, and the modern technological era of electronic attack and the EA-18G Growler. NAS Whidbey Island has made critical contributions to these historic events and has been on the forefront of the evolution of electronic attack technology, supporting the Department of Defense's (DoD) electronic attack mission, training, and operations.

As the home of the electronic attack aviation community for the United States Navy, NAS Whidbey Island currently provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS). To continue support of the electronic attack mission at NAS Whidbey Island, the U.S. Navy proposes to:

- Continue and expand the existing electronic attack operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;
- Increase electronic attack capabilities and augment the EA-18G Growler FRS to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;

- Construct, demolish, and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

The above actions are the type of activities that have the potential to effect historic properties both directly and indirectly. The Navy proposes to define the direct effects component of the Area of Potential Effect (APE) as those areas where construction will occur on the installation. Maps indicating the direct effect component will become available as the Draft Environmental Impact Statement (DEIS) matures and will be used to define the proposed APE.

Consistent with historical practice, the Navy proposes to define the indirect effects component of the APE as those areas on and off the installation within the 65 dB DNL noise contours that result from air operations at NAS Whidbey Island. The DNL is the federally-accepted metric used by the Federal Aviation Administration (FAA), Environmental Protection Agency (EPA), DoD, and other federal and state agencies to assess noise effects on communities. The 65 dB DNL is used to assess compatible land uses within the DNL contours. The threshold of 65 dB DNL or less is considered to be "acceptable" for most land uses and not expected to affect historic properties.

In order to facilitate this initial discussion, we have included the most current noise contours for Ault Field and OLF Coupeville. Specifically, Enclosure 3 represents the DNL contours developed for Ault Field in the 2014 Supplemental EIS for the introduction of the P-8A aircraft, and Enclosure 4 represents the DNL contours developed for OLF Coupeville as part of the 2005 Environmental Assessment for the replacement of EA-6B aircraft with EA-18G aircraft at NAS Whidbey Island. The enclosed noise contours are the most current noise contours available. The Navy is preparing an updated noise modeling study with DNL contours for this undertaking and for the DEIS process. When updated DNL contours become available, the Navy will define the proposed APE boundaries accordingly and continue consultation.

The Navy understands that the project area and its surrounding location may have cultural importance and significance to the Jamestown S'Klallam Tribe. Section 106 of the NHPA requires federal agencies to seek information from tribes likely to have knowledge of, or concerns with, historic resources within the project's APE. We are specifically seeking your comments on our proposed APE and will continue consultation in the near future to identify properties that may have religious or cultural significance and may be eligible for listing in the National Register of Historic Places, including Traditional Cultural Properties.


We appreciate any assistance you could provide us in our efforts to comply with Section 106 of the NHPA. Please be assured that the Navy will treat any information you share with us with the degree of confidentiality that is required in Section 800.11(c) of the NHPA, or with any other special restrictions you may require.

5090
Ser N44/1446
30 Jun 16

If you require additional information, please contact NAS Whidbey Island Cultural Resources Program Manager, Kendall Campbell, at (360) 257-6780 or kendall.campbell1@navy.mil, or Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or at tracy.schwartz.ctr@navy.mil.

We look forward to continued consultation and appreciate your comments on the proposed definition of the Area of Potential Effect for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island.

Sincerely,



G. C. MOORE
Captain, United States Navy
Commanding Officer

Enclosures:

1. NAS Whidbey Island Site Locations
2. NAS Whidbey Island Ault Field and Seaplane Base
3. 2013 Navy Noise Study DNL Contours
4. 2005 Navy Noise Study DNL Contours

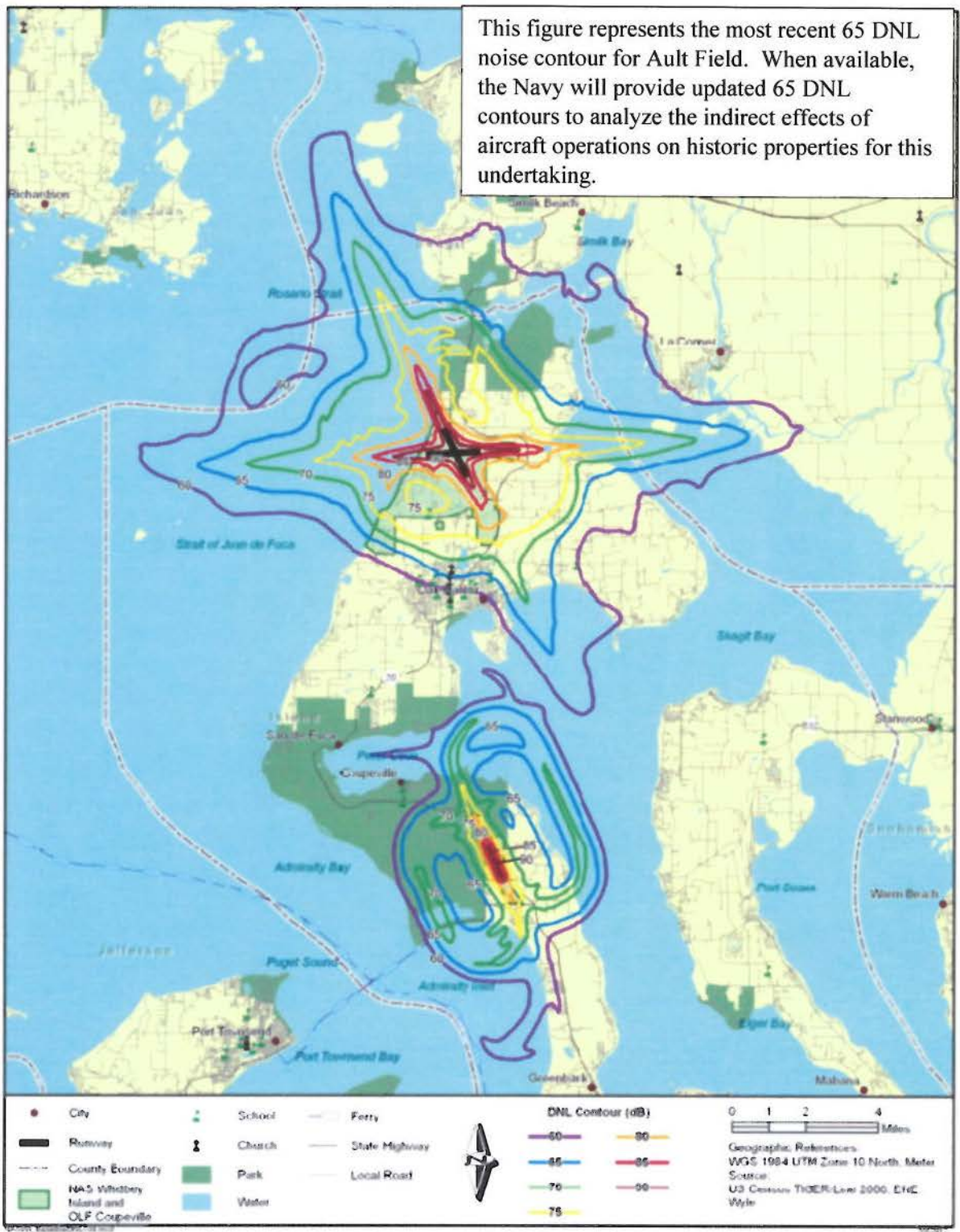


Enclosure (1)

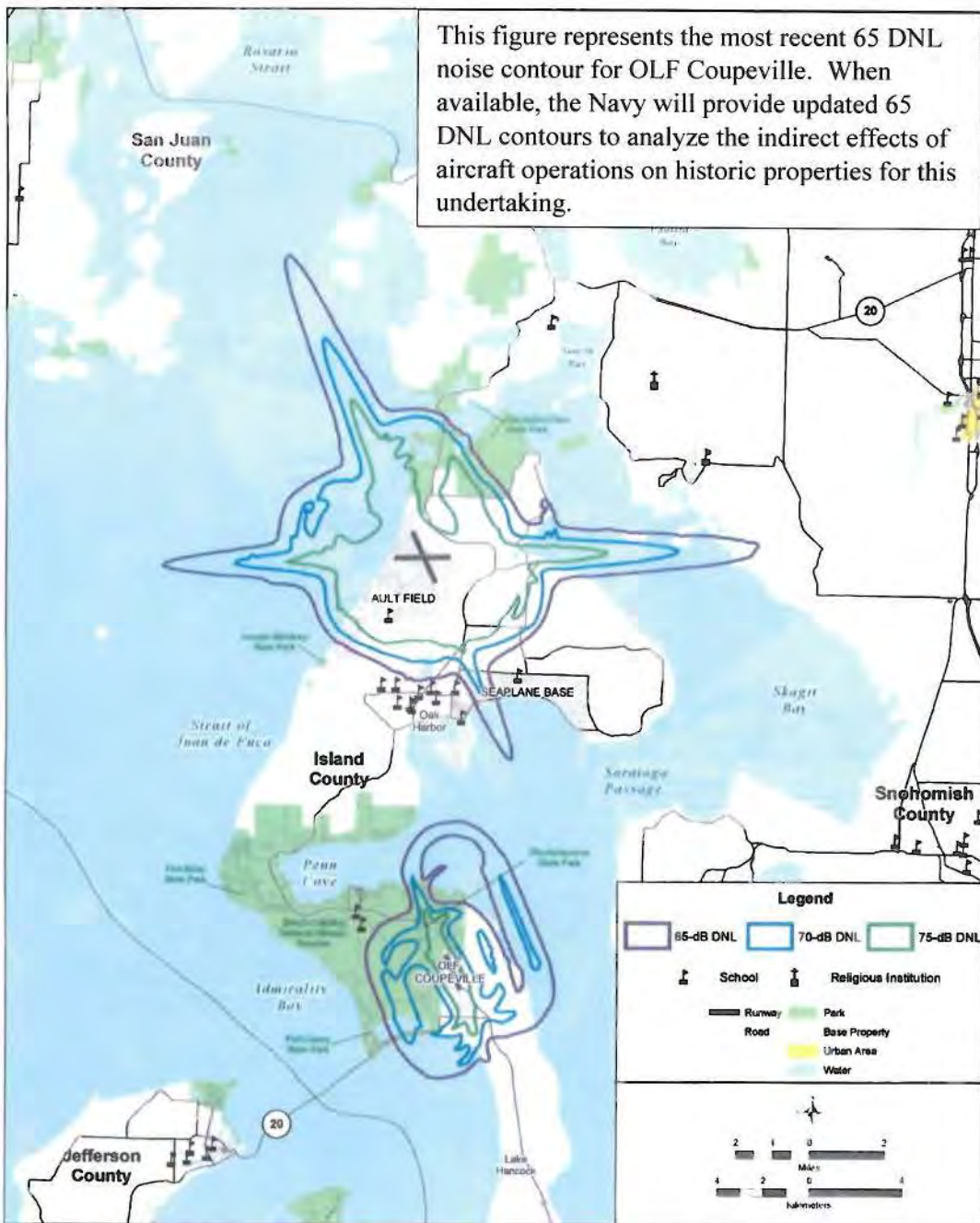


Enclosure (2)

This figure represents the most recent 65 DNL noise contour for Ault Field. When available, the Navy will provide updated 65 DNL contours to analyze the indirect effects of aircraft operations on historic properties for this undertaking.



Enclosure (3)



Source: Wyle Laboratories Inc. 2004.

Enclosure (4)



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WA 98278-5000

5090
Ser N44/1446
30 Jun 16

Mr. Ken Pickard
President
Citizens of Ebey's Reserve
P.O. Box 202
Coupeville, WA 98239

Dear Mr. Pickard:

SUBJECT: REQUEST FOR SECTION 106 COMMENTS ON THE PROPOSED DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE CONTINUATION AND INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station Whidbey Island (NAS Whidbey Island) is continuing consultation first requested on 20 October 2014 and asks for your comments on the Navy's proposed definition of the Area of Potential Effect (APE) for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosures 1 and 2).

Over the last 74 years, NAS Whidbey Island has been home to a variety of evolving naval aircraft that have addressed the technological and military demands of their time. These aircraft and their missions have played critical roles in events that have shaped our nation's history, including the rearming of Seaplanes in World War II, the introduction of Tactical Electronic Warfare during the Cold War, and the modern technological era of electronic attack and the EA-18G Growler. NAS Whidbey Island has made critical contributions to these historic events and has been on the forefront of the evolution of electronic attack technology, supporting the Department of Defense's (DoD) electronic attack mission, training, and operations.

As the home of the electronic attack aviation community for the United States Navy, NAS Whidbey Island currently provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS). To continue support of the electronic attack mission at NAS Whidbey Island, the U.S. Navy proposes to:

- Continue and expand the existing electronic attack operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;
- Increase electronic attack capabilities and augment the EA-18G Growler FRS to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;
- Construct, demolish, and renovate facilities at Ault Field to accommodate additional aircraft; and

- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

The above actions are the type of activities that have the potential to effect historic properties both directly and indirectly. The Navy proposes to define the direct effects component of the Area of Potential Effect (APE) as those areas where construction will occur on the installation. Maps indicating the direct effect component will become available as the Draft Environmental Impact Statement (DEIS) matures and will be used to define the proposed APE.

Consistent with historical practice, the Navy proposes to define the indirect effects component of the APE as those areas on and off the installation within the 65 dB DNL noise contours that result from air operations at NAS Whidbey Island. The DNL is the federally-accepted metric used by the Federal Aviation Administration (FAA), Environmental Protection Agency (EPA), DoD, and other federal and state agencies to assess noise effects on communities. The 65 dB DNL is used to assess compatible land uses within the DNL contours. The threshold of 65 dB DNL or less is considered to be "acceptable" for most land uses and not expected to affect historic properties.

In order to facilitate this initial discussion, we have included the most current noise contours for Ault Field and OLF Coupeville. Specifically, Enclosure 3 represents the DNL contours developed for Ault Field in the 2014 Supplemental EIS for the introduction of the P-8A aircraft, and Enclosure 4 represents the DNL contours developed for OLF Coupeville as part of the 2005 Environmental Assessment for the replacement of EA-6B aircraft with EA-18G aircraft at NAS Whidbey Island. The enclosed noise contours are the most current noise contours available. The Navy is preparing an updated noise modeling study with DNL contours for this undertaking and for the DEIS process. When updated DNL contours become available, the Navy will define the proposed APE boundaries accordingly and continue consultation.

If you require additional information, please contact NAS Whidbey Island Cultural Resources Program Manager, Kendall Campbell, at (360) 257-6780 or kendall.campbell1@navy.mil, or Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or at tracy.schwartz.ctr@navy.mil.

We look forward to continued consultation and appreciate your comments on the proposed definition of the Area of Potential Effect for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island.

Sincerely,



G. C. MOORE
Captain, United States Navy
Commanding Officer

5090
Ser N44/1447
30 Jun 16

Enclosures: 1. NAS Whidbey Island Site Locations
2. NAS Whidbey Island Ault Field and Seaplane Base
3. 2013 Navy Noise Study DNL Contours
4. 2005 Navy Noise Study DNL Contours

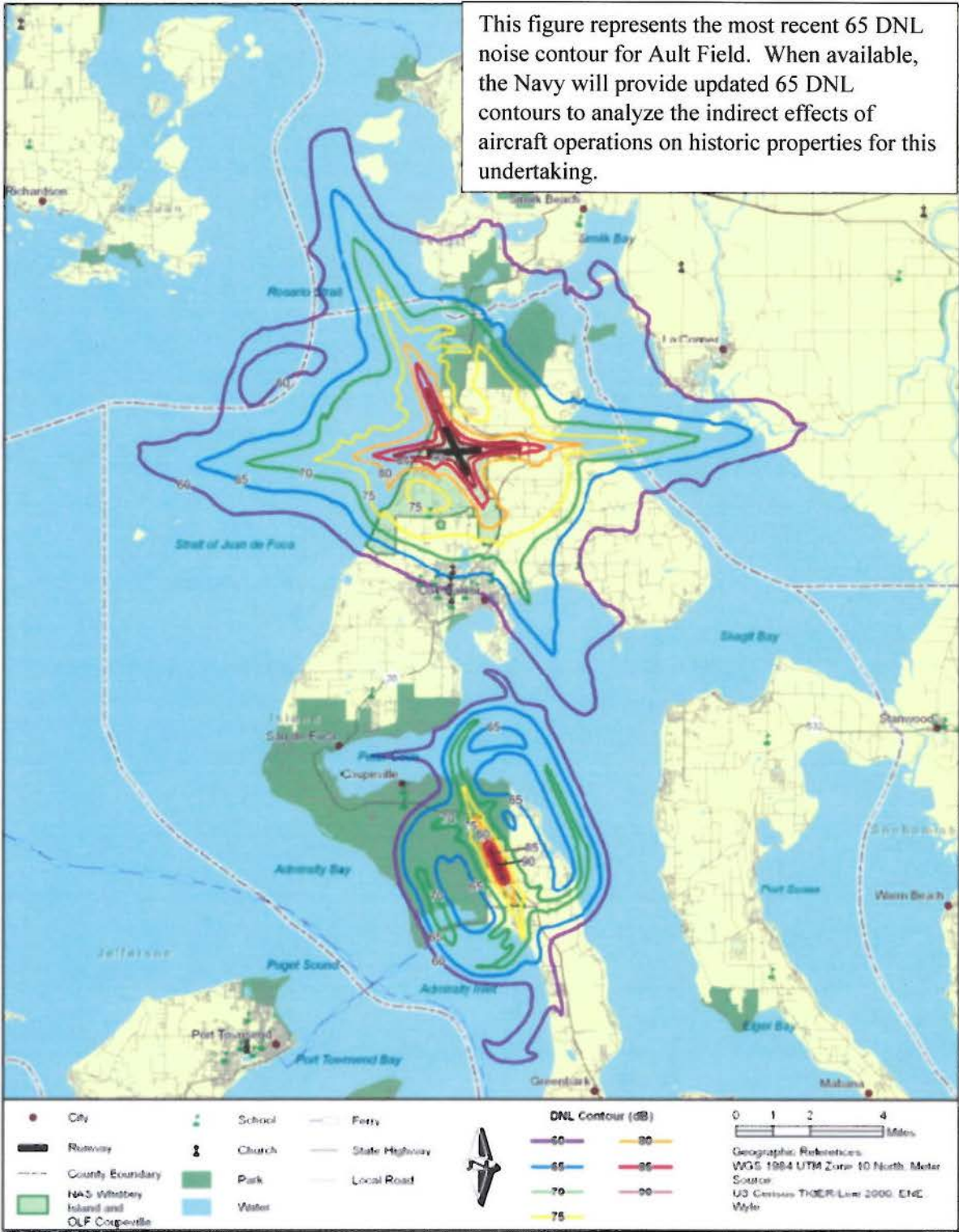


Enclosure (1)

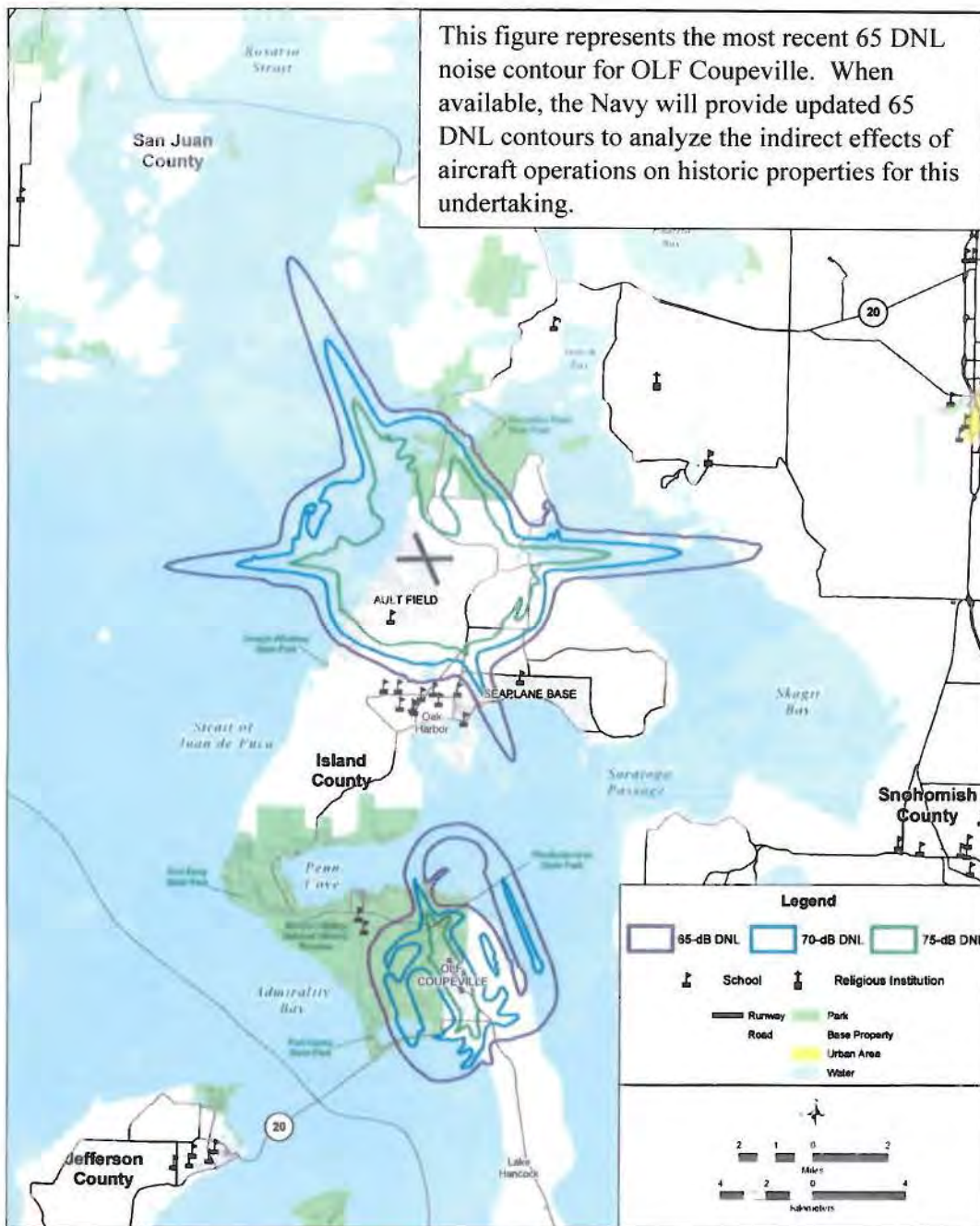


Enclosure (2)

This figure represents the most recent 65 DNL noise contour for Ault Field. When available, the Navy will provide updated 65 DNL contours to analyze the indirect effects of aircraft operations on historic properties for this undertaking.



Enclosure (3)



Source: Wyle Laboratories Inc. 2004.

Enclosure (4)

Kirchler-Owen, Leslie

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 <kendall.campbell1@navy.mil>
Sent: Friday, October 21, 2016 4:11 PM
To: Kirchler-Owen, Leslie
Subject: FW: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations
Signed By: kendall.campbell1@navy.mil

FYSA

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4
Sent: Tuesday, July 05, 2016 12:08 PM
To: 'Brooks, Allyson (DAHP)'; 'Katharine R. Kerr'
Cc: Schwartz, Tracy CTR NAVFAC NW, EV2
Subject: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Consultation Partners,

In continuation of section 106 consultation for the Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and Development of Support Facilities at Naval Air Station Whidbey Island (NASWI), you will soon be receiving correspondence from NASWI inviting you to comment on our proposed definition of the Area of Potential Effect (APE). Since some time has passed since we began section 106 consultation on this undertaking and we have experienced some issues with mail delivery, we wanted to reach out via email to let you know you should soon be receiving a consultation letter from us via regular mail. If you do not receive this letter in the next 10 days please let me know.

Please feel free to contact me at any time during our consultation process if you have questions or want to know where we are at in the section 106 process. To ensure that your concerns are effectively taken into consideration and to help facilitate development of our final determination of the APE, we would appreciate receiving written comments back by 1 September 2016 in order to prepare our determination of the APE. Please send comments to myself at kendall.campbell1@navy.mil or Tracy Schwartz, Cultural Resource Contract Support, at tracy.schwartz.ctr@navy.mil.

Again, please do not hesitate to contact me with questions. We look forward to continuing consultation and building partnerships throughout the section 106 process. If you feel I have not included the appropriate representative for consultation on this email list please let me know.

All My Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexington Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780

From: Campbell, Kendall D CIV NAVFAC NW, PRW4
To: Schwartz, Tracy CTR NAVFAC NW, EV2
Subject: FW: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations
Date: Monday, August 08, 2016 12:56:18

-----Original Message-----

From: Molly Hughes [mailto:Mayor@townofcoupeville.org]
Sent: Saturday, August 06, 2016 4:48 PM
To: Stallings, Sarah CIV NAVFAC Atlantic
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: [Non-DoD Source] RE: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Hi Sarah,
Your contact information was passed along by Kendall Campbell. The Coupeville Town Council and I would be very appreciative if you, or someone working on the NASWI EIS would be willing to come to a Council meeting and explain how the noise levels are being determined for the new Growlers. Coupeville is being asked to comment on various aspects of the section 106 and EIS, however, we don't feel we can give educated input without this information. We know from Kendall that new Growler readings are not yet being used, old Prowler data is. We are concerned that the way the Navy measures noise levels will not adequately define affected areas or reflect true noise impacts on our community.

The Town Council meets on the second and fourth Tuesdays of each month at 6:30 here in Coupeville. If an evening presentation will not work for you, it is possible I might be able to arrange an afternoon workshop to hear your information. We are getting a lot of conflicting information from our community and would like to hear directly from NEPA how the noise data is generated and presented in the studies.

Thanks so much for your consideration of this request, Molly

Molly Hughes, Mayor
Town of Coupeville
PO Box 725
4 NE 7th Street
Coupeville WA 98239
360-678-4461, ext. 2
www.townofcoupeville.org

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [mailto:kendall.campbell1@navy.mil]
Sent: Friday, July 29, 2016 4:20 PM
To: Molly Hughes <Mayor@townofcoupeville.org>
Cc: Stallings, Sarah CIV NAVFAC Atlantic <sarah.stallings@navy.mil>
Subject: RE: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Hi Molly,

For the section 106 analysis we are using the study being generated by the NEPA team for the EIS. Someone from the NEPA team would be the most appropriate to provide this information. I am c'ing the NEPA lead for the EIS on this email and we will get back to you as quickly as possible.

Have a great weekend.

Best,
Kendall

-----Original Message-----

From: Molly Hughes [mailto:Mayor@townofcoupeville.org]
Sent: Friday, July 29, 2016 8:16 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: [Non-DoD Source] RE: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Morning Kendall,
The Coupeville Town Council is interested in having someone come to a Council meeting to explain exactly how a "noise modeling study" is done. In other words, how is the Navy coming up with the 65 dB, 70 dB, 75dB levels it is using to define the APE? This information is necessary for us to comment on the current section 106 issue and for future comments on the EIS.

Who should I contact to request a presentation of this sort? Our next Council meetings are on August 9 and 23.

Thanks for your help,

Molly

Molly Hughes, Mayor
Town of Coupeville
PO Box 725
4 NE 7th Street
Coupeville WA 98239
360-678-4461, ext. 2

http://cp.mcafee.com/dk-Kr4wUg4zq3sEVPusp76XCQCzHIV4Qh3HzqgP6OYsgeM1PXCJV6VEVubd76WXXNj6VEVad78VVBNSHFqglg4F5mrlm0YPSY-40CVRegGXqHqTCp7D_M04SNp01EV7IZvASKLTD1T1tknjul.P3XPNEVvd7f8jmkCHhDBgY-F68K1F4SECL08RT36cd7b3bIKVIFQWC3ULIFPzP_U02m_13Jr44Z7DDEwGcGTaGf6EL9FL6Mm9y6K3D8Mg0199z8sumd4Rzq_o8y6v-QVwq84K6y2RakerDVwq87q4d4mz4lfgs40ZQvSDCv2HFfwwfKvY4z0R8sqKPA46Mgd40m-cP8ss3q5jPKPJQn-NR1

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [mailto:kendall.campbell1@navy.mil]
Sent: Thursday, July 14, 2016 10:18 AM
To: Molly Hughes <Mayor@townofcoupeville.org>
Subject: RE: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Hi Mayor Hughes,

Happy to answer your questions.

To answer your first question, YES. Right now Navy is just providing information on how we are proposing to define the Area of Potential Effect (APE) for the section 106 consultation. We are seeking your comments on our proposal to use the 65 dnl as the boundary for the APE. In a nutshell, we want to get feedback on our approach to defining the APE. Once we have received feedback from our consultation partners on our approach and the updated noise maps become available we will send another letter asking for your comments on how we defined the APE.

The September 1st date was provided to make sure that we received your comments and could take them into consideration before we began to finalize our definition of the APE.

For your second question, the noise modeling study is being conducted by the EIS team and they are the best suited to answer your question. The information we are using from the study will be available when the draft EIS is released and there will be several opportunities to ask and comment on the study during the Draft EIS comment period and the public meetings.

We will not ask you to make any final comments on the APE until that study and its explanation are available to you.

I hope that this information is helpful. I am more than happy to explain the 106 process in further detail and will do my best to provide you the information you need to make your comments, and I hope, to also aid you in responding to any questions you may get from your constituents. You can contact me anytime.

Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexington Dr.
Oak Harbor, WA 98278-3500
kendall.campbell1@navy.mil
360-257-6780

-----Original Message-----

From: Molly Hughes [mailto:Mayor@townofcoupeville.org]
Sent: Tuesday, July 12, 2016 4:01 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: [Non-DoD Source] RE: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Hi Kendall,

I received the letter regarding increased Growler operations at OLF and the area of potential effect. I see that comments are due by September 1st, I will work to meet that deadline.

I have one question. The letter says you will be updating the noise modeling study which will change the APE. Will you be having another comment period when the noise readings are updated and the APE is redefined?

I guess I have two questions. When you perform a "noise modeling study" does this mean you don't actually gather decibel readings near the airfields? This sounds almost like a computer model, that can't be right, can it???

Molly

Molly Hughes, Mayor
Town of Coupeville
PO Box 725
4 NE 7th Street
Coupeville WA 98239
360-678-4461, ext. 2

http://cp.mcafee.com/d3HCNS8YMIUY-cUchpfdE7t47b0EVo7676QcZBV4Qd3DDTgP6OYsgeM1PXCJV6VEVubd76WXXNj6VEVad78VVBNSHFqglg4F5mrlm0YPSY-40CVRegGXqHqTCp7D_M04SNp01EV7IZvASKLTD1T1tknjul.P3XPNEVvd7f8jmkCHhDBgY-L0m2JTDLkLkCCCc_P1PUCVZBzBHEShhhKNGfawkaZIQQsyhYTVWSXsE1V76z8bW7SKW9y4ak3G5NVCNv_Y11dhwafV_m211PP2g3j9p7CqP6Mq96b6Azh011usd40ZAV486y8ME4430vcvqGM4d4T1h1qIdDPS6GM443Kc-Cy086G1mDE6y0dsuqXp11IQQ3j9vwhu2hEw=9h77pC3r86y0c4v7pOH2xKX31Q24

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [mailto:kendall.campbell1@navy.mil]
Sent: Tuesday, July 05, 2016 12:08 PM
To: Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Katharine R. Kerr <kkerr@achp.gov>
Cc: Schwartz, Tracy CTR NAVFAC NW, EV2 <tracy.schwartz.ctr@navy.mil>
Subject: NAS Whidbey Island Section 106 consultation for Proposed Increase of EA-18G Aircraft and Operations

Consultation Partners,

In continuation of section 106 consultation for the Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and Development of Support Facilities at Naval Air Station Whidbey Island (NASWI), you will soon be receiving correspondence from NASWI inviting you to comment on our proposed definition of the Area of Potential Effect (APE). Since some time has passed since we began section 106 consultation on this undertaking and we have experienced some issues with mail delivery, we wanted to reach out via email to let you know you should soon be receiving a consultation letter from us via regular mail. If you do not receive this letter in the next 10 days please let me know.

Please feel free to contact me at any time during our consultation process if you have questions or want to know where we are in the section 106 process. To ensure that your concerns are effectively taken into consideration and to help facilitate development of our final determination of the APE, we would appreciate receiving written comments back by 1 September 2016 in order to prepare our determination of the APE. Please send comments to myself at kendall.campbell1@navy.mil or Tracy Schwartz, Cultural Resource Contract Support, at tracy.schwartz.ctr@navy.mil.

Again, please do not hesitate to contact me with questions. We look forward to continuing consultation and building partnerships throughout the section 106 process. If you feel I have not included the appropriate representative for consultation on this email list please let me know.

All My Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexington Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-227-4780

From: Schwartz, Tracy CTR NAVFAC NW, EV2
To: ["106 \(DAHP\)"](#)
Cc: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: Log No. 102214-23-USN: Comments on the APE for the Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and Development of Support Facilities, NAS Whidbey Island
Date: Wednesday, July 06, 2016 6:22:00
Attachments: [Growler APE for Comments, dtd 30 June 16 \(SHPO\).pdf](#)

Dr. Brooks,

Please find our letter continuing section 106 consultation and asking for comments on the proposed definition of the Area of Potential Effect for the proposed increase of EA-18G Growler aircraft operations and development of support facilities at Naval Air Station (NAS) Whidbey Island (Log No. 102214-23-USN).

Please CC Kendall Campbell on all correspondence.

Thank you!
-Tracy

-Tracy Schwartz

Cultural Resource Contract Support
Naval Air Station Whidbey Island

Phone: 360.257.5742
Email: tracy.schwartz.ctr@navy.mil

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Romero, Joseph CAPT USFF, N01L](#); [Padgett, Lisa M CIV USFF, N46](#); [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Hall, Amberly CIV NAVFAC LANT, Counsel](#); [Sackett, Russell H CIV NAVFAC NW, EV22](#); [Bishop, Laura E LCDR RLSO NW, BANGOR](#); [Bianchi, Michael C NAVFAC NW, PRW4](#); [Bengtson, Melanie L CIV NAVFAC NW, PRW4](#); [Schwartz, Tracy CTR NAVFAC NW, EV2](#); [Parr, Timothy R LCDR OJAG, CODE 13](#); [McCurdy, Caren L CAPT RLSO NW, BREMERTON](#)
Cc: [Quay, Erin C LCDR USFF, N01L](#); [Shurling, Cynthia](#); [Kirchler-Owen, Leslie](#)
Subject: FW: Response to APE Growler Operations
Date: Wednesday, July 06, 2016 16:50:53

Please find below my acknowledgement of receipt to Dr. Brooks.

Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexinton Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4
Sent: Wednesday, July 06, 2016 4:33 PM
To: 'Brooks, Allyson (DAHP)'
Cc: Baumgart, Jim (GOV); Whitlam, Rob (DAHP)
Subject: RE: Response to APE Growler Operations

Allyson,

Thank you for your prompt response. I appreciate your comments and want to assure you that we are not seeking your concurrence at this time. As stated in our letter, the correspondence is meant to initiate a discussion on our proposed definition of the APE. Your comments are exactly what we were looking for and we hope to have a response with the clarification you desire before we request your concurrence on our definition of the APE.

Thank you again for your response and I will make sure it is forwarded to Captain Moore.

All My Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexinton Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780

-----Original Message-----

From: Brooks, Allyson (DAHP) [<mailto:Allyson.Brooks@DAHP.WA.GOV>]
Sent: Wednesday, July 06, 2016 2:45 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Cc: Whitlam, Rob (DAHP); Baumgart, Jim (GOV); KKerr@acp.gov; Leonard Forsman; 'Dennis Lewarch'; ryoung@tulaliptribes-nsn.gov; Jpeters@swinomish.nsn.us
Subject: [Non-DoD Source] Response to APE Growler Operations

Kendall - Please forward to Captain Moore.

Thank you.

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer

Dept. of Archaeology and Historic Preservation

1110 Capitol Way South, Suite 30

360-586-3066

Cell:360-480-6922

Like DAHP on Facebook <<https://www.facebook.com/pages/Department-of-Archaeology-and-Historic-Preservation/222364134453940>> !

Please note that in order to streamline responses plus save time and money, DAHP now requires that all documents related to project reviews be submitted electronically. Reports, forms, photos, etc. must now be submitted in PDF format through DAHP's on-line WISAARD system. For more information about interacting with WISAARD visit: <http://www.dahp.wa.gov/wisaard-and-historic-property-inventory-phase-iii-rollout> <<http://www.dahp.wa.gov/wisaard-and-historic-property-inventory-phase-iii-rollout>> .

Description: logo option FINAL - Small



July 7, 2016

Captain G.C. Moore
Naval Air Station Whidbey Island
Department of the Navy
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

Log No.: 102214-23-USN
Re: Increase in EA-18G Growler Operations Project

Dear Captain Moore:

Thank you for contacting us. We reviewed the materials you provided for the proposed *Continuation and Increase in EA-18G Growler Operations Project* at Naval Air Station Whidbey Island, Whidbey Island, Island County, Washington.

We appreciate your identification of the proposed Area of Potential Effect (APE) however, we have serious concerns about the defined APE as detailed in your letter and associated maps. We therefore cannot concur with your APE until we receive additional information.

We specifically need to understand the location of areas that are proposed to contain flight paths associated with Growlers operations at Ault Field and OLF Coupeville. This additional information for the purposes of developing the APE should include identifying areas containing the flight paths for the return to Ault Field after field carrier landing practice and any areas of general flight Growler practices. These routes may generate noise impacts for the neighboring communities in the San Juan Islands, Port Townsend, and the Olympic Peninsula, and may need to be considered part of the APE.

While we appreciate that for security reasons you may not be able to supply us with actual flight paths, you should be able to identify large areas that will contain the flights for the purpose of the APE. Again, we need to understand the noise impacts from practice flights whether touch and go at OLF or general practice from Ault Field.



Captain G.C. Moore
July 6, 2016
Page 2

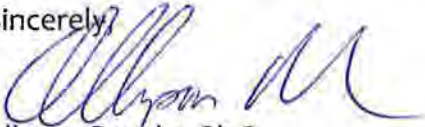
We also need the additional information and maps detailing actual construction areas that due to increased operations will result in increased personnel and family members at NAS Whidbey and the surrounding communities. We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

Should additional information become available, our assessment may be revised. We look forward to your response on this information request.

If you have any questions, please contact me at 360.586.3066 or at Allyson.brooks@dahp.wa.gov.

Sincerely,



Allyson Brooks, Ph.D
Director, State Historic Preservation Officer

cc: Kendall Campbell



Kirchler-Owen, Leslie

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 <kendall.campbell1@navy.mil>
Sent: Wednesday, July 06, 2016 6:48 PM
To: Romero, Joseph CAPT USFF, N01L; Padgett, Lisa M CIV USFF, N46; Stallings, Sarah CIV NAVFAC Atlantic; Williamson, Todd H CIV NAVFAC LANT, EV; Hall, Amberly CIV NAVFAC LANT, Counsel; Sackett, Russell H CIV NAVFAC NW, EV22; Bishop, Laura E LCDR RLSO NW, BANGOR; Bianchi, Michael C NAVFAC NW, PRW4; Bengtson, Melanie L CIV NAVFAC NW, PRW4; Schwartz, Tracy CTR NAVFAC NW, EV2; Parr, Timothy R LCDR OJAG, CODE 13; McCurdy, Caren L CAPT RLSO NW, BREMERTON
Cc: Quay, Erin C LCDR USFF, N01L; Shurling, Cynthia; Kirchler-Owen, Leslie
Subject: FW: Response to APE Growler Operations
Attachments: image001.jpg; 0914_001.pdf
Signed By: kendall.campbell1@navy.mil

All,

Please find attached Dr. Allyson Brooks response to our proposed APE. I have responded briefly to her emailing acknowledging receipt and clarifying that we are not currently seeking her concurrence at this time. I will forward that email next for the administrative record.

I propose that we meet briefly next week to discuss a response to her letter and determine what information we can include. I do not anticipate we would need more than 30 minutes.

Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexington Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780

-----Original Message-----

From: Brooks, Allyson (DAHP) [mailto:Allyson.Brooks@DAHP.WA.GOV]
Sent: Wednesday, July 06, 2016 2:45 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Cc: Whitlam, Rob (DAHP); Baumgart, Jim (GOV); KKerr@acp.gov; Leonard Forsman; 'Dennis Lewarch'; ryoung@tulaliptribes-nsn.gov; Jpeters@swinomish.nsn.us
Subject: [Non-DoD Source] Response to APE Growler Operations

Kendall - Please forward to Captain Moore.

Thank you.

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer

Dept. of Archaeology and Historic Preservation

1110 Capitol Way South, Suite 30

360-586-3066

Cell:360-480-6922

Like DAHP on Facebook <<https://www.facebook.com/pages/Department-of-Archaeology-and-Historic-Preservation/222364134453940>> !

Please note that in order to streamline responses plus save time and money, DAHP now requires that all documents related to project reviews be submitted electronically. Reports, forms, photos, etc. must now be submitted in PDF format through DAHP's on-line WISAARD system. For more information about interacting with WISAARD visit: <http://www.dahp.wa.gov/wisaard-and-historic-property-inventory-phase-iii-rollout> <<http://www.dahp.wa.gov/wisaard-and-historic-property-inventory-phase-iii-rollout>> .

Description: logo option FINAL - Small



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1499
12 Jul 16

The Honorable Richard Hannold
Island County Commissioner
PO Box 5000
Coupeville, WA 98239-5000

Dear Commissioner Hannold:

SUBJECT: REQUEST FOR SECTION 106 COMMENTS ON THE PROPOSED DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE CONTINUATION AND INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station Whidbey Island (NAS Whidbey Island) is asking for your comments on the Navy's proposed definition of the Area of Potential Effect (APE) for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosures 1 and 2).

Over the last 74 years, NAS Whidbey Island has been home to a variety of evolving naval aircraft that have addressed the technological and military demands of their time. These aircraft and their missions have played critical roles in events that have shaped our nation's history, including the rearming of Seaplanes in World War II, the introduction of Tactical Electronic Warfare during the Cold War, and the modern technological era of electronic attack and the EA-18G Growler. NAS Whidbey Island has made critical contributions to these historic events and has been on the forefront of the evolution of electronic attack technology, supporting the Department of Defense's (DoD) electronic attack mission, training, and operations.

As the home of the electronic attack aviation community for the United States Navy, NAS Whidbey Island currently provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS). To continue support of the electronic attack mission at NAS Whidbey Island, the U.S. Navy proposes to:

- Continue and expand the existing electronic attack operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;
- Increase electronic attack capabilities and augment the EA-18G Growler FRS to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;
- Construct, demolish, and renovate facilities at Ault Field to accommodate additional aircraft; and

- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

The above actions are the type of activities that have the potential to effect historic properties both directly and indirectly. The Navy proposes to define the direct effects component of the Area of Potential Effect (APE) as those areas where construction will occur on the installation. Maps indicating the direct effect component will become available as the Draft Environmental Impact Statement (DEIS) matures and will be used to define the proposed APE.

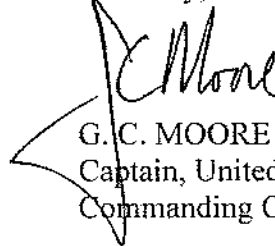
Consistent with historical practice, the Navy proposes to define the indirect effects component of the APE as those areas on and off the installation within the 65 dB DNL noise contours that result from air operations at NAS Whidbey Island. The DNL is the federally-accepted metric used by the Federal Aviation Administration (FAA), Environmental Protection Agency (EPA), DoD, and other federal and state agencies to assess noise effects on communities. The 65 dB DNL is used to assess compatible land uses within the DNL contours. The threshold of 65 dB DNL or less is considered to be "acceptable" for most land uses and not expected to affect historic properties.

In order to facilitate this initial discussion, we have included the most current noise contours for Ault Field and OLF Coupeville. Specifically, Enclosure 3 represents the DNL contours developed for Ault Field in the 2014 Supplemental EIS for the introduction of the P-8A aircraft, and Enclosure 4 represents the DNL contours developed for OLF Coupeville as part of the 2005 Environmental Assessment for the replacement of EA-6B aircraft with EA-18G aircraft at NAS Whidbey Island. The enclosed noise contours are the most current noise contours available. The Navy is preparing an updated noise modeling study with DNL contours for this undertaking and for the DEIS process. When updated DNL contours become available, the Navy will define the proposed APE boundaries accordingly and continue consultation.

If you require additional information, please contact NAS Whidbey Island Cultural Resources Program Manager, Kendall Campbell, at (360) 257-6780 or kendall.campbell1@navy.mil, or Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or at tracy.schwartz.ctr@navy.mil.

We look forward to continued consultation and appreciate your comments on the proposed definition of the Area of Potential Effect for the continuation and increase of EA-18G Growler operations at NAS Whidbey Island.

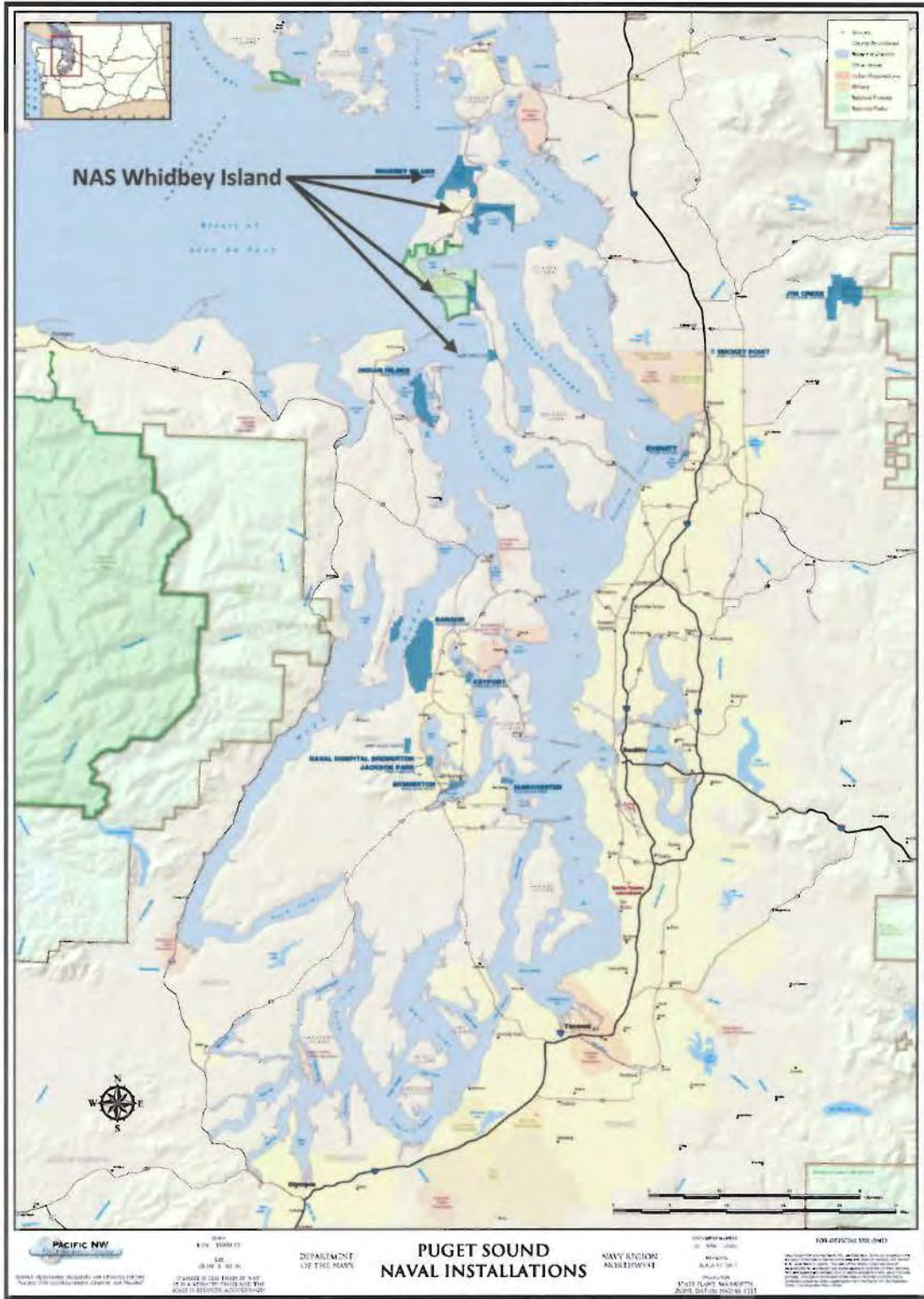
Sincerely,



G. C. MOORE
Captain, United States Navy
Commanding Officer

5090
Ser N44/1499
12 Jul 16

- Enclosures:
1. NAS Whidbey Island Site Locations
 2. NAS Whidbey Island Ault Field and Seaplane Base
 3. 2013 Navy Noise Study DNL Contours
 4. 2005 Navy Noise Study DNL Contours

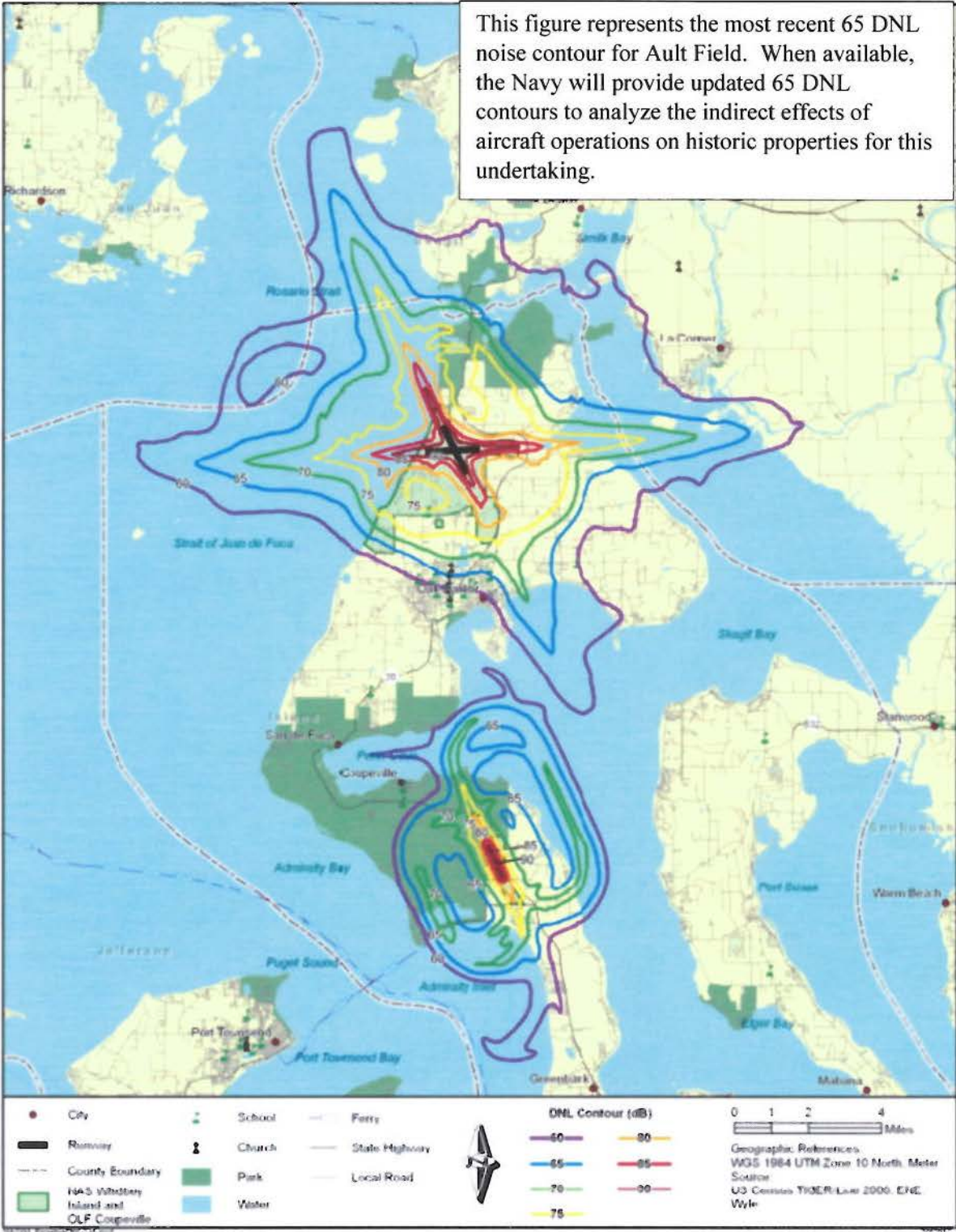


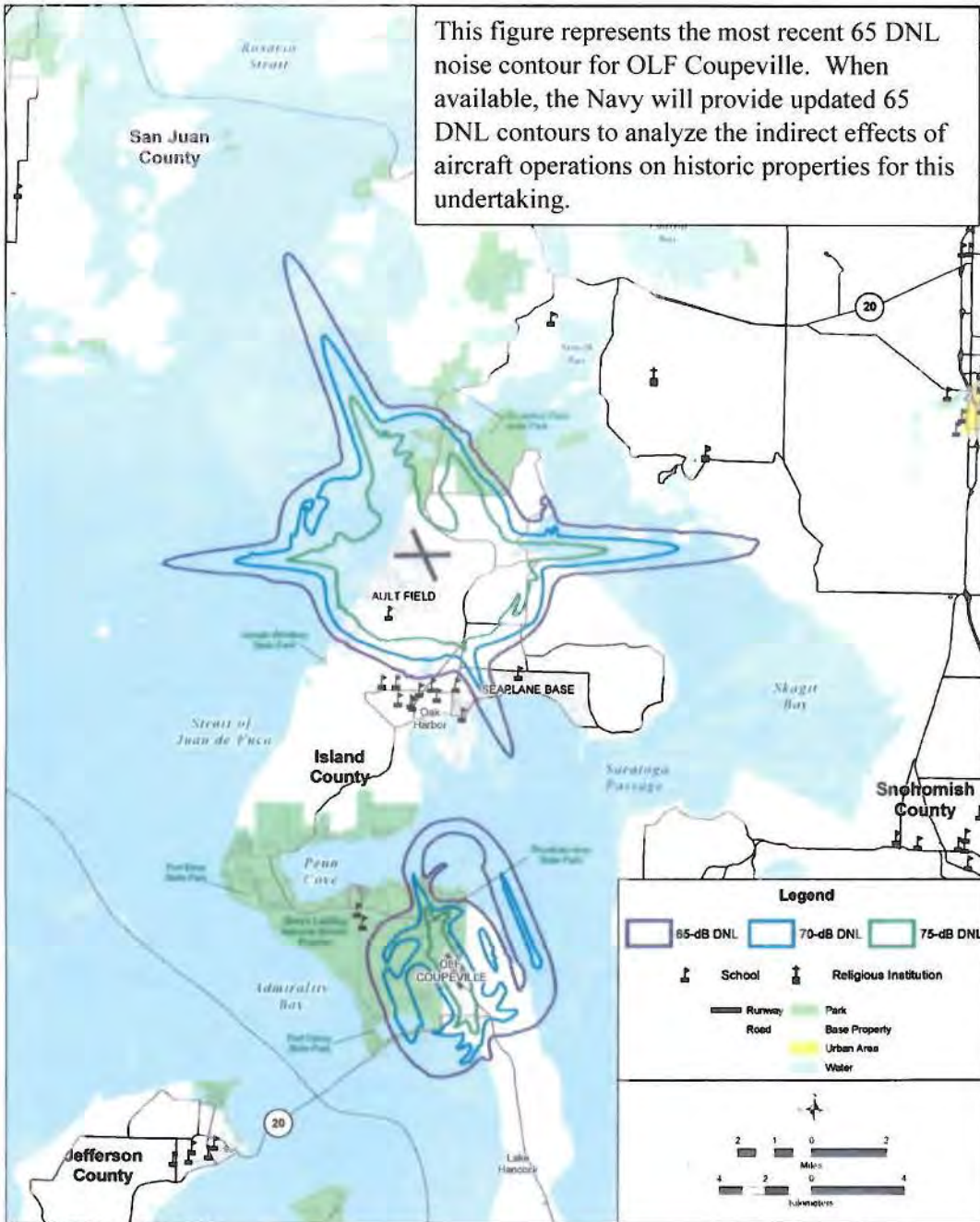
Enclosure (1)



Enclosure (2)

This figure represents the most recent 65 DNL noise contour for Ault Field. When available, the Navy will provide updated 65 DNL contours to analyze the indirect effects of aircraft operations on historic properties for this undertaking.





Enclosure (4)

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

July 22, 2016

Commander NASWI
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

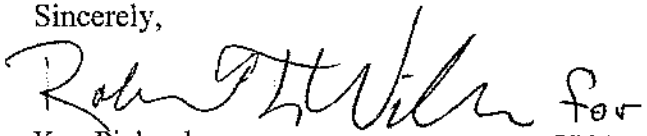
Dear Captain Moore,

I received your June 30, 2016, request for section 106 comments on expanded operations. The COER board of directors appreciates that opportunity and will comment. Can you please inform me as to the comment deadline and two related questions:

Your first-stated bullet is, "Continue and expand the existing electronic attack operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville." Could you please inform what expanded operations at the Ault Field and OLF entails, and most specifically whether that means an increase in FCLPs at those fields.

Near the end of your letter, you further mention that the "Navy is preparing an updated noise modeling study" for the OLF draft EIS. We repeat previous correspondence expressing our interest in acquiring the input variables for that study as soon as they are available, in addition to our earlier request for the input files for the 2005 EA. Is that something you can provide directly or will we need to FOIA that?

Sincerely,


Ken Pickard

Chair, Citizens of Ebey's Reserve, COER

Post Office Box 202, Coupeville WA 98239 citizensofebeyreserve.com Email
citizensoftheebeyreserve2@gmail.com



ATTN: Kendall Campbell
NASWI Cultural Resources Program Manager and Archaeologist
Re: EA-18G Growler Operations

August 1, 2016

Ms. Campbell,

The Jamestown S'Klallam Tribe has received a request for comments on the continuation and increase of EA18-G operation at Naval Air Station Whidbey Island, WA. With respect to cultural resources, the Jamestown S'Klallam Tribe has no comments regarding EA-18G flight operations. However, the Tribe would appreciate engaging in consultation with the Navy regarding the future renovation, demolition, and construction of facilities at Naval Air Station Whidbey Island. Please notify the Tribe when additional information is available regarding these or any other projects requiring ground disturbance.

Thank you for the opportunity to comment on this project. If you need any additional information, please contact me at 360-681-4638 or dbrownell@jamestowntribe.org.

Sincerely,

David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe



Preserving America's Heritage

August 10, 2016

Captain G.C. Moore
Commanding Officer
Department of the Navy
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Ref: *Proposed Increase of Aircraft and Aircraft Operations and Development of Support Facilities
Naval Air Station Whidbey Island
Island County, Washington
ACHPConnect Log Number: 008500*

Dear Capt. Moore:

On July 11, 2016, the Advisory Council on Historic Preservation received your correspondence regarding the proposed Area of Potential Effects (APE) for the reference undertaking. Based on the information provided, and the response you have already received from the Washington State Historic Preservation Office (SHPO), the ACHP has the following comments:

- This is a complex undertaking involving various moving parts and programs. The ACHP understands the undertaking includes the continuation of current operations and the increase in the number of EA-18G Growlers at Naval Air Station Whidbey Island (NASWI).
- Given this complex nature, the APE should be drawn as broad as possible to take into account both direct and indirect effects, and may be multiple geographical areas based on the scope and scale of the undertaking. It is our undertaking that NASWI intends to have two APEs: (1) for direct effects based on the information gathered and analyzed for the development of an Environmental Impact Statement in accordance with the National Environmental Policy Act (NEPA); and (2) for indirect effects, based on the 65 dB Day-Night Sound Level (DNL) noise contours that result from air operations at NASWI.
- The maps provided are only for the indirect APE; however, the maps include contours out to 60 dB DNL, which is beyond the 65 dB DNL for which NASWI proposes to define the boundary of the indirect APE. If there is no substantive reason to illustrate this 60dB contour, we recommend that you only include the line of the contour for 65 dB DNL.
- While NASWI is still determining the direct APE, by coordinating review efforts with the NEPA process, we recommend that you provide consulting parties with a *draft* direct APE for comment that is based on the proposed construction areas at Ault Field to accommodate additional aircraft.

The ACHP appreciates the effort NASWI is demonstrating to meet both the regulatory and substitutive

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 30811 Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

requirements of Section 106. In using the Section 106 process as intended, as a planning tool, it can meet the requirement to take into account effects of this undertaking on historic properties and make a more informed decision. In order to keep the consultation process moving along, we also recommend that NASWI develop a consultation plan that includes key milestones for the review and implementation of this undertaking.

If you have any questions regarding our comments please contact Ms. Katharine R. Kerr who can be reached at (202) 517-0216 or via e-mail at kkerr@achp.gov and reference the ACHPConnect Log Number.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom", followed by a long, sweeping horizontal stroke.

Tom McCulloch, Ph.D., R.P.A.
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section



**Deborah Stinson
Mayor**

250 Madison, Suite 2
Port Townsend, WA 98368
360-379-5047
dstinson@cityofpt.us

August 16, 2016

Captain G.C. Moore
Commanding Officer
Naval Air Station, Whidbey Island
3730 North Charles Potter Avenue
Oak Harbor, Washington 98278-5000

RE: Request for Section 106 Comments – EA-18G Growler Operations

Dear Captain Moore:

Thank you for the opportunity you provide in your July 12, 2016 letter for the City of Port Townsend to consult on the proposed Area of Potential Effect (“APE”) for the continuation and increase of Growler operations at NAS Whidbey Island.

The City asks that you expand your area of study, as well as your definition of the indirect effects component of the APE. We also ask that you consider using a different measure of sound impacts.

Area of study is too narrow.

Your area of study does not include all of the historic areas over which the Growlers fly. While the primary impact areas on Whidbey are affected by take-off and landing operations, many other areas of the Salish Sea area, including the City, are affected by flight operations. The City was founded in 1851 and contains two U.S. National Historic Landmark Districts: our Downtown and Uptown areas, as well as the Fort Worden Historic District. The Districts include approximately 40 separately-listed properties and structures on the National Register of Historic



Places. The noise impacts from Growler operations impacts residents, visitors, and historic structures in the District. Therefore, the City asks that the APE be expanded to include all historic areas within the training flight areas.

Measure of sound impacts does not take into account rural/naturally quiet areas.

The City believes that the flight operations may diminish the integrity of the setting of Port Townsend's Historic Districts in that they change the historically-quiet setting of those Districts. Also, flight operations may have an adverse physical effect on some historic structures within those Districts¹.

According to your letter, your baseline for impacts is noise over 65 decibel ("dB") Day-Night Average Sound Level ("DNL"). This is an average noise level measured over the course of a year. While this is the FAA standard, FAA policy does not preclude local jurisdictions from setting a lower threshold of compatibility for new land use developments, and the policy allows for supplemental or alternative measurements².

The average decibel level in the City, especially at night, is likely to be very low – even below 55dB in certain parts of the City. Growler operations are not continuous; the noise impacts of the operations vary based on the exercise, but include flights over and near the City for hours at a time – frequently at night. Therefore, the City believes that measuring the noise impacts here and on Whidbey using an Effective Perceived Noise Level as provided in Federal Aviation Regulation Part 36 would be a more accurate measure of the effect of flight operations.

Finally, the DNL uses A-weighting for the decibel measurement. It does not take into account low-frequency noise. As noted in a 2004 article:

Regulatory authorities must accept that annoyance by low frequency noise presents a real problem which is not addressed by the commonly used assessment methods. In particular, the A-weighted level is very inadequate, as are the NR and NC criterion curves. Assessment methods specific to low frequency noise are emerging, but a limitation of existing methods is that they do not give full assessment of fluctuations. It is possible that application of noise quality concepts, in particular fluctuation and roughness (Zwicker and Fastl, 1999), may be a way forward.

¹ See FAA Section 106 Handbook, June 2015, Page 27, Section C(1)(a), (e); Noise Basics and the Effect of Aviation Noise on the Environment, Wyle, Page 25, Sections 3.10, 3.11 (Viewed at <http://www.rduaircraftnoise.com/rduaircraftnoise/noiseinfo/downloads/NoiseBasicsandEffects.pdf> on August 16, 2016).

² Report No. DOT/FAA/AEE/2011-02, Technical Support for Day/Night Average Sound Level (DNL) Replacement Metric Research, June 14, 2011. Mestre, Schomer, Fidell, & Berry, Authors

Leventhall H G. Low frequency noise and annoyance. Noise Health [serial online] 2004 [cited 2016 Aug 3];6:59-72. Available from: <http://www.noiseandhealth.org/text.asp?2004/6/23/59/31663>.

The City appreciates the need for pilot training, and is grateful for the sacrifices made by the members of our military and their families. We ask that the APE be expanded to cover all historic areas subject to flight operations, not just take-off and landing. We also ask that you measure those impacts as precisely as possible, and take into consideration low-impact frequencies.

Sincerely,


Deborah S. Stinson
Mayor

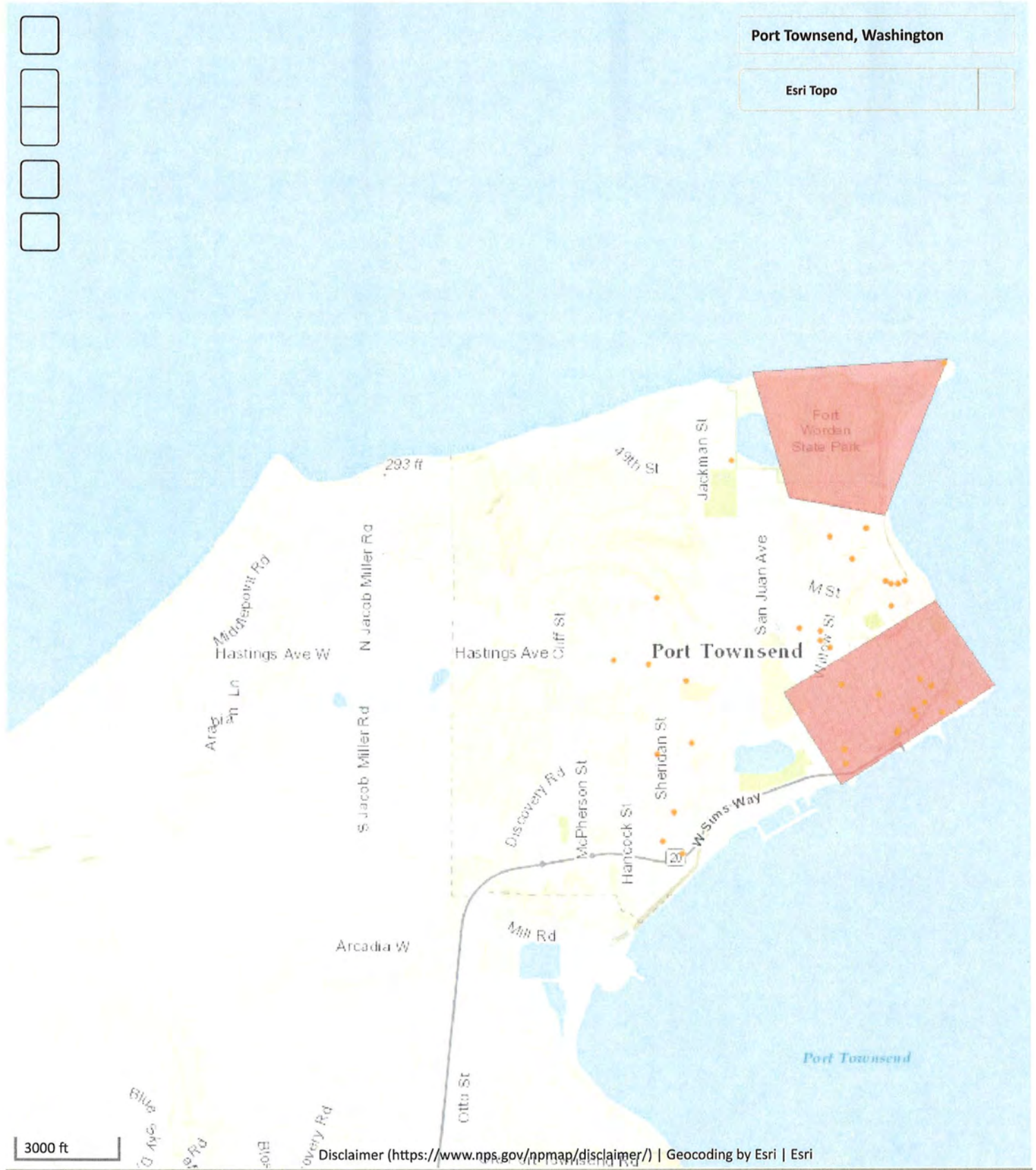
Encl.

cc: Honorable Patty Murray, U.S. Senator
Honorable Maria Cantwell, U.S. Senator
Honorable Derek Kilmer, U.S. Representative
Honorable James Hargrove, Washington State Senator
Honorable Steve Tharinger, Washington State Representative
Honorable Kevin Van De Wege, Washington State Representative

National Register of Histori...

National Park Service
U.S. Department of the Interior

Public, non-restricted data depicting National Register spatial data proce...





August 25, 2016

Naval Air Station Whidbey Island
Attn: Captain G.C. Moore
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Dear Captain Moore,

Thank you for the opportunity to comment on the Navy's proposed definition of the Area of Potential Effect (APE), due to existing and expanded electronic attack operations and increased EA-18G Growler operations at OLF Coupeville, pursuant to Section 106.

The Coupeville Town Council and I discussed the proposal at our August 9 workshop. We feel we are unable to provide complete input for three reasons:

1. The maps provided, showing the 65 DNL noise contour for OLF Coupeville, are small and without detail, making it hard to determine what streets and areas are included. It appears the Town of Coupeville is not within the 65 DNL noise contour.
2. We do not fully understand the Day-Night Average Sound Level (DNL) method used to determine the APE.
3. The Areas of Potential Effect shown for OLF Coupeville are based on 2005 noise data. Until noise data is updated, we won't know how it will affect the noise contours and therefore, are uncomfortable committing to the parameters of 65 dB DNL Area.

We do, however, want to honor the September 1 deadline for comments. Based on what we know now, we offer the following comments:

The current method of defining the APE, using Day-Night Average Sound Levels (DNL) noise modeling, does not appear to cover an area large enough, at 65 dB, to include affected residents, businesses and historic resources in Central Whidbey. We strongly disagree with defining the area around OLF Coupeville as "indirectly affected". Central Whidbey and a large portion of Ebey's Landing National Historical Reserve, should be classified as "directly affected" by jet noise.

We believe expanded and increased electronic attack operations and Growler training flights will result in an expanded and increased APE.

Specifically, as to section 106, we support and encourage the adaptive reuse of historic properties to help owners financially maintain and preserve their buildings. Some of the more successful reuses of historic buildings in Central Whidbey have been bed and breakfasts and event venues. Agriculture is also an important part of the historic landscape of Ebey's Reserve. All three of these cited businesses and, therefore, the historic resource, have been negatively affected by jet noise.

There are over 300 historic buildings in Central Whidbey and all of Ebey's Reserve is listed as a national historic district. Many of the affected historic properties, buildings and landscapes are outside of your defined APE. This indicates to us that the 65dB DNL is not an adequate noise measurement to use to define the APE.

Again, we appreciate the opportunity to comment and look forward to receiving up-to-date noise data and maps with the coming EIS draft.

Sincerely,



Molly Hughes
Mayor

cc: Town Council Members

Date: September 1, 2016

To: NAS Whidbey Island Cultural Resources Program Manager, Kendal Campbell,
kendall.campbell1@navy.mil

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station Whidbey Island (NAS Whidbey Island) is continuing consultation first requested on 20 October 2014 and now is asking for comments on this proposed action.

From: Ken Pickard, President, Citizens of Ebey's Reserve (COER)

Regarding: Request for Section 106 Comments on the Proposed Definition of the Area of Potential Effect for the Continuation and Increase in EA-18G Growler Operations at Naval Air Station, Whidbey Island, Island County, Washington.

COMMENTS:

Problems with the DNL Metric

The DNL metric is the wrong metric to address the direct and indirect impacts of Growler jet noise on The Area of Potential Impact over Ebey's Reserve and the Outlying Field located at the southerly entrance to the Reserve. Nor is it the correct metric to determine the extent of that impact on Central Whidbey and its residents, visitors and historic structures.

The day–night average sound level, or DNL, is a complicated metric of quiet times averaged, with noisy times. This has the effect of making the noisy times seem not so noisy. DNLs do not inform as to the noise magnitude, duration, or number of single hazardous noise events; instead DNLs attempt to characterize the overall noise experience in a 24-hour period. Our bodies, however, react to the cumulative impact of each separate hazardous noise event, not to an overall average. Put another way, using the DNL to evaluate health or structural impacts is like using average wind speed in New Orleans throughout the year of 2004 to evaluate the damage done by Hurricane Katrina.

The DNL is an accepted method to evaluate *community annoyance* as related to land-use

planning, The Navy's 2005 AICUZ (pages 4-6) clearly states as much (emphasis added)¹:

*“However, individuals do not “hear” DNL. The DNL contours are **intended for land use planning, not to describe what someone hears when a single event occurs.** Individual or single noise events are described in terms of the Sound Exposure Level (SEL) in units of dB [decibels]². SEL takes into account the amplitude of a sound and the length of time during which each noise event occurs. It thus provides a direct comparison of the **relative intrusiveness** among single noise events of different intensities and durations of aircraft overflights. (emphasis added)*

Most of the day–night noise level (DNL) annoyance research has been derived from studies of commercial airports, which generally have frequent daily traffic, but lower maximum sound levels. According to Paul Schomer (Standards Director, Emeritus, Acoustical Society of America, Schomer and Associates, Inc.), extrapolating that database to military jets impacting civilian residents is problematic. He questions *“the substantiated extension of DNL into untested and unsubstantiated regions so loud that hearing protection and warning signs are required.”* He goes on to point out that a *“65 DNL for a year is 91 dB if it comes in one day, 140 dB in 1 second, and 170 dB in 1 millisecond (ms)—permanent hearing loss and damage to the ear but no [DNL] impacts.”* That clearly shows how and why the DNL is a useless metric to evaluate health impacts on humans or wildlife.

Indeed, as stated in USACHPPM (1998; page 28),³ *“although the DNL has been emphasized by the DoD and especially the Army as the primary noise exposure metric, this metric applies to community annoyance and is seldom related to behavioral or reproductive effects of wildlife. Hence the DNL metric is of no use or value to evaluate Growler noise impacts on visitors to the Reserve or on its wildlife, or historic structures. A complicated formula is used to figure DNLs but, simply put, it means that quiet times are averaged, with noisy times. Theoretically, this has the effect of making the noisy times seem not so noisy. DNLs are an average – they do not exist.*

¹ AICUZ Study Update for Naval Air Station Whidbey Island's Ault Field and Outlying Landing Field Coupeville, Washington. Final Submission. March 2005. (This study was produced by The Onyx Group of Alexandria, VA and San Diego, CA, under the direction of the NAVFAC Southwest)

² Noise is measured on a log scale in decibel (dB) units. Loudness is a measurement index of the sound we perceive, and hence how it affects our psyche and functionality; sound pressure intensity is the more important metric when it comes to hearing damage and pressure impacts on the body.

³ *Ecological Risk Assessment Framework for Low-Altitude Overflights by Fixed-Wing and Rotary-Wing Military Aircraft*. January 2000. Rebecca A. Efroymson (Oak Ridge National Laboratory), Winifred Hodge Rose and Sarah Nemeth (U. S. Army Construction Engineering Research Laboratory), and Glenn W. Suter II (U. S. Environmental Protection Agency). Research sponsored by the Strategic Environmental Research and Development Program of the U. S. Department of Defense under Interagency Agreement 2107-N218-S1 under contract DE-AC05-00OR22725 with UT-Battelle, LLC. Publication No. 5010, Environmental Sciences Division, ORNL.
<https://www.researchgate.net/publication/252522677>

They are imaginary numbers. They don't tell us what the loudest event is in a 24-hour period, nor do they tell us how many noisy events there may be in a 24-hour period. Our ears don't average noise over 24-hours --- We hear and react to each noise as a separate event. So, in looking strictly at annoyance, it similarly follows that an annual average DNL as applied to Ebey's Reserve and its thousands of annual visitors is not useful for assessing 'impact' because Growlers have no annoyance effect when not flying overhead and a huge effect when they do fly overhead.

DNL Flaws in the Navy's 2005 Finding of No Significant Impact

Other problems impact the Navy's proposed continuance and expansion of Growler flights, as well; i.e., inappropriate data was used to produce the 2005 EA "finding of no significant impact" (FONSI) for the completed transition of Prowlers to Growlers at OLFC in 2013.

The five problems discussed below apply significant question to the validity of the DNL noise contours recently provided for OLFC by Commander Moore, NASWI. If those problems were corrected and revised, it would expand the areas of land encompassed within each contour. It follows that increased Growler activity at OLFC would further expand the 65 DNL area and encroach even further upon the quiet cultural soundscape and historic buildings and residences of the Reserve, and the intention and purpose of the Ebey's National Historical Reserve.

The following five problems involve fallacious information the Navy data putatively provided to Wyle for its two noise studies used to produce its 2004 and 2012 noise studies⁴ as refuted by actual data obtained by COER via the Freedom of Information Act:

- 1) Wyle in both 2004 and 2012 based its DNLs on a 50:50 split-use of OLFC paths 14 and 32. However, use of path 14 has never been near 50%, but instead 5% to 25%. The Navy affirmed in the lawsuit trial record and as iterated by Judge Zilly in his decision,⁵ "...it is

⁴ Aircraft Noise Study For Naval Air Station Whidbey Island and Outlying Field Coupeville Washington, WR 04-26, Wyle, October 2004. <And> Aircraft Noise Study For Naval Air Station Whidbey Island and Outlying Field Coupeville Washington, WR 10-22, Wyle, October 2012.

⁵ Citizens of Ebey's Reserve v. U. S. Navy, Quote from base commander Norter's declaration to Judge Zilly [Citizens of Ebey's Reserve v. U. S. Navy]: "OLF Coupeville has one runway oriented generally North/South, and is called runway 32 or 3 runway 14, depending on direction of approach. The weather and winds determine the direction in which to conduct FCLPs. The local prevailing winds support runway 32 usage most of the 4 year. FCLP flight patterns for OLF Coupeville were historically used by the EA 6B and A 6 aircraft, which shared similar flight characteristics. In the past, the flight pattern for runway 14 5 was adjusted for noise abatement purposes for homes on the eastern coastal boundary. Additionally, noise abatement procedures were designed to avoid flying over Long Point and a 6 bird farm that is no longer in existence, and those procedures are still followed. Even with

apparent that flight path 14 is now rarely used for FCLP operations....” So, path 32 has and will continue to be used almost exclusively.

https://ja.scribd.com/mobile/document/267136375/2015_05_29_Declaration_of_Captain_Mike_Nortier_With_2_Appendices. This 50:50 misrepresentation, corrected to >90% on path 32, would expand the impact area over the Reserve and adjacent Admirals Cove and Pelicar Shores.

- 2) Wyle also indicated its use of OLFC after 10 PM is 5.8% of the landing practices, and Wyle based its DNL analysis on that percentage (note: night operations drive the DNL level way up due to a 10-fold mathematical weighting penalty). However, rather than 5.8%, the actual after 10 PM operations from 2007 to 2012 averaged 24% to 63%. So, Wyle’s 2004 and 2012 DNL contours based on 5.8% night FCLPs, makes the DNL values and contours far less that had the 2007-2012 average (35%) had been used.
- 3) The 2005 EA and attendant 2004 Wyle noise study were based on the Navy’s selection of a single year, 2003, to represent the number of FCLP operations over the baseline years prior to the 2005 EA. The EA stipulated that Navy plans for 2013 and beyond called for 6120 operations annually at OLFC, the so-called “*projected operations*.” If the historical base of operations (the so-called “*existing condition*”) was greater than the *projected* 6120, then the *projected* number of operations would be less than the *existing condition*. That, in turn, would make the *projected operations* produce less noise than the historical *existing condition* ... and that would help establish no environmental impact for the transition to Prowlers. So, the Navy selected 2003 as the base year, which at 7682 operations was the only year of the six preceding years that exceeded the 6120 *projected* operations. Had any year other than 2003 been selected for the comparison year (e.g., 2002 = 4100 operations, or 2001 = 3568, or an average of 2002-2004 = 5117), then the *existing condition* would have been lower than the 6120 *projected operations* and produced an increase in noise, rather than a decrease. No respectable statistician would establish a baseline from a single stochastic year, especially given the wide variation in annual operation totals. This, however, is what the Navy did by selecting 2003 as the baseline year.

these modifications to the pattern, the EA 6B and A 6 could operate within acceptable parameters and use runway 14 when the meteorological conditions favored this runway. The EA 18G has a slightly different required flight profile in the FCLP pattern due to differences in weight and flight characteristics. As a result, the EA 18G cannot safely operate within the confines of the daytime runway 14 parameters currently in place. The Navy is examining runway usage and historical noise abatement procedures as part of its ongoing EA 18G Environmental Impact study. ntil hat study complete, unway 4 arely sed or CLPs.”

The Navy's 2012 EA and 2012 Wyle noise study used a 6-year average (2005-2010), which should have more fairly represented the *existing condition*. The problem, however is that the information from the Navy via FOIA data shows that the average for those 6 years is 4206 operations (about 4700 including arrivals/departures), NOT 6120 reported by the Navy. This is about 1400 operations fewer than used by Wyle—a discrepancy of about 30% (1400/4700).

Had COER's FOIA data from the Navy been used by Wyle, the DNLs produced by NOISEMAP would have been greater, and the noise contours would have been larger.

- 4) In 2005 the Navy asserted in their 2005 AICUZ document that on approach to touchdown Growlers are at 114 decibels (dB) at 1000 feet above ground, or 7 dB louder than Prowlers at 107 dB. But the 2012 Navy feed to Wyle somehow found that Growlers on approach were 109 dB and the Prowler was 111 dB. So, in those 7 years between 2005 and 2012, the Growlers inexplicably grew 5 dB quieter and the Prowlers grew 7 dB louder (see table below). Likewise, in those 7 years the departure takeoff for the Growler had become 2 db quieter, while inexplicitly the Prowler had become 2 dB louder. And the Prowler downwind leg of the FCLP at 1000 ft was 4 dB louder than the Growler in 2005, but in 2012 the Prowler was 8 dB louder. Which of those disparate Prowler vs. Growler metrics is believable, if any? Note too that Growlers, on their approach and takeoff on either path, cross the most populous portion of the racetrack, often at 200-400 feet above rooftops. By comparison, the FAA with its quieter commercial aircraft standards strictly requires no flyovers be less than 500 feet over people or homes.
- 5) The well-established standards for calculating an annual 24-hour average DNL is different for airports used daily versus those used intermittently. Airfields used daily are to be calculated based on all 365 days of use in the year; DNLs for airstrips used intermittently are to be based on just the "busy days" of use. In other words, if the airport averages just 50 days of use per year, the DNL should be averaged over just those 50 days, not all 365 days of the year. Averaging OLFC use over 365 days would reduce the area under each noise contour, while use of 50 days would increase the areas.

The Navy has been unable to confirm how the DNLs were averaged, as requested by COER (July 3, 2016, letter). In essence Commander Moore indicated that the average could be an average of "busy days" only (i.e., all days OLFC was used in an average year) **or** an average over all 365 days in the average year. He wasn't sure which. If the Navy used the 365-day averaging method, then the DNLs Commander Moore provided would likely understate the DNL, such that the 65 DNL contour might actually be close to 70 DNL, and the 60 DNL might be a close to 65 DNL.

Those five data irregularities have a profound effect on the assessment of environmental impacts related to the Prowler–Growler transition and the related 2005 EA’s dubious “finding of no significant impact” at OLFC. It follows that the contours Commander Moore provided for the Section 106 Process understate the size of the 65 DNL area, which, in reality, extends further into Ebey’s Reserve than shown on current maps.

Jet type	Approach @ 1000 feet (SEL, dB)		Departure @ 1000 feet (SEL, dB)		Downwind leg cruise @1000 feet (SEL, dB)	
	2005 AICUZ	2012 EA	2005 AICUZ	2012 EA	2005 AICUZ	2012 EA
Prowler	107	111 (+4)	114	116 (+2)	117	109
Growler	114	109 (-2)	117	109 (-8)	113	101

Note that in regard to Prowler vs. Growler noise (#4 above), the 2005 EA states:

The Navy has acquired aviation easements (also known in some cases as joint stipulations) in the vicinity of OLF Coupeville. These easements provide landowners’ consent for the EA-6B or follow-on aircraft of *lesser or comparable noise level* to fly at altitudes of 800 feet AGL, based on a maximum of 10,000 flights per calendar year.

Note, in that quote “*of lesser or comparable noise level,*” This could be one reason the Navy needs the Growler to be quieter than the Prowler. Also note that the approach over Admirals Cove is well under 800 feet, albeit there is no navigation easement there. And, nowhere in either EA or in the Wyle studies are the approach elevations over Admirals Cove mentioned, perhaps with good reason. In this respect, it should be noted that the Growler produces greater low-frequency noise than the Prowler, which the dBA scale used by Wyle filters out. Using bBC would make the Growler about 8 dB louder than the Prowler.

Problems with Modeling the DNL Contour

The modeling used to prepare the DNLs is also potentially problematic. The Navy has recently asserted it was not necessary to have on-site noise studies for OLFC in the current EIS process, and they have opted to use modeled (NOISEMAP) data instead. The contours provided for this Section 106 Process were derived from the 2005 NOISEMAP data.

Modeled data, however, can fail to reflect actual on-site measurements. A study of 36 sites around Raleigh–Durham airport⁶ found the modeled data consistently **underestimated** the actual on-site noise by 5–15 decibels; that is, the actual noise levels were roughly 50% to 150% louder than the NOISEMAP (1991–1998) and INM (1999–2002) models had indicated.

ISO Invalidates 65-dB DNL Threshold

In 1992 the Federal Aviation Administration (FAA), based on a synthesis of 1978 studies, established in Regulation Part 150 that a maximum average DNL of 65 dB or above is incompatible with residential communities, and that communities in affected areas may be eligible for mitigation such as soundproofing.

The 65 DNL was established in 1992 by the Federal Interagency Committee on Noise (FICON) from a dose/response curve showing that at 65 DNL 13.2% of the population is highly annoyed by aircraft noise. It hence was established as the point at which the FAA considers significant noise impact to begin. Based on that science, Congress adopted 13.2% as the threshold that should not be exceeded, and 65 DNL became the standard.

The Navy’s Air Installations Compatible Use Zones (AICUZ)⁷ similarly adopted the 65 DNL for its land-use compatibility determinations concerning aircraft noise, noting the sources as the Federal Interagency Committee on Urban Noise, “Guidelines for Considering Noise In Land Use Planning and Control” (Reference (km)) as endorsed by FICON in the “Federal Agency Review of Selected Airport Noise Analysis Issues” (see section 2.b in <http://www.dtic.mil/whs/directives/corres/pdf/416557p.pdf>).

New scientific information, however, now shows the 1978 studies and dose/response curve were flawed, invalidating the 65 DNL threshold. On March 9, 2016, the International Organization for Standardization (ISO)—an independent, non-governmental organization of 162 national standards bodies—published a revision of ISO standard on measurement and assessment of environmental noise. The revised ISO standard reflects 5 years of analysis by an ISO technical committee, which produced the new dose/response curve based on recent research. An American National Standards Institute (ANSI) version of the ISO standard has been developed, which further mirrors ISO findings and validates the pervasive concurrence of worldwide noise experts. To be consistent with 13.2% annoyance, the correct standard needs to be reduced to 55 DNL.

⁶ *Technical Report on Preparation of Day-Night Sound Level (DNL) Contours of Aircraft Noise During 2003 Raleigh-Durham International Airport North Carolina*. March 2005. HMMH Report 295097.001 . Harris Harris Miller & Hanson, Inc., 15 New England Executive Park, Burlington, MA 01803
http://198.1.119.239/~flyduco/rduaircraftnoise/noiseinfo/downloads/RDU_2003_DNL.pdf

⁷ AICUZ Study Update for Naval Air Station Whidbey Island’s Ault Field and Outlying Landing Field Coupeville, Washington. Final Submission. March 2005. (This study was produced by The Onyx Group of Alexandria, VA and San Diego, CA, under the direction of the NAVFAC Southwest)

The technical team's findings show that at 65 DNL, actually 28% of individuals will be highly annoyed by aircraft noise, rather than the old prediction of 13.2%, or about twice that predicted by the old dose/response curve. So, to achieve the congressional limit of 13.2%, the FAA will need to adopt the new 55 DNL standard; it can no longer hold up the old standard as scientifically valid.

So, the 65 DNL contour underestimates by nearly 50% the annoyance impacts among Ebey's Reserve visitors and residents. So, to comply with 13.2% standard, the attendant contour needs to be 55 DNL, which will therefore encompass a much larger area of the Reserve. And in that regard, as discussed above, the existing 55 DNL contour in the maps provided by Commander Moore is smaller than it would be if corrected for data irregularities and shortcomings.

OLFC Violates Navy's Own Encroachment Guidelines

During a recent attempt to build an outlying field in eastern North Carolina, the Navy sought 30,000 acres of relatively undeveloped land in order to comply with its AICUZ land-use guidelines. By comparison, at only 700 acres, OLFC falls 29,300 acres short. This is why, in 1987, a Navy planning document (Navy document 101) examined the status of OLFC for future use and called for alternatives to OLFC be investigated by the Navy because of the surrounding encroachment. Instead, the Navy administrators issued itself a permanent waiver to continue use of OLFC.

As a result, the 65 DNL contour includes much of the Reserve with its historic farms and homes, as well as the adjacent residential area and several state and local parks, a well-used children's athletic field and dog park, a youth shelter, County re-cycling Center, and a Transportation Center with above-ground fuel tanks. And of course, when the Growlers are practicing at OLFC all these areas are highly impacted by the loudest noise imaginable, juxtapose against the expected natural beauty and soundscape of the Reserve.

Because of an interagency agreement among the U. S. Fish and Wildlife Service, the National Park Service, and the Bureau of Land Management with the Federal Aviation Administration, it has imposed a voluntary altitude restriction of 2000 feet above ground level for overflights crossing land administered by the Department of the Interior. The Department of Defense is not bound by this agreement, and policies regarding lands near DoD installations are typically negotiated locally. However, OLFC flight paths are at less than 1000 feet.

Both OLFC flight paths (14 and 32) require low-level (200–1000 feet) flight altitudes. As explained by this Oak Ridge National Laboratory Report, this violates federal regulation the Department of Defense is supposed to honor but ignores at OLFC:

The military services are committed to safety and to minimizing the collateral noise associated with low-level flight training. The U. S. Air Force, for example, has set numerous restrictions and tailored its training to reduce noise as much as possible. The DoD in general, in addition to following its own flying rules of low-level altitudes and airspeed, also follows those in Federal Aviation Regulation 91.79 which states that no plane may fly closer than "500 ft [152 m] from any person, vessel, vehicle, or structure." (USAF Fact Sheet 96-17) In addition, because of the greater potential for human annoyance during sleeping hours, low-level flying by military fixed-wing aircraft generally occurs during daylight hours; low-level flying near densely populated areas is prohibited.⁸

The 2012 EA states, in regard to land use planning:

[The Navy limits] flying to only mission essential activities, locating engine run-up areas away from populated areas, and minimizing flights over heavily populated areas, while fulfilling all mission essential requirements. In addition, the Navy works with communities to discourage locating noise-sensitive land uses in high noise areas through the use of zoning and other land use planning tools. Communities that MUST locate noise-sensitive land uses, such as residential, in high noise areas are encouraged to require that sound-reduction techniques be used in new construction and to require real estate disclosures. (p 1-19; emphasis added)

It is true that incompatible land use recommendations are stated clearly in the 2005 AICUZ. It is also true that Island County has been apparently unaware of those recommendations and remains so, to the extent that no building permits have been refused due to non-compliant jet noise in Admirals Cove or Pelican Shores, among others.

For example, Commander Nortier delineates in his declaration to Judge Zilly (paragraph 12) the things he has done to "mitigate" noise impacts. In total, they amount to window dressing. For example, in paragraph 14 he states the 2005 AICUZ is made available to prospective homebuyers (see: https://www.scribd.com/document/267136375/2015_05_29_Declaration_of_Captain_Mike_Nortier_With_2_Appendices),

Actually, this is a false statement. The Island County jet noise disclosure to prospective home buyers says nothing about the AICUZ, and even if did, the lengthy technical text and charts would easily exceed most buyers comprehension and analysis. And the disclosure says nothing of the fact that thousands of homes--the one you could be buying--may be within an area the Navy's AICUZ asserts should contain none/zero residences.

⁸ *Ecological Risk Assessment Framework for Low-Altitude Overflights by Fixed-Wing and Rotary-Wing Military Aircraft*. January 2000. Rebecca A. Efroymson (Oak Ridge National Laboratory), Winifred Hodge Rose and Sarah Nemeth (U. S. Army Construction Engineering Research Laboratory), and Glenn W. Suter II (U. S. Environmental Protection Agency). Research sponsored by the Strategic Environmental Research and Development Program of the U. S. Department of Defense under Interagency Agreement 2107-N218-S1 under contract DE-AC05-00OR22725 with UT-Battelle, LLC. Publication No. 5010, Environmental Sciences Division, ORNL. <https://www.researchgate.net/publication/252522677>

DNL – An Inappropriate Health Impact Metric

Hearing and sound pressures on the human body produce intertwined physical and physiological reactions, and that biological reaction includes reactions to the sound vibrations that penetrate into the entire body (just as it rattles buildings). Low-frequency sounds are more intense in their penetration. Loudness is a measurement index of the sound we perceive to hear, and hence how it affects our psyche and functionality. Sound pressure intensity is the metric to index both hearing damage and pressure impacts on the body.

So, to evaluate the biological complement of noise effects on health, the Navy admits that single noise event metrics (e.g., *sound exposure levels* or SELs), *not* DNLs, are the appropriate metrics of ubiquitous use in medical research to evaluate noise–health (dose/response) impacts. Yet the 2012 EA nevertheless argues that the DNL overestimates hearing damage:

Since hearing loss is a function of the actual sound levels rather than annoyance levels, characterizing the noise exposure in terms of DNL usually overestimates the assessment of hearing loss risk because DNL includes a 10-dB weighting factor for aircraft operations occurring between 2200 and 0700. (p 3-14)

That statement is wrong. Medical research on toxic noise does not use DNLs (as explained above), but rather, uses the exposure time and actual noise levels from single noise events. And the 10 dB penalty has no basis in terms of health impact. If, for example, jets flew x number of overflights during a given daytime session producing a DNL of y . Had those same overflights occurred after 10PM instead of at daytime, then the DNL would be considerably greater than y , but the sound exposure levels would have been equal and, hence, the health impacts about the same. So, the EA statement above is scientifically unsupportable and disturbingly misleading.

In 2013, COER engaged an independent noise study (JGL Noise Study #1⁹) to obtain actual on-site Growler noise data at OLFC (report is available on request). We commissioned the JGL study, rather than simply accept the computer-modeled data used by Wyle Labs because the Navy refused to conduct on-site recordings and modeled DNLs have been shown to be inaccurate. That is, a study of 36 sites around Raleigh–Durham airport¹⁰ found the modeled data consistently underestimated the actual DNLs from on-site noise measurement by 5-15 dB.

⁹ Whidbey Island Military Jet Noise Study, JGL Acoustics report to David Mann, June 10, 2013, available at <http://citizensofeyebysreserve.com/References/Files/JGL%20Noise%20Report.pdf>)

¹⁰ Technical Report on Preparation of Day-Night Sound Level (DNL) Contours of Aircraft Noise During 2003 Raleigh-Durham International Airport North Carolina. March 2005. HMMH Report 295097.001 . Harris Harris

The JGL sound data were gathered at five locations around OLFC while Growlers conducted FCLPs on Path 32. One site was directly under the approach over Admirals Cove and another was at a youth ballpark (Rhododendron Park) adjacent to and under the takeoff path, a third was at Ebey's Landing, and the fourth was in farm lands within the Reserve. At each site about 30 Growler flyovers were recorded, and sound levels for each such flyover at all four outdoor sites were very similar having sound exposure levels of 122 to 128 dBA for a recorded session.

At the ballpark/playground for example, Lilly found that had parents and children been present they would have experienced in one 40-min FCLP session (30 flyovers) a cumulative 2.25 minutes of noise over 100 dB or about 1 minute over what EPA has identified as a noise dose sufficient to cause permanent hearing loss. That is, if someone in a 24-hour period is exposed to 1.5 minutes of noise over 100 dB, the EPA indicates that individual will likely suffer some permanent hearing loss. The same is generally true for those visiting portions of the Reserve that were measured. Repeat exposure adds to the loss each time.

This information is reinforced by the National Institute for Occupational Safety and Health (NIOSH). They assert that above a critical noise level, the mechanism of hearing damage changes from one based on cumulative noise exposure (i.e., the combination of magnitude and duration of sound) to a mechanism based on sound pressure intensity alone, regardless of duration. They estimate 115 to 120 dBA as the critical noise level at which human hearing is subject to a permanent hearing threshold shift. All of this information is available at <http://citizensofebeysreserve.com/LinksAndFiles.html>.

Furthermore, children are well known to be more sensitive to noise. Executive Order 13045 of April 21, 1997: Protection of Children From Environmental Health Risks and Safety Risks, recognizes the susceptibility of children to greater environmental risks than adults, and it creates requirements to ensure their extra protection (EO 13045, Protection of Children from Environmental Health Risks and Safety Risks (EO 13045, 62 Federal Register 1985).

The Navy has argued that the 2013 JGL noise study lacked statistical robustness because it was a stochastic one-time sample that might lack repeatability due to weather. That possibility lacks credibility because all sites were well within one mile of the jet path; Lilly explained it this way:

Temperature profiles, humidity, and wind all can affect the resulting sound level, but these environmental effects are insignificant unless the listener is at least a mile or more away from the source. The greater the distance, the greater the effect. Sometimes the environmental conditions will cause the noise level to increase by 10 dB (or more) and other times it might decrease the level by 10 dB (or more). Atmospheric conditions will have no impact on the areas directly below (or within a mile of) the flight patterns. (Jerry Lilly, JGL Acoustics)

Miller & Hanson, Inc., 15 New England Executive Park, Burlington, MA 01803
http://198.1.119.239/~flyduco/rduaircraftnoise/noiseinfo/downloads/RDU_2003_DNL.pdf

Nevertheless, to quell the possibility that the May 2013 JGL noise sampling was atypical of routine FCLPs at OLFC, COER again commissioned Lilly to conduct a second set of samples in February 2016 with repeat sampling at two of the same sites and two additional sites not sampled in 2013 (also available at <http://citizensofebeysreserve.com/LinksAndFiles.html>).

Samples at the 2016 repeated sites produced almost identical results with the 2013 measurements, while the two new sites showed that noise was extremely consistent across the full approach path above Admirals Cove. The consistency (i.e., the standard deviation was very low) between the two independent sampling periods show that the JGL measurements were not anomalies but were reliable and valid, as explained by Lilly:

The primary purpose for this study was to determine if there is any significant difference in the measured noise levels when compared with the data collected in 2013. ...The fact that the measured change from 2013 to 2016 is less than half of the standard deviation of the maximum noise level within a single session suggests that the difference is insignificant. <JGL Acoustics>

It is also noteworthy that the JGL sound exposure levels (SELs) at position 1 and 6, which are under the path 32 approach over Admirals Cove) are very similar to the approach sound exposure levels (SELs) for Growlers stated in the 2005 AICUZ.

Further, based on a Navy study (Wyle Aircraft Noise Study dated October 2012), the Growler produces more low-frequency noise, on average 11 decibels, than the Prowler aircraft previously used by the Navy at Whidbey. This increased low-frequency noise has a greater impact on areas further from the base (i.e., San Juan Islands) because it travels further than high-frequency noise, which tends to get filtered out much more quickly than low frequencies.

COER also retained a well-known environmental and occupational health physician, Dr. James Dalgren, professor at UCLA and on the staff at Cedars Sinai Hospital in Los Angeles, to review the Lilly and Wyle sound data and advise as to the attendant health risks. His conclusion in July 2014 is that *"the Navy has created a public health emergency at Central Whidbey Island."* He went on to say:

"If there was a poisonous gas cloud over Central Whidbey and people were falling over dead, they would know why. But because the health impacts are more gradual and cumulative most citizens do not yet know why they are suffering more strokes, more severe strokes, strokes at a younger age, cardiovascular events such as arrhythmias, heart attacks, hypertension, psychological damage such as anxiety, depression and panic attacks, along with sleep disorders, weight gains, hearing loss, tinnitus, and in children, especially, troubling learning disorders and attention deficit disorder."

As per state and national guidelines and law addressing noise exposure, Coupeville has sustained noise levels above the “community exposure level” threshold. This is reflected in a review of the scientific literature on noise–health studies by experts at the University of Washington, which confirms that public health is a real issue of great concern under OLFC’s jet shadow. All of that extensive research information has been compiled and is available at http://citizensofebysreserve.com/Files/Community%20Aircraft%20Noise_A%20Public%20Health%20Issue.pdf.

It is clear that residents, visitors and those who work in the Reserve and its surrounds, especially in Central Whidbey, are put at health risk due to the adverse effects of toxic noise levels that they can be exposed to by Growler FCLP’s at the OLF. Increased Growler operations at the OLFC will only exacerbate those risks.

Low-Frequency Noise: Growler Worse than Prowler

All noise consists of pressure fluctuations in the air. Low-frequency noise (LFN) fluctuations occur between 20 and 160 times/sec. Most everyday sounds fluctuate much faster than this (up to 16,000 times/sec), so the term “low frequency” means the fluctuations are relatively slow compared with other types of sound. Said another way, in audiology, the measured range is restricted to the frequencies relevant to speech 125–8000 Hz (i.e., SI symbol for hertz, meaning “frequency” or specific to sound, “cycles per second”). Low-frequencies are loosely defined as those below this range, which are typically heard as a low rumble. Sometimes there is also a sensation of vibration or pressure on the ears.

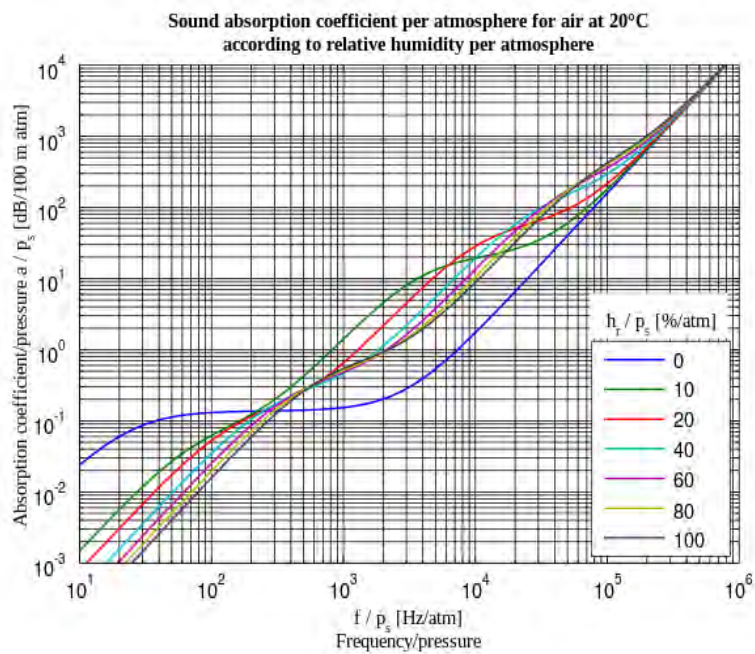
Low-frequency noise travels further than higher frequencies. That has to do with what's stopping the sound, a process referred to as “attenuation.” Sound is a pressure wave vibration of molecules. Whenever molecules are "pushed" they lose some energy to heat. Because of this, sound is lost to heating of the medium it is propagating through. The attenuation of sound waves is frequency-dependent in most materials, and this means that low frequencies are not absorbed at nearly the same rate as high frequencies, so low frequencies travel further through air. (https://en.wikibooks.org/wiki/Engineering_Acoustics/Outdoor_Sound_Propagation).

The Growler sound profile is substantially different from the Prowler. From the Navy’s own website: “The EA-18G has more low frequency content than the Prowler it is replacing. Close to the airfield, there might be a slight increase in potential for noise-induced vibration in areas where the peak sound levels exceed 110 dB.”

The 2012 Wyle noise study reiterates that:

The EA-18G Growler is recognizable by the low frequency “rumble” of its jet engines, whereas the EA-6B Prowler is associated with a higher frequency sound of its jet engines. With its increased low-frequency content, Growler take-off events have the higher potential to cause noise induced vibration. Noise-induced structural vibration may also cause annoyance to dwelling occupants because of induced secondary vibrations, or rattling of objects within the dwelling such as hanging pictures, dishes, plaques, and bric-a-brac. (p 1-15)

The graph depicts the attenuation of sound at difference frequencies (accounting for atmospheric pressure and humidity):



From Physics Stack Exchange

Sound propagation, especially through walls, is also affected by other relative hard surfaces, which is known as reflection. Reflection is also frequency-dependent. High frequencies are better reflected than low frequencies, which are able to pass through hard barriers.

According to Mireille Oud, a medical physicist in an article *Low-Frequency Noise: a biophysical phenomenon*, “there is no shielding against LFN. Since LFN propagation is mainly structure-borne, closing doors and windows is not effective. Earplugs are of no use, because LFN bypasses the eardrum.”¹¹

¹¹ Mireille Oud, *Low frequency Noise: a biophysical phenomenon*, Presented at Congress “Noise, Vibrations, Air Quality, Field & Building”, 6 November 2012, Nieuwegein, The Netherlands.

Impact of LFN on Structures and the Environment

According to Norman Lederman, MS, Director of Research & Development, Oval Window Audio¹², the commonly used A-weighted decibel metric, is scientifically inaccurate; the C-weighted metric should instead be used.

Low frequency noise pollution is an intrusive and unhealthy by product of aviation. In addition, the current acceptance of A weighted noise measurements largely understates the degree that low frequency noise pollution impacts the environment. For example, using A weighting...a low frequency noise of 50 Hz, which vibrates homes and is felt in the body, is under measured by 30 dB as compared to 1.3 dB in measurements taken with C weighting. Overall measurements are undermeasured by 7 8 dB A weighting as compared to C weighting...

Strong low frequency components produced by aircraft may rattle doors, windows, and other contents of houses. These secondary physical sound sources may be much more annoying than the original primary low frequency component the low frequency range of 15 400 Hz. It may then under predict perceived loudness by 7 to 8 dBA, relative to a 1,000 Hz target noise (Kjellberg & Goldstein, 1985).

And more recently a study¹³ of the impact of low-frequency sound on historic structures focused on a soundscape regime at the low end of the frequency spectrum (e.g., 10–25 Hz), which is inaudible to humans:

[N]onindigenous sound energy may cause noise induced vibrations structures. uch w frequency components may be of sufficient magnitude to pose damage risk potential to historic structures and cultural resources. Examples include Anasazi cliff and cave dwellings, and pueblo structures of vega type roof construction. Both are susceptible to noise induced vibration rom low frequency sound pressures that excite resonant frequencies in these structures. The initial damage mechanism is usually fatigue cracking. Many mechanisms are subtle, temporally multi phased, and not initially evident to the naked eye. This paper reviews the types of sources posing the greatest potential threat, their low frequency spectral characteristics, typical structural responses, and the damage risk mechanisms involved.

The adverse impacts of LFN on buildings was known and discussed in the Navy's 2012 EA,

¹² Norman Nederland, CO., USA in his article, *Aviation Low Frequency Noise of April 13, 2001*,

¹³ Louis C. Sutherland and Richard D. Horonjeff; Impact f w frequency sound on historic structures 2005. Noise Pollution Clearing House, <http://www.nonoise.org/index.htm>, **Report to Congress: Report of Effects of Aircraft Overflights on the National Park System EFFECTS ON CULTURAL AND HISTORIC RESOURCES, SACRED SITES, AND CEREMONIES, Chapter 4, September 4, 1994.**

which calls for special building codes to protect against such damage.

From all of the above, it follows that older buildings are at risk because they lack the necessary reinforcement against vibration. This problem as related to OLFC is exacerbated by LFN because it travels much further than higher frequencies. As a result, Growler LFN has potential to impact structures from low-level FCLP flight patterns at OLFC (paths 14 and 32). This is cause for serious preservation concerns in the town of Coupeville, Washington State's second oldest town, and recognized for its large number of examples of Victorian houses as well as, historic Reserve farm structures and clusters. Current FCLPs are already exposing these national historical treasures to undue vibrational deterioration, and an increase in FCLP is unacceptable if these structures are to be retained for future generations.

Low Frequency Noise (LFN) Impacts on APE Historic Properties

There is no doubt that absence of noise and the presence of sound contribute to the sense of place or setting of many heritage assets. For example, churchyards, burial mounds, ruined buildings can all have a very distinct sense of place which is at least partially the result of the absence, or at least recession, of the invasive sounds of jet noise. Soundscape is an important factor in the Reserve.

A variety of laws, executive orders, and regulations clearly charge the National Park Service (NPS), a partner in the Reserve, with preserving cultural resources and providing for their enjoyment "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Parks offer special opportunities for people to experience their cultural inheritance by offering special protection for cultural resources.

The NPS Management Policies recognize five broad categories of cultural resources, with many resources often classified into multiple categories.

1. Archeological resources are organized bodies of scientific evidence providing clues to the mystery of past events, primarily objects in context, ranging from household debris in a site from a past culture, to foundations of buildings, to pottery and tools, to paintings or writings.

2. Cultural landscapes are settings humans have created in the natural world showing fundamental ties between people and the land, ranging from formal gardens to cattle ranches, and from cemeteries or battlefields to village squares.

3. Structures are large, mechanical constructions that fundamentally change the nature of human capabilities, ranging from Anasazi cliff dwellings to statues, and from locomotives to temple mounds.

4. Museum objects are manifestations and records of behavior and ideas that span the breadth of human experience and depth of natural history, and may include archeological resources removed from the context where they were found.

5. Ethnographic resources are the foundation of traditional societies and the basis for cultural continuity, ranging from traditional arts and native languages, spiritual concepts and subsistence activities which are supported by special places in the natural world, structures with historic associations, and natural materials.

An important aspect of cultural resources is their non-renewability. If they lose significant material aspect, context, associations, and integrity, they are lost forever. The responsibility of the NPS is to minimize loss of pre-historic and historic material. Closely related but secondary responsibilities include maximizing the expression of historic character, integrating site development with natural processes, sustaining the lifeways of ethnic groups, increasing our knowledge of past human behavior, and supporting the interpretation of park resources.

Adverse aircraft overflight impacts on cultural resources entrusted to the NPS include physical impacts from vibrations, loss of historical or cultural context or setting, and interference with visitors' park experience. The term "adverse effect" has special meaning when used in association with historical properties. The definition put forth in The National Historic Preservation Act of 1966 states: *"An undertaking is considered to have an adverse effect when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."*

While physical impacts can permanently harm objects, impacts to context or setting, such as when aircraft fly over an 1800's reenactment or an ancient religious ceremony, can significantly reduce the associations and integrity of the objects, and the enjoyment and understanding of the cultural heritage.

Growler noise is both extremely loud and includes low-frequency vibrational noise. This adversely impacts and stands in the way of the National Park Service and the Ebey's National Historical Reserve Board fulfilling their mission and directives of protecting this non-renewable cultural resource of National importance today and for future generations.

The National Park Service, a partner in the Ebey's National Historical Reserve, has recently completed its own six week noise study which confirms data collected in two independent COER noise studies of actual noise from the Navy's Growlers flying in FCLP patterns at the OLF. These studies confirm the current significant and adverse impacts of jet noise in the Reserve and on its mission, as well as, on the structures and people living in the Reserve, and the thousands of annual visitors. Further, the Navy has made a decision NOT to measure actual noise

but to rely on modeled noise profiles, which generally predict lower decibel readings than actual measurements.

Based on the research presented in this analysis, including the Navy's own research of low-frequency sound, there is cause for real concern. The Navy's current operations, not to mention proposed operational increases at OLFC, represent potential adverse impacts on the 426 contributing fragile historic structures listed in the Reserve, as well as the cultural and historical heritage, soundscape, context, and visitor appreciation of the Reserve. These impacts will occur every time a jet flies over Central Whidbey. These impacts will include the farm clusters and historic homes and fine examples of Victorian architecture in historic Coupeville, Washington State's second oldest town. The Navy's 2005 EA listed some of these structures that were of concern at that time, demonstrating recognition for this issue. (see [Appendix A](#))

Island County and the citizen's of Island County have a long-term investment and commitment in the Reserve and have deemed it a priority in the goals and policies of the new Comprehensive Plan. The intrusion of the Navy's Growler jet noise into the Reserve's soundscape has considerable impact on Island County's ability to achieve the protection and pro-active preservation goals published in its Comprehensive Plan. The low-level jet noise degrades and negatively impacts the rural character and the economically important heritage resources within our agricultural, recreation and tourism industries -- so important to the community and to the thousands of visitors who visit the Reserve annually. The direct and indirect impacts and the secondary effects of Growler jet noise have costs associated and them --- and these are 106 issues for the Navy to investigate so that they will have no adverse impact.

Examples of Frequency & Effects on Human Health

Just as LFN vibration affects structures, those same vibrations invade the human body and impact its organ systems. The impacts of LFN on human health have been widely documented; the following are examples:

7 Hz: Supposedly the most dangerous frequency corresponding with the median alpha-rhythm frequencies of the brain. It has also been alleged that this is the resonant frequency of the body's organs; therefore, organ rupture and even death can occur at prolonged exposure.¹⁴

1–10 Hz: "Intellectual activity is first inhibited, blocked, and then destroyed. As the amplitude is increased, several disconcerting responses have been noted. These responses begin a complete

¹⁴ Organ Music Instills Religious Feelings,' by Jonathan Amos, 9/8/2003

neurological interference. The action of the medulla is physiologically blocked, its autonomic functions cease.”¹⁵

43–73 Hz: “...lack of visual acuity, IQ scores fall to 77% of normal, distortion of spatial orientation, poor muscular coordination, loss of equilibrium, slurred speech, and blackout.”¹⁶

50–100 Hz: “...intolerable sensations in the chest and thoracic region can be produced—even with the ears protected. Other physiological changes that can occur include chest wall vibration and some respiratory rhythm changes in human subjects, together with hypopharyngeal fullness (gagging). The frequency range between 50 and 100 Hz also produces mild nausea and giddiness at levels of 150–155 dB, at which point subjective tolerance is reached. At 150–155 dB or 0.63–1.1 kPa [Pa is the SI symbol for pascal or pressure/stress; k = kilo or 1000], respiration-related effects include substernal discomfort, coughing, severe substernal pressure, choking respiration, and hypopharyngeal discomfort.”¹⁷

100 Hz: At this level, a person experiences irritation, “mild nausea, giddiness, skin flushing, and body tingling.” Following this, a person undergoes “vertigo, anxiety, extreme fatigue, throat pressure, and respiratory dysfunction.”¹⁸

In researching impacts of low-frequency sound, numerous references were found, both old and recent, to demonstrate the well-known characteristics and adverse impacts of low-frequency sound—not assessed by the Navy in its 2012 EA.

The research strongly supports serious health effects of LFN like vertigo, disturbed sleep, stress, hypertension, and heart rhythm disorders. An excerpt¹⁹ had this to say:

Although the effects of lower intensities of low frequency noise are difficult to establish for methodological reasons, evidence suggests that a number of adverse effects of noise in general may be greater for low frequency noise than for the same noise energy in higher frequencies: loudness judgments and annoyance reactions are greater for low frequency noise than other noises for equal sound pressure level regardless of which weighting scheme is employed (Goldstein, 1994); annoyance is exacerbated by rattle or vibration induced by low frequency noise; speech intelligibility may be reduced more by low frequency noise than other noises (except those in the frequency range of speech itself because of the upward spread of masking) (Pickett, 1959; Loeb, 1986).

¹⁵ Gavreau V., “Sons graves intenses et infrasons” in: *Scientific Progres – la Nature* (Sept. 1968) p. 336-344

¹⁶ Gavreau V., “Sons graves intenses et infrasons” in: *Scientific Progres – la Nature* (Sept. 1968) p. 336-344

¹⁷ Acoustic Trauma: Bioeffects of Sound, by Alex Davies

¹⁸ Gavreau V., “Sons graves intenses et infrasons” in: *Scientific Progres – la Nature* (Sept. 1968) p. 336-344

¹⁹ Stalker, From a Short History of Sound Weapons Pt2: Infrasound, January 14, 2008

The following excerpts are from a study²⁰ summarizing 25 years of research on health impacts pertaining to LFN:

Abstract: Respiratory pathology induced by low frequency noise (LFN, < 500 Hz, including infrasound) is a novel subject even though in the 1960's, within the context of U.S. and U.S.S.R. Space Programs, other authors have already reported its existence. Within the scope of vibroacoustic disease (VAD), a whole body pathology caused by excessive exposure to LFN, respiratory pathology takes on specific features. Initially, respiratory pathology was not considered a consequence of LFN exposure; but today, LFN can be regarded as a major agent of disease that targets the respiratory system. The goal of this report is to put forth what is known to date on the clinical signs of respiratory pathology seen in VAD patients.

The methods explain, "Data from the past 25 years of research will be taken together and presented..." and the results section goes on to state:

In persons exposed to LFN in the job, respiratory complaints appear after the first 4 years of professional activity. At this stage, they disappear during vacation periods or when the person is removed from his/her workstation for other reasons. With long term exposure, more serious situations can arise, such as, atypical pleural effusion, respiratory insufficiency, fibrosis and tumors. There is no correlation with smoking habits. In LFN exposed animal models, morphological changes of the pleura, and loss of the phagocytic ability of pleural mesothelial cells (explaining the atypical pleural effusions). Fibrotic lesions and neo vascularization were observed along the entire respiratory tract. Fibrosis lesions and neovascularization were observed throughout the respiratory tract of the animals seen. Pre malignant lesions, metaplasia and dysplasia, were also identified.

And the authors go on in the discussion to explain, "LFN is an agent of disease and the respiratory tract is one of its preferential targets. The respiratory pathology associated with VAD needs further in-depth studies in order to achieve a greater understanding, and develop methods of pharmacological intervention."

Excerpts from another publication: Noise-induced extra-aural pathology: a review and commentary, Alves-Pereira M²⁰ further define LFN health effects.

Abstract: The focus of this review paper will be the effects of acoustic phenomenon (noise), characterized by large pressure amplitude ≥ 90 dB and low frequency (≤ 500 Hz) (LPALF) on humans and animal models. Current concepts imply the assumption that such LPALF noise impinges only on, through, the acoustic medium of the auditory system. As a consequence of this assumption, the effect of noise on humans is only regulated for purposes of hearing conservation. Guidelines and regulations governing occupational noise assessments are biased toward the subjective human perception of sound. The author will not make the assumption that airborne acoustic phenomena impacts only on the auditory system, and will present a literature

²⁰ Respiratory pathology in vibroacoustic disease: 25 years of research, Branco NA¹, Ferreira JR, Alves Pereira M.

review providing evidence for such position. The purpose of this review paper is to defend the existence of extra aural, noise induced pathology, particularly the vibroacoustic disease; and to advance the recognition that the respiratory tract could very well be a target organ of this environmental stressor.

An epidemiological survey²¹ examined low frequency noise from plant and appliances in or near domestic buildings by comparing to a control group of dwellings had comparable conditions to the test group except that there was no low frequency noise.

There were 27 individuals in the test group and 22 in the control group. The test group suffered more from their noise exposure than the control group did (as indicated in the table below); they were less happy, less confident and more inclined to depression, among others.

Symptom	Test group %	Control group %
Chronic fatigue	59	38
Heart ailments anxiety, stitch, beating palpitation	81	54
Chronic insomnia	41	9
Repeated headaches	89	59
Repeated ear pulsation, pains in neck, backache	70	40
Frequent ear vibration, eye ball and other pressure	55	5
Shortness of breath, shallow breathing, chest trembling	58	10
Frequent irritation, nervousness, anxiety	93	59
Frustration, depression, indecision	85	19
Depression	30	5

The World Health Organization recognizes the special place of low frequency noise as an environmental problem. Its publication on Community Noise²² (Berglund et al., 2000) makes a number of references to low frequency noise:

"For noise with a large proportion of low frequency sounds a still lower guideline (than 30dBA) is recommended."

"When prominent low frequency components are present, noise measures based on A weighting are inappropriate."

²¹ Alves Pereira M' Noise induced extra aural pathology: a review and commentary, 1999

Mirowska and Mroz. 2000. As reported in https://www.windwatch.org/documents/review_of_published_research_on_low_frequency_noise_and_its_effects/

²² World Health Organization, Guidelines for Community Noise, edited by B. Berglund, T. Lindvall, and D. H. Schuella, Cluster of Sustainable Development and Healthy Environment, Department of the Protection of the Human Environment, Occupational and Environmental Health, Geneva, Switzerland, 1999.

"Since A weighting underestimates the sound pressure level of noise with low frequency components, a better assessment of health effects would be to use C weighting."

"It should be noted that a large proportion of low frequency components in a noise may increase considerably the diverse effects on health."

"The evidence on low frequency noise is sufficiently strong to warrant immediate concern."

It is important to note that while the intensity of Growlers practice at OLFC is episodic, the sound intensity far exceeds anything like the intensity the subjects above experienced.

The more research that is done on LFN, the more we know about new negative health impacts. There seems to be little good news here. Navy caution over potential harm to civilian populations seems well advised as a way forward – especially in the Reserve where thousands of people visit from around the world.

Navy's Hearing Conservation Zones: Noise Equals Risk & Adverse Impact

If the areas under the OLFC racetrack were a Navy site, many residents would mandatorily be part of a "*Hearing Conservation Program*"²³ because they are in what the Navy calls a "*Hazardous Noise Area.*" The Navy identifies hazardous noise areas wherever the 8-hour time-weighted average noise exceeds 85 dB for more than 2 days in any month. Military and civilian personnel working in such areas are automatically enrolled and identified as "*At Risk,*" and must undergo frequent hearing tests and health monitoring.

The noise levels made by Growlers on path 32 over Ebey's Reserve as recorded by JGL Acoustics documented sound levels of over 130 dB. The JGL data were examined by another COER-retained noise expert Paul Schomer (Standards Director, Emeritus, of the Acoustical Society of America). Simplified, Dr. Schomer revealed that folks under path 32 are experiencing well over the Navy's threshold for designation of a Hearing Conservation Zone.

For example, in 14 days in July 2012 there were 1122 FCLP overflights, or an average of 80 overflights for each flying day that month. The noise that residents experienced that July exceeded the Navy's Hearing Conservation Zone threshold by more than 7 fold.

What the Navy is required to do for civilian and military folks in their Hearing Conservation Program has five components:

²³ Navy and Marine Corps Public Health Center Technical Manual NMCPHC – TM 6260.51.99-2. Navy Medical Department Hearing Conservation Program Procedures. Navy and Marine Corps Public Health Center, September 15, 2008. http://www.public.navy.mil/surfor/Documents/6260_51_99_2_NMCPHC_TM.pdf

1. **On-Site Noise Measurement**, to identify noise exposure levels and spatial variations.
2. **Engineering Controls**, to reduce the potential hazard to the maximum extent feasible.
3. **Annual Personnel Testing**, to enable timely audiological and medical evaluation.
4. **Hearing Protective Devices**, to be provided and fit to each individual and to be worn until and unless effective engineering controls mitigate the noise hazard.
5. **Education of Personnel**, as required regarding the impacts of noise hazards on human health and proper use and care of hearing protective devices.

However, there is NO protection program at all for those civilian residents routinely exposed in the Reserve or for Reserve visitors unknowingly exposed, and the mere existence of the DOD program acknowledges the existence of a health risk problem --- as a result of noise.

A Final Correction

Commander Moore, in his request for comment on this 106 Process, infers that OLFC has been used by the Navy for 74 years, which is off by nearly 25 years. To clarify, the Navy reactivated this 1943 WWII emergency landing strip in the late 1960s for FCLP use. In the intervening 50 or so years, while the jets evolved into the now fastest and loudest jets ever operated by the Navy -- the population density in Central Whidbey and around the OLF increased, the Reserve was created, and the highway was expanded that is located along side the OLF through the entrance to the Reserve.

The often-stated claim that the “Navy was here first” grossly misrepresents actual history and insults the Skagit Indians (one of four groups of Salish Indians), the European settlers, and the founding families of the historic town of Coupeville – the second oldest town in Washington State and establishment of the Ebey’s National Historical Reserve. The Navy is actually a Johnny-come-lately to Whidbey Island. And to Central Whidbey.

Even Admirals Cove, a community of over 600 properties lying directly under the FCLP approach, was planned and initiated in the mid-1960s, at which time public records show the Navy was intending to release OLFC to Island County. It was even offered to the developers of Admirals Cove, but they declined, not realizing that inaction by the County would fail to obtain OLFC for public use. So, even when Admirals Cove was developed, the Navy’s plans for the outlying field were conversion to nonmilitary use, and even after OLFC was reactivated in 1967, the Navy's use was supposed to be part-time along with civilian use.

While the Navy infers that its presence grants it some sort of grandfather rights, under that logic the grandfather rights really belong to those preceding the Navy. But, of course, neither argument is constructive or logical. What has happened here is the pure absence of foresight and meaningful planning, both by politicians and by the Navy, to address changes in military jets and demographics and to mitigate encroachment on the civilian community and its cultural history

and structures. Also, the Navy has an inconsistent record for following its own procedures and policies, providing itself with maximum use, instead of a negotiated, compromised or reconciled use. Additionally, indirect impacts on the contested Area of Impact have not been addressed by the Navy, nor can they be addressed because of the inappropriate noise metrics used to measure impact and effect mentioned already in the above comments.

While the development surrounding OLFC is too entrenched and important to move at this point, nor certainly can the historic and culturally significant structures and family relationships with the land in the Reserve, Growlers do and can move. The Navy can do Growler FCLP sessions at many other locations that will not impact a nationally significant cultural and historical resource.

CONCLUSION:

The Board of Directors of Citizens of Ebey's Reserve (COER), given (1) the inadequacies of the Navy's noise data and its reliance on an improper single noise metric (DNL based on LFN-masking dBA scale), and (2) based on the noise impacts on visitor and resident health and related annoyance and the long-term structural integrity of historic buildings of the Reserve, do hereby recommend that all FCLPs at OLFC and low-level fights over the Reserve be discontinued and redirected to an appropriate remote and environmentally insensitive location.

The Navy's use of the wrong measuring metric fails to measure the impacts on the Reserve and therefore makes it impossible to determine the Area of Potential Impact, which we strongly believe actually includes most of Central Whidbey – not just the area under flight path 32 and 14 at the OLFC. Until this is rectified, the Growler/Reserve 106 process cannot proceed with any veracity nor meet the requirements of this federal process.

We believe that the facts and data clearly demonstrate that there already is significant adverse impact on the Reserve and its environs from Growler jet noise and that additional flights and training proposed over the Reserve by the Navy will make the mission of the Ebey's Reserve and the preservation goals of Island County impossible to achieve.

—APPENDIX A —

NASWI 2005 EA: Table 3-26 NRHP-Listed Historic Sites at Ebey’s Landing National Historic Reserve Currently Located within the ≥ 65 -dB DNL and are of high concern for low-level noise impacts on fragile historic structures. These properties are all at risk and each should be surveyed and monitored for on-going current impacts.²⁴

Noise Zone (CY 2003 and CY 2013)

CY 2003

Newcomb Property
Bergman House
Benson House
Hughes House
Bradt House

Island County (outside town of Coupeville)

CY 2003

Reuble Farm
John Kineth Farmhouse
Sam Keith House
Wiley Place
Strong Granary
Old Anderson Place
Grove Terry Place
Fort Casey Housing/Myers House
Fort Casey Pump House
C. Wanamaker House
J. Gould House/Miller House
Strong House
Gilbert Place/Eggerman House
Gillespie House
Sam Crockett House
H. Crockett House/Boyer Farm

CY 2013

Reuble Farm
John Kineth Farmhouse
Sam Keith House
Wiley Place
Strong Granary
Old Anderson Place
Grove Terry Place
Fort Casey Housing/Myers House
Fort Casey Pump House
C. Wanamaker House
J. Gould House/Miller House
Strong House
Gilbert Place/Eggerman House
Gillespie House
Sam Crockett House
H. Crockett House/Boyer Farm
Col. W. Crockett Farmhouse
Thomas Sullivan House
Engle Farm

* Source: Kwarsick 2004; Island County Department of Planning and Community Development 2004

²⁴ FROM The NAS Whidbey Island’s 2005 EA.

In addition, NAS Whidbey Island should agree to provide historical documentation for the Kellogg House, a historic house that once occupied the OLF site and was the residence of a physician known as “the Canoe Doctor.”

Island County’s Comprehensive Plan supports the Goals & Policies of Ebey’s Reserve.

Washington State’s Growth Management Act outlines thirteen goals that communities must plan by; Goal 13 is to “identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.” Few communities however, have thoroughly addressed historic preservation in their Comprehensive Plans. Given the abundance of Island County’s historic resources, historic preservation is a high priority within the community and several sections of the new Comprehensive Plan include the preservation of Ebey’s Reserve.

5.3 EBHEY’S LANDING HISTORIC RESERVE

National Reserves are geographic areas containing nationally significant resources in which federal, state and/or local agencies, along with the private sector, work cooperatively to manage, protect and interpret the resources.

Ebey’s Landing National Historical Reserve (Reserve) was established by an act of Congress in 1978 in order “to preserve and protect a rural community which provides an unbroken historic record from nineteenth century exploration and settlement of Puget Sound up to the present time.” (Public Law 95 625, November 10, 1978). The Reserve, is one of the only remaining area in the Puget Sound region here road spectrum of Northwest history clearly visible in the landscape that lived and actively armed. Most of the land remains in private ownership, while retaining its historic, cultural, and rural character.

The Reserve is nationally significant; when it was established, it represented a new approach to preserving land and heritage resources. This new approach recognized that local government, including land county the government and residents) as always been a partner in the Reserve.

The Reserve’s distinct landscape, rural character and heritage resources are economically important in our agricultural, recreation and tourism industries, socially important in our community, and worthy of proactive Preservation.

... The Reserve’s boundaries reflect this history and are the same as those of the Central Whidbey Island Historic District established in 1973, which were based on the settlement patterns resulting from the Public Lands Survey Act of 1850, also known as the Donation Land Claim Act. The legislation points to the fact that this is a community that has evolved from early exploration to the present and consists of descendants of original settlers as well as new residents. As such, the Reserve cannot be interpreted from one specific point in time. In addition, most of the land is privately owned, with the rest a combination of local, state, and federal ownership; creating a unique set of circumstances. The NPS has purchased little land within the Reserve, but has actively acquired scenic easements on farms and important open spaces. The concept of the Reserve was a community effort and participating in land protection is voluntary in the part of private landowners. This has been a key to the Reserve’s success

the community.

The impetus to protect central Whidbey began from local citizens' initiative to protect Ebey's Prairie from inappropriate development and is well documented in the Reserve's administrative history. The concept of a national historical reserve was viewed as a way to preserve open space with a minimum disturbance to private landowners—to provide initial federal support without threatening local autonomy.

Goal 1. Actively participate as a partner in Ebey's Landing National Historical Reserve in order to "preserve and protect a rural community which provides an unbroken historical record from 19th century exploration and settlement in Puget Sound to the present time" (Public Law 95 625, November 10, 1978).

Goal 2. To identify Island County's archaeological resources, and to protect and preserve the cultural, historical, social, educational, and scientific value of these resources in a manner that respects their cultural significance.



EBEY'S LANDING
NATIONAL HISTORICAL RESERVE

Trust Board Members

Wilbur Bishop, Chair

Mark Sheehan, Vice Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Hank Florence

Jan Pickard

Lisa Meserole

Jon Crimmins

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

National Park Service

Washington State Parks

Island County

Town of Coupeville

Post Office Box 774
Coupeville, WA 98239
Phone (360) 678-6084
www.nps.gov/ebla

To: Kendall Campbell, NASWI Cultural Resources Program Manager

From: Trust Board of Ebey's Landing National Historical Reserve

Date: September 28, 2016

Subject: NHPA Section 106 comments on the proposed definition of the APE for the continuation and increase in the EA-18G Growler Operation at NASWI (letter of June 30, 2016, 5090, Ser N44/1450).

Ebey's Landing National Historical Reserve (the Reserve) is an area of nationally significant historic resources with boundaries defined by the Central Whidbey Island Historic District. The Trust Board of Ebey's Landing National Historical Reserve oversees the administration and management of the Reserve, as provided by the 1978 National Parks and Recreation Act, P.L. 95-625, and an Interlocal Agreement of July 26, 1988 between Island County, the Town of Coupeville, The Washington State Parks and Recreation Commission, and the National Park Service. The following comments are provided on behalf of the Trust Board in response to a request for comment on the process for determining the Area of Potential Effect as part of Section 106 Review for continued and increased EA-18G Growler Operation at NASWI.

The Trust Board does not agree that the current process for measuring Growler operation noise impacts is appropriate as an APE for this undertaking.

As noted in previously submitted comments for the EA-18G Growler Operation EIS (in process), the Trust Board is concerned that the 65 dB DNL contours may not fully characterize noise exposure and impacts (direct and indirect) to the Reserve's resources, values and/or visitor experience. This would require the use of metrics such as "time audible" and "time above," maximum A-weighted sound level, sound exposure level, equivalent sound level, and number-of-events-above a specified sound level.

More specifically, noise assessment and analysis should include not only noise propagation computer models but also actual ground measurement of intensity, frequency, and vibration as they are experienced by Reserve users, historic structures and other resources both directly under and immediately adjacent to over flights; should be measured at a wide range of locations within the Reserve, including locations associated with Growler noise complaints; should consider and report measured (not presumed) altitudes of the Growlers over the same during ascent, cruising, and descent; and should include on-ground intensity, duration and frequency measurements from multiple locations for entire touch and go training sessions at OLF, rather than include or average measurements during non-active periods.

Day-Night Average Sound Level is one measurement that the federal government can use for evaluating community noise impacts but in this case, there is concern it will not provide data adequate to define and evaluate impact to the Reserve.

The Trust Board of Ebey's Landing National Historical Reserve appreciates the opportunity to provide input during this Section 106 review and looks forward to further consultation on this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kristen Griffin".

Kristen Griffin, Reserve Manager
Trust Board of Ebey's Landing National Historical Reserve

Cc: file



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1806
August 31, 2016

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: ACHP LOG NO. 008500: CLARIFICATION OF THE SECTION 106 PROCESS FOR THE CONTINUATION AND INCREASE OF EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

In order to facilitate your participation in the section 106 consultation process for the proposed continuation and increase of EA-18G Growler operations at Naval Air Station Whidbey Island (NAS Whidbey Island), the Navy would like to offer you this overview of the section 106 consultation process and a description of our proposed plan to meet federal statutory responsibilities under the National Historic Preservation Act (NHPA) of 1966, as amended.

Per the NHPA, and its implementing regulations 36 CFR 800, the Navy, as a federal agency, is required to take into account the effects of an undertaking on historic properties included in or eligible for inclusion in the National Register of Historic Places (NRHP). Given the nature and scope of this undertaking, and the public interest in historic properties within the Area of Potential Effect (APE), the Navy will be offering ample opportunity for consulting parties to comment throughout the section 106 consultation process. The section 106 process consists of four steps:

1. DETERMINING THE UNDERTAKING:

The Navy has determined that the proposed action qualifies as an undertaking that is of a type that has the potential to effect historic properties.

2. DEFINING THE AREA OF POTENTIAL EFFECT (APE):

Currently, the Navy is requesting comments on the proposed approach to defining the Area of Potential Effect (APE). After comments have been received, and when updated noise model studies for the Environmental Impact Statement (EIS) have been completed, the Navy will define the APE, provide maps to all consulting parties for further comment, and request SHPO concurrence on the APE.

3. IDENTIFY AND EVALUATE HISTORIC PROPERTIES WITHIN THE APE:

Following defining the APE, the Navy will introduce their methodology for identifying historic properties and assessing the historic significance of resources that have not yet been evaluated for eligibility in the NRHP. All consulting parties will have the opportunity to comment on the proposed methodology prior to the Navy identifying and evaluating historic properties within the APE and requesting SHPO concurrence on determinations of eligibility.

4. DETERMINATION OF EFFECT:

The fourth step in the section 106 consultation process is to determine if the undertaking has an adverse effect on the identified historic properties within the APE. The Navy will provide our finding of effect to all consulting parties for comment prior to preparing a final finding of effect for SHPO concurrence

5090
Ser N44/1806
August 31, 2016

For a more detailed explanation of this process and the federal regulations and requirements that guide it please refer to Enclosures 1 and 2. Please find a copy of the implementing regulations 36 CFR 800 in Enclosure 3.

The time required to complete the section 106 consultation process can be influenced by other federal regulations and requirements outside of the NHPA. For the proposed continuation and increase of EA-18G Growler operations at NAS Whidbey Island section 106 consultation is being done in coordination with the National Environmental Policy Act (NEPA) review and preparation of an Environmental Impact Statement (EIS). The EIS will analyze the potential socio/economic, health, natural resource, and cultural resource impacts, whereas the section 106 process focuses specifically on potential effects to historic properties. Through coordination of these two federal processes the Navy seeks to increase the efficiency and effectiveness of each process by sharing information and documents while decreasing duplication of effort. In addition, coordinating the NHPA and NEPA processes allows for the promotion of greater transparency and potential for public involvement.

For this undertaking the section 106 consultation will provide the EIS team information to ensure historic properties are appropriately analyzed in the NEPA review. The EIS provides specialized studies to fill data gaps that meet information standards for the section 106 consultation. For this undertaking, the EIS will provide updated noise study models for the proposed action, which are necessary to facilitate section 106 consultation, particularly in defining the APE.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil. We appreciate your comments on the continuation and increase of EA-18G Growler operations at NAS Whidbey Island and look forward to continued section 106 consultation.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

Enclosures: 1. Continuation and Increase of Growler Operation Section 106 Consultation Process / Strategy
 2. Continuation and Increase of Growler Operation Section 106 Consultation Process / Strategy
 Flow Chart
 3. 36 CFR 800

Continuation and Increase of EA-18G Growler Operations: Section 106 Consultation Process / Strategy

1. Establish Undertaking [36 CFR 800.3(a)]: An undertaking is a “project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency...” [36 CFR 800.16(y)].

- The undertaking for the Continuation and Increase to Growler Operations is to:
 - continue and expand existing Growler operations at the Naval Air Station (NAS) Whidbey Island complex , which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field (OLF) Coupeville;
 - increase electronic attack capabilities (provide for an increase of 35 or 36 aircraft) to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment;
 - construct and renovate facilities at Ault Field to accommodate additional Growler aircraft; and
 - station additional personnel and their family members at the NAS Whidbey Island complex and in the surrounding community, beginning as early as 2017.
- Navy Cultural Resource staff determined this undertaking to be the type of activity that “has the potential to cause effects on historic properties” [36 CFR 800.3(a)]. In October 2014, the Navy initiated section 106 consultation and invited interested parties to consult on the undertaking. Navy Cultural Resource staff were present at National Environmental Policy Act (NEPA) scoping meetings seeking public comments on the undertaking.

2. Determine the Area of Potential Effect [36 CFR 800.4(a)]: The Area of Potential Effect (APE) is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” [36 CFR 800.16(d)].

- Given the nature and size of the undertaking, as well as coordination with the NEPA review process, the Navy asked consulting parties for comments on the proposed approach to defining the APE in June and July of 2016.
- When the Draft EIS is released to the public for comment (anticipated 30 September 2016), noise model studies included in the EIS will be used to define the APE and create a map of the APE based on the most expansive 65 dB DNL contours for all of the combined proposed alternatives. Maps of the proposed finalized APE will be sent to consulting parties for additional comments and considerations. The Washington State Historic Preservation Office (SHPO) will be asked to concur on the proposed finalized definition of the APE.
 - *The proposed and final definition of the APE is subject to Federal Aviation Administration (FAA) regulations (14 CFR 150).*

3. Identify Historic Properties and Evaluate Historic Significance [36 CFR 800.4(b) & 36 CFR 800.4(c)]: Based on comments received from consulting parties on the definition of the APE, the Navy will “make a reasonable and good faith effort to carry out appropriate identification efforts” of historic properties within the APE [36 CFR 800.4(b)(1)]. The Navy will also “apply National Register criteria (36 CFR 63) to properties identified within the [APE] that have not been previously evaluated for National Register eligibility” [36 CFR 800.4(c)(1)].

- A historic property “means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places...” [36 CFR 800.16(1)(1)]
- Once the APE has been defined and the Washington SHPO has concurred, the Navy will send out their proposed methodology for identifying historic properties and evaluating historic significance to all consulting parties. Consulting parties will have the opportunity to comment on the proposed methodology.
- Once comments have been received and taken into consideration, the Navy will identify historic properties and evaluate historic significance based on the finalized methodology. The final identification and evaluation report will be submitted to consulting parties.
 - Due to confidentiality requirements for archaeological sites and properties of traditional, religious, and cultural importance, the status of some historic properties may be withheld from consulting parties [36 CFR 800.11(c)].

4. Finding of Effect [36 CFR 800.4(d)]: If the Navy “finds that there are historic properties which may be affected by the undertaking, the [Navy] shall notify all consulting parties...and assess adverse effects, if any, in accordance, with 36 CFR 800.5” [36 CFR 800.4.(d)(2)].

- The Navy “shall apply the criteria of adverse effect to historic properties within the [APE]” [36 CFR 800.5(a)] and report their findings to all consulting parties for comments.
- Once comments have been received and taken into consideration, the Navy will send out the final finding of effect to all consulting parties and ask for Washington SHPO concurrence.
- In the event the Navy determines an Adverse Effect, the Navy shall follow 36 CFR 800.6 to resolve adverse effects to historic properties through avoidance, minimization, or mitigation.

ENCLOSURE 1.

Section 106 Consultation Process for the Continuation and Increase of EA-18G Growler Operations at NAS Whidbey Island / Strategy Flow Chart

Navy: Established the proposed continuation and increase of EA-18G Growlers at NAS Whidbey Island is an undertaking of the type that “has the potential to cause effects on historic properties”. Began section 106 consultation by notifying SHPO, ACHP, and consulting parties. (October 2014)

Public Consultation: To meet section 106 public notification requirements, public comments on section 106 were solicited and accepted at NEPA scoping meetings. (October/December 2014)



Navy: Consult with SHPO, ACHP, and consulting parties on the proposed approach to defining the Area of Potential Effect (APE) and ask for comments. (June/July 2016)

Consulting Parties: Provide Navy comments on proposed approach to defining the APE.

Navy: Take comments into consideration and using updated noise modeling maps from the Draft EIS, define the APE. Provide final APE to consulting parties for further comments and ask for SHPO concurrence. (Fall 2016)

Public Consultation: Navy will solicit and accept public comments on section 106 consultation during public meetings on the Draft EIS.

Consulting Parties: Provide Navy comments on the definition of the APE. SHPO has 30 days to respond to the Navy.



Navy: Make a “good and reasonable faith” effort to identify historic properties within the APE and apply National Register eligibility criteria to unevaluated properties within the APE. Share proposed methodology for identification and evaluation with SHPO, ACHP, and consulting parties for comments.

Consulting Parties: Provide Navy comments on proposed methodology for identifying and evaluating historic properties within the APE.

Navy: Take comments into consideration and identify and evaluate historic properties within the APE. Submit findings to consulting parties for comments and ask for SHPO concurrence.

Consulting Parties: Provide Navy comments on the identification and evaluation of historic properties. SHPO has 30 days to respond to the Navy.



Navy: Apply the criteria of adverse effect to determine if the undertaking will have an adverse effect to historic properties. Share proposed finding with SHPO, ACHP, and consulting parties for comments.

Consulting Parties: Provide Navy comments on the proposed finding of effect.

Navy: Take comments into consideration and submit final finding of effect to consulting parties and ask for SHPO concurrence.

Consulting Parties: Provide Navy comments on the finding of effect. SHPO has 30 days to respond to the Navy.

Public Consultation: Navy will accept public comments on section 106 consultation during the comment period for the Final EIS.



Navy: In the event Navy determines an Adverse Effect finding, the Navy shall follow 36 CFR 800.6 to resolve adverse effects to historic properties through avoidance, minimization, or mitigation.

Public Consultation: Please note, Navy will accept comments on section 106 consultation at anytime.

36 CFR PART 800 -- PROTECTION OF HISTORIC PROPERTIES (incorporating amendments effective August 5, 2004)

Subpart A -- Purposes and Participants

Sec.

- 800.1 Purposes.
- 800.2 Participants in the Section 106 process.

Subpart B -- The Section 106 Process

- 800.3 Initiation of the section 106 process.
- 800.4 Identification of historic properties.
- 800.5 Assessment of adverse effects.
- 800.6 Resolution of adverse effects.
- 800.7 Failure to resolve adverse effects.
- 800.8 Coordination with the National Environmental Policy act.
- 800.9 Council review of Section 106 compliance.
- 800.10 Special requirements for protecting National Historic Landmarks.
- 800.11 Documentation standards.
- 800.12 Emergency situations.
- 800.13 Post-review discoveries.

Subpart C -- Program Alternatives

- 800.14 Federal agency program alternatives.
- 800.15 Tribal, State and Local Program Alternatives. (Reserved)
- 800.16 Definitions.
- Appendix A – Criteria for Council involvement in reviewing individual section 106 cases

Authority: 16 U.S.C. 470s.

Subpart A-Purposes and Participants

§ 800.1 Purposes.

(a) *Purposes of the section 106 process.* Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings. The procedures in this part define how Federal agencies meet these statutory responsibilities. The section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of

project planning. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.

(b) *Relation to other provisions of the act.* Section 106 is related to other provisions of the act designed to further the national policy of historic preservation. References to those provisions are included in this part to identify circumstances where they may affect actions taken to meet section 106 requirements. Such provisions may have their own implementing regulations or guidelines and are not intended to be implemented by the procedures in this part except insofar as they relate to the section 106 process. Guidelines, policies and procedures issued by other agencies, including the Secretary, have been cited in this part for ease of access and are not incorporated by reference.

(c) *Timing.* The agency official must complete the section 106 process "prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license." This does not prohibit agency official from conducting or authorizing nondestructive project planning activities before completing compliance with section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties. The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking.

§ 800.2 Participants in the Section 106 process.

(a) *Agency official.* It is the statutory obligation of the Federal agency to fulfill the requirements of section 106 and to ensure that an agency official with jurisdiction over an undertaking takes legal and financial responsibility for section 106 compliance in accordance with subpart B of this part. The agency official has approval authority for the undertaking and can commit the Federal agency to take appropriate action for a specific undertaking as a result of section 106 compliance. For the purposes of subpart C of this part, the agency official has the authority to commit the Federal agency to any obligation it may assume in the

implementation of a program alternative. The agency official may be a State, local, or tribal government official who has been delegated legal responsibility for compliance with section 106 in accordance with Federal law.

(1) *Professional standards.* Section 112(a)(1)(A) of the act requires each Federal agency responsible for the protection of historic resources, including archeological resources, to ensure that all actions taken by employees or contractors of the agency shall meet professional standards under regulations developed by the Secretary.

(2) *Lead Federal agency.* If more than one Federal agency is involved in an undertaking, some or all the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part.

(3) *Use of contractors.* Consistent with applicable conflict of interest laws, the agency official may use the services of applicants, consultants, or designees to prepare information, analyses and recommendations under this part. The agency official remains legally responsible for all required findings and determinations. If a document or study is prepared by a non-Federal party, the agency official is responsible for ensuring that its content meets applicable standards and guidelines.

(4) *Consultation.* The agency official shall involve the consulting parties described in paragraph (c) of this section in findings and determinations made during the section 106 process. The agency official should plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement and coordinated with other requirements of other statutes, as applicable, such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation. The Council encourages the agency official to use to the extent possible existing agency procedures and mechanisms to fulfill the consultation requirements of this part.

(b) *Council.* The Council issues regulations to implement section 106,

provides guidance and advice on the application of the procedures in this part, and generally oversees the operation of the section 106 process. The Council also consults with and comments to agency officials on individual undertakings and programs that affect historic properties.

(1) *Council entry into the section 106 process.* When the Council determines that its involvement is necessary to ensure that the purposes of section 106 and the act are met, the Council may enter the section 106 process. Criteria guiding Council decisions to enter the section 106 process are found in appendix A to this part. The Council will document that the criteria have been met and notify the parties to the section 106 process as required by this part.

(2) *Council assistance.* Participants in the section 106 process may seek advice, guidance and assistance from the Council on the application of this part to specific undertakings, including the resolution of disagreements, whether or not the Council is formally involved in the review of the undertaking. If questions arise regarding the conduct of the section 106 process, participants are encouraged to obtain the Council's advice on completing the process.

(c) *Consulting parties.* The following parties have consultative roles in the section 106 process.

(1) *State historic preservation officer.*

(i) The State historic preservation officer (SHPO) reflects the interests of the State and its citizens in the preservation of their cultural heritage. In accordance with section 101(b)(3) of the act, the SHPO advises and assists Federal agencies in carrying out their section 106 responsibilities and cooperates with such agencies, local governments and organizations and individuals to ensure that historic properties are taking into consideration at all levels of planning and development.

(ii) If an Indian tribe has assumed the functions of the SHPO in the section 106 process for undertakings on tribal lands, the SHPO shall participate as a consulting party if the undertaking takes place on tribal lands but affects historic properties off tribal lands, if requested in accordance with § 800.3(c)(1), or if the Indian tribe agrees to include the SHPO pursuant to § 800.3(f)(3).

(2) *Indian tribes and Native Hawaiian organizations.*

(i) *Consultation on tribal lands.*

(A) *Tribal historic preservation officer.* For a tribe that has assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act, the tribal historic preservation officer (THPO) appointed or designated in accordance with the act is the official representative for the purposes of section 106. The agency official shall consult with the THPO in lieu of the SHPO regarding undertakings occurring on or affecting historic properties on tribal lands.

(B) *Tribes that have not assumed SHPO functions.* When an Indian tribe has not assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act, the agency official shall consult with a representative designated by such Indian tribe in addition to the SHPO regarding undertakings occurring on or affecting historic properties on its tribal lands. Such Indian tribes have the same rights of consultation and concurrence that the THPOs are given throughout subpart B of this part, except that such consultations shall be in addition to and on the same basis as consultation with the SHPO.

(ii) *Consultation on historic properties of significance to Indian tribes and Native Hawaiian organizations.* Section 101(d)(6)(B) of the act requires the agency official to consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking. This requirement applies regardless of the location of the historic property. Such Indian tribe or Native Hawaiian organization shall be a consulting party.

(A) The agency official shall ensure that consultation in the section 106 process provides the Indian tribe or Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking's effects on such properties, and participate in the resolution of adverse effects. It is the responsibility of the agency official to make a reasonable and good faith effort to identify Indian tribes and Native Hawaiian organizations that shall be consulted in the section 106 process. Consultation should commence early in the planning process, in order to identify and discuss relevant

preservation issues and resolve concerns about the confidentiality of information on historic properties.

(B) The Federal Government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes, and court decisions. Consultation with Indian tribes should be conducted in a sensitive manner respectful of tribal sovereignty. Nothing in this part alters, amends, repeals, interprets or modifies tribal sovereignty, any treaty rights, or other rights of an Indian tribe, or preempts, modifies or limits the exercise of any such rights.

(C) Consultation with an Indian tribe must recognize the government-to-government relationship between the Federal Government and Indian tribes. The agency official shall consult with representatives designated or identified by the tribal government or the governing body of a Native Hawaiian organization. Consultation with Indian tribes and Native Hawaiian organizations should be conducted in a manner sensitive to the concerns and needs of the Indian tribe or Native Hawaiian organization.

(D) When Indian tribes and Native Hawaiian organizations attach religious and cultural significance to historic properties off tribal lands, section 101(d)(6)(B) of the act requires Federal agencies to consult with such Indian tribes and Native Hawaiian organizations in the section 106 process. Federal agencies should be aware that frequently historic properties of religious and cultural significance are located on ancestral, aboriginal, or ceded lands of Indian tribes and Native Hawaiian organizations and should consider that when complying with the procedures in this part.

(E) An Indian tribe or a Native Hawaiian organization may enter into an agreement with an agency official that specifies how they will carry out responsibilities under this part, including concerns over the confidentiality of information. An agreement may cover all aspects of tribal participation in the section 106 process, provided that no modification may be made in the roles of other parties to the section 106 process without their consent. An agreement may grant the Indian tribe or Native Hawaiian organization additional rights to participate or concur in agency decisions in the section 106 process beyond those specified in subpart B of this part. The agency official shall

provide a copy of any such agreement to the Council and the appropriate SHPOs.

(F) An Indian tribe that has not assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act may notify the agency official in writing that it is waiving its rights under § 800.6(c)(1) to execute a memorandum of agreement.

(3) *Representatives of local governments.* A representative of a local government with jurisdiction over the area in which the effects of an undertaking may occur is entitled to participate as a consulting party. Under other provisions of Federal law, the local government may be authorized to act as the agency official for purposes of section 106.

(4) *Applicants for Federal assistance, permits, licenses and other approvals.* An applicant for Federal assistance or for a Federal permit, license or other approval is entitled to participate as a consulting party as defined in this part. The agency official may authorize an applicant or group of applicants to initiate consultation with the SHPO/THPO and others, but remains legally responsible for all findings and determinations charged to the agency official. The agency official shall notify the SHPO/THPO when an applicant or group of applicants is so authorized. A Federal agency may authorize all applicants in a specific program pursuant to this section by providing notice to all SHPO/THPOs. Federal agencies that provide authorizations to applicants remain responsible for their government to government relationships with Indian tribes.

(5) *Additional consulting parties.* Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.

(d) *The public.*

(1) *Nature of involvement.* The views of the public are essential to informed Federal decisionmaking in the section 106 process. The agency official shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and

the relationship of the Federal involvement to the undertaking.

(2) *Providing notice and information.* The agency official must, except where appropriate to protect confidentiality concerns of affected parties, provide the public with information about an undertaking and its effects on historic properties and seek public comment and input. Members of the public may also provide views on their own initiative for the agency official to consider in decisionmaking.

(3) *Use of agency procedures.* The agency official may use the agency's procedures for public involvement under the National Environmental Policy Act or other program requirements in lieu of public involvement requirements in subpart B of this part, if they provide adequate opportunities for public involvement consistent with this subpart.

Subpart B-The section 106 Process

§ 800.3 Initiation of the section 106 process.

(a) *Establish undertaking.* The agency official shall determine whether the proposed Federal action is an undertaking as defined in § 800.16(y) and, if so, whether it is a type of activity that has the potential to cause effects on historic properties.

(1) *No potential to cause effects.* If the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present, the agency official has no further obligations under section 106 or this part.

(2) *Program alternatives.* If the review of the undertaking is governed by a Federal agency program alternative established under § 800.14 or a programmatic agreement in existence before January 11, 2001, the agency official shall follow the program alternative.

(b) *Coordinate with other reviews.* The agency official should coordinate the steps of the section 106 process, as appropriate, with the overall planning schedule for the undertaking and with any reviews required under other authorities such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation, such as section 4(f) of the Department of

Transportation Act. Where consistent with the procedures in this subpart, the agency official may use information developed for other reviews under Federal, State or tribal law to meet the requirements of section 106.

(c) *Identify the appropriate SHPO and/or THPO.* As part of its initial planning, the agency official shall determine the appropriate SHPO or SHPOs to be involved in the section 106 process. The agency official shall also determine whether the undertaking may occur on or affect historic properties on any tribal lands and, if so, whether a THPO has assumed the duties of the SHPO. The agency official shall then initiate consultation with the appropriate officer or officers.

(1) *Tribal assumption of SHPO responsibilities.* Where an Indian tribe has assumed the section 106 responsibilities of the SHPO on tribal lands pursuant to section 101(d)(2) of the act, consultation for undertakings occurring on tribal land or for effects on tribal land is with the THPO for the Indian tribe in lieu of the SHPO. Section 101(d)(2)(D)(iii) of the act authorizes owners of properties on tribal lands which are neither owned by a member of the tribe nor held in trust by the Secretary for the benefit of the tribe to request the SHPO to participate in the section 106 process in addition to the THPO.

(2) *Undertakings involving more than one State.* If more than one State is involved in an undertaking, the involved SHPOs may agree to designate a lead SHPO to act on their behalf in the section 106 process, including taking actions that would conclude the section 106 process under this subpart.

(3) *Conducting consultation.* The agency official should consult with the SHPO/THPO in a manner appropriate to the agency planning process for the undertaking and to the nature of the undertaking and its effects on historic properties.

(4) *Failure of the SHPO/THPO to respond.* If the SHPO/THPO fails to respond within 30 days of receipt of a request for review of a finding or determination, the agency official may either proceed to the next step in the process based on the finding or determination or consult with the Council in lieu of the SHPO/THPO. If the SHPO/THPO re-enters the section 106 process, the agency official shall continue the consultation without being required to reconsider previous findings or determinations.

(d) *Consultation on tribal lands.*

Where the Indian tribe has not assumed the responsibilities of the SHPO on tribal lands, consultation with the Indian tribe regarding undertakings occurring on such tribe's lands or effects on such tribal lands shall be in addition to and on the same basis as consultation with the SHPO. If the SHPO has withdrawn from the process, the agency official may complete the section 106 process with the Indian tribe and the Council, as appropriate. An Indian tribe may enter into an agreement with a SHPO or SHPOs specifying the SHPO's participation in the section 106 process for undertakings occurring on or affecting historic properties on tribal lands.

(e) *Plan to involve the public.* In consultation with the SHPO/THPO, the agency official shall plan for involving the public in the section 106 process. The agency official shall identify the appropriate points for seeking public input and for notifying the public of proposed actions, consistent with § 800.2(d).

(f) *Identify other consulting parties.* In consultation with the SHPO/THPO, the agency official shall identify any other parties entitled to be consulting parties and invite them to participate as such in the section 106 process. The agency official may invite others to participate as consulting parties as the section 106 process moves forward.

(1) *Involving local governments and applicants.* The agency official shall invite any local governments or applicants that are entitled to be consulting parties under § 800.2(c).

(2) *Involving Indian tribes and Native Hawaiian organizations.* The agency official shall make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties. Such Indian tribe or Native Hawaiian organization that requests in writing to be a consulting party shall be one.

(3) *Requests to be consulting parties.* The agency official shall consider all written requests of individuals and organizations to participate as consulting parties and, in consultation with the SHPO/THPO and any Indian tribe upon whose tribal lands an undertaking occurs or affects historic properties, determine which should be consulting parties.

(g) *Expediting consultation.* A consultation by the agency official with the SHPO/THPO and other consulting parties may address multiple steps in §§ 800.3 through 800.6 where the agency official and the SHPO/THPO agree it is appropriate as long as the consulting parties and the public have an adequate opportunity to express their views as provided in § 800.2(d).

§ 800.4 Identification of historic properties.

(a) *Determine scope of identification efforts.* In consultation with the SHPO/THPO, the agency official shall:

(1) Determine and document the area of potential effects, as defined in § 800.16(d);

(2) Review existing information on historic properties within the area of potential effects, including any data concerning possible historic properties not yet identified;

(3) Seek information, as appropriate, from consulting parties, and other individuals and organizations likely to have knowledge of, or concerns with, historic properties in the area, and identify issues relating to the undertaking's potential effects on historic properties; and

(4) Gather information from any Indian tribe or Native Hawaiian organization identified pursuant to § 800.3(f) to assist in identifying properties, including those located off tribal lands, which may be of religious and cultural significance to them and may be eligible for the National Register, recognizing that an Indian tribe or Native Hawaiian organization may be reluctant to divulge specific information regarding the location, nature, and activities associated with such sites. The agency official should address concerns raised about confidentiality pursuant to § 800.11(c).

(b) *Identify historic properties.* Based on the information gathered under paragraph (a) of this section, and in consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to properties within the area of potential effects, the agency official shall take the steps necessary to identify historic properties within the area of potential effects.

(1) *Level of effort.* The agency official shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews,

sample field investigation, and field survey. The agency official shall take into account past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. The Secretary's Standards and Guidelines for Identification provide guidance on this subject. The agency official should also consider other applicable professional, State, tribal and local laws, standards and guidelines. The agency official shall take into account any confidentiality concerns raised by Indian tribes or Native Hawaiian organizations during the identification process.

(2) *Phased identification and evaluation.* Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process to conduct identification and evaluation efforts. The agency official may also defer final identification and evaluation of historic properties if it is specifically provided for in a memorandum of agreement executed pursuant to § 800.6, a programmatic agreement executed pursuant to § 800.14 (b), or the documents used by an agency official to comply with the National Environmental Policy Act pursuant to § 800.8. The process should establish the likely presence of historic properties within the area of potential effects for each alternative or inaccessible area through background research, consultation and an appropriate level of field investigation, taking into account the number of alternatives under consideration, the magnitude of the undertaking and its likely effects, and the views of the SHPO/THPO and any other consulting parties. As specific aspects or locations of an alternative are refined or access is gained, the agency official shall proceed with the identification and evaluation of historic properties in accordance with paragraphs (b)(1) and (c) of this section.

(c) *Evaluate historic significance.*

(1) *Apply National Register criteria.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified properties and guided by the Secretary's Standards and Guidelines for Evaluation, the agency official shall

apply the National Register criteria (36 CFR part 63) to properties identified within the area of potential effects that have not been previously evaluated for National Register eligibility. The passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible. The agency official shall acknowledge that Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them.

(2) *Determine whether a property is eligible.* If the agency official determines any of the National Register criteria are met and the SHPO/THPO agrees, the property shall be considered eligible for the National Register for section 106 purposes. If the agency official determines the criteria are not met and the SHPO/THPO agrees, the property shall be considered not eligible. If the agency official and the SHPO/THPO do not agree, or if the Council or the Secretary so request, the agency official shall obtain a determination of eligibility from the Secretary pursuant to 36 CFR part 63. If an Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to a property off tribal lands does not agree, it may ask the Council to request the agency official to obtain a determination of eligibility.

(d) *Results of identification and evaluation.*

(1) *No historic properties affected.* If the agency official finds that either there are no historic properties present or there are historic properties present but the undertaking will have no effect upon them as defined in § 800.16(i), the agency official shall provide documentation of this finding, as set forth in § 800.11(d), to the SHPO/THPO. The agency official shall notify all consulting parties, including Indian tribes and Native Hawaiian organizations, and make the documentation available for public inspection prior to approving the undertaking.

(i) If the SHPO/THPO, or the Council if it has entered the section 106 process, does not object within 30 days of receipt of an adequately documented finding, the agency official's responsibilities under section 106 are fulfilled.

(ii) If the SHPO/THPO objects within 30 days of receipt of an adequately documented finding, the agency official shall either consult with the objecting party to resolve the disagreement, or forward the finding and supporting documentation to the Council and request that the Council review the finding pursuant to paragraphs (d)(1)(iv)(A) through (d)(1)(iv)(C) of this section. When an agency official forwards such requests for review to the Council, the agency official shall concurrently notify all consulting parties that such a request has been made and make the request documentation available to the public.

(iii) During the SHPO/THPO 30 day review period, the Council may object to the finding and provide its opinion regarding the finding to the agency official and, if the Council determines the issue warrants it, the head of the agency. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The agency shall then proceed according to paragraphs (d)(1)(iv)(B) and (d)(1)(iv)(C) of this section.

(iv)(A) Upon receipt of the request under paragraph (d)(1)(ii) of this section, the Council will have 30 days in which to review the finding and provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the finding. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. If the Council does not respond within 30 days of receipt of the request, the agency official's responsibilities under section 106 are fulfilled.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion before the agency reaches a final decision on the finding.

(C) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall then prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council, the SHPO/THPO, and the consulting parties. The head of the agency may delegate his or her duties under this paragraph to the agency's senior policy official. If the agency official's initial finding will be revised, the agency official shall proceed in

accordance with the revised finding. If the final decision of the agency is to affirm the initial agency finding of no historic properties affected, once the summary of the decision has been sent to the Council, the SHPO/THPO, and the consulting parties, the agency official's responsibilities under section 106 are fulfilled.

(D) The Council shall retain a record of agency responses to Council opinions on their findings of no historic properties affected. The Council shall make this information available to the public.

(2) *Historic properties affected.* If the agency official finds that there are historic properties which may be affected by the undertaking, the agency official shall notify all consulting parties, including Indian tribes or Native Hawaiian organizations, invite their views on the effects and assess adverse effects, if any, in accordance with § 800.5.

§ 800.5 Assessment of adverse effects.

(a) *Apply criteria of adverse effect.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the agency official shall apply the criteria of adverse effect to historic properties within the area of potential effects. The agency official shall consider any views concerning such effects which have been provided by consulting parties and the public.

(1) *Criteria of adverse effect.* An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(2) *Examples of adverse effects.* Adverse effects on historic properties include, but are not limited to:

(i) Physical destruction of or damage to all or part of the property;

(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;

(iii) Removal of the property from its historic location;

(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

(3) *Phased application of criteria.* Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process in applying the criteria of adverse effect consistent with phased identification and evaluation efforts conducted pursuant to § 800.4(b)(2).

(b) *Finding of no adverse effect.* The agency official, in consultation with the SHPO/THPO, may propose a finding of no adverse effect when the undertaking's effects do not meet the criteria of paragraph (a)(1) of this section or the undertaking is modified or conditions are imposed, such as the subsequent review of plans for rehabilitation by the SHPO/THPO to ensure consistency with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines, to avoid adverse effects.

(c) *Consulting party review.* If the agency official proposes a finding of no adverse effect, the agency official shall notify all consulting parties of the finding and provide them with the documentation specified in § 800.11(e). The SHPO/THPO shall have 30 days from receipt to review the finding.

(1) *Agreement with, or no objection to, finding.* Unless the Council is reviewing the finding pursuant to paragraph (c)(3) of this section, the agency official may proceed after the close of the 30 day review period if the SHPO/THPO has agreed with the finding or has not provided a response, and no consulting party has objected. The agency official shall then carry out the undertaking in accordance with paragraph (d)(1) of this section.

(2) *Disagreement with finding.*

(i) If within the 30 day review period the SHPO/THPO or any consulting party notifies the agency official in writing that it disagrees with the finding and specifies the reasons for the disagreement in the notification, the agency official shall either consult with the party to resolve the disagreement, or request the Council to review the finding pursuant to paragraphs (c)(3)(i) and (c)(3)(ii) of this section. The agency official shall include with such request the documentation specified in § 800.11(e). The agency official shall also concurrently notify all consulting parties that such a submission has been made and make the submission documentation available to the public.

(ii) If within the 30 day review period the Council provides the agency official and, if the Council determines the issue warrants it, the head of the agency, with a written opinion objecting to the finding, the agency shall then proceed according to paragraph (c)(3)(ii) of this section. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part.

(iii) The agency official should seek the concurrence of any Indian tribe or Native Hawaiian organization that has made known to the agency official that it attaches religious and cultural significance to a historic property subject to the finding. If such Indian tribe or Native Hawaiian organization disagrees with the finding, it may within the 30 day review period specify the reasons for disagreeing with the finding and request the Council to review and object to the finding pursuant to paragraph (c)(2)(ii) of this section.

(3) *Council review of findings.*

(i) When a finding is submitted to the Council pursuant to paragraph (c)(2)(i) of this section, the Council shall review the finding and provide the agency official and, if the Council determines the issue warrants it, the head of the agency with its opinion as to whether the adverse effect criteria have

been correctly applied. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The Council will provide its opinion within 15 days of receiving the documented finding from the agency official. The Council at its discretion may extend that time period for 15 days, in which case it shall notify the agency of such extension prior to the end of the initial 15 day period. If the Council does not respond within the applicable time period, the agency official's responsibilities under section 106 are fulfilled.

(ii)(A) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion in reaching a final decision on the finding.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council, the SHPO/THPO, and the consulting parties. The head of the agency may delegate his or her duties under this paragraph to the agency's senior policy official. If the agency official's initial finding will be revised, the agency official shall proceed in accordance with the revised finding. If the final decision of the agency is to affirm the initial finding of no adverse effect, once the summary of the decision has been sent to the Council, the SHPO/THPO, and the consulting parties, the agency official's responsibilities under section 106 are fulfilled.

(C) The Council shall retain a record of agency responses to Council opinions on their findings of no adverse effects. The Council shall make this information available to the public.

(d) *Results of assessment.*

(1) *No adverse effect.* The agency official shall maintain a record of the finding and provide information on the finding to the public on request, consistent with the confidentiality provisions of § 800.11(c). Implementation of the undertaking in accordance with the finding as documented fulfills the agency official's responsibilities under section 106 and this part. If the agency official will not conduct the undertaking as proposed in the finding, the agency official shall reopen consultation under paragraph (a) of this section.

(2) *Adverse effect.* If an adverse effect is found, the agency official shall consult further to resolve the adverse effect pursuant to § 800.6.

§ 800.6 Resolution of adverse effects.

(a) *Continue consultation.* The agency official shall consult with the SHPO/THPO and other consulting parties, including Indian tribes and Native Hawaiian organizations, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties.

(1) *Notify the Council and determine Council participation.* The agency official shall notify the Council of the adverse effect finding by providing the documentation specified in § 800.11(e).

(i) The notice shall invite the Council to participate in the consultation when:

(A) The agency official wants the Council to participate;

(B) The undertaking has an adverse effect upon a National Historic Landmark; or

(C) A programmatic agreement under § 800.14(b) will be prepared;

(ii) The SHPO/THPO, an Indian tribe or Native Hawaiian organization, or any other consulting party may at any time independently request the Council to participate in the consultation.

(iii) The Council shall advise the agency official and all consulting parties whether it will participate within 15 days of receipt of notice or other request. Prior to entering the process, the Council shall provide written notice to the agency official and the consulting parties that its decision to participate meets the criteria set forth in appendix A to this part. The Council shall also advise the head of the agency of its decision to enter the process. Consultation with Council participation is conducted in accordance with paragraph (b)(2) of this section.

(iv) If the Council does not join the consultation, the agency official shall proceed with consultation in accordance with paragraph (b)(1) of this section.

(2) *Involve consulting parties.* In addition to the consulting parties identified under § 800.3(f), the agency official, the SHPO/THPO and the Council, if participating, may agree to invite other individuals or organizations to become consulting parties. The agency official shall invite any individual or organization that will assume a specific role or responsibility

in a memorandum of agreement to participate as a consulting party.

(3) *Provide documentation.* The agency official shall provide to all consulting parties the documentation specified in § 800.11(e), subject to the confidentiality provisions of § 800.11(c), and such other documentation as may be developed during the consultation to resolve adverse effects.

(4) *Involve the public.* The agency official shall make information available to the public, including the documentation specified in § 800.11(e), subject to the confidentiality provisions of § 800.11(c). The agency official shall provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. The agency official should use appropriate mechanisms, taking into account the magnitude of the undertaking and the nature of its effects upon historic properties, the likely effects on historic properties, and the relationship of the Federal involvement to the undertaking to ensure that the public's views are considered in the consultation. The agency official should also consider the extent of notice and information concerning historic preservation issues afforded the public at earlier steps in the section 106 process to determine the appropriate level of public involvement when resolving adverse effects so that the standards of § 800.2(d) are met.

(5) *Restrictions on disclosure of information.* Section 304 of the act and other authorities may limit the disclosure of information under paragraphs (a)(3) and (a)(4) of this section. If an Indian tribe or Native Hawaiian organization objects to the disclosure of information or if the agency official believes that there are other reasons to withhold information, the agency official shall comply with § 800.11(c) regarding the disclosure of such information.

(b) *Resolve adverse effects.*

(1) *Resolution without the Council.*

(i) The agency official shall consult with the SHPO/THPO and other consulting parties to seek ways to avoid, minimize or mitigate the adverse effects.

(ii) The agency official may use standard treatments established by the Council under § 800.14(d) as a basis for a memorandum of agreement.

(iii) If the Council decides to join the consultation, the agency official shall follow paragraph (b)(2) of this section.

(iv) If the agency official and the SHPO/THPO agree on how the adverse

effects will be resolved, they shall execute a memorandum of agreement. The agency official must submit a copy of the executed memorandum of agreement, along with the documentation specified in § 800.11(f), to the Council prior to approving the undertaking in order to meet the requirements of section 106 and this subpart.

(v) If the agency official, and the SHPO/THPO fail to agree on the terms of a memorandum of agreement, the agency official shall request the Council to join the consultation and provide the Council with the documentation set forth in § 800.11(g). If the Council decides to join the consultation, the agency official shall proceed in accordance with paragraph (b)(2) of this section. If the Council decides not to join the consultation, the Council will notify the agency and proceed to comment in accordance with § 800.7(c).

(2) *Resolution with Council participation.* If the Council decides to participate in the consultation, the agency official shall consult with the SHPO/THPO, the Council, and other consulting parties, including Indian tribes and Native Hawaiian organizations under § 800.2(c)(3), to seek ways to avoid, minimize or mitigate the adverse effects. If the agency official, the SHPO/THPO, and the Council agree on how the adverse effects will be resolved, they shall execute a memorandum of agreement.

(c) *Memorandum of agreement.* A memorandum of agreement executed and implemented pursuant to this section evidences the agency official's compliance with section 106 and this part and shall govern the undertaking and all of its parts. The agency official shall ensure that the undertaking is carried out in accordance with the memorandum of agreement.

(1) *Signatories.* The signatories have sole authority to execute, amend or terminate the agreement in accordance with this subpart.

(i) The agency official and the SHPO/THPO are the signatories to a memorandum of agreement executed pursuant to paragraph (b)(1) of this section.

(ii) The agency official, the SHPO/THPO, and the Council are the signatories to a memorandum of agreement executed pursuant to paragraph (b)(2) of this section.

(iii) The agency official and the Council are signatories to a

memorandum of agreement executed pursuant to § 800.7(a)(2).

(2) *Invited signatories.*

(i) The agency official may invite additional parties to be signatories to a memorandum of agreement. Any such party that signs the memorandum of agreement shall have the same rights with regard to seeking amendment or termination of the memorandum of agreement as other signatories.

(ii) The agency official may invite an Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties located off tribal lands to be a signatory to a memorandum of agreement concerning such properties.

(iii) The agency official should invite any party that assumes a responsibility under a memorandum of agreement to be a signatory.

(iv) The refusal of any party invited to become a signatory to a memorandum of agreement pursuant to paragraph (c)(2) of this section does not invalidate the memorandum of agreement.

(3) *Concurrence by others.* The agency official may invite all consulting parties to concur in the memorandum of agreement. The signatories may agree to invite others to concur. The refusal of any party invited to concur in the memorandum of agreement does not invalidate the memorandum of agreement.

(4) *Reports on implementation.* Where the signatories agree it is appropriate, a memorandum of agreement shall include a provision for monitoring and reporting on its implementation.

(5) *Duration.* A memorandum of agreement shall include provisions for termination and for reconsideration of terms if the undertaking has not been implemented within a specified time.

(6) *Discoveries.* Where the signatories agree it is appropriate, a memorandum of agreement shall include provisions to deal with the subsequent discovery or identification of additional historic properties affected by the undertaking.

(7) *Amendments.* The signatories to a memorandum of agreement may amend it. If the Council was not a signatory to the original agreement and the signatories execute an amended agreement, the agency official shall file it with the Council.

(8) *Termination.* If any signatory determines that the terms of a memorandum of agreement cannot be or are not being carried out, the signatories

shall consult to seek amendment of the agreement. If the agreement is not amended, any signatory may terminate it. The agency official shall either execute a memorandum of agreement with signatories under paragraph (c)(1) of this section or request the comments of the Council under § 800.7(a).

(9) *Copies.* The agency official shall provide each consulting party with a copy of any memorandum of agreement executed pursuant to this subpart.

§ 800.7 Failure to resolve adverse effects.

(a) *Termination of consultation.* After consulting to resolve adverse effects pursuant to § 800.6(b)(2), the agency official, the SHPO/THPO, or the Council may determine that further consultation will not be productive and terminate consultation. Any party that terminates consultation shall notify the other consulting parties and provide them the reasons for terminating in writing.

(1) If the agency official terminates consultation, the head of the agency or an Assistant Secretary or other officer with major department-wide or agency-wide responsibilities shall request that the Council comment pursuant to paragraph (c) of this section and shall notify all consulting parties of the request.

(2) If the SHPO terminates consultation, the agency official and the Council may execute a memorandum of agreement without the SHPO's involvement.

(3) If a THPO terminates consultation regarding an undertaking occurring on or affecting historic properties on its tribal lands, the Council shall comment pursuant to paragraph (c) of this section.

(4) If the Council terminates consultation, the Council shall notify the agency official, the agency's Federal preservation officer and all consulting parties of the termination and comment under paragraph (c) of this section. The Council may consult with the agency's Federal preservation officer prior to terminating consultation to seek to resolve issues concerning the undertaking and its effects on historic properties.

(b) *Comments without termination.* The Council may determine that it is appropriate to provide additional advisory comments upon an undertaking for which a memorandum of agreement will be executed. The Council shall provide them to the

agency official when it executes the memorandum of agreement.

(c) *Comments by the Council.*

(1) *Preparation.* The Council shall provide an opportunity for the agency official, all consulting parties, and the public to provide their views within the time frame for developing its comments. Upon request of the Council, the agency official shall provide additional existing information concerning the undertaking and assist the Council in arranging an onsite inspection and an opportunity for public participation.

(2) *Timing.* The Council shall transmit its comments within 45 days of receipt of a request under paragraph (a)(1) or (a)(3) of this section or § 800.8(c)(3), or termination by the Council under § 800.6(b)(1)(v) or paragraph (a)(4) of this section, unless otherwise agreed to by the agency official.

(3) *Transmittal.* The Council shall provide its comments to the head of the agency requesting comment with copies to the agency official, the agency's Federal preservation officer, all consulting parties, and others as appropriate.

(4) *Response to Council comment.* The head of the agency shall take into account the Council's comments in reaching a final decision on the undertaking. Section 110(l) of the act directs that the head of the agency shall document this decision and may not delegate his or her responsibilities pursuant to section 106. Documenting the agency head's decision shall include:

(i) Preparing a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's comments and providing it to the Council prior to approval of the undertaking;

(ii) Providing a copy of the summary to all consulting parties; and

(iii) Notifying the public and making the record available for public inspection.

§ 800.8 Coordination With the National Environmental Policy Act.

(a) *General principles.*

(1) *Early coordination.* Federal agencies are encouraged to coordinate compliance with section 106 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their section 106 responsibilities as early as possible in the NEPA process, and plan

their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner. The determination of whether an undertaking is a "major Federal action significantly affecting the quality of the human environment," and therefore requires preparation of an environmental impact statement (EIS) under NEPA, should include consideration of the undertaking's likely effects on historic properties. A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA.

(2) *Consulting party roles.* SHPO/THPOs, Indian tribes and Native Hawaiian organizations, other consulting parties, and organizations and individuals who may be concerned with the possible effects of an agency action on historic properties should be prepared to consult with agencies early in the NEPA process, when the purpose of and need for the proposed action as well as the widest possible range of alternatives are under consideration.

(3) *Inclusion of historic preservation issues.* Agency officials should ensure that preparation of an environmental assessment (EA) and finding of no significant impact (FONSI) or an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects.

(b) *Actions categorically excluded under NEPA.* If a project, activity or program is categorically excluded from NEPA review under an agency's NEPA procedures, the agency official shall determine if it still qualifies as an undertaking requiring review under section 106 pursuant to § 800.3(a). If so, the agency official shall proceed with section 106 review in accordance with the procedures in this subpart.

(c) *Use of the NEPA process for section 106 purposes.* An agency official may use the process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with section 106 in lieu of the procedures set forth in §§ 800.3 through 800.6 if the agency official has notified in advance the SHPO/THPO and the Council that it intends to do so and the following standards are met.

(1) *Standards for developing environmental documents to comply with Section 106.* During preparation of the EA or draft EIS (DEIS) the agency official shall:

(i) Identify consulting parties either pursuant to § 800.3(f) or through the NEPA scoping process with results consistent with § 800.3(f);

(ii) Identify historic properties and assess the effects of the undertaking on such properties in a manner consistent with the standards and criteria of §§ 800.4 through 800.5, provided that the scope and timing of these steps may be phased to reflect the agency official's consideration of project alternatives in the NEPA process and the effort is commensurate with the assessment of other environmental factors;

(iii) Consult regarding the effects of the undertaking on historic properties with the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, other consulting parties, and the Council, where appropriate, during NEPA scoping, environmental analysis, and the preparation of NEPA documents;

(iv) Involve the public in accordance with the agency's published NEPA procedures; and

(v) Develop in consultation with identified consulting parties alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties and describe them in the EA or DEIS.

(2) *Review of environmental documents.*

(i) The agency official shall submit the EA, DEIS or EIS to the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, and other consulting parties prior to or when making the document available for public comment. If the document being prepared is a DEIS or EIS, the agency official shall also submit it to the Council.

(ii) Prior to or within the time allowed for public comment on the document, a SHPO/THPO, an Indian tribe or Native Hawaiian organization, another consulting party or the Council may object to the agency official that preparation of the EA, DEIS or EIS has not met the standards set forth in paragraph (c)(1) of this section or that the substantive resolution of the effects on historic properties proposed in an EA, DEIS or EIS is inadequate. If the agency official receives such an objection, the agency official shall refer the matter to the Council.

(3) *Resolution of objections.* Within 30 days of the agency official's referral of an objection under paragraph (c)(2)(ii) of this section, the Council shall review the objection and notify the agency as to its opinion on the objection.

(i) If the Council agrees with the objection:

(A) The Council shall provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the objection. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion in reaching a final decision on the issue of the objection.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council. The head of the agency may delegate his or her duties under this paragraph to the agency's senior Policy Official. If the agency official's initial decision regarding the matter that is the subject of the objection will be revised, the agency official shall proceed in accordance with the revised decision. If the final decision of the agency is to affirm the initial agency decision, once the summary of the final decision has been sent to the Council, the agency official shall continue its compliance with this section.

(ii) If the Council disagrees with the objection, the Council shall so notify the agency official, in which case the agency official shall continue its compliance with this section.

(iii) If the Council fails to respond to the objection within the 30 day period, the agency official shall continue its compliance with this section.

(4) *Approval of the undertaking.* If the agency official has found, during the preparation of an EA or EIS that the effects of an undertaking on historic properties are adverse, the agency official shall develop measures in the EA, DEIS, or EIS to avoid, minimize, or mitigate such effects in accordance with paragraph (c)(1)(v) of this section. The agency official's responsibilities under section 106 and the procedures in this

subpart shall then be satisfied when either:

- (i) a binding commitment to such proposed measures is incorporated in
 - (A) the ROD, if such measures were proposed in a DEIS or EIS; or
 - (B) an MOA drafted in compliance with § 800.6(c); or
- (ii) the Council has commented under § 800.7 and received the agency's response to such comments.

(5) *Modification of the undertaking.* If the undertaking is modified after approval of the FONSI or the ROD in a manner that changes the undertaking or alters its effects on historic properties, or if the agency official fails to ensure that the measures to avoid, minimize or mitigate adverse effects (as specified in either the FONSI or the ROD, or in the binding commitment adopted pursuant to paragraph (c)(4) of this section) are carried out, the agency official shall notify the Council and all consulting parties that supplemental environmental documents will be prepared in compliance with NEPA or that the procedures in §§ 800.3 through 800.6 will be followed as necessary.

§ 800.9 Council review of section 106 compliance.

(a) *Assessment of agency official compliance for individual undertakings.* The Council may provide to the agency official its advisory opinion regarding the substance of any finding, determination or decision or regarding the adequacy of the agency official's compliance with the procedures under this part. The Council may provide such advice at any time at the request of any individual, agency or organization or on its own initiative. The agency official shall consider the views of the Council in reaching a decision on the matter in question.

(b) *Agency foreclosure of the Council's opportunity to comment.* Where an agency official has failed to complete the requirements of section 106 in accordance with the procedures in this part prior to the approval of an undertaking, the Council's opportunity to comment may be foreclosed. The Council may review a case to determine whether a foreclosure has occurred. The Council shall notify the agency official and the agency's Federal preservation officer and allow 30 days for the agency official to provide information as to whether foreclosure has occurred. If the Council determines foreclosure has occurred, the Council shall transmit the determination to the

agency official and the head of the agency. The Council shall also make the determination available to the public and any parties known to be interested in the undertaking and its effects upon historic properties.

(c) *Intentional adverse effects by applicants.*

(1) *Agency responsibility.* Section 110(k) of the act prohibits a Federal agency from granting a loan, loan guarantee, permit, license or other assistance to an applicant who, with intent to avoid the requirements of section 106, has intentionally significantly adversely affected a historic property to which the grant would relate, or having legal power to prevent it, has allowed such significant adverse effect to occur, unless the agency, after consultation with the Council, determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant. Guidance issued by the Secretary pursuant to section 110 of the act governs its implementation.

(2) *Consultation with the Council.* When an agency official determines, based on the actions of an applicant, that section 110(k) is applicable and that circumstances may justify granting the assistance, the agency official shall notify the Council and provide documentation specifying the circumstances under which the adverse effects to the historic property occurred and the degree of damage to the integrity of the property. This documentation shall include any views obtained from the applicant, SHPO/THPO, an Indian tribe if the undertaking occurs on or affects historic properties on tribal lands, and other parties known to be interested in the undertaking.

(i) Within thirty days of receiving the agency official's notification, unless otherwise agreed to by the agency official, the Council shall provide the agency official with its opinion as to whether circumstances justify granting assistance to the applicant and any possible mitigation of the adverse effects.

(ii) The agency official shall consider the Council's opinion in making a decision on whether to grant assistance to the applicant, and shall notify the Council, the SHPO/THPO, and other parties known to be interested in the undertaking prior to granting the assistance.

(3) *Compliance with Section 106.* If an agency official, after consulting with

the Council, determines to grant the assistance, the agency official shall comply with §§ 800.3 through 800.6 to take into account the effects of the undertaking on any historic properties.

(d) *Evaluation of Section 106 operations.* The Council may evaluate the operation of the section 106 process by periodic reviews of how participants have fulfilled their legal responsibilities and how effectively the outcomes reached advance the purposes of the act.

(1) *Information from participants.* Section 203 of the act authorizes the Council to obtain information from Federal agencies necessary to conduct evaluation of the section 106 process. The agency official shall make documentation of agency policies, operating procedures and actions taken to comply with section 106 available to the Council upon request. The Council may request available information and documentation from other participants in the section 106 process.

(2) *Improving the operation of section 106.* Based upon any evaluation of the section 106 process, the Council may make recommendations to participants, the heads of Federal agencies, and the Secretary of actions to improve the efficiency and effectiveness of the process. Where the Council determines that an agency official or a SHPO/THPO has failed to properly carry out the responsibilities assigned under the process in this part, the Council may participate in individual case reviews conducted under such process in addition to the SHPO/THPO for such period that it determines is necessary to improve performance or correct deficiencies. If the Council finds a pattern of failure by a Federal agency in carrying out its responsibilities under section 106, the Council may review the policies and programs of the agency related to historic preservation pursuant to section 202(a)(6) of the act and recommend methods to improve the effectiveness, coordination, and consistency of those policies and programs with section 106.

§ 800.10 Special requirements for protecting National Historic Landmarks.

(a) *Statutory requirement.* Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking. When

commenting on such undertakings, the Council shall use the process set forth in §§ 800.6 through 800.7 and give special consideration to protecting National Historic Landmarks as specified in this section.

(b) *Resolution of adverse effects.* The agency official shall request the Council to participate in any consultation to resolve adverse effects on National Historic Landmarks conducted under § 800.6.

(c) *Involvement of the Secretary.* The agency official shall notify the Secretary of any consultation involving a National Historic Landmark and invite the Secretary to participate in the consultation where there may be an adverse effect. The Council may request a report from the Secretary under section 213 of the act to assist in the consultation.

(d) *Report of outcome.* When the Council participates in consultation under this section, it shall report the outcome of the section 106 process, providing its written comments or any memoranda of agreement to which it is a signatory, to the Secretary and the head of the agency responsible for the undertaking.

§ 800.11 Documentation standards.

(a) *Adequacy of documentation.* The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis. The agency official shall provide such documentation to the extent permitted by law and within available funds. When an agency official is conducting phased identification or evaluation under this subpart, the documentation standards regarding description of historic properties may be applied flexibly. If the Council, or the SHPO/THPO when the Council is not involved, determines the applicable documentation standards are not met, the Council or the SHPO/THPO, as appropriate, shall notify the agency official and specify the information needed to meet the standard. At the request of the agency official or any of the consulting parties, the Council shall review any disputes over whether documentation standards are met and provide its views to the agency official and the consulting parties.

(b) *Format.* The agency official may use documentation prepared to comply with other laws to fulfill the

requirements of the procedures in this subpart, if that documentation meets the standards of this section.

(c) *Confidentiality.*

(1) *Authority to withhold information.* Section 304 of the act provides that the head of a Federal agency or other public official receiving grant assistance pursuant to the act, after consultation with the Secretary, shall withhold from public disclosure information about the location, character, or ownership of a historic property when disclosure may cause a significant invasion of privacy; risk harm to the historic property; or impede the use of a traditional religious site by practitioners. When the head of a Federal agency or other public official has determined that information should be withheld from the public pursuant to these criteria, the Secretary, in consultation with such Federal agency head or official, shall determine who may have access to the information for the purposes of carrying out the act.

(2) *Consultation with the Council.*

When the information in question has been developed in the course of an agency's compliance with this part, the Secretary shall consult with the Council in reaching determinations on the withholding and release of information. The Federal agency shall provide the Council with available information, including views of the SHPO/THPO, Indian tribes and Native Hawaiian organizations, related to the confidentiality concern. The Council shall advise the Secretary and the Federal agency within 30 days of receipt of adequate documentation.

(3) *Other authorities affecting confidentiality.* Other Federal laws and program requirements may limit public access to information concerning an undertaking and its effects on historic properties. Where applicable, those authorities shall govern public access to information developed in the section 106 process and may authorize the agency official to protect the privacy of non-governmental applicants.

(d) *Finding of no historic properties affected.* Documentation shall include:

(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, drawings, as necessary;

(2) A description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to § 800.4(b); and

(3) The basis for determining that no historic properties are present or affected.

(e) *Finding of no adverse effect or adverse effect.* Documentation shall include:

(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, and drawings, as necessary;

(2) A description of the steps taken to identify historic properties;

(3) A description of the affected historic properties, including information on the characteristics that qualify them for the National Register;

(4) A description of the undertaking's effects on historic properties;

(5) An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects; and

(6) Copies or summaries of any views provided by consulting parties and the public.

(f) *Memorandum of agreement.* When a memorandum of agreement is filed with the Council, the documentation shall include, any substantive revisions or additions to the documentation provided the Council pursuant to § 800.6(a)(1), an evaluation of any measures considered to avoid or minimize the undertaking's adverse effects and a summary of the views of consulting parties and the public.

(g) *Requests for comment without a memorandum of agreement.* Documentation shall include:

(1) A description and evaluation of any alternatives or mitigation measures that the agency official proposes to resolve the undertaking's adverse effects;

(2) A description of any reasonable alternatives or mitigation measures that were considered but not chosen, and the reasons for their rejection;

(3) Copies or summaries of any views submitted to the agency official concerning the adverse effects of the undertaking on historic properties and alternatives to reduce or avoid those effects; and

(4) Any substantive revisions or additions to the documentation provided the Council pursuant to § 800.6(a)(1).

§ 800.12 Emergency situations.

(a) *Agency procedures.* The agency official, in consultation with the appropriate SHPOs/THPOs, affected Indian tribes and Native Hawaiian organizations, and the Council, is encouraged to develop procedures for taking historic properties into account during operations which respond to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or which respond to other immediate threats to life or property. If approved by the Council, the procedures shall govern the agency's historic preservation responsibilities during any disaster or emergency in lieu of §§ 800.3 through 800.6.

(b) *Alternatives to agency procedures.* In the event an agency official proposes an emergency undertaking as an essential and immediate response to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or another immediate threat to life or property, and the agency has not developed procedures pursuant to paragraph (a) of this section, the agency official may comply with section 106 by:

(1) Following a programmatic agreement developed pursuant to § 800.14(b) that contains specific provisions for dealing with historic properties in emergency situations; or

(2) Notifying the Council, the appropriate SHPO/THPO and any Indian tribe or Native Hawaiian organization that may attach religious and cultural significance to historic properties likely to be affected prior to the undertaking and affording them an opportunity to comment within seven days of notification. If the agency official determines that circumstances do not permit seven days for comment, the agency official shall notify the Council, the SHPO/THPO and the Indian tribe or Native Hawaiian organization and invite any comments within the time available.

(c) *Local governments responsible for section 106 compliance.* When a local government official serves as the agency official for section 106 compliance, paragraphs (a) and (b) of this section also apply to an imminent threat to public health or safety as a result of a natural disaster or emergency declared by a local government's chief executive officer or legislative body, provided that if the Council or SHPO/THPO objects to the proposed action within seven days, the agency official shall comply with §§ 800.3 through 800.6.

(d) *Applicability.* This section applies only to undertakings that will be implemented within 30 days after the disaster or emergency has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability from the Council prior to the expiration of the 30 days. Immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of section 106 and this part.

§ 800.13 Post-review discoveries.

(a) *Planning for subsequent discoveries.*

(1) *Using a programmatic agreement.* An agency official may develop a programmatic agreement pursuant to § 800.14(b) to govern the actions to be taken when historic properties are discovered during the implementation of an undertaking.

(2) *Using agreement documents.* When the agency official's identification efforts in accordance with § 800.4 indicate that historic properties are likely to be discovered during implementation of an undertaking and no programmatic agreement has been developed pursuant to paragraph (a)(1) of this section, the agency official shall include in any finding of no adverse effect or memorandum of agreement a process to resolve any adverse effects upon such properties. Actions in conformance with the process satisfy the agency official's responsibilities under section 106 and this part.

(b) *Discoveries without prior planning.* If historic properties are discovered or unanticipated effects on historic properties found after the agency official has completed the section 106 process without establishing a process under paragraph (a) of this section, the agency official shall make reasonable efforts to avoid, minimize or mitigate adverse effects to such properties and:

(1) If the agency official has not approved the undertaking or if construction on an approved undertaking has not commenced, consult to resolve adverse effects pursuant to § 800.6; or

(2) If the agency official, the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property agree that such property is of value solely for its scientific, prehistoric, historic or archeological data, the agency official may comply with the

Archeological and Historic Preservation Act instead of the procedures in this part and provide the Council, the SHPO/THPO, and the Indian tribe or Native Hawaiian organization with a report on the actions within a reasonable time after they are completed; or

(3) If the agency official has approved the undertaking and construction has commenced, determine actions that the agency official can take to resolve adverse effects, and notify the SHPO/THPO, any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property, and the Council within 48 hours of the discovery. The notification shall describe the agency official's assessment of National Register eligibility of the property and proposed actions to resolve the adverse effects. The SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council shall respond within 48 hours of the notification. The agency official shall take into account their recommendations regarding National Register eligibility and proposed actions, and then carry out appropriate actions. The agency official shall provide the SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council a report of the actions when they are completed.

(c) *Eligibility of properties.* The agency official, in consultation with the SHPO/THPO, may assume a newly-discovered property to be eligible for the National Register for purposes of section 106. The agency official shall specify the National Register criteria used to assume the property's eligibility so that information can be used in the resolution of adverse effects.

(d) *Discoveries on tribal lands.* If historic properties are discovered on tribal lands, or there are unanticipated effects on historic properties found on tribal lands, after the agency official has completed the section 106 process without establishing a process under paragraph (a) of this section and construction has commenced, the agency official shall comply with applicable tribal regulations and procedures and obtain the concurrence of the Indian tribe on the proposed action.

Subpart C-Program Alternatives

§ 800.14 Federal agency program alternatives.

(a) *Alternate procedures.* An agency official may develop procedures to implement section 106 and substitute them for all or part of subpart B of this part if they are consistent with the Council's regulations pursuant to section 110(a)(2)(E) of the act.

(1) *Development of procedures.* The agency official shall consult with the Council, the National Conference of State Historic Preservation Officers or individual SHPO/THPOs, as appropriate, and Indian tribes and Native Hawaiian organizations, as specified in paragraph (f) of this section, in the development of alternate procedures, publish notice of the availability of proposed alternate procedures in the Federal Register and take other appropriate steps to seek public input during the development of alternate procedures.

(2) *Council review.* The agency official shall submit the proposed alternate procedures to the Council for a 60-day review period. If the Council finds the procedures to be consistent with this part, it shall notify the agency official and the agency official may adopt them as final alternate procedures.

(3) *Notice.* The agency official shall notify the parties with which it has consulted and publish notice of final alternate procedures in the Federal Register.

(4) *Legal effect.* Alternate procedures adopted pursuant to this subpart substitute for the Council's regulations for the purposes of the agency's compliance with section 106, except that where an Indian tribe has entered into an agreement with the Council to substitute tribal historic preservation regulations for the Council's regulations under section 101(d)(5) of the act, the agency shall follow those regulations in lieu of the agency's procedures regarding undertakings on tribal lands. Prior to the Council entering into such agreements, the Council will provide Federal agencies notice and opportunity to comment on the proposed substitute tribal regulations.

(b) *Programmatic agreements.* The Council and the agency official may negotiate a programmatic agreement to govern the implementation of a particular program or the resolution of adverse effects from certain complex project situations or multiple undertakings.

(1) *Use of programmatic agreements.* A programmatic agreement may be used:

(i) When effects on historic properties are similar and repetitive or are multi-State or regional in scope;

(ii) When effects on historic properties cannot be fully determined prior to approval of an undertaking;

(iii) When nonfederal parties are delegated major decisionmaking responsibilities;

(iv) Where routine management activities are undertaken at Federal installations, facilities, or other land-management units; or

(v) Where other circumstances warrant a departure from the normal section 106 process.

(2) *Developing programmatic agreements for agency programs.*

(i) The consultation shall involve, as appropriate, SHPO/THPOs, the National Conference of State Historic Preservation Officers (NCSHPO), Indian tribes and Native Hawaiian organizations, other Federal agencies, and members of the public. If the programmatic agreement has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the agency official shall also follow paragraph (f) of this section.

(ii) *Public Participation.* The agency official shall arrange for public participation appropriate to the subject matter and the scope of the program and in accordance with subpart A of this part. The agency official shall consider the nature of the program and its likely effects on historic properties and take steps to involve the individuals, organizations and entities likely to be interested.

(iii) *Effect.* The programmatic agreement shall take effect when executed by the Council, the agency official and the appropriate SHPOs/THPOs when the programmatic agreement concerns a specific region or the president of NCSHPO when NCSHPO has participated in the consultation. A programmatic agreement shall take effect on tribal lands only when the THPO, Indian tribe or a designated representative of the tribe is a signatory to the agreement. Compliance with the procedures established by an approved programmatic agreement satisfies the agency's section 106 responsibilities for all individual undertakings of the program covered by the agreement until

it expires or is terminated by the agency, the president of NCSHPO when a signatory, or the Council. Termination by an individual SHPO/THPO shall only terminate the application of a regional programmatic agreement within the jurisdiction of the SHPO/THPO. If a THPO assumes the responsibilities of a SHPO pursuant to section 101(d)(2) of the act and the SHPO is signatory to programmatic agreement, the THPO assumes the role of a signatory, including the right to terminate a regional programmatic agreement on lands under the jurisdiction of the tribe.

(iv) *Notice.* The agency official shall notify the parties with which it has consulted that a programmatic agreement has been executed under paragraph (b) of this section, provide appropriate public notice before it takes effect, and make any internal agency procedures implementing the agreement readily available to the Council, SHPO/THPOs, and the public.

(v) If the Council determines that the terms of a programmatic agreement are not being carried out, or if such an agreement is terminated, the agency official shall comply with subpart B of this part with regard to individual undertakings of the program covered by the agreement.

(3) *Developing programmatic agreements for complex or multiple undertakings.* Consultation to develop a programmatic agreement for dealing with the potential adverse effects of complex projects or multiple undertakings shall follow § 800.6. If consultation pertains to an activity involving multiple undertakings and the parties fail to reach agreement, then the agency official shall comply with the provisions of subpart B of this part for each individual undertaking.

(4) *Prototype programmatic agreements.* The Council may designate an agreement document as a prototype programmatic agreement that may be used for the same type of program or undertaking in more than one case or area. When an agency official uses such a prototype programmatic agreement, the agency official may develop and execute the agreement with the appropriate SHPO/THPO and the agreement shall become final without need for Council participation in consultation or Council signature.

(c) *Exempted categories.*

(1) *Criteria for establishing.* The Council or an agency official may propose a program or category of undertakings that may be exempted

from review under the provisions of subpart B of this part, if the program or category meets the following criteria:

(i) The actions within the program or category would otherwise qualify as "undertakings" as defined in § 800.16;

(ii) The potential effects of the undertakings within the program or category upon historic properties are foreseeable and likely to be minimal or not adverse; and

(iii) Exemption of the program or category is consistent with the purposes of the act.

(2) *Public participation.* The proponent of the exemption shall arrange for public participation appropriate to the subject matter and the scope of the exemption and in accordance with the standards in subpart A of this part. The proponent of the exemption shall consider the nature of the exemption and its likely effects on historic properties and take steps to involve individuals, organizations and entities likely to be interested.

(3) *Consultation with SHPOs/THPOs.* The proponent of the exemption shall notify and consider the views of the SHPOs/THPOs on the exemption.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the exempted program or category of undertakings has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Council review of proposed exemptions.* The Council shall review an exemption proposal that is supported by documentation describing the program or category for which the exemption is sought, demonstrating that the criteria of paragraph (c)(1) of this section have been met, describing the methods used to seek the views of the public, and summarizing any views submitted by the SHPO/THPOs, the public, and any others consulted. Unless it requests further information, the Council shall approve or reject the proposed exemption within 30 days of receipt, and thereafter notify the relevant agency official and SHPO/THPOs of the decision. The decision shall be based on the consistency of the exemption with the purposes of the act, taking into consideration the magnitude of the exempted undertaking or program and the likelihood of impairment of historic

properties in accordance with section 214 of the act.

(6) *Legal consequences.* Any undertaking that falls within an approved exempted program or category shall require no further review pursuant to subpart B of this part, unless the agency official or the Council determines that there are circumstances under which the normally excluded undertaking should be reviewed under subpart B of this part.

(7) *Termination.* The Council may terminate an exemption at the request of the agency official or when the Council determines that the exemption no longer meets the criteria of paragraph (c)(1) of this section. The Council shall notify the agency official 30 days before termination becomes effective.

(8) *Notice.* The proponent of the exemption shall publish notice of any approved exemption in the Federal Register.

(d) *Standard treatments.*

(1) *Establishment.* The Council, on its own initiative or at the request of another party, may establish standard methods for the treatment of a category of historic properties, a category of undertakings, or a category of effects on historic properties to assist Federal agencies in satisfying the requirements of subpart B of this part. The Council shall publish notice of standard treatments in the Federal Register.

(2) *Public participation.* The Council shall arrange for public participation appropriate to the subject matter and the scope of the standard treatment and consistent with subpart A of this part. The Council shall consider the nature of the standard treatment and its likely effects on historic properties and the individuals, organizations and entities likely to be interested. Where an agency official has proposed a standard treatment, the Council may request the agency official to arrange for public involvement.

(3) *Consultation with SHPOs/THPOs.* The Council shall notify and consider the views of SHPOs/THPOs on the proposed standard treatment.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the proposed standard treatment has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Termination.* The Council may terminate a standard treatment by publication of a notice in the Federal Register 30 days before the termination takes effect.

(e) *Program comments.* An agency official may request the Council to comment on a category of undertakings in lieu of conducting individual reviews under §§ 800.4 through 800.6. The Council may provide program comments at its own initiative.

(1) *Agency request.* The agency official shall identify the category of undertakings, specify the likely effects on historic properties, specify the steps the agency official will take to ensure that the effects are taken into account, identify the time period for which the comment is requested and summarize any views submitted by the public.

(2) *Public participation.* The agency official shall arrange for public participation appropriate to the subject matter and the scope of the category and in accordance with the standards in subpart A of this part. The agency official shall consider the nature of the undertakings and their likely effects on historic properties and the individuals, organizations and entities likely to be interested.

(3) *Consultation with SHPOs/THPOs.* The Council shall notify and consider the views of SHPOs/THPOs on the proposed program comment.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the program comment has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Council action.* Unless the Council requests additional documentation, notifies the agency official that it will decline to comment, or obtains the consent of the agency official to extend the period for providing comment, the Council shall comment to the agency official within 45 days of the request.

(i) If the Council comments, the agency official shall take into account the comments of the Council in carrying out the undertakings within the category and publish notice in the Federal Register of the Council's comments and steps the agency will take to ensure that effects to historic properties are taken into account.

(ii) If the Council declines to comment, the agency official shall continue to comply with the requirements of §§ 800.3 through 800.6 for the individual undertakings.

(6) *Withdrawal of comment.* If the Council determines that the consideration of historic properties is not being carried out in a manner consistent with the program comment, the Council may withdraw the comment and the agency official shall comply with the requirements of §§ 800.3 through 800.6 for the individual undertakings.

(f) *Consultation with Indian tribes and Native Hawaiian organizations when developing program alternatives.* Whenever an agency official proposes a program alternative pursuant to paragraphs (a) through (e) of this section, the agency official shall ensure that development of the program alternative includes appropriate government-to-government consultation with affected Indian tribes and consultation with affected Native Hawaiian organizations.

(1) *Identifying affected Indian tribes and Native Hawaiian organizations.* If any undertaking covered by a proposed program alternative has the potential to affect historic properties on tribal lands, the agency official shall identify and consult with the Indian tribes having jurisdiction over such lands. If a proposed program alternative has the potential to affect historic properties of religious and cultural significance to an Indian tribe or a Native Hawaiian organization which are located off tribal lands, the agency official shall identify those Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to such properties and consult with them. When a proposed program alternative has nationwide applicability, the agency official shall identify an appropriate government to government consultation with Indian tribes and consult with Native Hawaiian organizations in accordance with existing Executive orders, Presidential memoranda and applicable provisions of law.

(2) *Results of consultation.* The agency official shall provide summaries of the views, along with copies of any written comments, provided by affected Indian tribes and Native Hawaiian organizations to the Council as part of the documentation for the proposed program alternative. The agency official and the Council shall take those views

into account in reaching a final decision on the proposed program alternative.

§ 800.15 Tribal, State, and local program alternatives. (Reserved)

§ 800.16 Definitions.

(a) *Act* means the National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470-470w-6.

(b) *Agency* means agency as defined in 5 U.S.C. 551.

(c) *Approval of the expenditure of funds* means any final agency decision authorizing or permitting the expenditure of Federal funds or financial assistance on an undertaking, including any agency decision that may be subject to an administrative appeal.

(d) *Area of potential effects* means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

(e) *Comment* means the findings and recommendations of the Council formally provided in writing to the head of a Federal agency under section 106.

(f) *Consultation* means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process. The Secretary's "Standards and Guidelines for Federal Agency Preservation Programs pursuant to the National Historic Preservation Act" provide further guidance on consultation.

(g) *Council* means the Advisory Council on Historic Preservation or a Council member or employee designated to act for the Council.

(h) *Day or days* means calendar days.

(i) *Effect* means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

(j) *Foreclosure* means an action taken by an agency official that effectively precludes the Council from providing comments which the agency official can meaningfully consider prior to the approval of the undertaking.

(k) *Head of the agency* means the chief official of the Federal agency responsible for all aspects of the agency's actions. If a State, local or tribal government has assumed or has

been delegated responsibility for section 106 compliance, the head of that unit of government shall be considered the head of the agency.

(l)(1) *Historic property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

(2) The term *eligible for inclusion in the National Register* includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the National Register criteria.

(m) *Indian tribe* means an Indian tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, as those terms are defined in section 3 of the Alaska Native Claims Settlement Act (43 U.S.C. 1602), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

(n) *Local government* means a city, county, parish, township, municipality, borough, or other general purpose political subdivision of a State.

(o) *Memorandum of agreement* means the document that records the terms and conditions agreed upon to resolve the adverse effects of an undertaking upon historic properties.

(p) *National Historic Landmark* means a historic property that the Secretary of the Interior has designated a National Historic Landmark.

(q) *National Register* means the National Register of Historic Places maintained by the Secretary of the Interior.

(r) *National Register criteria* means the criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the National Register (36 CFR part 60).

(s)(1) *Native Hawaiian organization* means any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of

historic preservation that are significant to Native Hawaiians.

(2) *Native Hawaiian* means any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawaii.

(t) *Programmatic agreement* means a document that records the terms and conditions agreed upon to resolve the potential adverse effects of a Federal agency program, complex undertaking or other situations in accordance with § 800.14(b).

(u) *Secretary* means the Secretary of the Interior acting through the Director of the National Park Service except where otherwise specified.

(v) *State Historic Preservation Officer (SHPO)* means the official appointed or designated pursuant to section 101(b)(1) of the act to administer the State historic preservation program or a representative designated to act for the State historic preservation officer.

(w) *Tribal Historic Preservation Officer (THPO)* means the tribal official appointed by the tribe's chief governing authority or designated by a tribal ordinance or preservation program who has assumed the responsibilities of the SHPO for purposes of section 106 compliance on tribal lands in accordance with section 101(d)(2) of the act.

(x) *Tribal lands* means all lands within the exterior boundaries of any Indian reservation and all dependent Indian communities.

(y) *Undertaking* means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

(z) *Senior policy official* means the senior policy level official designated by the head of the agency pursuant to section 3(e) of Executive Order 13287.

Appendix A to Part 800 -- Criteria for Council Involvement in Reviewing Individual section 106 Cases

(a) *Introduction.* This appendix sets forth the criteria that will be used by the Council to determine whether to enter an individual section 106 review that it normally would not be involved in.

(b) *General policy.* The Council may choose to exercise its authorities under

the section 106 regulations to participate in an individual project pursuant to the following criteria. However, the Council will not always elect to participate even though one or more of the criteria may be met.

(c) *Specific criteria.* The Council is likely to enter the section 106 process at the steps specified in the regulations in this part when an undertaking:

(1) *Has substantial impacts on important historic properties.* This may include adverse effects on properties that possess a national level of significance or on properties that are of unusual or noteworthy importance or are a rare property type; or adverse effects to large numbers of historic properties, such as impacts to multiple properties within a historic district.

(2) *Presents important questions of policy or interpretation.* This may include questions about how the Council's regulations are being applied or interpreted, including possible foreclosure or anticipatory demolition situations; situations where the outcome will set a precedent affecting Council policies or program goals; or the development of programmatic agreements that alter the way the section 106 process is applied to a group or type of undertakings.

(3) *Has the potential for presenting procedural problems.* This may include cases with substantial public controversy that is related to historic preservation issues; with disputes among or about consulting parties which the Council's involvement could help resolve; that are involved or likely to be involved in litigation on the basis of section 106; or carried out by a Federal agency, in a State or locality, or on tribal lands where the Council has previously identified problems with section 106 compliance pursuant to § 800.9(d)(2).

(4) *Presents issues of concern to Indian tribes or Native Hawaiian organizations.* This may include cases where there have been concerns raised about the identification of, evaluation of or assessment of effects on historic properties to which an Indian tribe or Native Hawaiian organization attaches religious and cultural significance; where an Indian tribe or Native Hawaiian organization has requested Council involvement to assist in the resolution of adverse effects; or where there are questions relating to policy, interpretation or precedent under section 106 or its relation to other

authorities, such as the Native American Graves Protection and Repatriation Act.



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1807
August 31, 2016

Dr. Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: CLARIFICATION OF THE SECTION 106 PROCESS FOR THE CONTINUATION AND INCREASE OF EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

In order to facilitate your participation in the section 106 consultation process for the proposed continuation and increase of EA-18G Growler operations at Naval Air Station Whidbey Island (NAS Whidbey Island), the Navy would like to offer you this overview of the section 106 consultation process and a description of our proposed plan to meet federal statutory responsibilities under the National Historic Preservation Act (NHPA) of 1966, as amended.

Per the NHPA, and its implementing regulations 36 CFR 800, the Navy, as a federal agency, is required to take into account the effects of an undertaking on historic properties included in or eligible for inclusion in the National Register of Historic Places (NRHP). Given the nature and scope of this undertaking, and the public interest in historic properties within the Area of Potential Effect (APE), the Navy will be offering ample opportunity for consulting parties to comment throughout the section 106 consultation process. The section 106 process consists of four steps:

1. DETERMINING THE UNDERTAKING:

The Navy has determined that the proposed action qualifies as an undertaking that is of a type that has the potential to effect historic properties.

2. DEFINING THE AREA OF POTENTIAL EFFECT (APE):

Currently, the Navy is requesting comments on the proposed approach to defining the Area of Potential Effect (APE). After comments have been received, and when updated noise model studies for the Environmental Impact Statement (EIS) have been completed, the Navy will define the APE, provide maps to all consulting parties for further comment, and request SHPO concurrence on the APE.

3. IDENTIFY AND EVALUATE HISTORIC PROPERTIES WITHIN THE APE:

Following defining the APE, the Navy will introduce their methodology for identifying historic properties and assessing the historic significance of resources that have not yet been evaluated for eligibility in the NRHP. All consulting parties will have the opportunity to comment on the proposed methodology prior to the Navy identifying and evaluating historic properties within the APE and requesting SHPO concurrence on determinations of eligibility.

4. DETERMINATION OF EFFECT:

The fourth step in the section 106 consultation process is to determine if the undertaking has an adverse effect on the identified historic properties within the APE. The Navy will provide our finding of effect to all consulting parties for comment prior to preparing a final finding of effect for SHPO concurrence.

5090
Ser N44/1807
August 31, 2016

For a more detailed explanation of this process and the federal regulations and requirements that guide it please refer to Enclosures 1 and 2. Please find a copy of the implementing regulations 36 CFR 800 in Enclosure 3.

The time required to complete the section 106 consultation process can be influenced by other federal regulations and requirements outside of the NHPA. For the proposed continuation and increase of EA-18G Growler operations at NAS Whidbey Island section 106 consultation is being done in coordination with the National Environmental Policy Act (NEPA) review and preparation of an Environmental Impact Statement (EIS). The EIS will analyze the potential socio/economic, health, natural resource, and cultural resource impacts, whereas the section 106 process focuses specifically on potential effects to historic properties. Through coordination of these two federal processes the Navy seeks to increase the efficiency and effectiveness of each process by sharing information and documents while decreasing duplication of effort. In addition, coordinating the NHPA and NEPA processes allows for the promotion of greater transparency and potential for public involvement.

For this undertaking the section 106 consultation will provide the EIS team information to ensure historic properties are appropriately analyzed in the NEPA review. The EIS provides specialized studies to fill data gaps that meet information standards for the section 106 consultation. For this undertaking, the EIS will provide updated noise study models for the proposed action, which are necessary to facilitate section 106 consultation, particularly in defining the APE.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil. We appreciate your comments on the continuation and increase of EA-18G Growler operations at NAS Whidbey Island and look forward to continued section 106 consultation.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

Enclosures: 1. Continuation and Increase of Growler Operation Section 106 Consultation Process / Strategy
 2. Continuation and Increase of Growler Operation Section 106 Consultation Process / Strategy
 Flow Chart
 3. 36 CFR 800

Continuation and Increase of EA-18G Growler Operations: Section 106 Consultation Process / Strategy

1. Establish Undertaking [36 CFR 800.3(a)]: An undertaking is a “project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency...” [36 CFR 800.16(y)].

- The undertaking for the Continuation and Increase to Growler Operations is to:
 - continue and expand existing Growler operations at the Naval Air Station (NAS) Whidbey Island complex , which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field (OLF) Coupeville;
 - increase electronic attack capabilities (provide for an increase of 35 or 36 aircraft) to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment;
 - construct and renovate facilities at Ault Field to accommodate additional Growler aircraft; and
 - station additional personnel and their family members at the NAS Whidbey Island complex and in the surrounding community, beginning as early as 2017.
- Navy Cultural Resource staff determined this undertaking to be the type of activity that “has the potential to cause effects on historic properties” [36 CFR 800.3(a)]. In October 2014, the Navy initiated section 106 consultation and invited interested parties to consult on the undertaking. Navy Cultural Resource staff were present at National Environmental Policy Act (NEPA) scoping meetings seeking public comments on the undertaking.

2. Determine the Area of Potential Effect [36 CFR 800.4(a)]: The Area of Potential Effect (APE) is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” [36 CFR 800.16(d)].

- Given the nature and size of the undertaking, as well as coordination with the NEPA review process, the Navy asked consulting parties for comments on the proposed approach to defining the APE in June and July of 2016.
- When the Draft EIS is released to the public for comment (anticipated 30 September 2016), noise model studies included in the EIS will be used to define the APE and create a map of the APE based on the most expansive 65 dB DNL contours for all of the combined proposed alternatives. Maps of the proposed finalized APE will be sent to consulting parties for additional comments and considerations. The Washington State Historic Preservation Office (SHPO) will be asked to concur on the proposed finalized definition of the APE.
 - *The proposed and final definition of the APE is subject to Federal Aviation Administration (FAA) regulations (14 CFR 150).*

3. Identify Historic Properties and Evaluate Historic Significance [36 CFR 800.4(b) & 36 CFR 800.4(c)]: Based on comments received from consulting parties on the definition of the APE, the Navy will “make a reasonable and good faith effort to carry out appropriate identification efforts” of historic properties within the APE [36 CFR 800.4(b)(1)]. The Navy will also “apply National Register criteria (36 CFR 63) to properties identified within the [APE] that have not been previously evaluated for National Register eligibility” [36 CFR 800.4(c)(1)].

- A historic property “means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places...” [36 CFR 800.16(1)(1)]
- Once the APE has been defined and the Washington SHPO has concurred, the Navy will send out their proposed methodology for identifying historic properties and evaluating historic significance to all consulting parties. Consulting parties will have the opportunity to comment on the proposed methodology.
- Once comments have been received and taken into consideration, the Navy will identify historic properties and evaluate historic significance based on the finalized methodology. The final identification and evaluation report will be submitted to consulting parties.
 - Due to confidentiality requirements for archaeological sites and properties of traditional, religious, and cultural importance, the status of some historic properties may be withheld from consulting parties [36 CFR 800.11(c)].

4. Finding of Effect [36 CFR 800.4(d)]: If the Navy “finds that there are historic properties which may be affected by the undertaking, the [Navy] shall notify all consulting parties...and assess adverse effects, if any, in accordance, with 36 CFR 800.5” [36 CFR 800.4.(d)(2)].

- The Navy “shall apply the criteria of adverse effect to historic properties within the [APE]” [36 CFR 800.5(a)] and report their findings to all consulting parties for comments.
- Once comments have been received and taken into consideration, the Navy will send out the final finding of effect to all consulting parties and ask for Washington SHPO concurrence.
- In the event the Navy determines an Adverse Effect, the Navy shall follow 36 CFR 800.6 to resolve adverse effects to historic properties through avoidance, minimization, or mitigation.

ENCLOSURE 1.

Section 106 Consultation Process for the Continuation and Increase of EA-18G Growler Operations at NAS Whidbey Island / Strategy Flow Chart

Navy: Established the proposed continuation and increase of EA-18G Growlers at NAS Whidbey Island is an undertaking of the type that “has the potential to cause effects on historic properties”. Began section 106 consultation by notifying SHPO, ACHP, and consulting parties. (October 2014)

Public Consultation: To meet section 106 public notification requirements, public comments on section 106 were solicited and accepted at NEPA scoping meetings. (October/December 2014)



Navy: Consult with SHPO, ACHP, and consulting parties on the proposed approach to defining the Area of Potential Effect (APE) and ask for comments. (June/July 2016)

Consulting Parties: Provide Navy comments on proposed approach to defining the APE.

Navy: Take comments into consideration and using updated noise modeling maps from the Draft EIS, define the APE. Provide final APE to consulting parties for further comments and ask for SHPO concurrence. (Fall 2016)

Public Consultation: Navy will solicit and accept public comments on section 106 consultation during public meetings on the Draft EIS.

Consulting Parties: Provide Navy comments on the definition of the APE. SHPO has 30 days to respond to the Navy.



Navy: Make a “good and reasonable faith” effort to identify historic properties within the APE and apply National Register eligibility criteria to unevaluated properties within the APE. Share proposed methodology for identification and evaluation with SHPO, ACHP, and consulting parties for comments.

Consulting Parties: Provide Navy comments on proposed methodology for identifying and evaluating historic properties within the APE.

Navy: Take comments into consideration and identify and evaluate historic properties within the APE. Submit findings to consulting parties for comments and ask for SHPO concurrence.

Consulting Parties: Provide Navy comments on the identification and evaluation of historic properties. SHPO has 30 days to respond to the Navy.



Navy: Apply the criteria of adverse effect to determine if the undertaking will have an adverse effect to historic properties. Share proposed finding with SHPO, ACHP, and consulting parties for comments.

Consulting Parties: Provide Navy comments on the proposed finding of effect.

Navy: Take comments into consideration and submit final finding of effect to consulting parties and ask for SHPO concurrence.

Public Consultation: Navy will accept public comments on section 106 consultation during the comment period for the Final EIS.

Consulting Parties: Provide Navy comments on the finding of effect. SHPO has 30 days to respond to the Navy.



Navy: In the event Navy determines an Adverse Effect finding, the Navy shall follow 36 CFR 800.6 to resolve adverse effects to historic properties through avoidance, minimization, or mitigation.

Public Consultation: Please note, Navy will accept comments on section 106 consultation at anytime.

36 CFR PART 800 -- PROTECTION OF HISTORIC PROPERTIES (incorporating amendments effective August 5, 2004)

Subpart A -- Purposes and Participants

Sec.

- 800.1 Purposes.
- 800.2 Participants in the Section 106 process.

Subpart B -- The Section 106 Process

- 800.3 Initiation of the section 106 process.
- 800.4 Identification of historic properties.
- 800.5 Assessment of adverse effects.
- 800.6 Resolution of adverse effects.
- 800.7 Failure to resolve adverse effects.
- 800.8 Coordination with the National Environmental Policy act.
- 800.9 Council review of Section 106 compliance.
- 800.10 Special requirements for protecting National Historic Landmarks.
- 800.11 Documentation standards.
- 800.12 Emergency situations.
- 800.13 Post-review discoveries.

Subpart C -- Program Alternatives

- 800.14 Federal agency program alternatives.
- 800.15 Tribal, State and Local Program Alternatives. (Reserved)
- 800.16 Definitions.
- Appendix A – Criteria for Council involvement in reviewing individual section 106 cases

Authority: 16 U.S.C. 470s.

Subpart A-Purposes and Participants

§ 800.1 Purposes.

(a) *Purposes of the section 106 process.* Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings. The procedures in this part define how Federal agencies meet these statutory responsibilities. The section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of

project planning. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.

(b) *Relation to other provisions of the act.* Section 106 is related to other provisions of the act designed to further the national policy of historic preservation. References to those provisions are included in this part to identify circumstances where they may affect actions taken to meet section 106 requirements. Such provisions may have their own implementing regulations or guidelines and are not intended to be implemented by the procedures in this part except insofar as they relate to the section 106 process. Guidelines, policies and procedures issued by other agencies, including the Secretary, have been cited in this part for ease of access and are not incorporated by reference.

(c) *Timing.* The agency official must complete the section 106 process "prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license." This does not prohibit agency official from conducting or authorizing nondestructive project planning activities before completing compliance with section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties. The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking.

§ 800.2 Participants in the Section 106 process.

(a) *Agency official.* It is the statutory obligation of the Federal agency to fulfill the requirements of section 106 and to ensure that an agency official with jurisdiction over an undertaking takes legal and financial responsibility for section 106 compliance in accordance with subpart B of this part. The agency official has approval authority for the undertaking and can commit the Federal agency to take appropriate action for a specific undertaking as a result of section 106 compliance. For the purposes of subpart C of this part, the agency official has the authority to commit the Federal agency to any obligation it may assume in the

implementation of a program alternative. The agency official may be a State, local, or tribal government official who has been delegated legal responsibility for compliance with section 106 in accordance with Federal law.

(1) *Professional standards.* Section 112(a)(1)(A) of the act requires each Federal agency responsible for the protection of historic resources, including archeological resources, to ensure that all actions taken by employees or contractors of the agency shall meet professional standards under regulations developed by the Secretary.

(2) *Lead Federal agency.* If more than one Federal agency is involved in an undertaking, some or all the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part.

(3) *Use of contractors.* Consistent with applicable conflict of interest laws, the agency official may use the services of applicants, consultants, or designees to prepare information, analyses and recommendations under this part. The agency official remains legally responsible for all required findings and determinations. If a document or study is prepared by a non-Federal party, the agency official is responsible for ensuring that its content meets applicable standards and guidelines.

(4) *Consultation.* The agency official shall involve the consulting parties described in paragraph (c) of this section in findings and determinations made during the section 106 process. The agency official should plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement and coordinated with other requirements of other statutes, as applicable, such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation. The Council encourages the agency official to use to the extent possible existing agency procedures and mechanisms to fulfill the consultation requirements of this part.

(b) *Council.* The Council issues regulations to implement section 106,

provides guidance and advice on the application of the procedures in this part, and generally oversees the operation of the section 106 process. The Council also consults with and comments to agency officials on individual undertakings and programs that affect historic properties.

(1) *Council entry into the section 106 process.* When the Council determines that its involvement is necessary to ensure that the purposes of section 106 and the act are met, the Council may enter the section 106 process. Criteria guiding Council decisions to enter the section 106 process are found in appendix A to this part. The Council will document that the criteria have been met and notify the parties to the section 106 process as required by this part.

(2) *Council assistance.* Participants in the section 106 process may seek advice, guidance and assistance from the Council on the application of this part to specific undertakings, including the resolution of disagreements, whether or not the Council is formally involved in the review of the undertaking. If questions arise regarding the conduct of the section 106 process, participants are encouraged to obtain the Council's advice on completing the process.

(c) *Consulting parties.* The following parties have consultative roles in the section 106 process.

(1) *State historic preservation officer.*

(i) The State historic preservation officer (SHPO) reflects the interests of the State and its citizens in the preservation of their cultural heritage. In accordance with section 101(b)(3) of the act, the SHPO advises and assists Federal agencies in carrying out their section 106 responsibilities and cooperates with such agencies, local governments and organizations and individuals to ensure that historic properties are taken into consideration at all levels of planning and development.

(ii) If an Indian tribe has assumed the functions of the SHPO in the section 106 process for undertakings on tribal lands, the SHPO shall participate as a consulting party if the undertaking takes place on tribal lands but affects historic properties off tribal lands, if requested in accordance with § 800.3(c)(1), or if the Indian tribe agrees to include the SHPO pursuant to § 800.3(f)(3).

(2) *Indian tribes and Native Hawaiian organizations.*

(i) *Consultation on tribal lands.*

(A) *Tribal historic preservation officer.* For a tribe that has assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act, the tribal historic preservation officer (THPO) appointed or designated in accordance with the act is the official representative for the purposes of section 106. The agency official shall consult with the THPO in lieu of the SHPO regarding undertakings occurring on or affecting historic properties on tribal lands.

(B) *Tribes that have not assumed SHPO functions.* When an Indian tribe has not assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act, the agency official shall consult with a representative designated by such Indian tribe in addition to the SHPO regarding undertakings occurring on or affecting historic properties on its tribal lands. Such Indian tribes have the same rights of consultation and concurrence that the THPOs are given throughout subpart B of this part, except that such consultations shall be in addition to and on the same basis as consultation with the SHPO.

(ii) *Consultation on historic properties of significance to Indian tribes and Native Hawaiian organizations.* Section 101(d)(6)(B) of the act requires the agency official to consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking. This requirement applies regardless of the location of the historic property. Such Indian tribe or Native Hawaiian organization shall be a consulting party.

(A) The agency official shall ensure that consultation in the section 106 process provides the Indian tribe or Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking's effects on such properties, and participate in the resolution of adverse effects. It is the responsibility of the agency official to make a reasonable and good faith effort to identify Indian tribes and Native Hawaiian organizations that shall be consulted in the section 106 process. Consultation should commence early in the planning process, in order to identify and discuss relevant

preservation issues and resolve concerns about the confidentiality of information on historic properties.

(B) The Federal Government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes, and court decisions. Consultation with Indian tribes should be conducted in a sensitive manner respectful of tribal sovereignty. Nothing in this part alters, amends, repeals, interprets or modifies tribal sovereignty, any treaty rights, or other rights of an Indian tribe, or preempts, modifies or limits the exercise of any such rights.

(C) Consultation with an Indian tribe must recognize the government-to-government relationship between the Federal Government and Indian tribes. The agency official shall consult with representatives designated or identified by the tribal government or the governing body of a Native Hawaiian organization. Consultation with Indian tribes and Native Hawaiian organizations should be conducted in a manner sensitive to the concerns and needs of the Indian tribe or Native Hawaiian organization.

(D) When Indian tribes and Native Hawaiian organizations attach religious and cultural significance to historic properties off tribal lands, section 101(d)(6)(B) of the act requires Federal agencies to consult with such Indian tribes and Native Hawaiian organizations in the section 106 process. Federal agencies should be aware that frequently historic properties of religious and cultural significance are located on ancestral, aboriginal, or ceded lands of Indian tribes and Native Hawaiian organizations and should consider that when complying with the procedures in this part.

(E) An Indian tribe or a Native Hawaiian organization may enter into an agreement with an agency official that specifies how they will carry out responsibilities under this part, including concerns over the confidentiality of information. An agreement may cover all aspects of tribal participation in the section 106 process, provided that no modification may be made in the roles of other parties to the section 106 process without their consent. An agreement may grant the Indian tribe or Native Hawaiian organization additional rights to participate or concur in agency decisions in the section 106 process beyond those specified in subpart B of this part. The agency official shall

provide a copy of any such agreement to the Council and the appropriate SHPOs.

(F) An Indian tribe that has not assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act may notify the agency official in writing that it is waiving its rights under § 800.6(c)(1) to execute a memorandum of agreement.

(3) *Representatives of local governments.* A representative of a local government with jurisdiction over the area in which the effects of an undertaking may occur is entitled to participate as a consulting party. Under other provisions of Federal law, the local government may be authorized to act as the agency official for purposes of section 106.

(4) *Applicants for Federal assistance, permits, licenses and other approvals.* An applicant for Federal assistance or for a Federal permit, license or other approval is entitled to participate as a consulting party as defined in this part. The agency official may authorize an applicant or group of applicants to initiate consultation with the SHPO/THPO and others, but remains legally responsible for all findings and determinations charged to the agency official. The agency official shall notify the SHPO/THPO when an applicant or group of applicants is so authorized. A Federal agency may authorize all applicants in a specific program pursuant to this section by providing notice to all SHPO/THPOs. Federal agencies that provide authorizations to applicants remain responsible for their government to government relationships with Indian tribes.

(5) *Additional consulting parties.* Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.

(d) *The public.*

(1) *Nature of involvement.* The views of the public are essential to informed Federal decisionmaking in the section 106 process. The agency official shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and

the relationship of the Federal involvement to the undertaking.

(2) *Providing notice and information.* The agency official must, except where appropriate to protect confidentiality concerns of affected parties, provide the public with information about an undertaking and its effects on historic properties and seek public comment and input. Members of the public may also provide views on their own initiative for the agency official to consider in decisionmaking.

(3) *Use of agency procedures.* The agency official may use the agency's procedures for public involvement under the National Environmental Policy Act or other program requirements in lieu of public involvement requirements in subpart B of this part, if they provide adequate opportunities for public involvement consistent with this subpart.

Subpart B-The section 106 Process

§ 800.3 Initiation of the section 106 process.

(a) *Establish undertaking.* The agency official shall determine whether the proposed Federal action is an undertaking as defined in § 800.16(y) and, if so, whether it is a type of activity that has the potential to cause effects on historic properties.

(1) *No potential to cause effects.* If the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present, the agency official has no further obligations under section 106 or this part.

(2) *Program alternatives.* If the review of the undertaking is governed by a Federal agency program alternative established under § 800.14 or a programmatic agreement in existence before January 11, 2001, the agency official shall follow the program alternative.

(b) *Coordinate with other reviews.* The agency official should coordinate the steps of the section 106 process, as appropriate, with the overall planning schedule for the undertaking and with any reviews required under other authorities such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation, such as section 4(f) of the Department of

Transportation Act. Where consistent with the procedures in this subpart, the agency official may use information developed for other reviews under Federal, State or tribal law to meet the requirements of section 106.

(c) *Identify the appropriate SHPO and/or THPO.* As part of its initial planning, the agency official shall determine the appropriate SHPO or SHPOs to be involved in the section 106 process. The agency official shall also determine whether the undertaking may occur on or affect historic properties on any tribal lands and, if so, whether a THPO has assumed the duties of the SHPO. The agency official shall then initiate consultation with the appropriate officer or officers.

(1) *Tribal assumption of SHPO responsibilities.* Where an Indian tribe has assumed the section 106 responsibilities of the SHPO on tribal lands pursuant to section 101(d)(2) of the act, consultation for undertakings occurring on tribal land or for effects on tribal land is with the THPO for the Indian tribe in lieu of the SHPO. Section 101(d)(2)(D)(iii) of the act authorizes owners of properties on tribal lands which are neither owned by a member of the tribe nor held in trust by the Secretary for the benefit of the tribe to request the SHPO to participate in the section 106 process in addition to the THPO.

(2) *Undertakings involving more than one State.* If more than one State is involved in an undertaking, the involved SHPOs may agree to designate a lead SHPO to act on their behalf in the section 106 process, including taking actions that would conclude the section 106 process under this subpart.

(3) *Conducting consultation.* The agency official should consult with the SHPO/THPO in a manner appropriate to the agency planning process for the undertaking and to the nature of the undertaking and its effects on historic properties.

(4) *Failure of the SHPO/THPO to respond.* If the SHPO/THPO fails to respond within 30 days of receipt of a request for review of a finding or determination, the agency official may either proceed to the next step in the process based on the finding or determination or consult with the Council in lieu of the SHPO/THPO. If the SHPO/THPO re-enters the section 106 process, the agency official shall continue the consultation without being required to reconsider previous findings or determinations.

(d) *Consultation on tribal lands.*

Where the Indian tribe has not assumed the responsibilities of the SHPO on tribal lands, consultation with the Indian tribe regarding undertakings occurring on such tribe's lands or effects on such tribal lands shall be in addition to and on the same basis as consultation with the SHPO. If the SHPO has withdrawn from the process, the agency official may complete the section 106 process with the Indian tribe and the Council, as appropriate. An Indian tribe may enter into an agreement with a SHPO or SHPOs specifying the SHPO's participation in the section 106 process for undertakings occurring on or affecting historic properties on tribal lands.

(e) *Plan to involve the public.* In consultation with the SHPO/THPO, the agency official shall plan for involving the public in the section 106 process. The agency official shall identify the appropriate points for seeking public input and for notifying the public of proposed actions, consistent with § 800.2(d).

(f) *Identify other consulting parties.* In consultation with the SHPO/THPO, the agency official shall identify any other parties entitled to be consulting parties and invite them to participate as such in the section 106 process. The agency official may invite others to participate as consulting parties as the section 106 process moves forward.

(1) *Involving local governments and applicants.* The agency official shall invite any local governments or applicants that are entitled to be consulting parties under § 800.2(c).

(2) *Involving Indian tribes and Native Hawaiian organizations.* The agency official shall make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties. Such Indian tribe or Native Hawaiian organization that requests in writing to be a consulting party shall be one.

(3) *Requests to be consulting parties.* The agency official shall consider all written requests of individuals and organizations to participate as consulting parties and, in consultation with the SHPO/THPO and any Indian tribe upon whose tribal lands an undertaking occurs or affects historic properties, determine which should be consulting parties.

(g) *Expediting consultation.* A consultation by the agency official with the SHPO/THPO and other consulting parties may address multiple steps in §§ 800.3 through 800.6 where the agency official and the SHPO/THPO agree it is appropriate as long as the consulting parties and the public have an adequate opportunity to express their views as provided in § 800.2(d).

§ 800.4 Identification of historic properties.

(a) *Determine scope of identification efforts.* In consultation with the SHPO/THPO, the agency official shall:

(1) Determine and document the area of potential effects, as defined in § 800.16(d);

(2) Review existing information on historic properties within the area of potential effects, including any data concerning possible historic properties not yet identified;

(3) Seek information, as appropriate, from consulting parties, and other individuals and organizations likely to have knowledge of, or concerns with, historic properties in the area, and identify issues relating to the undertaking's potential effects on historic properties; and

(4) Gather information from any Indian tribe or Native Hawaiian organization identified pursuant to § 800.3(f) to assist in identifying properties, including those located off tribal lands, which may be of religious and cultural significance to them and may be eligible for the National Register, recognizing that an Indian tribe or Native Hawaiian organization may be reluctant to divulge specific information regarding the location, nature, and activities associated with such sites. The agency official should address concerns raised about confidentiality pursuant to § 800.11(c).

(b) *Identify historic properties.* Based on the information gathered under paragraph (a) of this section, and in consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to properties within the area of potential effects, the agency official shall take the steps necessary to identify historic properties within the area of potential effects.

(1) *Level of effort.* The agency official shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews,

sample field investigation, and field survey. The agency official shall take into account past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. The Secretary's Standards and Guidelines for Identification provide guidance on this subject. The agency official should also consider other applicable professional, State, tribal and local laws, standards and guidelines. The agency official shall take into account any confidentiality concerns raised by Indian tribes or Native Hawaiian organizations during the identification process.

(2) *Phased identification and evaluation.* Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process to conduct identification and evaluation efforts. The agency official may also defer final identification and evaluation of historic properties if it is specifically provided for in a memorandum of agreement executed pursuant to § 800.6, a programmatic agreement executed pursuant to § 800.14 (b), or the documents used by an agency official to comply with the National Environmental Policy Act pursuant to § 800.8. The process should establish the likely presence of historic properties within the area of potential effects for each alternative or inaccessible area through background research, consultation and an appropriate level of field investigation, taking into account the number of alternatives under consideration, the magnitude of the undertaking and its likely effects, and the views of the SHPO/THPO and any other consulting parties. As specific aspects or locations of an alternative are refined or access is gained, the agency official shall proceed with the identification and evaluation of historic properties in accordance with paragraphs (b)(1) and (c) of this section.

(c) *Evaluate historic significance.*

(1) *Apply National Register criteria.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified properties and guided by the Secretary's Standards and Guidelines for Evaluation, the agency official shall

apply the National Register criteria (36 CFR part 63) to properties identified within the area of potential effects that have not been previously evaluated for National Register eligibility. The passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible. The agency official shall acknowledge that Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them.

(2) *Determine whether a property is eligible.* If the agency official determines any of the National Register criteria are met and the SHPO/THPO agrees, the property shall be considered eligible for the National Register for section 106 purposes. If the agency official determines the criteria are not met and the SHPO/THPO agrees, the property shall be considered not eligible. If the agency official and the SHPO/THPO do not agree, or if the Council or the Secretary so request, the agency official shall obtain a determination of eligibility from the Secretary pursuant to 36 CFR part 63. If an Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to a property off tribal lands does not agree, it may ask the Council to request the agency official to obtain a determination of eligibility.

(d) *Results of identification and evaluation.*

(1) *No historic properties affected.* If the agency official finds that either there are no historic properties present or there are historic properties present but the undertaking will have no effect upon them as defined in § 800.16(i), the agency official shall provide documentation of this finding, as set forth in § 800.11(d), to the SHPO/THPO. The agency official shall notify all consulting parties, including Indian tribes and Native Hawaiian organizations, and make the documentation available for public inspection prior to approving the undertaking.

(i) If the SHPO/THPO, or the Council if it has entered the section 106 process, does not object within 30 days of receipt of an adequately documented finding, the agency official's responsibilities under section 106 are fulfilled.

(ii) If the SHPO/THPO objects within 30 days of receipt of an adequately documented finding, the agency official shall either consult with the objecting party to resolve the disagreement, or forward the finding and supporting documentation to the Council and request that the Council review the finding pursuant to paragraphs (d)(1)(iv)(A) through (d)(1)(iv)(C) of this section. When an agency official forwards such requests for review to the Council, the agency official shall concurrently notify all consulting parties that such a request has been made and make the request documentation available to the public.

(iii) During the SHPO/THPO 30 day review period, the Council may object to the finding and provide its opinion regarding the finding to the agency official and, if the Council determines the issue warrants it, the head of the agency. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The agency shall then proceed according to paragraphs (d)(1)(iv)(B) and (d)(1)(iv)(C) of this section.

(iv)(A) Upon receipt of the request under paragraph (d)(1)(ii) of this section, the Council will have 30 days in which to review the finding and provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the finding. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. If the Council does not respond within 30 days of receipt of the request, the agency official's responsibilities under section 106 are fulfilled.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion before the agency reaches a final decision on the finding.

(C) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall then prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council, the SHPO/THPO, and the consulting parties. The head of the agency may delegate his or her duties under this paragraph to the agency's senior policy official. If the agency official's initial finding will be revised, the agency official shall proceed in

accordance with the revised finding. If the final decision of the agency is to affirm the initial agency finding of no historic properties affected, once the summary of the decision has been sent to the Council, the SHPO/THPO, and the consulting parties, the agency official's responsibilities under section 106 are fulfilled.

(D) The Council shall retain a record of agency responses to Council opinions on their findings of no historic properties affected. The Council shall make this information available to the public.

(2) *Historic properties affected.* If the agency official finds that there are historic properties which may be affected by the undertaking, the agency official shall notify all consulting parties, including Indian tribes or Native Hawaiian organizations, invite their views on the effects and assess adverse effects, if any, in accordance with § 800.5.

§ 800.5 Assessment of adverse effects.

(a) *Apply criteria of adverse effect.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the agency official shall apply the criteria of adverse effect to historic properties within the area of potential effects. The agency official shall consider any views concerning such effects which have been provided by consulting parties and the public.

(1) *Criteria of adverse effect.* An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(2) *Examples of adverse effects.* Adverse effects on historic properties include, but are not limited to:

(i) Physical destruction of or damage to all or part of the property;

(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;

(iii) Removal of the property from its historic location;

(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

(3) *Phased application of criteria.* Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process in applying the criteria of adverse effect consistent with phased identification and evaluation efforts conducted pursuant to § 800.4(b)(2).

(b) *Finding of no adverse effect.* The agency official, in consultation with the SHPO/THPO, may propose a finding of no adverse effect when the undertaking's effects do not meet the criteria of paragraph (a)(1) of this section or the undertaking is modified or conditions are imposed, such as the subsequent review of plans for rehabilitation by the SHPO/THPO to ensure consistency with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines, to avoid adverse effects.

(c) *Consulting party review.* If the agency official proposes a finding of no adverse effect, the agency official shall notify all consulting parties of the finding and provide them with the documentation specified in § 800.11(e). The SHPO/THPO shall have 30 days from receipt to review the finding.

(1) *Agreement with, or no objection to, finding.* Unless the Council is reviewing the finding pursuant to paragraph (c)(3) of this section, the agency official may proceed after the close of the 30 day review period if the SHPO/THPO has agreed with the finding or has not provided a response, and no consulting party has objected. The agency official shall then carry out the undertaking in accordance with paragraph (d)(1) of this section.

(2) *Disagreement with finding.*

(i) If within the 30 day review period the SHPO/THPO or any consulting party notifies the agency official in writing that it disagrees with the finding and specifies the reasons for the disagreement in the notification, the agency official shall either consult with the party to resolve the disagreement, or request the Council to review the finding pursuant to paragraphs (c)(3)(i) and (c)(3)(ii) of this section. The agency official shall include with such request the documentation specified in § 800.11(e). The agency official shall also concurrently notify all consulting parties that such a submission has been made and make the submission documentation available to the public.

(ii) If within the 30 day review period the Council provides the agency official and, if the Council determines the issue warrants it, the head of the agency, with a written opinion objecting to the finding, the agency shall then proceed according to paragraph (c)(3)(ii) of this section. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part.

(iii) The agency official should seek the concurrence of any Indian tribe or Native Hawaiian organization that has made known to the agency official that it attaches religious and cultural significance to a historic property subject to the finding. If such Indian tribe or Native Hawaiian organization disagrees with the finding, it may within the 30 day review period specify the reasons for disagreeing with the finding and request the Council to review and object to the finding pursuant to paragraph (c)(2)(ii) of this section.

(3) *Council review of findings.*

(i) When a finding is submitted to the Council pursuant to paragraph (c)(2)(i) of this section, the Council shall review the finding and provide the agency official and, if the Council determines the issue warrants it, the head of the agency with its opinion as to whether the adverse effect criteria have

been correctly applied. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The Council will provide its opinion within 15 days of receiving the documented finding from the agency official. The Council at its discretion may extend that time period for 15 days, in which case it shall notify the agency of such extension prior to the end of the initial 15 day period. If the Council does not respond within the applicable time period, the agency official's responsibilities under section 106 are fulfilled.

(ii)(A) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion in reaching a final decision on the finding.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council, the SHPO/THPO, and the consulting parties. The head of the agency may delegate his or her duties under this paragraph to the agency's senior policy official. If the agency official's initial finding will be revised, the agency official shall proceed in accordance with the revised finding. If the final decision of the agency is to affirm the initial finding of no adverse effect, once the summary of the decision has been sent to the Council, the SHPO/THPO, and the consulting parties, the agency official's responsibilities under section 106 are fulfilled.

(C) The Council shall retain a record of agency responses to Council opinions on their findings of no adverse effects. The Council shall make this information available to the public.

(d) *Results of assessment.*

(1) *No adverse effect.* The agency official shall maintain a record of the finding and provide information on the finding to the public on request, consistent with the confidentiality provisions of § 800.11(c). Implementation of the undertaking in accordance with the finding as documented fulfills the agency official's responsibilities under section 106 and this part. If the agency official will not conduct the undertaking as proposed in the finding, the agency official shall reopen consultation under paragraph (a) of this section.

(2) *Adverse effect.* If an adverse effect is found, the agency official shall consult further to resolve the adverse effect pursuant to § 800.6.

§ 800.6 Resolution of adverse effects.

(a) *Continue consultation.* The agency official shall consult with the SHPO/THPO and other consulting parties, including Indian tribes and Native Hawaiian organizations, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties.

(1) *Notify the Council and determine Council participation.* The agency official shall notify the Council of the adverse effect finding by providing the documentation specified in § 800.11(e).

(i) The notice shall invite the Council to participate in the consultation when:

(A) The agency official wants the Council to participate;

(B) The undertaking has an adverse effect upon a National Historic Landmark; or

(C) A programmatic agreement under § 800.14(b) will be prepared;

(ii) The SHPO/THPO, an Indian tribe or Native Hawaiian organization, or any other consulting party may at any time independently request the Council to participate in the consultation.

(iii) The Council shall advise the agency official and all consulting parties whether it will participate within 15 days of receipt of notice or other request. Prior to entering the process, the Council shall provide written notice to the agency official and the consulting parties that its decision to participate meets the criteria set forth in appendix A to this part. The Council shall also advise the head of the agency of its decision to enter the process. Consultation with Council participation is conducted in accordance with paragraph (b)(2) of this section.

(iv) If the Council does not join the consultation, the agency official shall proceed with consultation in accordance with paragraph (b)(1) of this section.

(2) *Involve consulting parties.* In addition to the consulting parties identified under § 800.3(f), the agency official, the SHPO/THPO and the Council, if participating, may agree to invite other individuals or organizations to become consulting parties. The agency official shall invite any individual or organization that will assume a specific role or responsibility

in a memorandum of agreement to participate as a consulting party.

(3) *Provide documentation.* The agency official shall provide to all consulting parties the documentation specified in § 800.11(e), subject to the confidentiality provisions of § 800.11(c), and such other documentation as may be developed during the consultation to resolve adverse effects.

(4) *Involve the public.* The agency official shall make information available to the public, including the documentation specified in § 800.11(e), subject to the confidentiality provisions of § 800.11(c). The agency official shall provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. The agency official should use appropriate mechanisms, taking into account the magnitude of the undertaking and the nature of its effects upon historic properties, the likely effects on historic properties, and the relationship of the Federal involvement to the undertaking to ensure that the public's views are considered in the consultation. The agency official should also consider the extent of notice and information concerning historic preservation issues afforded the public at earlier steps in the section 106 process to determine the appropriate level of public involvement when resolving adverse effects so that the standards of § 800.2(d) are met.

(5) *Restrictions on disclosure of information.* Section 304 of the act and other authorities may limit the disclosure of information under paragraphs (a)(3) and (a)(4) of this section. If an Indian tribe or Native Hawaiian organization objects to the disclosure of information or if the agency official believes that there are other reasons to withhold information, the agency official shall comply with § 800.11(c) regarding the disclosure of such information.

(b) *Resolve adverse effects.*

(1) *Resolution without the Council.*

(i) The agency official shall consult with the SHPO/THPO and other consulting parties to seek ways to avoid, minimize or mitigate the adverse effects.

(ii) The agency official may use standard treatments established by the Council under § 800.14(d) as a basis for a memorandum of agreement.

(iii) If the Council decides to join the consultation, the agency official shall follow paragraph (b)(2) of this section.

(iv) If the agency official and the SHPO/THPO agree on how the adverse

effects will be resolved, they shall execute a memorandum of agreement. The agency official must submit a copy of the executed memorandum of agreement, along with the documentation specified in § 800.11(f), to the Council prior to approving the undertaking in order to meet the requirements of section 106 and this subpart.

(v) If the agency official, and the SHPO/THPO fail to agree on the terms of a memorandum of agreement, the agency official shall request the Council to join the consultation and provide the Council with the documentation set forth in § 800.11(g). If the Council decides to join the consultation, the agency official shall proceed in accordance with paragraph (b)(2) of this section. If the Council decides not to join the consultation, the Council will notify the agency and proceed to comment in accordance with § 800.7(c).

(2) *Resolution with Council participation.* If the Council decides to participate in the consultation, the agency official shall consult with the SHPO/THPO, the Council, and other consulting parties, including Indian tribes and Native Hawaiian organizations under § 800.2(c)(3), to seek ways to avoid, minimize or mitigate the adverse effects. If the agency official, the SHPO/THPO, and the Council agree on how the adverse effects will be resolved, they shall execute a memorandum of agreement.

(c) *Memorandum of agreement.* A memorandum of agreement executed and implemented pursuant to this section evidences the agency official's compliance with section 106 and this part and shall govern the undertaking and all of its parts. The agency official shall ensure that the undertaking is carried out in accordance with the memorandum of agreement.

(1) *Signatories.* The signatories have sole authority to execute, amend or terminate the agreement in accordance with this subpart.

(i) The agency official and the SHPO/THPO are the signatories to a memorandum of agreement executed pursuant to paragraph (b)(1) of this section.

(ii) The agency official, the SHPO/THPO, and the Council are the signatories to a memorandum of agreement executed pursuant to paragraph (b)(2) of this section.

(iii) The agency official and the Council are signatories to a

memorandum of agreement executed pursuant to § 800.7(a)(2).

(2) *Invited signatories.*

(i) The agency official may invite additional parties to be signatories to a memorandum of agreement. Any such party that signs the memorandum of agreement shall have the same rights with regard to seeking amendment or termination of the memorandum of agreement as other signatories.

(ii) The agency official may invite an Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties located off tribal lands to be a signatory to a memorandum of agreement concerning such properties.

(iii) The agency official should invite any party that assumes a responsibility under a memorandum of agreement to be a signatory.

(iv) The refusal of any party invited to become a signatory to a memorandum of agreement pursuant to paragraph (c)(2) of this section does not invalidate the memorandum of agreement.

(3) *Concurrence by others.* The agency official may invite all consulting parties to concur in the memorandum of agreement. The signatories may agree to invite others to concur. The refusal of any party invited to concur in the memorandum of agreement does not invalidate the memorandum of agreement.

(4) *Reports on implementation.* Where the signatories agree it is appropriate, a memorandum of agreement shall include a provision for monitoring and reporting on its implementation.

(5) *Duration.* A memorandum of agreement shall include provisions for termination and for reconsideration of terms if the undertaking has not been implemented within a specified time.

(6) *Discoveries.* Where the signatories agree it is appropriate, a memorandum of agreement shall include provisions to deal with the subsequent discovery or identification of additional historic properties affected by the undertaking.

(7) *Amendments.* The signatories to a memorandum of agreement may amend it. If the Council was not a signatory to the original agreement and the signatories execute an amended agreement, the agency official shall file it with the Council.

(8) *Termination.* If any signatory determines that the terms of a memorandum of agreement cannot be or are not being carried out, the signatories

shall consult to seek amendment of the agreement. If the agreement is not amended, any signatory may terminate it. The agency official shall either execute a memorandum of agreement with signatories under paragraph (c)(1) of this section or request the comments of the Council under § 800.7(a).

(9) *Copies.* The agency official shall provide each consulting party with a copy of any memorandum of agreement executed pursuant to this subpart.

§ 800.7 Failure to resolve adverse effects.

(a) *Termination of consultation.* After consulting to resolve adverse effects pursuant to § 800.6(b)(2), the agency official, the SHPO/THPO, or the Council may determine that further consultation will not be productive and terminate consultation. Any party that terminates consultation shall notify the other consulting parties and provide them the reasons for terminating in writing.

(1) If the agency official terminates consultation, the head of the agency or an Assistant Secretary or other officer with major department-wide or agency-wide responsibilities shall request that the Council comment pursuant to paragraph (c) of this section and shall notify all consulting parties of the request.

(2) If the SHPO terminates consultation, the agency official and the Council may execute a memorandum of agreement without the SHPO's involvement.

(3) If a THPO terminates consultation regarding an undertaking occurring on or affecting historic properties on its tribal lands, the Council shall comment pursuant to paragraph (c) of this section.

(4) If the Council terminates consultation, the Council shall notify the agency official, the agency's Federal preservation officer and all consulting parties of the termination and comment under paragraph (c) of this section. The Council may consult with the agency's Federal preservation officer prior to terminating consultation to seek to resolve issues concerning the undertaking and its effects on historic properties.

(b) *Comments without termination.* The Council may determine that it is appropriate to provide additional advisory comments upon an undertaking for which a memorandum of agreement will be executed. The Council shall provide them to the

agency official when it executes the memorandum of agreement.

(c) *Comments by the Council.*

(1) *Preparation.* The Council shall provide an opportunity for the agency official, all consulting parties, and the public to provide their views within the time frame for developing its comments. Upon request of the Council, the agency official shall provide additional existing information concerning the undertaking and assist the Council in arranging an onsite inspection and an opportunity for public participation.

(2) *Timing.* The Council shall transmit its comments within 45 days of receipt of a request under paragraph (a)(1) or (a)(3) of this section or § 800.8(c)(3), or termination by the Council under § 800.6(b)(1)(v) or paragraph (a)(4) of this section, unless otherwise agreed to by the agency official.

(3) *Transmittal.* The Council shall provide its comments to the head of the agency requesting comment with copies to the agency official, the agency's Federal preservation officer, all consulting parties, and others as appropriate.

(4) *Response to Council comment.* The head of the agency shall take into account the Council's comments in reaching a final decision on the undertaking. Section 110(l) of the act directs that the head of the agency shall document this decision and may not delegate his or her responsibilities pursuant to section 106. Documenting the agency head's decision shall include:

(i) Preparing a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's comments and providing it to the Council prior to approval of the undertaking;

(ii) Providing a copy of the summary to all consulting parties; and

(iii) Notifying the public and making the record available for public inspection.

§ 800.8 Coordination With the National Environmental Policy Act.

(a) *General principles.*

(1) *Early coordination.* Federal agencies are encouraged to coordinate compliance with section 106 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their section 106 responsibilities as early as possible in the NEPA process, and plan

their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner. The determination of whether an undertaking is a "major Federal action significantly affecting the quality of the human environment," and therefore requires preparation of an environmental impact statement (EIS) under NEPA, should include consideration of the undertaking's likely effects on historic properties. A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA.

(2) *Consulting party roles.* SHPO/THPOs, Indian tribes and Native Hawaiian organizations, other consulting parties, and organizations and individuals who may be concerned with the possible effects of an agency action on historic properties should be prepared to consult with agencies early in the NEPA process, when the purpose of and need for the proposed action as well as the widest possible range of alternatives are under consideration.

(3) *Inclusion of historic preservation issues.* Agency officials should ensure that preparation of an environmental assessment (EA) and finding of no significant impact (FONSI) or an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects.

(b) *Actions categorically excluded under NEPA.* If a project, activity or program is categorically excluded from NEPA review under an agency's NEPA procedures, the agency official shall determine if it still qualifies as an undertaking requiring review under section 106 pursuant to § 800.3(a). If so, the agency official shall proceed with section 106 review in accordance with the procedures in this subpart.

(c) *Use of the NEPA process for section 106 purposes.* An agency official may use the process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with section 106 in lieu of the procedures set forth in §§ 800.3 through 800.6 if the agency official has notified in advance the SHPO/THPO and the Council that it intends to do so and the following standards are met.

(1) *Standards for developing environmental documents to comply with Section 106.* During preparation of the EA or draft EIS (DEIS) the agency official shall:

(i) Identify consulting parties either pursuant to § 800.3(f) or through the NEPA scoping process with results consistent with § 800.3(f);

(ii) Identify historic properties and assess the effects of the undertaking on such properties in a manner consistent with the standards and criteria of §§ 800.4 through 800.5, provided that the scope and timing of these steps may be phased to reflect the agency official's consideration of project alternatives in the NEPA process and the effort is commensurate with the assessment of other environmental factors;

(iii) Consult regarding the effects of the undertaking on historic properties with the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, other consulting parties, and the Council, where appropriate, during NEPA scoping, environmental analysis, and the preparation of NEPA documents;

(iv) Involve the public in accordance with the agency's published NEPA procedures; and

(v) Develop in consultation with identified consulting parties alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties and describe them in the EA or DEIS.

(2) *Review of environmental documents.*

(i) The agency official shall submit the EA, DEIS or EIS to the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, and other consulting parties prior to or when making the document available for public comment. If the document being prepared is a DEIS or EIS, the agency official shall also submit it to the Council.

(ii) Prior to or within the time allowed for public comment on the document, a SHPO/THPO, an Indian tribe or Native Hawaiian organization, another consulting party or the Council may object to the agency official that preparation of the EA, DEIS or EIS has not met the standards set forth in paragraph (c)(1) of this section or that the substantive resolution of the effects on historic properties proposed in an EA, DEIS or EIS is inadequate. If the agency official receives such an objection, the agency official shall refer the matter to the Council.

(3) *Resolution of objections.* Within 30 days of the agency official's referral of an objection under paragraph (c)(2)(ii) of this section, the Council shall review the objection and notify the agency as to its opinion on the objection.

(i) If the Council agrees with the objection:

(A) The Council shall provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the objection. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion in reaching a final decision on the issue of the objection.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council. The head of the agency may delegate his or her duties under this paragraph to the agency's senior Policy Official. If the agency official's initial decision regarding the matter that is the subject of the objection will be revised, the agency official shall proceed in accordance with the revised decision. If the final decision of the agency is to affirm the initial agency decision, once the summary of the final decision has been sent to the Council, the agency official shall continue its compliance with this section.

(ii) If the Council disagrees with the objection, the Council shall so notify the agency official, in which case the agency official shall continue its compliance with this section.

(iii) If the Council fails to respond to the objection within the 30 day period, the agency official shall continue its compliance with this section.

(4) *Approval of the undertaking.* If the agency official has found, during the preparation of an EA or EIS that the effects of an undertaking on historic properties are adverse, the agency official shall develop measures in the EA, DEIS, or EIS to avoid, minimize, or mitigate such effects in accordance with paragraph (c)(1)(v) of this section. The agency official's responsibilities under section 106 and the procedures in this

subpart shall then be satisfied when either:

- (i) a binding commitment to such proposed measures is incorporated in
 - (A) the ROD, if such measures were proposed in a DEIS or EIS; or
 - (B) an MOA drafted in compliance with § 800.6(c); or
- (ii) the Council has commented under § 800.7 and received the agency's response to such comments.

(5) *Modification of the undertaking.* If the undertaking is modified after approval of the FONSI or the ROD in a manner that changes the undertaking or alters its effects on historic properties, or if the agency official fails to ensure that the measures to avoid, minimize or mitigate adverse effects (as specified in either the FONSI or the ROD, or in the binding commitment adopted pursuant to paragraph (c)(4) of this section) are carried out, the agency official shall notify the Council and all consulting parties that supplemental environmental documents will be prepared in compliance with NEPA or that the procedures in §§ 800.3 through 800.6 will be followed as necessary.

§ 800.9 Council review of section 106 compliance.

(a) *Assessment of agency official compliance for individual undertakings.* The Council may provide to the agency official its advisory opinion regarding the substance of any finding, determination or decision or regarding the adequacy of the agency official's compliance with the procedures under this part. The Council may provide such advice at any time at the request of any individual, agency or organization or on its own initiative. The agency official shall consider the views of the Council in reaching a decision on the matter in question.

(b) *Agency foreclosure of the Council's opportunity to comment.* Where an agency official has failed to complete the requirements of section 106 in accordance with the procedures in this part prior to the approval of an undertaking, the Council's opportunity to comment may be foreclosed. The Council may review a case to determine whether a foreclosure has occurred. The Council shall notify the agency official and the agency's Federal preservation officer and allow 30 days for the agency official to provide information as to whether foreclosure has occurred. If the Council determines foreclosure has occurred, the Council shall transmit the determination to the

agency official and the head of the agency. The Council shall also make the determination available to the public and any parties known to be interested in the undertaking and its effects upon historic properties.

(c) *Intentional adverse effects by applicants.*

(1) *Agency responsibility.* Section 110(k) of the act prohibits a Federal agency from granting a loan, loan guarantee, permit, license or other assistance to an applicant who, with intent to avoid the requirements of section 106, has intentionally significantly adversely affected a historic property to which the grant would relate, or having legal power to prevent it, has allowed such significant adverse effect to occur, unless the agency, after consultation with the Council, determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant. Guidance issued by the Secretary pursuant to section 110 of the act governs its implementation.

(2) *Consultation with the Council.* When an agency official determines, based on the actions of an applicant, that section 110(k) is applicable and that circumstances may justify granting the assistance, the agency official shall notify the Council and provide documentation specifying the circumstances under which the adverse effects to the historic property occurred and the degree of damage to the integrity of the property. This documentation shall include any views obtained from the applicant, SHPO/THPO, an Indian tribe if the undertaking occurs on or affects historic properties on tribal lands, and other parties known to be interested in the undertaking.

(i) Within thirty days of receiving the agency official's notification, unless otherwise agreed to by the agency official, the Council shall provide the agency official with its opinion as to whether circumstances justify granting assistance to the applicant and any possible mitigation of the adverse effects.

(ii) The agency official shall consider the Council's opinion in making a decision on whether to grant assistance to the applicant, and shall notify the Council, the SHPO/THPO, and other parties known to be interested in the undertaking prior to granting the assistance.

(3) *Compliance with Section 106.* If an agency official, after consulting with

the Council, determines to grant the assistance, the agency official shall comply with §§ 800.3 through 800.6 to take into account the effects of the undertaking on any historic properties.

(d) *Evaluation of Section 106 operations.* The Council may evaluate the operation of the section 106 process by periodic reviews of how participants have fulfilled their legal responsibilities and how effectively the outcomes reached advance the purposes of the act.

(1) *Information from participants.* Section 203 of the act authorizes the Council to obtain information from Federal agencies necessary to conduct evaluation of the section 106 process. The agency official shall make documentation of agency policies, operating procedures and actions taken to comply with section 106 available to the Council upon request. The Council may request available information and documentation from other participants in the section 106 process.

(2) *Improving the operation of section 106.* Based upon any evaluation of the section 106 process, the Council may make recommendations to participants, the heads of Federal agencies, and the Secretary of actions to improve the efficiency and effectiveness of the process. Where the Council determines that an agency official or a SHPO/THPO has failed to properly carry out the responsibilities assigned under the process in this part, the Council may participate in individual case reviews conducted under such process in addition to the SHPO/THPO for such period that it determines is necessary to improve performance or correct deficiencies. If the Council finds a pattern of failure by a Federal agency in carrying out its responsibilities under section 106, the Council may review the policies and programs of the agency related to historic preservation pursuant to section 202(a)(6) of the act and recommend methods to improve the effectiveness, coordination, and consistency of those policies and programs with section 106.

§ 800.10 Special requirements for protecting National Historic Landmarks.

(a) *Statutory requirement.* Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking. When

commenting on such undertakings, the Council shall use the process set forth in §§ 800.6 through 800.7 and give special consideration to protecting National Historic Landmarks as specified in this section.

(b) *Resolution of adverse effects.* The agency official shall request the Council to participate in any consultation to resolve adverse effects on National Historic Landmarks conducted under § 800.6.

(c) *Involvement of the Secretary.* The agency official shall notify the Secretary of any consultation involving a National Historic Landmark and invite the Secretary to participate in the consultation where there may be an adverse effect. The Council may request a report from the Secretary under section 213 of the act to assist in the consultation.

(d) *Report of outcome.* When the Council participates in consultation under this section, it shall report the outcome of the section 106 process, providing its written comments or any memoranda of agreement to which it is a signatory, to the Secretary and the head of the agency responsible for the undertaking.

§ 800.11 Documentation standards.

(a) *Adequacy of documentation.* The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis. The agency official shall provide such documentation to the extent permitted by law and within available funds. When an agency official is conducting phased identification or evaluation under this subpart, the documentation standards regarding description of historic properties may be applied flexibly. If the Council, or the SHPO/THPO when the Council is not involved, determines the applicable documentation standards are not met, the Council or the SHPO/THPO, as appropriate, shall notify the agency official and specify the information needed to meet the standard. At the request of the agency official or any of the consulting parties, the Council shall review any disputes over whether documentation standards are met and provide its views to the agency official and the consulting parties.

(b) *Format.* The agency official may use documentation prepared to comply with other laws to fulfill the

requirements of the procedures in this subpart, if that documentation meets the standards of this section.

(c) *Confidentiality.*

(1) *Authority to withhold information.* Section 304 of the act provides that the head of a Federal agency or other public official receiving grant assistance pursuant to the act, after consultation with the Secretary, shall withhold from public disclosure information about the location, character, or ownership of a historic property when disclosure may cause a significant invasion of privacy; risk harm to the historic property; or impede the use of a traditional religious site by practitioners. When the head of a Federal agency or other public official has determined that information should be withheld from the public pursuant to these criteria, the Secretary, in consultation with such Federal agency head or official, shall determine who may have access to the information for the purposes of carrying out the act.

(2) *Consultation with the Council.*

When the information in question has been developed in the course of an agency's compliance with this part, the Secretary shall consult with the Council in reaching determinations on the withholding and release of information. The Federal agency shall provide the Council with available information, including views of the SHPO/THPO, Indian tribes and Native Hawaiian organizations, related to the confidentiality concern. The Council shall advise the Secretary and the Federal agency within 30 days of receipt of adequate documentation.

(3) *Other authorities affecting confidentiality.* Other Federal laws and program requirements may limit public access to information concerning an undertaking and its effects on historic properties. Where applicable, those authorities shall govern public access to information developed in the section 106 process and may authorize the agency official to protect the privacy of non-governmental applicants.

(d) *Finding of no historic properties affected.* Documentation shall include:

(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, drawings, as necessary;

(2) A description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to § 800.4(b); and

(3) The basis for determining that no historic properties are present or affected.

(e) *Finding of no adverse effect or adverse effect.* Documentation shall include:

(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, and drawings, as necessary;

(2) A description of the steps taken to identify historic properties;

(3) A description of the affected historic properties, including information on the characteristics that qualify them for the National Register;

(4) A description of the undertaking's effects on historic properties;

(5) An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects; and

(6) Copies or summaries of any views provided by consulting parties and the public.

(f) *Memorandum of agreement.* When a memorandum of agreement is filed with the Council, the documentation shall include, any substantive revisions or additions to the documentation provided the Council pursuant to § 800.6(a)(1), an evaluation of any measures considered to avoid or minimize the undertaking's adverse effects and a summary of the views of consulting parties and the public.

(g) *Requests for comment without a memorandum of agreement.* Documentation shall include:

(1) A description and evaluation of any alternatives or mitigation measures that the agency official proposes to resolve the undertaking's adverse effects;

(2) A description of any reasonable alternatives or mitigation measures that were considered but not chosen, and the reasons for their rejection;

(3) Copies or summaries of any views submitted to the agency official concerning the adverse effects of the undertaking on historic properties and alternatives to reduce or avoid those effects; and

(4) Any substantive revisions or additions to the documentation provided the Council pursuant to § 800.6(a)(1).

§ 800.12 Emergency situations.

(a) *Agency procedures.* The agency official, in consultation with the appropriate SHPOs/THPOs, affected Indian tribes and Native Hawaiian organizations, and the Council, is encouraged to develop procedures for taking historic properties into account during operations which respond to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or which respond to other immediate threats to life or property. If approved by the Council, the procedures shall govern the agency's historic preservation responsibilities during any disaster or emergency in lieu of §§ 800.3 through 800.6.

(b) *Alternatives to agency procedures.* In the event an agency official proposes an emergency undertaking as an essential and immediate response to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or another immediate threat to life or property, and the agency has not developed procedures pursuant to paragraph (a) of this section, the agency official may comply with section 106 by:

(1) Following a programmatic agreement developed pursuant to § 800.14(b) that contains specific provisions for dealing with historic properties in emergency situations; or

(2) Notifying the Council, the appropriate SHPO/THPO and any Indian tribe or Native Hawaiian organization that may attach religious and cultural significance to historic properties likely to be affected prior to the undertaking and affording them an opportunity to comment within seven days of notification. If the agency official determines that circumstances do not permit seven days for comment, the agency official shall notify the Council, the SHPO/THPO and the Indian tribe or Native Hawaiian organization and invite any comments within the time available.

(c) *Local governments responsible for section 106 compliance.* When a local government official serves as the agency official for section 106 compliance, paragraphs (a) and (b) of this section also apply to an imminent threat to public health or safety as a result of a natural disaster or emergency declared by a local government's chief executive officer or legislative body, provided that if the Council or SHPO/THPO objects to the proposed action within seven days, the agency official shall comply with §§ 800.3 through 800.6.

(d) *Applicability.* This section applies only to undertakings that will be implemented within 30 days after the disaster or emergency has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability from the Council prior to the expiration of the 30 days. Immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of section 106 and this part.

§ 800.13 Post-review discoveries.

(a) *Planning for subsequent discoveries.*

(1) *Using a programmatic agreement.* An agency official may develop a programmatic agreement pursuant to § 800.14(b) to govern the actions to be taken when historic properties are discovered during the implementation of an undertaking.

(2) *Using agreement documents.* When the agency official's identification efforts in accordance with § 800.4 indicate that historic properties are likely to be discovered during implementation of an undertaking and no programmatic agreement has been developed pursuant to paragraph (a)(1) of this section, the agency official shall include in any finding of no adverse effect or memorandum of agreement a process to resolve any adverse effects upon such properties. Actions in conformance with the process satisfy the agency official's responsibilities under section 106 and this part.

(b) *Discoveries without prior planning.* If historic properties are discovered or unanticipated effects on historic properties found after the agency official has completed the section 106 process without establishing a process under paragraph (a) of this section, the agency official shall make reasonable efforts to avoid, minimize or mitigate adverse effects to such properties and:

(1) If the agency official has not approved the undertaking or if construction on an approved undertaking has not commenced, consult to resolve adverse effects pursuant to § 800.6; or

(2) If the agency official, the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property agree that such property is of value solely for its scientific, prehistoric, historic or archeological data, the agency official may comply with the

Archeological and Historic Preservation Act instead of the procedures in this part and provide the Council, the SHPO/THPO, and the Indian tribe or Native Hawaiian organization with a report on the actions within a reasonable time after they are completed; or

(3) If the agency official has approved the undertaking and construction has commenced, determine actions that the agency official can take to resolve adverse effects, and notify the SHPO/THPO, any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property, and the Council within 48 hours of the discovery. The notification shall describe the agency official's assessment of National Register eligibility of the property and proposed actions to resolve the adverse effects. The SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council shall respond within 48 hours of the notification. The agency official shall take into account their recommendations regarding National Register eligibility and proposed actions, and then carry out appropriate actions. The agency official shall provide the SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council a report of the actions when they are completed.

(c) *Eligibility of properties.* The agency official, in consultation with the SHPO/THPO, may assume a newly-discovered property to be eligible for the National Register for purposes of section 106. The agency official shall specify the National Register criteria used to assume the property's eligibility so that information can be used in the resolution of adverse effects.

(d) *Discoveries on tribal lands.* If historic properties are discovered on tribal lands, or there are unanticipated effects on historic properties found on tribal lands, after the agency official has completed the section 106 process without establishing a process under paragraph (a) of this section and construction has commenced, the agency official shall comply with applicable tribal regulations and procedures and obtain the concurrence of the Indian tribe on the proposed action.

Subpart C-Program Alternatives

§ 800.14 Federal agency program alternatives.

(a) *Alternate procedures.* An agency official may develop procedures to implement section 106 and substitute them for all or part of subpart B of this part if they are consistent with the Council's regulations pursuant to section 110(a)(2)(E) of the act.

(1) *Development of procedures.* The agency official shall consult with the Council, the National Conference of State Historic Preservation Officers or individual SHPO/THPOs, as appropriate, and Indian tribes and Native Hawaiian organizations, as specified in paragraph (f) of this section, in the development of alternate procedures, publish notice of the availability of proposed alternate procedures in the Federal Register and take other appropriate steps to seek public input during the development of alternate procedures.

(2) *Council review.* The agency official shall submit the proposed alternate procedures to the Council for a 60-day review period. If the Council finds the procedures to be consistent with this part, it shall notify the agency official and the agency official may adopt them as final alternate procedures.

(3) *Notice.* The agency official shall notify the parties with which it has consulted and publish notice of final alternate procedures in the Federal Register.

(4) *Legal effect.* Alternate procedures adopted pursuant to this subpart substitute for the Council's regulations for the purposes of the agency's compliance with section 106, except that where an Indian tribe has entered into an agreement with the Council to substitute tribal historic preservation regulations for the Council's regulations under section 101(d)(5) of the act, the agency shall follow those regulations in lieu of the agency's procedures regarding undertakings on tribal lands. Prior to the Council entering into such agreements, the Council will provide Federal agencies notice and opportunity to comment on the proposed substitute tribal regulations.

(b) *Programmatic agreements.* The Council and the agency official may negotiate a programmatic agreement to govern the implementation of a particular program or the resolution of adverse effects from certain complex project situations or multiple undertakings.

(1) *Use of programmatic agreements.* A programmatic agreement may be used:

(i) When effects on historic properties are similar and repetitive or are multi-State or regional in scope;

(ii) When effects on historic properties cannot be fully determined prior to approval of an undertaking;

(iii) When nonfederal parties are delegated major decisionmaking responsibilities;

(iv) Where routine management activities are undertaken at Federal installations, facilities, or other land-management units; or

(v) Where other circumstances warrant a departure from the normal section 106 process.

(2) *Developing programmatic agreements for agency programs.*

(i) The consultation shall involve, as appropriate, SHPO/THPOs, the National Conference of State Historic Preservation Officers (NCSHPO), Indian tribes and Native Hawaiian organizations, other Federal agencies, and members of the public. If the programmatic agreement has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the agency official shall also follow paragraph (f) of this section.

(ii) *Public Participation.* The agency official shall arrange for public participation appropriate to the subject matter and the scope of the program and in accordance with subpart A of this part. The agency official shall consider the nature of the program and its likely effects on historic properties and take steps to involve the individuals, organizations and entities likely to be interested.

(iii) *Effect.* The programmatic agreement shall take effect when executed by the Council, the agency official and the appropriate SHPOs/THPOs when the programmatic agreement concerns a specific region or the president of NCSHPO when NCSHPO has participated in the consultation. A programmatic agreement shall take effect on tribal lands only when the THPO, Indian tribe or a designated representative of the tribe is a signatory to the agreement. Compliance with the procedures established by an approved programmatic agreement satisfies the agency's section 106 responsibilities for all individual undertakings of the program covered by the agreement until

it expires or is terminated by the agency, the president of NCSHPO when a signatory, or the Council. Termination by an individual SHPO/THPO shall only terminate the application of a regional programmatic agreement within the jurisdiction of the SHPO/THPO. If a THPO assumes the responsibilities of a SHPO pursuant to section 101(d)(2) of the act and the SHPO is signatory to programmatic agreement, the THPO assumes the role of a signatory, including the right to terminate a regional programmatic agreement on lands under the jurisdiction of the tribe.

(iv) *Notice.* The agency official shall notify the parties with which it has consulted that a programmatic agreement has been executed under paragraph (b) of this section, provide appropriate public notice before it takes effect, and make any internal agency procedures implementing the agreement readily available to the Council, SHPO/THPOs, and the public.

(v) If the Council determines that the terms of a programmatic agreement are not being carried out, or if such an agreement is terminated, the agency official shall comply with subpart B of this part with regard to individual undertakings of the program covered by the agreement.

(3) *Developing programmatic agreements for complex or multiple undertakings.* Consultation to develop a programmatic agreement for dealing with the potential adverse effects of complex projects or multiple undertakings shall follow § 800.6. If consultation pertains to an activity involving multiple undertakings and the parties fail to reach agreement, then the agency official shall comply with the provisions of subpart B of this part for each individual undertaking.

(4) *Prototype programmatic agreements.* The Council may designate an agreement document as a prototype programmatic agreement that may be used for the same type of program or undertaking in more than one case or area. When an agency official uses such a prototype programmatic agreement, the agency official may develop and execute the agreement with the appropriate SHPO/THPO and the agreement shall become final without need for Council participation in consultation or Council signature.

(c) *Exempted categories.*

(1) *Criteria for establishing.* The Council or an agency official may propose a program or category of undertakings that may be exempted

from review under the provisions of subpart B of this part, if the program or category meets the following criteria:

(i) The actions within the program or category would otherwise qualify as "undertakings" as defined in § 800.16;

(ii) The potential effects of the undertakings within the program or category upon historic properties are foreseeable and likely to be minimal or not adverse; and

(iii) Exemption of the program or category is consistent with the purposes of the act.

(2) *Public participation.* The proponent of the exemption shall arrange for public participation appropriate to the subject matter and the scope of the exemption and in accordance with the standards in subpart A of this part. The proponent of the exemption shall consider the nature of the exemption and its likely effects on historic properties and take steps to involve individuals, organizations and entities likely to be interested.

(3) *Consultation with SHPOs/THPOs.* The proponent of the exemption shall notify and consider the views of the SHPOs/THPOs on the exemption.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the exempted program or category of undertakings has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Council review of proposed exemptions.* The Council shall review an exemption proposal that is supported by documentation describing the program or category for which the exemption is sought, demonstrating that the criteria of paragraph (c)(1) of this section have been met, describing the methods used to seek the views of the public, and summarizing any views submitted by the SHPO/THPOs, the public, and any others consulted. Unless it requests further information, the Council shall approve or reject the proposed exemption within 30 days of receipt, and thereafter notify the relevant agency official and SHPO/THPOs of the decision. The decision shall be based on the consistency of the exemption with the purposes of the act, taking into consideration the magnitude of the exempted undertaking or program and the likelihood of impairment of historic

properties in accordance with section 214 of the act.

(6) *Legal consequences.* Any undertaking that falls within an approved exempted program or category shall require no further review pursuant to subpart B of this part, unless the agency official or the Council determines that there are circumstances under which the normally excluded undertaking should be reviewed under subpart B of this part.

(7) *Termination.* The Council may terminate an exemption at the request of the agency official or when the Council determines that the exemption no longer meets the criteria of paragraph (c)(1) of this section. The Council shall notify the agency official 30 days before termination becomes effective.

(8) *Notice.* The proponent of the exemption shall publish notice of any approved exemption in the Federal Register.

(d) *Standard treatments.*

(1) *Establishment.* The Council, on its own initiative or at the request of another party, may establish standard methods for the treatment of a category of historic properties, a category of undertakings, or a category of effects on historic properties to assist Federal agencies in satisfying the requirements of subpart B of this part. The Council shall publish notice of standard treatments in the Federal Register.

(2) *Public participation.* The Council shall arrange for public participation appropriate to the subject matter and the scope of the standard treatment and consistent with subpart A of this part. The Council shall consider the nature of the standard treatment and its likely effects on historic properties and the individuals, organizations and entities likely to be interested. Where an agency official has proposed a standard treatment, the Council may request the agency official to arrange for public involvement.

(3) *Consultation with SHPOs/THPOs.* The Council shall notify and consider the views of SHPOs/THPOs on the proposed standard treatment.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the proposed standard treatment has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Termination.* The Council may terminate a standard treatment by publication of a notice in the Federal Register 30 days before the termination takes effect.

(e) *Program comments.* An agency official may request the Council to comment on a category of undertakings in lieu of conducting individual reviews under §§ 800.4 through 800.6. The Council may provide program comments at its own initiative.

(1) *Agency request.* The agency official shall identify the category of undertakings, specify the likely effects on historic properties, specify the steps the agency official will take to ensure that the effects are taken into account, identify the time period for which the comment is requested and summarize any views submitted by the public.

(2) *Public participation.* The agency official shall arrange for public participation appropriate to the subject matter and the scope of the category and in accordance with the standards in subpart A of this part. The agency official shall consider the nature of the undertakings and their likely effects on historic properties and the individuals, organizations and entities likely to be interested.

(3) *Consultation with SHPOs/THPOs.* The Council shall notify and consider the views of SHPOs/THPOs on the proposed program comment.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the program comment has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Council action.* Unless the Council requests additional documentation, notifies the agency official that it will decline to comment, or obtains the consent of the agency official to extend the period for providing comment, the Council shall comment to the agency official within 45 days of the request.

(i) If the Council comments, the agency official shall take into account the comments of the Council in carrying out the undertakings within the category and publish notice in the Federal Register of the Council's comments and steps the agency will take to ensure that effects to historic properties are taken into account.

(ii) If the Council declines to comment, the agency official shall continue to comply with the requirements of §§ 800.3 through 800.6 for the individual undertakings.

(6) *Withdrawal of comment.* If the Council determines that the consideration of historic properties is not being carried out in a manner consistent with the program comment, the Council may withdraw the comment and the agency official shall comply with the requirements of §§ 800.3 through 800.6 for the individual undertakings.

(f) *Consultation with Indian tribes and Native Hawaiian organizations when developing program alternatives.* Whenever an agency official proposes a program alternative pursuant to paragraphs (a) through (e) of this section, the agency official shall ensure that development of the program alternative includes appropriate government-to-government consultation with affected Indian tribes and consultation with affected Native Hawaiian organizations.

(1) *Identifying affected Indian tribes and Native Hawaiian organizations.* If any undertaking covered by a proposed program alternative has the potential to affect historic properties on tribal lands, the agency official shall identify and consult with the Indian tribes having jurisdiction over such lands. If a proposed program alternative has the potential to affect historic properties of religious and cultural significance to an Indian tribe or a Native Hawaiian organization which are located off tribal lands, the agency official shall identify those Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to such properties and consult with them. When a proposed program alternative has nationwide applicability, the agency official shall identify an appropriate government to government consultation with Indian tribes and consult with Native Hawaiian organizations in accordance with existing Executive orders, Presidential memoranda and applicable provisions of law.

(2) *Results of consultation.* The agency official shall provide summaries of the views, along with copies of any written comments, provided by affected Indian tribes and Native Hawaiian organizations to the Council as part of the documentation for the proposed program alternative. The agency official and the Council shall take those views

into account in reaching a final decision on the proposed program alternative.

§ 800.15 Tribal, State, and local program alternatives. (Reserved)

§ 800.16 Definitions.

(a) *Act* means the National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470-470w-6.

(b) *Agency* means agency as defined in 5 U.S.C. 551.

(c) *Approval of the expenditure of funds* means any final agency decision authorizing or permitting the expenditure of Federal funds or financial assistance on an undertaking, including any agency decision that may be subject to an administrative appeal.

(d) *Area of potential effects* means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

(e) *Comment* means the findings and recommendations of the Council formally provided in writing to the head of a Federal agency under section 106.

(f) *Consultation* means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process. The Secretary's "Standards and Guidelines for Federal Agency Preservation Programs pursuant to the National Historic Preservation Act" provide further guidance on consultation.

(g) *Council* means the Advisory Council on Historic Preservation or a Council member or employee designated to act for the Council.

(h) *Day or days* means calendar days.

(i) *Effect* means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

(j) *Foreclosure* means an action taken by an agency official that effectively precludes the Council from providing comments which the agency official can meaningfully consider prior to the approval of the undertaking.

(k) *Head of the agency* means the chief official of the Federal agency responsible for all aspects of the agency's actions. If a State, local or tribal government has assumed or has

been delegated responsibility for section 106 compliance, the head of that unit of government shall be considered the head of the agency.

(l)(1) *Historic property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

(2) The term *eligible for inclusion in the National Register* includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the National Register criteria.

(m) *Indian tribe* means an Indian tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, as those terms are defined in section 3 of the Alaska Native Claims Settlement Act (43 U.S.C. 1602), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

(n) *Local government* means a city, county, parish, township, municipality, borough, or other general purpose political subdivision of a State.

(o) *Memorandum of agreement* means the document that records the terms and conditions agreed upon to resolve the adverse effects of an undertaking upon historic properties.

(p) *National Historic Landmark* means a historic property that the Secretary of the Interior has designated a National Historic Landmark.

(q) *National Register* means the National Register of Historic Places maintained by the Secretary of the Interior.

(r) *National Register criteria* means the criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the National Register (36 CFR part 60).

(s)(1) *Native Hawaiian organization* means any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of

historic preservation that are significant to Native Hawaiians.

(2) *Native Hawaiian* means any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawaii.

(t) *Programmatic agreement* means a document that records the terms and conditions agreed upon to resolve the potential adverse effects of a Federal agency program, complex undertaking or other situations in accordance with § 800.14(b).

(u) *Secretary* means the Secretary of the Interior acting through the Director of the National Park Service except where otherwise specified.

(v) *State Historic Preservation Officer (SHPO)* means the official appointed or designated pursuant to section 101(b)(1) of the act to administer the State historic preservation program or a representative designated to act for the State historic preservation officer.

(w) *Tribal Historic Preservation Officer (THPO)* means the tribal official appointed by the tribe's chief governing authority or designated by a tribal ordinance or preservation program who has assumed the responsibilities of the SHPO for purposes of section 106 compliance on tribal lands in accordance with section 101(d)(2) of the act.

(x) *Tribal lands* means all lands within the exterior boundaries of any Indian reservation and all dependent Indian communities.

(y) *Undertaking* means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

(z) *Senior policy official* means the senior policy level official designated by the head of the agency pursuant to section 3(e) of Executive Order 13287.

Appendix A to Part 800 -- Criteria for Council Involvement in Reviewing Individual section 106 Cases

(a) *Introduction.* This appendix sets forth the criteria that will be used by the Council to determine whether to enter an individual section 106 review that it normally would not be involved in.

(b) *General policy.* The Council may choose to exercise its authorities under

the section 106 regulations to participate in an individual project pursuant to the following criteria. However, the Council will not always elect to participate even though one or more of the criteria may be met.

(c) *Specific criteria.* The Council is likely to enter the section 106 process at the steps specified in the regulations in this part when an undertaking:

(1) *Has substantial impacts on important historic properties.* This may include adverse effects on properties that possess a national level of significance or on properties that are of unusual or noteworthy importance or are a rare property type; or adverse effects to large numbers of historic properties, such as impacts to multiple properties within a historic district.

(2) *Presents important questions of policy or interpretation.* This may include questions about how the Council's regulations are being applied or interpreted, including possible foreclosure or anticipatory demolition situations; situations where the outcome will set a precedent affecting Council policies or program goals; or the development of programmatic agreements that alter the way the section 106 process is applied to a group or type of undertakings.

(3) *Has the potential for presenting procedural problems.* This may include cases with substantial public controversy that is related to historic preservation issues; with disputes among or about consulting parties which the Council's involvement could help resolve; that are involved or likely to be involved in litigation on the basis of section 106; or carried out by a Federal agency, in a State or locality, or on tribal lands where the Council has previously identified problems with section 106 compliance pursuant to § 800.9(d)(2).

(4) *Presents issues of concern to Indian tribes or Native Hawaiian organizations.* This may include cases where there have been concerns raised about the identification of, evaluation of or assessment of effects on historic properties to which an Indian tribe or Native Hawaiian organization attaches religious and cultural significance; where an Indian tribe or Native Hawaiian organization has requested Council involvement to assist in the resolution of adverse effects; or where there are questions relating to policy, interpretation or precedent under section 106 or its relation to other

authorities, such as the Native American Graves Protection and Repatriation Act.



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1826
August 31, 2016

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: CLARIFICATION OF THE SECTION 106 PROCESS FOR THE CONTINUATION AND INCREASE OF EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

In order to facilitate your participation in the section 106 consultation process for the proposed continuation and increase of EA-18G Growler operations at Naval Air Station Whidbey Island (NAS Whidbey Island), the Navy would like to offer you this overview of the section 106 consultation process and a description of our proposed plan to meet federal statutory responsibilities under the National Historic Preservation Act (NHPA) of 1966, as amended.

Per the NHPA, and its implementing regulations 36 CFR 800, the Navy, as a federal agency, is required to take into account the effects of an undertaking on historic properties included in or eligible for inclusion in the National Register of Historic Places (NRHP). Given the nature and scope of this undertaking, and the public interest in historic properties within the Area of Potential Effect (APE), the Navy will be offering ample opportunity for consulting parties to comment throughout the section 106 consultation process. The section 106 process consists of four steps:

1. DETERMINING THE UNDERTAKING:

The Navy has determined that the proposed action qualifies as an undertaking that is of a type that has the potential to effect historic properties.

2. DEFINING THE AREA OF POTENTIAL EFFECT (APE):

Currently, the Navy is requesting comments on the proposed approach to defining the Area of Potential Effect (APE). After comments have been received, and when updated noise model studies for the Environmental Impact Statement (EIS) have been completed, the Navy will define the APE, provide maps to all consulting parties for further comment, and request SHPO concurrence on the APE.

3. IDENTIFY AND EVALUATE HISTORIC PROPERTIES WITHIN THE APE:

Following defining the APE, the Navy will introduce their methodology for identifying historic properties and assessing the historic significance of resources that have not yet been evaluated for eligibility in the NRHP. All consulting parties will have the opportunity to comment on the proposed methodology prior to the Navy identifying and evaluating historic properties within the APE and requesting SHPO concurrence on determinations of eligibility.

4. DETERMINATION OF EFFECT:

The fourth step in the section 106 consultation process is to determine if the undertaking has an adverse effect on the identified historic properties within the APE. The Navy will provide our finding of effect to all consulting parties for comment prior to preparing a final finding of effect for SHPO concurrence.

5090
Ser N44/1826
August 31, 2016

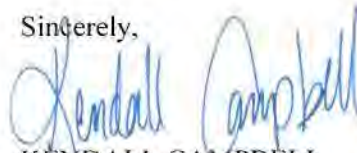
For a more detailed explanation of this process and the federal regulations and requirements that guide it please refer to Enclosures 1 and 2. Please find a copy of the implementing regulations 36 CFR 800 in Enclosure 3.

The time required to complete the section 106 consultation process can be influenced by other federal regulations and requirements outside of the NHPA. For the proposed continuation and increase of EA-18G Growler operations at NAS Whidbey Island section 106 consultation is being done in coordination with the National Environmental Policy Act (NEPA) review and preparation of an Environmental Impact Statement (EIS). The EIS will analyze the potential socio/economic, health, natural resource, and cultural resource impacts, whereas the section 106 process focuses specifically on potential effects to historic properties. Through coordination of these two federal processes the Navy seeks to increase the efficiency and effectiveness of each process by sharing information and documents while decreasing duplication of effort. In addition, coordinating the NHPA and NEPA processes allows for the promotion of greater transparency and potential for public involvement.

For this undertaking the section 106 consultation will provide the EIS team information to ensure historic properties are appropriately analyzed in the NEPA review. The EIS provides specialized studies to fill data gaps that meet information standards for the section 106 consultation. For this undertaking, the EIS will provide updated noise study models for the proposed action, which are necessary to facilitate section 106 consultation, particularly in defining the APE.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil. We appreciate your comments on the continuation and increase of EA-18G Growler operations at NAS Whidbey Island and look forward to continued section 106 consultation.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

Enclosures: 1. Continuation and Increase of Growler Operation Section 106 Consultation Process / Strategy
 2. Continuation and Increase of Growler Operation Section 106 Consultation Process / Strategy
 Flow Chart
 3. 36 CFR 800

Continuation and Increase of EA-18G Growler Operations: Section 106 Consultation Process / Strategy

1. Establish Undertaking [36 CFR 800.3(a)]: An undertaking is a “project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency...” [36 CFR 800.16(y)].

- The undertaking for the Continuation and Increase to Growler Operations is to:
 - continue and expand existing Growler operations at the Naval Air Station (NAS) Whidbey Island complex , which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field (OLF) Coupeville;
 - increase electronic attack capabilities (provide for an increase of 35 or 36 aircraft) to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment;
 - construct and renovate facilities at Ault Field to accommodate additional Growler aircraft; and
 - station additional personnel and their family members at the NAS Whidbey Island complex and in the surrounding community, beginning as early as 2017.
- Navy Cultural Resource staff determined this undertaking to be the type of activity that “has the potential to cause effects on historic properties” [36 CFR 800.3(a)]. In October 2014, the Navy initiated section 106 consultation and invited interested parties to consult on the undertaking. Navy Cultural Resource staff were present at National Environmental Policy Act (NEPA) scoping meetings seeking public comments on the undertaking.

2. Determine the Area of Potential Effect [36 CFR 800.4(a)]: The Area of Potential Effect (APE) is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” [36 CFR 800.16(d)].

- Given the nature and size of the undertaking, as well as coordination with the NEPA review process, the Navy asked consulting parties for comments on the proposed approach to defining the APE in June and July of 2016.
- When the Draft EIS is released to the public for comment (anticipated 30 September 2016), noise model studies included in the EIS will be used to define the APE and create a map of the APE based on the most expansive 65 dB DNL contours for all of the combined proposed alternatives. Maps of the proposed finalized APE will be sent to consulting parties for additional comments and considerations. The Washington State Historic Preservation Office (SHPO) will be asked to concur on the proposed finalized definition of the APE.
 - *The proposed and final definition of the APE is subject to Federal Aviation Administration (FAA) regulations (14 CFR 150).*

3. Identify Historic Properties and Evaluate Historic Significance [36 CFR 800.4(b) & 36 CFR 800.4(c)]: Based on comments received from consulting parties on the definition of the APE, the Navy will “make a reasonable and good faith effort to carry out appropriate identification efforts” of historic properties within the APE [36 CFR 800.4(b)(1)]. The Navy will also “apply National Register criteria (36 CFR 63) to properties identified within the [APE] that have not been previously evaluated for National Register eligibility” [36 CFR 800.4(c)(1)].

- A historic property “means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places...” [36 CFR 800.16(1)(1)]
- Once the APE has been defined and the Washington SHPO has concurred, the Navy will send out their proposed methodology for identifying historic properties and evaluating historic significance to all consulting parties. Consulting parties will have the opportunity to comment on the proposed methodology.
- Once comments have been received and taken into consideration, the Navy will identify historic properties and evaluate historic significance based on the finalized methodology. The final identification and evaluation report will be submitted to consulting parties.
 - Due to confidentiality requirements for archaeological sites and properties of traditional, religious, and cultural importance, the status of some historic properties may be withheld from consulting parties [36 CFR 800.11(c)].

4. Finding of Effect [36 CFR 800.4(d)]: If the Navy “finds that there are historic properties which may be affected by the undertaking, the [Navy] shall notify all consulting parties...and assess adverse effects, if any, in accordance, with 36 CFR 800.5” [36 CFR 800.4.(d)(2)].

- The Navy “shall apply the criteria of adverse effect to historic properties within the [APE]” [36 CFR 800.5(a)] and report their findings to all consulting parties for comments.
- Once comments have been received and taken into consideration, the Navy will send out the final finding of effect to all consulting parties and ask for Washington SHPO concurrence.
- In the event the Navy determines an Adverse Effect, the Navy shall follow 36 CFR 800.6 to resolve adverse effects to historic properties through avoidance, minimization, or mitigation.

ENCLOSURE 1.

Section 106 Consultation Process for the Continuation and Increase of EA-18G Growler Operations at NAS Whidbey Island / Strategy Flow Chart

Navy: Established the proposed continuation and increase of EA-18G Growlers at NAS Whidbey Island is an undertaking of the type that “has the potential to cause effects on historic properties”. Began section 106 consultation by notifying SHPO, ACHP, and consulting parties. (October 2014)

Public Consultation: To meet section 106 public notification requirements, public comments on section 106 were solicited and accepted at NEPA scoping meetings. (October/December 2014)



Navy: Consult with SHPO, ACHP, and consulting parties on the proposed approach to defining the Area of Potential Effect (APE) and ask for comments. (June/July 2016)

Consulting Parties: Provide Navy comments on proposed approach to defining the APE.

Navy: Take comments into consideration and using updated noise modeling maps from the Draft EIS, define the APE. Provide final APE to consulting parties for further comments and ask for SHPO concurrence. (Fall 2016)

Public Consultation: Navy will solicit and accept public comments on section 106 consultation during public meetings on the Draft EIS.

Consulting Parties: Provide Navy comments on the definition of the APE. SHPO has 30 days to respond to the Navy.



Navy: Make a “good and reasonable faith” effort to identify historic properties within the APE and apply National Register eligibility criteria to unevaluated properties within the APE. Share proposed methodology for identification and evaluation with SHPO, ACHP, and consulting parties for comments.

Consulting Parties: Provide Navy comments on proposed methodology for identifying and evaluating historic properties within the APE.

Navy: Take comments into consideration and identify and evaluate historic properties within the APE. Submit findings to consulting parties for comments and ask for SHPO concurrence.

Consulting Parties: Provide Navy comments on the identification and evaluation of historic properties. SHPO has 30 days to respond to the Navy.



Navy: Apply the criteria of adverse effect to determine if the undertaking will have an adverse effect to historic properties. Share proposed finding with SHPO, ACHP, and consulting parties for comments.

Consulting Parties: Provide Navy comments on the proposed finding of effect.

Navy: Take comments into consideration and submit final finding of effect to consulting parties and ask for SHPO concurrence.

Public Consultation: Navy will accept public comments on section 106 consultation during the comment period for the Final EIS.

Consulting Parties: Provide Navy comments on the finding of effect. SHPO has 30 days to respond to the Navy.



Navy: In the event Navy determines an Adverse Effect finding, the Navy shall follow 36 CFR 800.6 to resolve adverse effects to historic properties through avoidance, minimization, or mitigation.

Public Consultation: Please note, Navy will accept comments on section 106 consultation at anytime.

36 CFR PART 800 -- PROTECTION OF HISTORIC PROPERTIES (incorporating amendments effective August 5, 2004)

Subpart A -- Purposes and Participants

- Sec.
- 800.1 Purposes.
- 800.2 Participants in the Section 106 process.

Subpart B -- The Section 106 Process

- 800.3 Initiation of the section 106 process.
- 800.4 Identification of historic properties.
- 800.5 Assessment of adverse effects.
- 800.6 Resolution of adverse effects.
- 800.7 Failure to resolve adverse effects.
- 800.8 Coordination with the National Environmental Policy act.
- 800.9 Council review of Section 106 compliance.
- 800.10 Special requirements for protecting National Historic Landmarks.
- 800.11 Documentation standards.
- 800.12 Emergency situations.
- 800.13 Post-review discoveries.

Subpart C -- Program Alternatives

- 800.14 Federal agency program alternatives.
- 800.15 Tribal, State and Local Program Alternatives. (Reserved)
- 800.16 Definitions.
- Appendix A – Criteria for Council involvement in reviewing individual section 106 cases

Authority: 16 U.S.C. 470s.

Subpart A-Purposes and Participants

§ 800.1 Purposes.

(a) *Purposes of the section 106 process.* Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings. The procedures in this part define how Federal agencies meet these statutory responsibilities. The section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of

project planning. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.

(b) *Relation to other provisions of the act.* Section 106 is related to other provisions of the act designed to further the national policy of historic preservation. References to those provisions are included in this part to identify circumstances where they may affect actions taken to meet section 106 requirements. Such provisions may have their own implementing regulations or guidelines and are not intended to be implemented by the procedures in this part except insofar as they relate to the section 106 process. Guidelines, policies and procedures issued by other agencies, including the Secretary, have been cited in this part for ease of access and are not incorporated by reference.

(c) *Timing.* The agency official must complete the section 106 process "prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license." This does not prohibit agency official from conducting or authorizing nondestructive project planning activities before completing compliance with section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties. The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking.

§ 800.2 Participants in the Section 106 process.

(a) *Agency official.* It is the statutory obligation of the Federal agency to fulfill the requirements of section 106 and to ensure that an agency official with jurisdiction over an undertaking takes legal and financial responsibility for section 106 compliance in accordance with subpart B of this part. The agency official has approval authority for the undertaking and can commit the Federal agency to take appropriate action for a specific undertaking as a result of section 106 compliance. For the purposes of subpart C of this part, the agency official has the authority to commit the Federal agency to any obligation it may assume in the

implementation of a program alternative. The agency official may be a State, local, or tribal government official who has been delegated legal responsibility for compliance with section 106 in accordance with Federal law.

(1) *Professional standards.* Section 112(a)(1)(A) of the act requires each Federal agency responsible for the protection of historic resources, including archeological resources, to ensure that all actions taken by employees or contractors of the agency shall meet professional standards under regulations developed by the Secretary.

(2) *Lead Federal agency.* If more than one Federal agency is involved in an undertaking, some or all the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part.

(3) *Use of contractors.* Consistent with applicable conflict of interest laws, the agency official may use the services of applicants, consultants, or designees to prepare information, analyses and recommendations under this part. The agency official remains legally responsible for all required findings and determinations. If a document or study is prepared by a non-Federal party, the agency official is responsible for ensuring that its content meets applicable standards and guidelines.

(4) *Consultation.* The agency official shall involve the consulting parties described in paragraph (c) of this section in findings and determinations made during the section 106 process. The agency official should plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement and coordinated with other requirements of other statutes, as applicable, such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation. The Council encourages the agency official to use to the extent possible existing agency procedures and mechanisms to fulfill the consultation requirements of this part.

(b) *Council.* The Council issues regulations to implement section 106,

provides guidance and advice on the application of the procedures in this part, and generally oversees the operation of the section 106 process. The Council also consults with and comments to agency officials on individual undertakings and programs that affect historic properties.

(1) *Council entry into the section 106 process.* When the Council determines that its involvement is necessary to ensure that the purposes of section 106 and the act are met, the Council may enter the section 106 process. Criteria guiding Council decisions to enter the section 106 process are found in appendix A to this part. The Council will document that the criteria have been met and notify the parties to the section 106 process as required by this part.

(2) *Council assistance.* Participants in the section 106 process may seek advice, guidance and assistance from the Council on the application of this part to specific undertakings, including the resolution of disagreements, whether or not the Council is formally involved in the review of the undertaking. If questions arise regarding the conduct of the section 106 process, participants are encouraged to obtain the Council's advice on completing the process.

(c) *Consulting parties.* The following parties have consultative roles in the section 106 process.

(1) *State historic preservation officer.*

(i) The State historic preservation officer (SHPO) reflects the interests of the State and its citizens in the preservation of their cultural heritage. In accordance with section 101(b)(3) of the act, the SHPO advises and assists Federal agencies in carrying out their section 106 responsibilities and cooperates with such agencies, local governments and organizations and individuals to ensure that historic properties are taking into consideration at all levels of planning and development.

(ii) If an Indian tribe has assumed the functions of the SHPO in the section 106 process for undertakings on tribal lands, the SHPO shall participate as a consulting party if the undertaking takes place on tribal lands but affects historic properties off tribal lands, if requested in accordance with § 800.3(c)(1), or if the Indian tribe agrees to include the SHPO pursuant to § 800.3(f)(3).

(2) *Indian tribes and Native Hawaiian organizations.*

(i) *Consultation on tribal lands.*

(A) *Tribal historic preservation officer.* For a tribe that has assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act, the tribal historic preservation officer (THPO) appointed or designated in accordance with the act is the official representative for the purposes of section 106. The agency official shall consult with the THPO in lieu of the SHPO regarding undertakings occurring on or affecting historic properties on tribal lands.

(B) *Tribes that have not assumed SHPO functions.* When an Indian tribe has not assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act, the agency official shall consult with a representative designated by such Indian tribe in addition to the SHPO regarding undertakings occurring on or affecting historic properties on its tribal lands. Such Indian tribes have the same rights of consultation and concurrence that the THPOs are given throughout subpart B of this part, except that such consultations shall be in addition to and on the same basis as consultation with the SHPO.

(ii) *Consultation on historic properties of significance to Indian tribes and Native Hawaiian organizations.* Section 101(d)(6)(B) of the act requires the agency official to consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking. This requirement applies regardless of the location of the historic property. Such Indian tribe or Native Hawaiian organization shall be a consulting party.

(A) The agency official shall ensure that consultation in the section 106 process provides the Indian tribe or Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking's effects on such properties, and participate in the resolution of adverse effects. It is the responsibility of the agency official to make a reasonable and good faith effort to identify Indian tribes and Native Hawaiian organizations that shall be consulted in the section 106 process. Consultation should commence early in the planning process, in order to identify and discuss relevant

preservation issues and resolve concerns about the confidentiality of information on historic properties.

(B) The Federal Government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes, and court decisions. Consultation with Indian tribes should be conducted in a sensitive manner respectful of tribal sovereignty. Nothing in this part alters, amends, repeals, interprets or modifies tribal sovereignty, any treaty rights, or other rights of an Indian tribe, or preempts, modifies or limits the exercise of any such rights.

(C) Consultation with an Indian tribe must recognize the government-to-government relationship between the Federal Government and Indian tribes. The agency official shall consult with representatives designated or identified by the tribal government or the governing body of a Native Hawaiian organization. Consultation with Indian tribes and Native Hawaiian organizations should be conducted in a manner sensitive to the concerns and needs of the Indian tribe or Native Hawaiian organization.

(D) When Indian tribes and Native Hawaiian organizations attach religious and cultural significance to historic properties off tribal lands, section 101(d)(6)(B) of the act requires Federal agencies to consult with such Indian tribes and Native Hawaiian organizations in the section 106 process. Federal agencies should be aware that frequently historic properties of religious and cultural significance are located on ancestral, aboriginal, or ceded lands of Indian tribes and Native Hawaiian organizations and should consider that when complying with the procedures in this part.

(E) An Indian tribe or a Native Hawaiian organization may enter into an agreement with an agency official that specifies how they will carry out responsibilities under this part, including concerns over the confidentiality of information. An agreement may cover all aspects of tribal participation in the section 106 process, provided that no modification may be made in the roles of other parties to the section 106 process without their consent. An agreement may grant the Indian tribe or Native Hawaiian organization additional rights to participate or concur in agency decisions in the section 106 process beyond those specified in subpart B of this part. The agency official shall

provide a copy of any such agreement to the Council and the appropriate SHPOs.

(F) An Indian tribe that has not assumed the responsibilities of the SHPO for section 106 on tribal lands under section 101(d)(2) of the act may notify the agency official in writing that it is waiving its rights under § 800.6(c)(1) to execute a memorandum of agreement.

(3) *Representatives of local governments.* A representative of a local government with jurisdiction over the area in which the effects of an undertaking may occur is entitled to participate as a consulting party. Under other provisions of Federal law, the local government may be authorized to act as the agency official for purposes of section 106.

(4) *Applicants for Federal assistance, permits, licenses and other approvals.* An applicant for Federal assistance or for a Federal permit, license or other approval is entitled to participate as a consulting party as defined in this part. The agency official may authorize an applicant or group of applicants to initiate consultation with the SHPO/THPO and others, but remains legally responsible for all findings and determinations charged to the agency official. The agency official shall notify the SHPO/THPO when an applicant or group of applicants is so authorized. A Federal agency may authorize all applicants in a specific program pursuant to this section by providing notice to all SHPO/THPOs. Federal agencies that provide authorizations to applicants remain responsible for their government to government relationships with Indian tribes.

(5) *Additional consulting parties.* Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.

(d) *The public.*

(1) *Nature of involvement.* The views of the public are essential to informed Federal decisionmaking in the section 106 process. The agency official shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and

the relationship of the Federal involvement to the undertaking.

(2) *Providing notice and information.* The agency official must, except where appropriate to protect confidentiality concerns of affected parties, provide the public with information about an undertaking and its effects on historic properties and seek public comment and input. Members of the public may also provide views on their own initiative for the agency official to consider in decisionmaking.

(3) *Use of agency procedures.* The agency official may use the agency's procedures for public involvement under the National Environmental Policy Act or other program requirements in lieu of public involvement requirements in subpart B of this part, if they provide adequate opportunities for public involvement consistent with this subpart.

Subpart B-The section 106 Process

§ 800.3 Initiation of the section 106 process.

(a) *Establish undertaking.* The agency official shall determine whether the proposed Federal action is an undertaking as defined in § 800.16(y) and, if so, whether it is a type of activity that has the potential to cause effects on historic properties.

(1) *No potential to cause effects.* If the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present, the agency official has no further obligations under section 106 or this part.

(2) *Program alternatives.* If the review of the undertaking is governed by a Federal agency program alternative established under § 800.14 or a programmatic agreement in existence before January 11, 2001, the agency official shall follow the program alternative.

(b) *Coordinate with other reviews.* The agency official should coordinate the steps of the section 106 process, as appropriate, with the overall planning schedule for the undertaking and with any reviews required under other authorities such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation, such as section 4(f) of the Department of

Transportation Act. Where consistent with the procedures in this subpart, the agency official may use information developed for other reviews under Federal, State or tribal law to meet the requirements of section 106.

(c) *Identify the appropriate SHPO and/or THPO.* As part of its initial planning, the agency official shall determine the appropriate SHPO or SHPOs to be involved in the section 106 process. The agency official shall also determine whether the undertaking may occur on or affect historic properties on any tribal lands and, if so, whether a THPO has assumed the duties of the SHPO. The agency official shall then initiate consultation with the appropriate officer or officers.

(1) *Tribal assumption of SHPO responsibilities.* Where an Indian tribe has assumed the section 106 responsibilities of the SHPO on tribal lands pursuant to section 101(d)(2) of the act, consultation for undertakings occurring on tribal land or for effects on tribal land is with the THPO for the Indian tribe in lieu of the SHPO. Section 101(d)(2)(D)(iii) of the act authorizes owners of properties on tribal lands which are neither owned by a member of the tribe nor held in trust by the Secretary for the benefit of the tribe to request the SHPO to participate in the section 106 process in addition to the THPO.

(2) *Undertakings involving more than one State.* If more than one State is involved in an undertaking, the involved SHPOs may agree to designate a lead SHPO to act on their behalf in the section 106 process, including taking actions that would conclude the section 106 process under this subpart.

(3) *Conducting consultation.* The agency official should consult with the SHPO/THPO in a manner appropriate to the agency planning process for the undertaking and to the nature of the undertaking and its effects on historic properties.

(4) *Failure of the SHPO/THPO to respond.* If the SHPO/THPO fails to respond within 30 days of receipt of a request for review of a finding or determination, the agency official may either proceed to the next step in the process based on the finding or determination or consult with the Council in lieu of the SHPO/THPO. If the SHPO/THPO re-enters the section 106 process, the agency official shall continue the consultation without being required to reconsider previous findings or determinations.

(d) *Consultation on tribal lands.*

Where the Indian tribe has not assumed the responsibilities of the SHPO on tribal lands, consultation with the Indian tribe regarding undertakings occurring on such tribe's lands or effects on such tribal lands shall be in addition to and on the same basis as consultation with the SHPO. If the SHPO has withdrawn from the process, the agency official may complete the section 106 process with the Indian tribe and the Council, as appropriate. An Indian tribe may enter into an agreement with a SHPO or SHPOs specifying the SHPO's participation in the section 106 process for undertakings occurring on or affecting historic properties on tribal lands.

(e) *Plan to involve the public.* In consultation with the SHPO/THPO, the agency official shall plan for involving the public in the section 106 process. The agency official shall identify the appropriate points for seeking public input and for notifying the public of proposed actions, consistent with § 800.2(d).

(f) *Identify other consulting parties.* In consultation with the SHPO/THPO, the agency official shall identify any other parties entitled to be consulting parties and invite them to participate as such in the section 106 process. The agency official may invite others to participate as consulting parties as the section 106 process moves forward.

(1) *Involving local governments and applicants.* The agency official shall invite any local governments or applicants that are entitled to be consulting parties under § 800.2(c).

(2) *Involving Indian tribes and Native Hawaiian organizations.* The agency official shall make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties. Such Indian tribe or Native Hawaiian organization that requests in writing to be a consulting party shall be one.

(3) *Requests to be consulting parties.* The agency official shall consider all written requests of individuals and organizations to participate as consulting parties and, in consultation with the SHPO/THPO and any Indian tribe upon whose tribal lands an undertaking occurs or affects historic properties, determine which should be consulting parties.

(g) *Expediting consultation.* A consultation by the agency official with the SHPO/THPO and other consulting parties may address multiple steps in §§ 800.3 through 800.6 where the agency official and the SHPO/THPO agree it is appropriate as long as the consulting parties and the public have an adequate opportunity to express their views as provided in § 800.2(d).

§ 800.4 Identification of historic properties.

(a) *Determine scope of identification efforts.* In consultation with the SHPO/THPO, the agency official shall:

(1) Determine and document the area of potential effects, as defined in § 800.16(d);

(2) Review existing information on historic properties within the area of potential effects, including any data concerning possible historic properties not yet identified;

(3) Seek information, as appropriate, from consulting parties, and other individuals and organizations likely to have knowledge of, or concerns with, historic properties in the area, and identify issues relating to the undertaking's potential effects on historic properties; and

(4) Gather information from any Indian tribe or Native Hawaiian organization identified pursuant to § 800.3(f) to assist in identifying properties, including those located off tribal lands, which may be of religious and cultural significance to them and may be eligible for the National Register, recognizing that an Indian tribe or Native Hawaiian organization may be reluctant to divulge specific information regarding the location, nature, and activities associated with such sites. The agency official should address concerns raised about confidentiality pursuant to § 800.11(c).

(b) *Identify historic properties.* Based on the information gathered under paragraph (a) of this section, and in consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to properties within the area of potential effects, the agency official shall take the steps necessary to identify historic properties within the area of potential effects.

(1) *Level of effort.* The agency official shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews,

sample field investigation, and field survey. The agency official shall take into account past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. The Secretary's Standards and Guidelines for Identification provide guidance on this subject. The agency official should also consider other applicable professional, State, tribal and local laws, standards and guidelines. The agency official shall take into account any confidentiality concerns raised by Indian tribes or Native Hawaiian organizations during the identification process.

(2) *Phased identification and evaluation.* Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process to conduct identification and evaluation efforts. The agency official may also defer final identification and evaluation of historic properties if it is specifically provided for in a memorandum of agreement executed pursuant to § 800.6, a programmatic agreement executed pursuant to § 800.14 (b), or the documents used by an agency official to comply with the National Environmental Policy Act pursuant to § 800.8. The process should establish the likely presence of historic properties within the area of potential effects for each alternative or inaccessible area through background research, consultation and an appropriate level of field investigation, taking into account the number of alternatives under consideration, the magnitude of the undertaking and its likely effects, and the views of the SHPO/THPO and any other consulting parties. As specific aspects or locations of an alternative are refined or access is gained, the agency official shall proceed with the identification and evaluation of historic properties in accordance with paragraphs (b)(1) and (c) of this section.

(c) *Evaluate historic significance.*

(1) *Apply National Register criteria.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified properties and guided by the Secretary's Standards and Guidelines for Evaluation, the agency official shall

apply the National Register criteria (36 CFR part 63) to properties identified within the area of potential effects that have not been previously evaluated for National Register eligibility. The passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible. The agency official shall acknowledge that Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them.

(2) *Determine whether a property is eligible.* If the agency official determines any of the National Register criteria are met and the SHPO/THPO agrees, the property shall be considered eligible for the National Register for section 106 purposes. If the agency official determines the criteria are not met and the SHPO/THPO agrees, the property shall be considered not eligible. If the agency official and the SHPO/THPO do not agree, or if the Council or the Secretary so request, the agency official shall obtain a determination of eligibility from the Secretary pursuant to 36 CFR part 63. If an Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to a property off tribal lands does not agree, it may ask the Council to request the agency official to obtain a determination of eligibility.

(d) *Results of identification and evaluation.*

(1) *No historic properties affected.* If the agency official finds that either there are no historic properties present or there are historic properties present but the undertaking will have no effect upon them as defined in § 800.16(i), the agency official shall provide documentation of this finding, as set forth in § 800.11(d), to the SHPO/THPO. The agency official shall notify all consulting parties, including Indian tribes and Native Hawaiian organizations, and make the documentation available for public inspection prior to approving the undertaking.

(i) If the SHPO/THPO, or the Council if it has entered the section 106 process, does not object within 30 days of receipt of an adequately documented finding, the agency official's responsibilities under section 106 are fulfilled.

(ii) If the SHPO/THPO objects within 30 days of receipt of an adequately documented finding, the agency official shall either consult with the objecting party to resolve the disagreement, or forward the finding and supporting documentation to the Council and request that the Council review the finding pursuant to paragraphs (d)(1)(iv)(A) through (d)(1)(iv)(C) of this section. When an agency official forwards such requests for review to the Council, the agency official shall concurrently notify all consulting parties that such a request has been made and make the request documentation available to the public.

(iii) During the SHPO/THPO 30 day review period, the Council may object to the finding and provide its opinion regarding the finding to the agency official and, if the Council determines the issue warrants it, the head of the agency. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The agency shall then proceed according to paragraphs (d)(1)(iv)(B) and (d)(1)(iv)(C) of this section.

(iv)(A) Upon receipt of the request under paragraph (d)(1)(ii) of this section, the Council will have 30 days in which to review the finding and provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the finding. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. If the Council does not respond within 30 days of receipt of the request, the agency official's responsibilities under section 106 are fulfilled.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion before the agency reaches a final decision on the finding.

(C) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall then prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council, the SHPO/THPO, and the consulting parties. The head of the agency may delegate his or her duties under this paragraph to the agency's senior policy official. If the agency official's initial finding will be revised, the agency official shall proceed in

accordance with the revised finding. If the final decision of the agency is to affirm the initial agency finding of no historic properties affected, once the summary of the decision has been sent to the Council, the SHPO/THPO, and the consulting parties, the agency official's responsibilities under section 106 are fulfilled.

(D) The Council shall retain a record of agency responses to Council opinions on their findings of no historic properties affected. The Council shall make this information available to the public.

(2) *Historic properties affected.* If the agency official finds that there are historic properties which may be affected by the undertaking, the agency official shall notify all consulting parties, including Indian tribes or Native Hawaiian organizations, invite their views on the effects and assess adverse effects, if any, in accordance with § 800.5.

§ 800.5 Assessment of adverse effects.

(a) *Apply criteria of adverse effect.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the agency official shall apply the criteria of adverse effect to historic properties within the area of potential effects. The agency official shall consider any views concerning such effects which have been provided by consulting parties and the public.

(1) *Criteria of adverse effect.* An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(2) *Examples of adverse effects.* Adverse effects on historic properties include, but are not limited to:

(i) Physical destruction of or damage to all or part of the property;

(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;

(iii) Removal of the property from its historic location;

(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

(3) *Phased application of criteria.* Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process in applying the criteria of adverse effect consistent with phased identification and evaluation efforts conducted pursuant to § 800.4(b)(2).

(b) *Finding of no adverse effect.* The agency official, in consultation with the SHPO/THPO, may propose a finding of no adverse effect when the undertaking's effects do not meet the criteria of paragraph (a)(1) of this section or the undertaking is modified or conditions are imposed, such as the subsequent review of plans for rehabilitation by the SHPO/THPO to ensure consistency with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines, to avoid adverse effects.

(c) *Consulting party review.* If the agency official proposes a finding of no adverse effect, the agency official shall notify all consulting parties of the finding and provide them with the documentation specified in § 800.11(e). The SHPO/THPO shall have 30 days from receipt to review the finding.

(1) *Agreement with, or no objection to, finding.* Unless the Council is reviewing the finding pursuant to paragraph (c)(3) of this section, the agency official may proceed after the close of the 30 day review period if the SHPO/THPO has agreed with the finding or has not provided a response, and no consulting party has objected. The agency official shall then carry out the undertaking in accordance with paragraph (d)(1) of this section.

(2) *Disagreement with finding.*

(i) If within the 30 day review period the SHPO/THPO or any consulting party notifies the agency official in writing that it disagrees with the finding and specifies the reasons for the disagreement in the notification, the agency official shall either consult with the party to resolve the disagreement, or request the Council to review the finding pursuant to paragraphs (c)(3)(i) and (c)(3)(ii) of this section. The agency official shall include with such request the documentation specified in § 800.11(e). The agency official shall also concurrently notify all consulting parties that such a submission has been made and make the submission documentation available to the public.

(ii) If within the 30 day review period the Council provides the agency official and, if the Council determines the issue warrants it, the head of the agency, with a written opinion objecting to the finding, the agency shall then proceed according to paragraph (c)(3)(ii) of this section. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part.

(iii) The agency official should seek the concurrence of any Indian tribe or Native Hawaiian organization that has made known to the agency official that it attaches religious and cultural significance to a historic property subject to the finding. If such Indian tribe or Native Hawaiian organization disagrees with the finding, it may within the 30 day review period specify the reasons for disagreeing with the finding and request the Council to review and object to the finding pursuant to paragraph (c)(2)(ii) of this section.

(3) *Council review of findings.*

(i) When a finding is submitted to the Council pursuant to paragraph (c)(2)(i) of this section, the Council shall review the finding and provide the agency official and, if the Council determines the issue warrants it, the head of the agency with its opinion as to whether the adverse effect criteria have

been correctly applied. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The Council will provide its opinion within 15 days of receiving the documented finding from the agency official. The Council at its discretion may extend that time period for 15 days, in which case it shall notify the agency of such extension prior to the end of the initial 15 day period. If the Council does not respond within the applicable time period, the agency official's responsibilities under section 106 are fulfilled.

(ii)(A) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion in reaching a final decision on the finding.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council, the SHPO/THPO, and the consulting parties. The head of the agency may delegate his or her duties under this paragraph to the agency's senior policy official. If the agency official's initial finding will be revised, the agency official shall proceed in accordance with the revised finding. If the final decision of the agency is to affirm the initial finding of no adverse effect, once the summary of the decision has been sent to the Council, the SHPO/THPO, and the consulting parties, the agency official's responsibilities under section 106 are fulfilled.

(C) The Council shall retain a record of agency responses to Council opinions on their findings of no adverse effects. The Council shall make this information available to the public.

(d) *Results of assessment.*

(1) *No adverse effect.* The agency official shall maintain a record of the finding and provide information on the finding to the public on request, consistent with the confidentiality provisions of § 800.11(c). Implementation of the undertaking in accordance with the finding as documented fulfills the agency official's responsibilities under section 106 and this part. If the agency official will not conduct the undertaking as proposed in the finding, the agency official shall reopen consultation under paragraph (a) of this section.

(2) *Adverse effect.* If an adverse effect is found, the agency official shall consult further to resolve the adverse effect pursuant to § 800.6.

§ 800.6 Resolution of adverse effects.

(a) *Continue consultation.* The agency official shall consult with the SHPO/THPO and other consulting parties, including Indian tribes and Native Hawaiian organizations, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties.

(1) *Notify the Council and determine Council participation.* The agency official shall notify the Council of the adverse effect finding by providing the documentation specified in § 800.11(e).

(i) The notice shall invite the Council to participate in the consultation when:

(A) The agency official wants the Council to participate;

(B) The undertaking has an adverse effect upon a National Historic Landmark; or

(C) A programmatic agreement under § 800.14(b) will be prepared;

(ii) The SHPO/THPO, an Indian tribe or Native Hawaiian organization, or any other consulting party may at any time independently request the Council to participate in the consultation.

(iii) The Council shall advise the agency official and all consulting parties whether it will participate within 15 days of receipt of notice or other request. Prior to entering the process, the Council shall provide written notice to the agency official and the consulting parties that its decision to participate meets the criteria set forth in appendix A to this part. The Council shall also advise the head of the agency of its decision to enter the process. Consultation with Council participation is conducted in accordance with paragraph (b)(2) of this section.

(iv) If the Council does not join the consultation, the agency official shall proceed with consultation in accordance with paragraph (b)(1) of this section.

(2) *Involve consulting parties.* In addition to the consulting parties identified under § 800.3(f), the agency official, the SHPO/THPO and the Council, if participating, may agree to invite other individuals or organizations to become consulting parties. The agency official shall invite any individual or organization that will assume a specific role or responsibility

in a memorandum of agreement to participate as a consulting party.

(3) *Provide documentation.* The agency official shall provide to all consulting parties the documentation specified in § 800.11(e), subject to the confidentiality provisions of § 800.11(c), and such other documentation as may be developed during the consultation to resolve adverse effects.

(4) *Involve the public.* The agency official shall make information available to the public, including the documentation specified in § 800.11(e), subject to the confidentiality provisions of § 800.11(c). The agency official shall provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. The agency official should use appropriate mechanisms, taking into account the magnitude of the undertaking and the nature of its effects upon historic properties, the likely effects on historic properties, and the relationship of the Federal involvement to the undertaking to ensure that the public's views are considered in the consultation. The agency official should also consider the extent of notice and information concerning historic preservation issues afforded the public at earlier steps in the section 106 process to determine the appropriate level of public involvement when resolving adverse effects so that the standards of § 800.2(d) are met.

(5) *Restrictions on disclosure of information.* Section 304 of the act and other authorities may limit the disclosure of information under paragraphs (a)(3) and (a)(4) of this section. If an Indian tribe or Native Hawaiian organization objects to the disclosure of information or if the agency official believes that there are other reasons to withhold information, the agency official shall comply with § 800.11(c) regarding the disclosure of such information.

(b) *Resolve adverse effects.*

(1) *Resolution without the Council.*

(i) The agency official shall consult with the SHPO/THPO and other consulting parties to seek ways to avoid, minimize or mitigate the adverse effects.

(ii) The agency official may use standard treatments established by the Council under § 800.14(d) as a basis for a memorandum of agreement.

(iii) If the Council decides to join the consultation, the agency official shall follow paragraph (b)(2) of this section.

(iv) If the agency official and the SHPO/THPO agree on how the adverse

effects will be resolved, they shall execute a memorandum of agreement. The agency official must submit a copy of the executed memorandum of agreement, along with the documentation specified in § 800.11(f), to the Council prior to approving the undertaking in order to meet the requirements of section 106 and this subpart.

(v) If the agency official, and the SHPO/THPO fail to agree on the terms of a memorandum of agreement, the agency official shall request the Council to join the consultation and provide the Council with the documentation set forth in § 800.11(g). If the Council decides to join the consultation, the agency official shall proceed in accordance with paragraph (b)(2) of this section. If the Council decides not to join the consultation, the Council will notify the agency and proceed to comment in accordance with § 800.7(c).

(2) *Resolution with Council participation.* If the Council decides to participate in the consultation, the agency official shall consult with the SHPO/THPO, the Council, and other consulting parties, including Indian tribes and Native Hawaiian organizations under § 800.2(c)(3), to seek ways to avoid, minimize or mitigate the adverse effects. If the agency official, the SHPO/THPO, and the Council agree on how the adverse effects will be resolved, they shall execute a memorandum of agreement.

(c) *Memorandum of agreement.* A memorandum of agreement executed and implemented pursuant to this section evidences the agency official's compliance with section 106 and this part and shall govern the undertaking and all of its parts. The agency official shall ensure that the undertaking is carried out in accordance with the memorandum of agreement.

(1) *Signatories.* The signatories have sole authority to execute, amend or terminate the agreement in accordance with this subpart.

(i) The agency official and the SHPO/THPO are the signatories to a memorandum of agreement executed pursuant to paragraph (b)(1) of this section.

(ii) The agency official, the SHPO/THPO, and the Council are the signatories to a memorandum of agreement executed pursuant to paragraph (b)(2) of this section.

(iii) The agency official and the Council are signatories to a

memorandum of agreement executed pursuant to § 800.7(a)(2).

(2) *Invited signatories.*

(i) The agency official may invite additional parties to be signatories to a memorandum of agreement. Any such party that signs the memorandum of agreement shall have the same rights with regard to seeking amendment or termination of the memorandum of agreement as other signatories.

(ii) The agency official may invite an Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties located off tribal lands to be a signatory to a memorandum of agreement concerning such properties.

(iii) The agency official should invite any party that assumes a responsibility under a memorandum of agreement to be a signatory.

(iv) The refusal of any party invited to become a signatory to a memorandum of agreement pursuant to paragraph (c)(2) of this section does not invalidate the memorandum of agreement.

(3) *Concurrence by others.* The agency official may invite all consulting parties to concur in the memorandum of agreement. The signatories may agree to invite others to concur. The refusal of any party invited to concur in the memorandum of agreement does not invalidate the memorandum of agreement.

(4) *Reports on implementation.* Where the signatories agree it is appropriate, a memorandum of agreement shall include a provision for monitoring and reporting on its implementation.

(5) *Duration.* A memorandum of agreement shall include provisions for termination and for reconsideration of terms if the undertaking has not been implemented within a specified time.

(6) *Discoveries.* Where the signatories agree it is appropriate, a memorandum of agreement shall include provisions to deal with the subsequent discovery or identification of additional historic properties affected by the undertaking.

(7) *Amendments.* The signatories to a memorandum of agreement may amend it. If the Council was not a signatory to the original agreement and the signatories execute an amended agreement, the agency official shall file it with the Council.

(8) *Termination.* If any signatory determines that the terms of a memorandum of agreement cannot be or are not being carried out, the signatories

shall consult to seek amendment of the agreement. If the agreement is not amended, any signatory may terminate it. The agency official shall either execute a memorandum of agreement with signatories under paragraph (c)(1) of this section or request the comments of the Council under § 800.7(a).

(9) *Copies.* The agency official shall provide each consulting party with a copy of any memorandum of agreement executed pursuant to this subpart.

§ 800.7 Failure to resolve adverse effects.

(a) *Termination of consultation.* After consulting to resolve adverse effects pursuant to § 800.6(b)(2), the agency official, the SHPO/THPO, or the Council may determine that further consultation will not be productive and terminate consultation. Any party that terminates consultation shall notify the other consulting parties and provide them the reasons for terminating in writing.

(1) If the agency official terminates consultation, the head of the agency or an Assistant Secretary or other officer with major department-wide or agency-wide responsibilities shall request that the Council comment pursuant to paragraph (c) of this section and shall notify all consulting parties of the request.

(2) If the SHPO terminates consultation, the agency official and the Council may execute a memorandum of agreement without the SHPO's involvement.

(3) If a THPO terminates consultation regarding an undertaking occurring on or affecting historic properties on its tribal lands, the Council shall comment pursuant to paragraph (c) of this section.

(4) If the Council terminates consultation, the Council shall notify the agency official, the agency's Federal preservation officer and all consulting parties of the termination and comment under paragraph (c) of this section. The Council may consult with the agency's Federal preservation officer prior to terminating consultation to seek to resolve issues concerning the undertaking and its effects on historic properties.

(b) *Comments without termination.* The Council may determine that it is appropriate to provide additional advisory comments upon an undertaking for which a memorandum of agreement will be executed. The Council shall provide them to the

agency official when it executes the memorandum of agreement.

(c) *Comments by the Council.*

(1) *Preparation.* The Council shall provide an opportunity for the agency official, all consulting parties, and the public to provide their views within the time frame for developing its comments. Upon request of the Council, the agency official shall provide additional existing information concerning the undertaking and assist the Council in arranging an onsite inspection and an opportunity for public participation.

(2) *Timing.* The Council shall transmit its comments within 45 days of receipt of a request under paragraph (a)(1) or (a)(3) of this section or § 800.8(c)(3), or termination by the Council under § 800.6(b)(1)(v) or paragraph (a)(4) of this section, unless otherwise agreed to by the agency official.

(3) *Transmittal.* The Council shall provide its comments to the head of the agency requesting comment with copies to the agency official, the agency's Federal preservation officer, all consulting parties, and others as appropriate.

(4) *Response to Council comment.* The head of the agency shall take into account the Council's comments in reaching a final decision on the undertaking. Section 110(l) of the act directs that the head of the agency shall document this decision and may not delegate his or her responsibilities pursuant to section 106. Documenting the agency head's decision shall include:

(i) Preparing a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's comments and providing it to the Council prior to approval of the undertaking;

(ii) Providing a copy of the summary to all consulting parties; and

(iii) Notifying the public and making the record available for public inspection.

§ 800.8 Coordination With the National Environmental Policy Act.

(a) *General principles.*

(1) *Early coordination.* Federal agencies are encouraged to coordinate compliance with section 106 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their section 106 responsibilities as early as possible in the NEPA process, and plan

their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner. The determination of whether an undertaking is a "major Federal action significantly affecting the quality of the human environment," and therefore requires preparation of an environmental impact statement (EIS) under NEPA, should include consideration of the undertaking's likely effects on historic properties. A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA.

(2) *Consulting party roles.* SHPO/THPOs, Indian tribes and Native Hawaiian organizations, other consulting parties, and organizations and individuals who may be concerned with the possible effects of an agency action on historic properties should be prepared to consult with agencies early in the NEPA process, when the purpose of and need for the proposed action as well as the widest possible range of alternatives are under consideration.

(3) *Inclusion of historic preservation issues.* Agency officials should ensure that preparation of an environmental assessment (EA) and finding of no significant impact (FONSI) or an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects.

(b) *Actions categorically excluded under NEPA.* If a project, activity or program is categorically excluded from NEPA review under an agency's NEPA procedures, the agency official shall determine if it still qualifies as an undertaking requiring review under section 106 pursuant to § 800.3(a). If so, the agency official shall proceed with section 106 review in accordance with the procedures in this subpart.

(c) *Use of the NEPA process for section 106 purposes.* An agency official may use the process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with section 106 in lieu of the procedures set forth in §§ 800.3 through 800.6 if the agency official has notified in advance the SHPO/THPO and the Council that it intends to do so and the following standards are met.

(1) *Standards for developing environmental documents to comply with Section 106.* During preparation of the EA or draft EIS (DEIS) the agency official shall:

(i) Identify consulting parties either pursuant to § 800.3(f) or through the NEPA scoping process with results consistent with § 800.3(f);

(ii) Identify historic properties and assess the effects of the undertaking on such properties in a manner consistent with the standards and criteria of §§ 800.4 through 800.5, provided that the scope and timing of these steps may be phased to reflect the agency official's consideration of project alternatives in the NEPA process and the effort is commensurate with the assessment of other environmental factors;

(iii) Consult regarding the effects of the undertaking on historic properties with the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, other consulting parties, and the Council, where appropriate, during NEPA scoping, environmental analysis, and the preparation of NEPA documents;

(iv) Involve the public in accordance with the agency's published NEPA procedures; and

(v) Develop in consultation with identified consulting parties alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties and describe them in the EA or DEIS.

(2) *Review of environmental documents.*

(i) The agency official shall submit the EA, DEIS or EIS to the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, and other consulting parties prior to or when making the document available for public comment. If the document being prepared is a DEIS or EIS, the agency official shall also submit it to the Council.

(ii) Prior to or within the time allowed for public comment on the document, a SHPO/THPO, an Indian tribe or Native Hawaiian organization, another consulting party or the Council may object to the agency official that preparation of the EA, DEIS or EIS has not met the standards set forth in paragraph (c)(1) of this section or that the substantive resolution of the effects on historic properties proposed in an EA, DEIS or EIS is inadequate. If the agency official receives such an objection, the agency official shall refer the matter to the Council.

(3) *Resolution of objections.* Within 30 days of the agency official's referral of an objection under paragraph (c)(2)(ii) of this section, the Council shall review the objection and notify the agency as to its opinion on the objection.

(i) If the Council agrees with the objection:

(A) The Council shall provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the objection. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall take into account the Council's opinion in reaching a final decision on the issue of the objection.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council. The head of the agency may delegate his or her duties under this paragraph to the agency's senior Policy Official. If the agency official's initial decision regarding the matter that is the subject of the objection will be revised, the agency official shall proceed in accordance with the revised decision. If the final decision of the agency is to affirm the initial agency decision, once the summary of the final decision has been sent to the Council, the agency official shall continue its compliance with this section.

(ii) If the Council disagrees with the objection, the Council shall so notify the agency official, in which case the agency official shall continue its compliance with this section.

(iii) If the Council fails to respond to the objection within the 30 day period, the agency official shall continue its compliance with this section.

(4) *Approval of the undertaking.* If the agency official has found, during the preparation of an EA or EIS that the effects of an undertaking on historic properties are adverse, the agency official shall develop measures in the EA, DEIS, or EIS to avoid, minimize, or mitigate such effects in accordance with paragraph (c)(1)(v) of this section. The agency official's responsibilities under section 106 and the procedures in this

subpart shall then be satisfied when either:

- (i) a binding commitment to such proposed measures is incorporated in
 - (A) the ROD, if such measures were proposed in a DEIS or EIS; or
 - (B) an MOA drafted in compliance with § 800.6(c); or
- (ii) the Council has commented under § 800.7 and received the agency's response to such comments.

(5) *Modification of the undertaking.* If the undertaking is modified after approval of the FONSI or the ROD in a manner that changes the undertaking or alters its effects on historic properties, or if the agency official fails to ensure that the measures to avoid, minimize or mitigate adverse effects (as specified in either the FONSI or the ROD, or in the binding commitment adopted pursuant to paragraph (c)(4) of this section) are carried out, the agency official shall notify the Council and all consulting parties that supplemental environmental documents will be prepared in compliance with NEPA or that the procedures in §§ 800.3 through 800.6 will be followed as necessary.

§ 800.9 Council review of section 106 compliance.

(a) *Assessment of agency official compliance for individual undertakings.* The Council may provide to the agency official its advisory opinion regarding the substance of any finding, determination or decision or regarding the adequacy of the agency official's compliance with the procedures under this part. The Council may provide such advice at any time at the request of any individual, agency or organization or on its own initiative. The agency official shall consider the views of the Council in reaching a decision on the matter in question.

(b) *Agency foreclosure of the Council's opportunity to comment.* Where an agency official has failed to complete the requirements of section 106 in accordance with the procedures in this part prior to the approval of an undertaking, the Council's opportunity to comment may be foreclosed. The Council may review a case to determine whether a foreclosure has occurred. The Council shall notify the agency official and the agency's Federal preservation officer and allow 30 days for the agency official to provide information as to whether foreclosure has occurred. If the Council determines foreclosure has occurred, the Council shall transmit the determination to the

agency official and the head of the agency. The Council shall also make the determination available to the public and any parties known to be interested in the undertaking and its effects upon historic properties.

(c) *Intentional adverse effects by applicants.*

(1) *Agency responsibility.* Section 110(k) of the act prohibits a Federal agency from granting a loan, loan guarantee, permit, license or other assistance to an applicant who, with intent to avoid the requirements of section 106, has intentionally significantly adversely affected a historic property to which the grant would relate, or having legal power to prevent it, has allowed such significant adverse effect to occur, unless the agency, after consultation with the Council, determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant. Guidance issued by the Secretary pursuant to section 110 of the act governs its implementation.

(2) *Consultation with the Council.* When an agency official determines, based on the actions of an applicant, that section 110(k) is applicable and that circumstances may justify granting the assistance, the agency official shall notify the Council and provide documentation specifying the circumstances under which the adverse effects to the historic property occurred and the degree of damage to the integrity of the property. This documentation shall include any views obtained from the applicant, SHPO/THPO, an Indian tribe if the undertaking occurs on or affects historic properties on tribal lands, and other parties known to be interested in the undertaking.

(i) Within thirty days of receiving the agency official's notification, unless otherwise agreed to by the agency official, the Council shall provide the agency official with its opinion as to whether circumstances justify granting assistance to the applicant and any possible mitigation of the adverse effects.

(ii) The agency official shall consider the Council's opinion in making a decision on whether to grant assistance to the applicant, and shall notify the Council, the SHPO/THPO, and other parties known to be interested in the undertaking prior to granting the assistance.

(3) *Compliance with Section 106.* If an agency official, after consulting with

the Council, determines to grant the assistance, the agency official shall comply with §§ 800.3 through 800.6 to take into account the effects of the undertaking on any historic properties.

(d) *Evaluation of Section 106 operations.* The Council may evaluate the operation of the section 106 process by periodic reviews of how participants have fulfilled their legal responsibilities and how effectively the outcomes reached advance the purposes of the act.

(1) *Information from participants.* Section 203 of the act authorizes the Council to obtain information from Federal agencies necessary to conduct evaluation of the section 106 process. The agency official shall make documentation of agency policies, operating procedures and actions taken to comply with section 106 available to the Council upon request. The Council may request available information and documentation from other participants in the section 106 process.

(2) *Improving the operation of section 106.* Based upon any evaluation of the section 106 process, the Council may make recommendations to participants, the heads of Federal agencies, and the Secretary of actions to improve the efficiency and effectiveness of the process. Where the Council determines that an agency official or a SHPO/THPO has failed to properly carry out the responsibilities assigned under the process in this part, the Council may participate in individual case reviews conducted under such process in addition to the SHPO/THPO for such period that it determines is necessary to improve performance or correct deficiencies. If the Council finds a pattern of failure by a Federal agency in carrying out its responsibilities under section 106, the Council may review the policies and programs of the agency related to historic preservation pursuant to section 202(a)(6) of the act and recommend methods to improve the effectiveness, coordination, and consistency of those policies and programs with section 106.

§ 800.10 Special requirements for protecting National Historic Landmarks.

(a) *Statutory requirement.* Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking. When

commenting on such undertakings, the Council shall use the process set forth in §§ 800.6 through 800.7 and give special consideration to protecting National Historic Landmarks as specified in this section.

(b) *Resolution of adverse effects.* The agency official shall request the Council to participate in any consultation to resolve adverse effects on National Historic Landmarks conducted under § 800.6.

(c) *Involvement of the Secretary.* The agency official shall notify the Secretary of any consultation involving a National Historic Landmark and invite the Secretary to participate in the consultation where there may be an adverse effect. The Council may request a report from the Secretary under section 213 of the act to assist in the consultation.

(d) *Report of outcome.* When the Council participates in consultation under this section, it shall report the outcome of the section 106 process, providing its written comments or any memoranda of agreement to which it is a signatory, to the Secretary and the head of the agency responsible for the undertaking.

§ 800.11 Documentation standards.

(a) *Adequacy of documentation.* The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis. The agency official shall provide such documentation to the extent permitted by law and within available funds. When an agency official is conducting phased identification or evaluation under this subpart, the documentation standards regarding description of historic properties may be applied flexibly. If the Council, or the SHPO/THPO when the Council is not involved, determines the applicable documentation standards are not met, the Council or the SHPO/THPO, as appropriate, shall notify the agency official and specify the information needed to meet the standard. At the request of the agency official or any of the consulting parties, the Council shall review any disputes over whether documentation standards are met and provide its views to the agency official and the consulting parties.

(b) *Format.* The agency official may use documentation prepared to comply with other laws to fulfill the

requirements of the procedures in this subpart, if that documentation meets the standards of this section.

(c) *Confidentiality.*

(1) *Authority to withhold information.* Section 304 of the act provides that the head of a Federal agency or other public official receiving grant assistance pursuant to the act, after consultation with the Secretary, shall withhold from public disclosure information about the location, character, or ownership of a historic property when disclosure may cause a significant invasion of privacy; risk harm to the historic property; or impede the use of a traditional religious site by practitioners. When the head of a Federal agency or other public official has determined that information should be withheld from the public pursuant to these criteria, the Secretary, in consultation with such Federal agency head or official, shall determine who may have access to the information for the purposes of carrying out the act.

(2) *Consultation with the Council.*

When the information in question has been developed in the course of an agency's compliance with this part, the Secretary shall consult with the Council in reaching determinations on the withholding and release of information. The Federal agency shall provide the Council with available information, including views of the SHPO/THPO, Indian tribes and Native Hawaiian organizations, related to the confidentiality concern. The Council shall advise the Secretary and the Federal agency within 30 days of receipt of adequate documentation.

(3) *Other authorities affecting confidentiality.* Other Federal laws and program requirements may limit public access to information concerning an undertaking and its effects on historic properties. Where applicable, those authorities shall govern public access to information developed in the section 106 process and may authorize the agency official to protect the privacy of non-governmental applicants.

(d) *Finding of no historic properties affected.* Documentation shall include:

(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, drawings, as necessary;

(2) A description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to § 800.4(b); and

(3) The basis for determining that no historic properties are present or affected.

(e) *Finding of no adverse effect or adverse effect.* Documentation shall include:

(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, and drawings, as necessary;

(2) A description of the steps taken to identify historic properties;

(3) A description of the affected historic properties, including information on the characteristics that qualify them for the National Register;

(4) A description of the undertaking's effects on historic properties;

(5) An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects; and

(6) Copies or summaries of any views provided by consulting parties and the public.

(f) *Memorandum of agreement.* When a memorandum of agreement is filed with the Council, the documentation shall include, any substantive revisions or additions to the documentation provided the Council pursuant to § 800.6(a)(1), an evaluation of any measures considered to avoid or minimize the undertaking's adverse effects and a summary of the views of consulting parties and the public.

(g) *Requests for comment without a memorandum of agreement.* Documentation shall include:

(1) A description and evaluation of any alternatives or mitigation measures that the agency official proposes to resolve the undertaking's adverse effects;

(2) A description of any reasonable alternatives or mitigation measures that were considered but not chosen, and the reasons for their rejection;

(3) Copies or summaries of any views submitted to the agency official concerning the adverse effects of the undertaking on historic properties and alternatives to reduce or avoid those effects; and

(4) Any substantive revisions or additions to the documentation provided the Council pursuant to § 800.6(a)(1).

§ 800.12 Emergency situations.

(a) *Agency procedures.* The agency official, in consultation with the appropriate SHPOs/THPOs, affected Indian tribes and Native Hawaiian organizations, and the Council, is encouraged to develop procedures for taking historic properties into account during operations which respond to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or which respond to other immediate threats to life or property. If approved by the Council, the procedures shall govern the agency's historic preservation responsibilities during any disaster or emergency in lieu of §§ 800.3 through 800.6.

(b) *Alternatives to agency procedures.* In the event an agency official proposes an emergency undertaking as an essential and immediate response to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or another immediate threat to life or property, and the agency has not developed procedures pursuant to paragraph (a) of this section, the agency official may comply with section 106 by:

(1) Following a programmatic agreement developed pursuant to § 800.14(b) that contains specific provisions for dealing with historic properties in emergency situations; or

(2) Notifying the Council, the appropriate SHPO/THPO and any Indian tribe or Native Hawaiian organization that may attach religious and cultural significance to historic properties likely to be affected prior to the undertaking and affording them an opportunity to comment within seven days of notification. If the agency official determines that circumstances do not permit seven days for comment, the agency official shall notify the Council, the SHPO/THPO and the Indian tribe or Native Hawaiian organization and invite any comments within the time available.

(c) *Local governments responsible for section 106 compliance.* When a local government official serves as the agency official for section 106 compliance, paragraphs (a) and (b) of this section also apply to an imminent threat to public health or safety as a result of a natural disaster or emergency declared by a local government's chief executive officer or legislative body, provided that if the Council or SHPO/THPO objects to the proposed action within seven days, the agency official shall comply with §§ 800.3 through 800.6.

(d) *Applicability.* This section applies only to undertakings that will be implemented within 30 days after the disaster or emergency has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability from the Council prior to the expiration of the 30 days. Immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of section 106 and this part.

§ 800.13 Post-review discoveries.

(a) *Planning for subsequent discoveries.*

(1) *Using a programmatic agreement.* An agency official may develop a programmatic agreement pursuant to § 800.14(b) to govern the actions to be taken when historic properties are discovered during the implementation of an undertaking.

(2) *Using agreement documents.* When the agency official's identification efforts in accordance with § 800.4 indicate that historic properties are likely to be discovered during implementation of an undertaking and no programmatic agreement has been developed pursuant to paragraph (a)(1) of this section, the agency official shall include in any finding of no adverse effect or memorandum of agreement a process to resolve any adverse effects upon such properties. Actions in conformance with the process satisfy the agency official's responsibilities under section 106 and this part.

(b) *Discoveries without prior planning.* If historic properties are discovered or unanticipated effects on historic properties found after the agency official has completed the section 106 process without establishing a process under paragraph (a) of this section, the agency official shall make reasonable efforts to avoid, minimize or mitigate adverse effects to such properties and:

(1) If the agency official has not approved the undertaking or if construction on an approved undertaking has not commenced, consult to resolve adverse effects pursuant to § 800.6; or

(2) If the agency official, the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property agree that such property is of value solely for its scientific, prehistoric, historic or archeological data, the agency official may comply with the

Archeological and Historic Preservation Act instead of the procedures in this part and provide the Council, the SHPO/THPO, and the Indian tribe or Native Hawaiian organization with a report on the actions within a reasonable time after they are completed; or

(3) If the agency official has approved the undertaking and construction has commenced, determine actions that the agency official can take to resolve adverse effects, and notify the SHPO/THPO, any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property, and the Council within 48 hours of the discovery. The notification shall describe the agency official's assessment of National Register eligibility of the property and proposed actions to resolve the adverse effects. The SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council shall respond within 48 hours of the notification. The agency official shall take into account their recommendations regarding National Register eligibility and proposed actions, and then carry out appropriate actions. The agency official shall provide the SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council a report of the actions when they are completed.

(c) *Eligibility of properties.* The agency official, in consultation with the SHPO/THPO, may assume a newly-discovered property to be eligible for the National Register for purposes of section 106. The agency official shall specify the National Register criteria used to assume the property's eligibility so that information can be used in the resolution of adverse effects.

(d) *Discoveries on tribal lands.* If historic properties are discovered on tribal lands, or there are unanticipated effects on historic properties found on tribal lands, after the agency official has completed the section 106 process without establishing a process under paragraph (a) of this section and construction has commenced, the agency official shall comply with applicable tribal regulations and procedures and obtain the concurrence of the Indian tribe on the proposed action.

Subpart C-Program Alternatives

§ 800.14 Federal agency program alternatives.

(a) *Alternate procedures.* An agency official may develop procedures to implement section 106 and substitute them for all or part of subpart B of this part if they are consistent with the Council's regulations pursuant to section 110(a)(2)(E) of the act.

(1) *Development of procedures.* The agency official shall consult with the Council, the National Conference of State Historic Preservation Officers or individual SHPO/THPOs, as appropriate, and Indian tribes and Native Hawaiian organizations, as specified in paragraph (f) of this section, in the development of alternate procedures, publish notice of the availability of proposed alternate procedures in the Federal Register and take other appropriate steps to seek public input during the development of alternate procedures.

(2) *Council review.* The agency official shall submit the proposed alternate procedures to the Council for a 60-day review period. If the Council finds the procedures to be consistent with this part, it shall notify the agency official and the agency official may adopt them as final alternate procedures.

(3) *Notice.* The agency official shall notify the parties with which it has consulted and publish notice of final alternate procedures in the Federal Register.

(4) *Legal effect.* Alternate procedures adopted pursuant to this subpart substitute for the Council's regulations for the purposes of the agency's compliance with section 106, except that where an Indian tribe has entered into an agreement with the Council to substitute tribal historic preservation regulations for the Council's regulations under section 101(d)(5) of the act, the agency shall follow those regulations in lieu of the agency's procedures regarding undertakings on tribal lands. Prior to the Council entering into such agreements, the Council will provide Federal agencies notice and opportunity to comment on the proposed substitute tribal regulations.

(b) *Programmatic agreements.* The Council and the agency official may negotiate a programmatic agreement to govern the implementation of a particular program or the resolution of adverse effects from certain complex project situations or multiple undertakings.

(1) *Use of programmatic agreements.* A programmatic agreement may be used:

(i) When effects on historic properties are similar and repetitive or are multi-State or regional in scope;

(ii) When effects on historic properties cannot be fully determined prior to approval of an undertaking;

(iii) When nonfederal parties are delegated major decisionmaking responsibilities;

(iv) Where routine management activities are undertaken at Federal installations, facilities, or other land-management units; or

(v) Where other circumstances warrant a departure from the normal section 106 process.

(2) *Developing programmatic agreements for agency programs.*

(i) The consultation shall involve, as appropriate, SHPO/THPOs, the National Conference of State Historic Preservation Officers (NCSHPO), Indian tribes and Native Hawaiian organizations, other Federal agencies, and members of the public. If the programmatic agreement has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the agency official shall also follow paragraph (f) of this section.

(ii) *Public Participation.* The agency official shall arrange for public participation appropriate to the subject matter and the scope of the program and in accordance with subpart A of this part. The agency official shall consider the nature of the program and its likely effects on historic properties and take steps to involve the individuals, organizations and entities likely to be interested.

(iii) *Effect.* The programmatic agreement shall take effect when executed by the Council, the agency official and the appropriate SHPOs/THPOs when the programmatic agreement concerns a specific region or the president of NCSHPO when NCSHPO has participated in the consultation. A programmatic agreement shall take effect on tribal lands only when the THPO, Indian tribe or a designated representative of the tribe is a signatory to the agreement. Compliance with the procedures established by an approved programmatic agreement satisfies the agency's section 106 responsibilities for all individual undertakings of the program covered by the agreement until

it expires or is terminated by the agency, the president of NCSHPO when a signatory, or the Council. Termination by an individual SHPO/THPO shall only terminate the application of a regional programmatic agreement within the jurisdiction of the SHPO/THPO. If a THPO assumes the responsibilities of a SHPO pursuant to section 101(d)(2) of the act and the SHPO is signatory to programmatic agreement, the THPO assumes the role of a signatory, including the right to terminate a regional programmatic agreement on lands under the jurisdiction of the tribe.

(iv) *Notice.* The agency official shall notify the parties with which it has consulted that a programmatic agreement has been executed under paragraph (b) of this section, provide appropriate public notice before it takes effect, and make any internal agency procedures implementing the agreement readily available to the Council, SHPO/THPOs, and the public.

(v) If the Council determines that the terms of a programmatic agreement are not being carried out, or if such an agreement is terminated, the agency official shall comply with subpart B of this part with regard to individual undertakings of the program covered by the agreement.

(3) *Developing programmatic agreements for complex or multiple undertakings.* Consultation to develop a programmatic agreement for dealing with the potential adverse effects of complex projects or multiple undertakings shall follow § 800.6. If consultation pertains to an activity involving multiple undertakings and the parties fail to reach agreement, then the agency official shall comply with the provisions of subpart B of this part for each individual undertaking.

(4) *Prototype programmatic agreements.* The Council may designate an agreement document as a prototype programmatic agreement that may be used for the same type of program or undertaking in more than one case or area. When an agency official uses such a prototype programmatic agreement, the agency official may develop and execute the agreement with the appropriate SHPO/THPO and the agreement shall become final without need for Council participation in consultation or Council signature.

(c) *Exempted categories.*

(1) *Criteria for establishing.* The Council or an agency official may propose a program or category of undertakings that may be exempted

from review under the provisions of subpart B of this part, if the program or category meets the following criteria:

(i) The actions within the program or category would otherwise qualify as "undertakings" as defined in § 800.16;

(ii) The potential effects of the undertakings within the program or category upon historic properties are foreseeable and likely to be minimal or not adverse; and

(iii) Exemption of the program or category is consistent with the purposes of the act.

(2) *Public participation.* The proponent of the exemption shall arrange for public participation appropriate to the subject matter and the scope of the exemption and in accordance with the standards in subpart A of this part. The proponent of the exemption shall consider the nature of the exemption and its likely effects on historic properties and take steps to involve individuals, organizations and entities likely to be interested.

(3) *Consultation with SHPOs/THPOs.* The proponent of the exemption shall notify and consider the views of the SHPOs/THPOs on the exemption.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the exempted program or category of undertakings has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Council review of proposed exemptions.* The Council shall review an exemption proposal that is supported by documentation describing the program or category for which the exemption is sought, demonstrating that the criteria of paragraph (c)(1) of this section have been met, describing the methods used to seek the views of the public, and summarizing any views submitted by the SHPO/THPOs, the public, and any others consulted. Unless it requests further information, the Council shall approve or reject the proposed exemption within 30 days of receipt, and thereafter notify the relevant agency official and SHPO/THPOs of the decision. The decision shall be based on the consistency of the exemption with the purposes of the act, taking into consideration the magnitude of the exempted undertaking or program and the likelihood of impairment of historic

properties in accordance with section 214 of the act.

(6) *Legal consequences.* Any undertaking that falls within an approved exempted program or category shall require no further review pursuant to subpart B of this part, unless the agency official or the Council determines that there are circumstances under which the normally excluded undertaking should be reviewed under subpart B of this part.

(7) *Termination.* The Council may terminate an exemption at the request of the agency official or when the Council determines that the exemption no longer meets the criteria of paragraph (c)(1) of this section. The Council shall notify the agency official 30 days before termination becomes effective.

(8) *Notice.* The proponent of the exemption shall publish notice of any approved exemption in the Federal Register.

(d) *Standard treatments.*

(1) *Establishment.* The Council, on its own initiative or at the request of another party, may establish standard methods for the treatment of a category of historic properties, a category of undertakings, or a category of effects on historic properties to assist Federal agencies in satisfying the requirements of subpart B of this part. The Council shall publish notice of standard treatments in the Federal Register.

(2) *Public participation.* The Council shall arrange for public participation appropriate to the subject matter and the scope of the standard treatment and consistent with subpart A of this part. The Council shall consider the nature of the standard treatment and its likely effects on historic properties and the individuals, organizations and entities likely to be interested. Where an agency official has proposed a standard treatment, the Council may request the agency official to arrange for public involvement.

(3) *Consultation with SHPOs/THPOs.* The Council shall notify and consider the views of SHPOs/THPOs on the proposed standard treatment.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the proposed standard treatment has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Termination.* The Council may terminate a standard treatment by publication of a notice in the Federal Register 30 days before the termination takes effect.

(e) *Program comments.* An agency official may request the Council to comment on a category of undertakings in lieu of conducting individual reviews under §§ 800.4 through 800.6. The Council may provide program comments at its own initiative.

(1) *Agency request.* The agency official shall identify the category of undertakings, specify the likely effects on historic properties, specify the steps the agency official will take to ensure that the effects are taken into account, identify the time period for which the comment is requested and summarize any views submitted by the public.

(2) *Public participation.* The agency official shall arrange for public participation appropriate to the subject matter and the scope of the category and in accordance with the standards in subpart A of this part. The agency official shall consider the nature of the undertakings and their likely effects on historic properties and the individuals, organizations and entities likely to be interested.

(3) *Consultation with SHPOs/THPOs.* The Council shall notify and consider the views of SHPOs/THPOs on the proposed program comment.

(4) *Consultation with Indian tribes and Native Hawaiian organizations.* If the program comment has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe or Native Hawaiian organization, the Council shall follow the requirements for the agency official set forth in paragraph (f) of this section.

(5) *Council action.* Unless the Council requests additional documentation, notifies the agency official that it will decline to comment, or obtains the consent of the agency official to extend the period for providing comment, the Council shall comment to the agency official within 45 days of the request.

(i) If the Council comments, the agency official shall take into account the comments of the Council in carrying out the undertakings within the category and publish notice in the Federal Register of the Council's comments and steps the agency will take to ensure that effects to historic properties are taken into account.

(ii) If the Council declines to comment, the agency official shall continue to comply with the requirements of §§ 800.3 through 800.6 for the individual undertakings.

(6) *Withdrawal of comment.* If the Council determines that the consideration of historic properties is not being carried out in a manner consistent with the program comment, the Council may withdraw the comment and the agency official shall comply with the requirements of §§ 800.3 through 800.6 for the individual undertakings.

(f) *Consultation with Indian tribes and Native Hawaiian organizations when developing program alternatives.* Whenever an agency official proposes a program alternative pursuant to paragraphs (a) through (e) of this section, the agency official shall ensure that development of the program alternative includes appropriate government-to-government consultation with affected Indian tribes and consultation with affected Native Hawaiian organizations.

(1) *Identifying affected Indian tribes and Native Hawaiian organizations.* If any undertaking covered by a proposed program alternative has the potential to affect historic properties on tribal lands, the agency official shall identify and consult with the Indian tribes having jurisdiction over such lands. If a proposed program alternative has the potential to affect historic properties of religious and cultural significance to an Indian tribe or a Native Hawaiian organization which are located off tribal lands, the agency official shall identify those Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to such properties and consult with them. When a proposed program alternative has nationwide applicability, the agency official shall identify an appropriate government to government consultation with Indian tribes and consult with Native Hawaiian organizations in accordance with existing Executive orders, Presidential memoranda and applicable provisions of law.

(2) *Results of consultation.* The agency official shall provide summaries of the views, along with copies of any written comments, provided by affected Indian tribes and Native Hawaiian organizations to the Council as part of the documentation for the proposed program alternative. The agency official and the Council shall take those views

into account in reaching a final decision on the proposed program alternative.

§ 800.15 Tribal, State, and local program alternatives. (Reserved)

§ 800.16 Definitions.

(a) *Act* means the National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470-470w-6.

(b) *Agency* means agency as defined in 5 U.S.C. 551.

(c) *Approval of the expenditure of funds* means any final agency decision authorizing or permitting the expenditure of Federal funds or financial assistance on an undertaking, including any agency decision that may be subject to an administrative appeal.

(d) *Area of potential effects* means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

(e) *Comment* means the findings and recommendations of the Council formally provided in writing to the head of a Federal agency under section 106.

(f) *Consultation* means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process. The Secretary's "Standards and Guidelines for Federal Agency Preservation Programs pursuant to the National Historic Preservation Act" provide further guidance on consultation.

(g) *Council* means the Advisory Council on Historic Preservation or a Council member or employee designated to act for the Council.

(h) *Day or days* means calendar days.

(i) *Effect* means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

(j) *Foreclosure* means an action taken by an agency official that effectively precludes the Council from providing comments which the agency official can meaningfully consider prior to the approval of the undertaking.

(k) *Head of the agency* means the chief official of the Federal agency responsible for all aspects of the agency's actions. If a State, local or tribal government has assumed or has

been delegated responsibility for section 106 compliance, the head of that unit of government shall be considered the head of the agency.

(l)(1) *Historic property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

(2) The term *eligible for inclusion in the National Register* includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the National Register criteria.

(m) *Indian tribe* means an Indian tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, as those terms are defined in section 3 of the Alaska Native Claims Settlement Act (43 U.S.C. 1602), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

(n) *Local government* means a city, county, parish, township, municipality, borough, or other general purpose political subdivision of a State.

(o) *Memorandum of agreement* means the document that records the terms and conditions agreed upon to resolve the adverse effects of an undertaking upon historic properties.

(p) *National Historic Landmark* means a historic property that the Secretary of the Interior has designated a National Historic Landmark.

(q) *National Register* means the National Register of Historic Places maintained by the Secretary of the Interior.

(r) *National Register criteria* means the criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the National Register (36 CFR part 60).

(s)(1) *Native Hawaiian organization* means any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of

historic preservation that are significant to Native Hawaiians.

(2) *Native Hawaiian* means any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawaii.

(t) *Programmatic agreement* means a document that records the terms and conditions agreed upon to resolve the potential adverse effects of a Federal agency program, complex undertaking or other situations in accordance with § 800.14(b).

(u) *Secretary* means the Secretary of the Interior acting through the Director of the National Park Service except where otherwise specified.

(v) *State Historic Preservation Officer (SHPO)* means the official appointed or designated pursuant to section 101(b)(1) of the act to administer the State historic preservation program or a representative designated to act for the State historic preservation officer.

(w) *Tribal Historic Preservation Officer (THPO)* means the tribal official appointed by the tribe's chief governing authority or designated by a tribal ordinance or preservation program who has assumed the responsibilities of the SHPO for purposes of section 106 compliance on tribal lands in accordance with section 101(d)(2) of the act.

(x) *Tribal lands* means all lands within the exterior boundaries of any Indian reservation and all dependent Indian communities.

(y) *Undertaking* means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

(z) *Senior policy official* means the senior policy level official designated by the head of the agency pursuant to section 3(e) of Executive Order 13287.

Appendix A to Part 800 -- Criteria for Council Involvement in Reviewing Individual section 106 Cases

(a) *Introduction.* This appendix sets forth the criteria that will be used by the Council to determine whether to enter an individual section 106 review that it normally would not be involved in.

(b) *General policy.* The Council may choose to exercise its authorities under

the section 106 regulations to participate in an individual project pursuant to the following criteria. However, the Council will not always elect to participate even though one or more of the criteria may be met.

(c) *Specific criteria.* The Council is likely to enter the section 106 process at the steps specified in the regulations in this part when an undertaking:

(1) *Has substantial impacts on important historic properties.* This may include adverse effects on properties that possess a national level of significance or on properties that are of unusual or noteworthy importance or are a rare property type; or adverse effects to large numbers of historic properties, such as impacts to multiple properties within a historic district.

(2) *Presents important questions of policy or interpretation.* This may include questions about how the Council's regulations are being applied or interpreted, including possible foreclosure or anticipatory demolition situations; situations where the outcome will set a precedent affecting Council policies or program goals; or the development of programmatic agreements that alter the way the section 106 process is applied to a group or type of undertakings.

(3) *Has the potential for presenting procedural problems.* This may include cases with substantial public controversy that is related to historic preservation issues; with disputes among or about consulting parties which the Council's involvement could help resolve; that are involved or likely to be involved in litigation on the basis of section 106; or carried out by a Federal agency, in a State or locality, or on tribal lands where the Council has previously identified problems with section 106 compliance pursuant to § 800.9(d)(2).

(4) *Presents issues of concern to Indian tribes or Native Hawaiian organizations.* This may include cases where there have been concerns raised about the identification of, evaluation of or assessment of effects on historic properties to which an Indian tribe or Native Hawaiian organization attaches religious and cultural significance; where an Indian tribe or Native Hawaiian organization has requested Council involvement to assist in the resolution of adverse effects; or where there are questions relating to policy, interpretation or precedent under section 106 or its relation to other

authorities, such as the Native American Graves Protection and Repatriation Act.

Kirchler-Owen, Leslie

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 <kendall.campbell1@navy.mil>
Sent: Friday, October 21, 2016 4:17 PM
To: Kirchler-Owen, Leslie
Subject: FW: Growler Section 106 Thank You and further information
Signed By: kendall.campbell1@navy.mil

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4
Sent: Thursday, September 01, 2016 12:23 PM
To: 'Brooks, Allyson (DAHP)'; 'Katharine R. Kerr'
Subject: Growler Section 106 Thank You and further information

Consultation Partners,

Thank you to those who provided comments on the Navy's proposed approach to defining the Area of Potential Effect (APE) for the proposed continuation and increase of EA-18G Growlers at NAS Whidbey Island. We appreciate your participation in the 106 consultation process and your comments are being taken into consideration as we define the APE and consider the effects of the undertaking on historic properties.

For those who were not able to provide us comments, or if you would like to offer additional comments, please feel free to do so at anytime. Section 106 is an ongoing consultation, and we accept comments from all consulting parties and the public at any time.

We are also sending all consulting parties a letter with resources and materials to refer to throughout this process to facilitate your participation in and provide a better understanding of the section 106 consultation process for this undertaking. These resources include guidelines as to the process the Navy will be taking to fulfill our section 106 responsibilities, as well as the regulations (36 CFR 800) guiding this process. If you do not receive these materials by 15 September, please let me know and we will resend them.

Please feel free to contact me at any time with questions either by phone at (360) 257-6780 or email. Thank you again for your comments and we look forward to continuing consultation.

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexinton Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780



September 30, 2016

Ms. Kendall Campbell
Cultural Resources
US Dept. of the Navy
NASWI
3730 North Charles Porter Ave.
Oak Harbor, WA 98278-5000

In future correspondence please refer to:
Project Tracking Code: 102214-23-USN
Re: Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and
Development of Support Facilities

Dear Ms. Campbell:

Thank you for your letter of August 31, 2016 regarding the above referenced proposal. We have reviewed the clarification process for the Continuation and Increase of EA-18G Growler Operations at Naval Station Whidbey Island (NASWI) that includes Ault Field and OLF Coupeville. In response, we are providing the following comments and recommendations:

1. In general, we concur with the section 106 process as outlined in your letter as adhering to the implementing regulations found in 36 CFR 800. We understand that the Navy has made the determination that the proposed action qualifies as an undertaking that has potential to affect historic properties.
2. In regard to step 2 (Defining the Area of Potential Effect (APE)), following are comments and recommendations for defining the APE from the State Historic Preservation Officer's July 7, 2016 letter to Captain G.C. Moore:

We specifically need to understand the location of areas that are proposed to contain flight paths associated with Growlers operations at Ault Field and OLF Coupeville. This additional information for the purposes of developing the APE should include the identification of areas containing the flight paths for the return to Ault Field after field carrier landing practice and any areas of general flight Growler practices. These routes may generate noise impacts for the neighboring communities in the San Juan Islands, Port Townsend, and the Olympic Peninsula and may need to be considered part of the APE.



While we appreciate that for security reasons you may not be able to supply us with actual flight paths, you should be able to identify large areas that will contain the flights for the purpose of the APE. Again, we need to understand the noise impacts from practice flights whether touch and go at OLF or general practice from Ault Field.

We also need the additional information and maps detailing actual construction areas that due to increased operations will result in increased personnel and family members at NAS Whidbey and the surrounding communities.

3. Given the high public interest and large area that potentially could be affected by this proposal, we recommend a robust public involvement process. A section 106 public involvement plan is recommended to be developed that will specifically outline how the public will be engaged and provide comments. A draft of the plan should be circulated to the SHPO and other interested parties for review and comment.
4. Interested and affected Tribes also must be consulted regarding the effects of the proposal including defining the APE since areas of cultural importance to tribes may be off-shore or perhaps in international waters. Tribal consultation should be ongoing and meaningful and any comments received by Tribal representatives should be carefully considered and responded to.
5. Thank you for the discussion about the distinction between the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA). Please keep in mind that the SHPO typically does not respond to NEPA correspondence/documents unless the SHPO is formally notified that the Navy has decided to combine the two processes.
6. In the event that the Navy reaches a determination that the proposal will have an adverse effect on National Register eligible and/or eligible resources, it will be important for the Navy to be prepared to commit and provide for an adequate level of mitigation including off-site and creative mitigation measures.
7. In drafting a memorandum of agreement (MOA) to mitigate for adverse effects, DAHP will look for alternative dispute resolution language that will bring about greater collaboration and transparency in resolving disputes that might arise over the course of implementing mitigation measure.

These comments are based on the information in your letter and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. We appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.



Ms. Kendall Campbell
September 30, 2016
Page Three

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,



Greg Griffith.
Deputy State Historic Preservation Officer
Greg.griffith@dahp.wa.gov
360-586-3073

c: Jim Baumgart, Governor's Office
Larry Campbell, Swinomish THPO
Jackie Ferry, Samish Indian Nation, THPO
Kristen Griffin, EBLA Reserve Manager
Josephine Peters, Swinomish, Cultural Resource Protection
Richard Young, Tulalip Tribes, Cultural Resources





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2354
November 10, 2016

John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: PUBLIC INVOLVEMENT IN SECTION 106 FOR THE CONTINUATION AND INCREASE OF EA-18G OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

This letter is to notify you that the Navy, per 36 CFR 800.8(a), intends to utilize the Draft EIS public meetings to partially fulfill the section 106 public notification and consultation requirements. The Navy first notified the Advisory Council on Historic Preservation of this intent on 10 October 2014.

Five meetings will be held on the following days and locations:

- Monday, 5 December 2016: Fort Worden State Park-Conference Center USO Hall, Port Townsend, WA. 3:00 PM to 6:00 PM
- Tuesday, 6 December 2016: Oak Harbor Elks Lodge- Grande Hall, Oak Harbor, WA. 4:00 PM to 7:00 PM
- Wednesday, 7 December 2016: Lopez Center for Community and the Arts, Lopez Island, WA. 3:00 PM to 6:00 PM
- Thursday, 8 December 2016: Seafarer's Memorial Park Building, Anacortes, WA. 3:00 PM to 6:00 PM
- Friday, 9 December 2016: Coupeville High School Commons, Coupeville, WA. 4:00 PM to 7:00 PM

At these meetings cultural resource staff from NAS Whidbey Island will have a poster and handouts dedicated to discussing the section 106 consultation for this undertaking, the cultural resource analysis in the EIS, and tribal resources. The EIS team will provide NAS Whidbey Island cultural resource staff with all comments collected pertaining to cultural resources for consideration in the section 106 process.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2353
November 10, 2016

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: PUBLIC INVOLVEMENT IN SECTION 106 FOR THE CONTINUATION AND INCREASE OF EA-18G OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

This letter is to notify you that the Navy, per 36 CFR 800.8(a), intends to utilize the Draft EIS public meetings to partially fulfill the section 106 public notification and consultation requirements. The Navy first notified the Washington State Historic Preservation Officer (SHPO) of this intent on 10 October 2014 (Log No. 102214-23-USN).

Five meetings will be held on the following days and locations:

- Monday, 5 December 2016: Fort Worden State Park-Conference Center USO Hall, Port Townsend, WA. 3:00 PM to 6:00 PM
- Tuesday, 6 December 2016: Oak Harbor Elks Lodge- Grande Hall, Oak Harbor, WA. 4:00 PM to 7:00 PM
- Wednesday, 7 December 2016: Lopez Center for Community and the Arts, Lopez Island, WA. 3:00 PM to 6:00 PM
- Thursday, 8 December 2016: Seafarer's Memorial Park Building, Anacortes, WA. 3:00 PM to 6:00 PM
- Friday, 9 December 2016: Coupeville High School Commons, Coupeville, WA. 4:00 PM to 7:00 PM

At these meetings cultural resource staff from NAS Whidbey Island will have a poster and handouts dedicated to discussing the section 106 consultation for this undertaking, the cultural resource analysis in the EIS, and tribal resources. The EIS team will provide NAS Whidbey Island cultural resource staff with all comments collected pertaining to cultural resources for consideration in the section 106 process.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2373
November 10, 2016

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: PUBLIC INVOLVEMENT IN SECTION 106 FOR THE CONTINUATION AND INCREASE OF EA-18G OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

This letter is to notify you that the Navy, per 36 CFR 800.8(a), intends to utilize the Draft EIS public meetings to partially fulfill the section 106 public notification and consultation requirements.

Five meetings will be held on the following days and locations:

- Monday, 5 December 2016: Fort Worden State Park-Conference Center USO Hall, Port Townsend, WA. 3:00 PM to 6:00 PM
- Tuesday, 6 December 2016: Oak Harbor Elks Lodge- Grande Hall, Oak Harbor, WA. 4:00 PM to 7:00 PM
- Wednesday, 7 December 2016: Lopez Center for Community and the Arts, Lopez Island, WA. 3:00 PM to 6:00 PM
- Thursday, 8 December 2016: Seafarer's Memorial Park Building, Anacortes, WA. 3:00 PM to 6:00 PM
- Friday, 9 December 2016: Coupeville High School Commons, Coupeville, WA. 4:00 PM to 7:00 PM

At these meetings cultural resource staff from NAS Whidbey Island will have a poster and handouts dedicated to discussing the section 106 consultation for this undertaking, the cultural resource analysis in the EIS, and tribal resources. The EIS team will provide NAS Whidbey Island cultural resource staff with all comments collected pertaining to cultural resources for consideration in the section 106 process.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2365
November 10, 2016

Mr. Ken Pickard
President
Citizens of Ebey's Reserve
P.O. Box 202
Coupeville, WA 98239-0202

Dear Mr. Pickard:

SUBJECT: PUBLIC INVOLVEMENT IN SECTION 106 FOR THE CONTINUATION AND INCREASE OF EA-18G OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

This letter is to notify you that the Navy, per 36 CFR 800.8(a), intends to utilize the Draft EIS public meetings to partially fulfill the section 106 public notification and consultation requirements.

Five meetings will be held on the following days and locations:

- Monday, 5 December 2016: Fort Worden State Park-Conference Center USO Hall, Port Townsend, WA. 3:00 PM to 6:00 PM
- Tuesday, 6 December 2016: Oak Harbor Elks Lodge- Grande Hall, Oak Harbor, WA. 4:00 PM to 7:00 PM
- Wednesday, 7 December 2016: Lopez Center for Community and the Arts, Lopez Island, WA. 3:00 PM to 6:00 PM
- Thursday, 8 December 2016: Seafarer's Memorial Park Building, Anacortes, WA. 3:00 PM to 6:00 PM
- Friday, 9 December 2016: Coupeville High School Commons, Coupeville, WA. 4:00 PM to 7:00 PM

At these meetings cultural resource staff from NAS Whidbey Island will have a poster and handouts dedicated to discussing the section 106 consultation for this undertaking, the cultural resource analysis in the EIS, and tribal resources. The EIS team will provide NAS Whidbey Island cultural resource staff with all comments collected pertaining to cultural resources for consideration in the section 106 process.

If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

From: Schwartz, Tracy CTR NAVFAC NW, EV2
To: ["106 \(DAHP\)"; Brooks, Allyson \(DAHP\)](#)
Cc: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: Log No. 102214-23-USN: 106 and NEPA Coordination for the Proposed Increase of EA-18G Operations, NAS Whidbey Island
Date: Monday, November 14, 2016 8:00:00
Attachments: [NEPA 106 Coordination, dtd 10 Nov 16 \(SHPO\).pdf](#)

Good Morning Dr. Brooks,

Please find attached our letter with regard to the coordination of section 106 consultation and EIS NEPA public meetings for the proposed increase of EA-18G Growler aircraft operations and development of support facilities at Naval Air Station (NAS) Whidbey Island (Log No. 102214-23-USN).

Please CC Kendall Campbell on all correspondence.

Thank you and have a wonderful Monday!

-Tracy Schwartz

Cultural Resource Contract Support
Naval Air Station Whidbey Island

Phone: 360.257.5742

Email: tracy.schwartz.ctr@navy.mil

Kirchler-Owen, Leslie

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 <kendall.campbell1@navy.mil>
Sent: Tuesday, January 3, 2017 7:26 PM
To: Padgett, Lisa M CIV USFF, N46; Romero, Joseph CAPT USFF, N01L; Stallings, Sarah CIV NAVFAC Atlantic
Cc: Williamson, Todd H CIV NAVFAC LANT, EV; Bianchi, Michael C NAVFAC NW, PRW4; Shurling, Cynthia; Lyz Ellis
Subject: FW: [Non-DoD Source] NPS comment on proposed APE for Growler Operations at NASWI
Attachments: NPS Comment to Navy RE Growler APE_3Jan2017.pdf

-----Original Message-----

From: Zipp, Roy [mailto:roy_zipp@nps.gov]
Sent: Tuesday, January 03, 2017 4:37 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Cc: Griffin, Kristen; greg.griffith@dahp.wa.gov
Subject: [Non-DoD Source] NPS comment on proposed APE for Growler Operations at NASWI

Hi Kendall,

Thanks for the opportunity to comment on the proposed APE. Sorry for the delayed response--we needed to review the full DEIS before we could fully comment on this undertaking.

Per the attached letter that I am mailing to you today, we do not believe the 65dB DNL sufficiently captures the APE.

We suggest you delineate the APE by modeling and mapping the 60db Sound Exposure Level and using that polygon as the basis for delineating the APE.

Best Regards,
Roy

<http://>

Roy M. Zipp
Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

593 Fort Casey Road
Coupeville, Washington 98239
W: 360-678-5787

C: 360-630-1119
www.nps.gov/ebla

<http://www.nps.gov/subjects/centennial/images/NPS-Centennial-E-Mail-Signature-with-Goal-11-24-14.jpg>



United States Department of the Interior

NATIONAL PARK SERVICE
Ebey's Landing National Historical Reserve
Reuble Farmstead
593 Fort Casey Road
Coupeville, Washington 98239

IN REPLY REFER TO:

January 3, 2017

Department of the Navy
Whidbey Naval Air Station
Attention: Kendall Campbell, Cultural Resources
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

RE: Area of Potential Affect for proposed increase of EA-18G Growler aircraft operations

Dear Ms Campbell: *Kendall*

As you know we are concerned about the proposed expansion of Growler operations at Outlying Field Coupeville (OLF) given the extreme noise from current conditions, and the understanding that circumstances would worsen significantly if Growler operations are increased as proposed. We are specifically concerned about the impacts to the nationally significant historic resources of the Reserve, especially the Reserve's cultural landscape, and we do not believe the proposal to delineate the APE using the 65dB Day-Night Average Sound Level (DNL) captures the spatial extent of historic resources that would be affected by this undertaking.

Growlers produce intense noise, across broad geographic areas, that is often louder than thunder. This extreme noise permeates the atmosphere of the Reserve well beyond the proposed 65dB DNL Area of Potential Affect (APE). For example, at the historic Ferry House near Ebey's Landing, acoustic monitoring conducted by NPS in summer 2015 documented 1,436 Growler overflight events that were audible for more than 28 hours over the one month monitoring timeframe. These events produced Sound Pressure Levels (SPL) up to 85 dB, and Sound Exposure Levels (SEL) as high as 96 dB (<https://irma.nps.gov/DataStore/Reference/Profile/2233340>). In spite of these findings, the Ferry House and adjacent historic resources would be excluded from the APE as presently proposed.

The Reserve's cultural landscape is a fundamental resource, as documented in the July 7, 1998 amendment to National Register Nomination for the Central Whidbey Island Historic District. As the lead federal preservation agency, the NPS has established cultural resource management policy and guidance for cultural landscapes that has been adopted by other agencies and preservation organizations. The Reserve was one of the first cultural landscapes recognized by the NPS, and the early 1980's research conducted here influenced the development of policy and professional procedures for the analysis and evaluation of the historic integrity of cultural landscapes throughout the United States (Susan Dolan, NPS Cultural Landscapes Program Manager, personal communication).

The cultural landscape within the Reserve enables visitors and residents to experience patterns of settlement, historic homes, and pastoral farmsteads that are still within their original farm, forest and marine settings. The cultural landscape includes prehistoric and historic settlement patterns and natural features that reflect human history and the unique northwest character of the area. Views and perceptual qualities, including the soundscape, contribute to the authenticity of the cultural landscape and enable one

to imagine what it was like to be here hundreds if not thousands of years ago. The Reserve is a nationally significant cultural landscape and unit of the NPS system. A more conservative metric for delineating the APE should be applied in deference to the nationally significant historical resources within the Reserve.

The Department of Defense Noise Working Group has identified supplemental metrics to the DNL, which averages noise and does not mirror the actual magnitude of individual noise events or the human experience of those events in real time. Research conducted by the U.S. Environmental Protection Agency (EPA) demonstrates that noise greater than 60 dB Sound Pressure Level (SPL) disrupts speech during normal conversation. In light of this EPA research and our monitoring results, we believe the APE should be delineated by modeling and mapping the 60 dB SPL contour line for Growler aircraft and using that polygon as the basis for the APE. This would be a much more appropriate surrogate metric for analyzing impacts to the sights, sounds, feelings and associations of place that are essential qualities of the cultural landscape and will be adversely impacted by this undertaking.

Thank you for the opportunity to comment on the proposed APE. I can be reached at 360-678-5787, or roy_zipp@nps.gov, if you have any further questions.

Sincerely,



Roy M. Zipp
Superintendent, NPS Operation

cc: Kristen Griffin, Reserve Manager, Trust Board for Ebey's Landing
Greg Griffith, Deputy State Historic Preservation Officer



January 25, 2017

Gary A. Mayes
Rear Admiral
U.S. Navy
Commander, Navy Region Northwest
1100 Hunley Road
Silverdale, Washington 98315-1100

In future correspondence please refer to:

Project Tracking Code: 102214-23-USN

Re: Draft Environmental Impact Statement for Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and Development of Support Facilities, NASWI

Dear Rear Admiral Mayes:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) with notification of the availability of the Draft Environmental Impact Statement (DEIS) for the above referenced action proposed for Naval Air Station Whidbey Island (NASWI). The DEIS analyzes the potential environmental effects that may result from the addition of up to 36 Growler aircraft at NASWI. As a result of our review, we provide the following comments and recommendations for your consideration:

- 1) Based upon our review of the DEIS, we reach the opinion that cultural and historic resources within the area of potential effect (APE) will be adversely affected by implementation of the action as proposed. In reaching this opinion, we note the Criteria of Adverse Effect from 36 CFR 800.5 and cited in Table 4.6-1 is:
...found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register [of Historic Places] in a manner that would diminish the integrity of the property's location, setting, design, materials, workmanship, feeling, or association, Consideration shall be given to all qualifying characteristics of a historic property, including those that may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or cumulative.

In addition, examples of adverse effect that are relevant to this proposal from 36 CFR 800.5 and Table 4.6-1 include, but not limited to:

- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features



- 2) We reiterate our concerns that the project APE defined as "...the area encompassed by the 65 dBA DNL noise contour that would exist in 2021 as represented by the No Action Alternative" (and drawn on Figure 3.6.1) is too restrictive and does not include portions of the region that will face comparable effects from "visual, atmospheric, or audible elements" as those areas within the 65 dBA lines as drawn in Figure 3.6-1. We note that the DEIS states that "...APE boundaries will be updated as consultation continues between the SHPO, consulting parties, American Indian tribes and nations, and other interested parties." Therefore, we recommend including in an expanded APE additional portions of Whidbey Island, Camano Island, Port Townsend vicinity, and San Juan Islands.
- 3) In addition, we are not convinced that the 65 dBA serves as the best or most appropriate measure for quantifying and assessing harmful levels of sound and vibrations from Growler activities. Our concern is based upon what appears to be an averaging of sound levels over long time periods that does not adequately capture the real time experience of brief but more numerous exposures to higher decibel levels, as well as the cumulative effect of these events.
- 4) Further, we note that the U.S. Department of Housing and Urban Development has posted on HUD Exchange (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) standards that classify 65 dB as "normally unacceptable" and above 75 as being "unacceptable." Given discussion on page 4-194 of the Kester and Czech 2012 study at NSAWI finding takeoff sounds levels greater than 110 dBC, fosters additional concern of noise levels of historic properties receiving exposure to 75 dB and the need for further, perhaps ongoing, site specific sound testing, data gathering, analysis and a commensurate level of mitigation measures.
- 5) In a related comment, discussion in Chapter 4 on operational impacts of vibration on historic properties states "No significant physical damage as a result of aircraft operations has been reported to these structures as a result of continuous operation of aircraft for over 70 years" (p. 4-195) and "...sound levels damaging to structural components of buildings are not likely to occur." (p. 4-50) Again, our concerns are not allayed by these statement about the cumulative impacts of vibration and sound waves on the structural integrity of historic buildings/structures in the APE and beyond in communities such as Coupeville and Port Townsend.
- 6) Furthermore and even if a consensus were reached that the sound waves and vibration associated with flight operations have only minor impact on structural integrity, there is a concern that historic building owners will take steps to remedy rattling windows and replace cracking walls and ceilings with inappropriate replacement materials and methods, if not total replacement or abandonment, of the structure.
- 7) Overall, our larger concern about this proposal is the long-term and cumulative effects of increased flight operations on the character and qualities of historic places and communities that will experience increased levels and frequencies of noise. We do not see firm evidence in the DEIS that the characteristics and qualities that have drawn generations to the region to live, work, and recreate will not be significantly diminished, if not eventually lost, as a result of increased flight operations.



In summary, our review of the DEIS leads us to the opinion that the project implementation will adversely affect historic properties in the APE. We look forward to further consultation with the SHPO, Tribes, and other affected parties to avoid, minimize, or mitigate the adverse effect.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,



Allyson Brooks
State Historic Preservation Officer
Allyson.Brooks@dahp.wa.gov
360-586-3066

C: Jim Baumgart, Governor's Office
Kristin Griffin, Trust Board of Ebey's Landing NHR
Deborah S. Stinson, Mayor, City of Port Townsend



Kirchler-Owen, Leslie

From: Shurling, Cynthia
Sent: Thursday, January 26, 2017 10:13 AM
To: Kirchler-Owen, Leslie
Subject: FW: Growler DEIS Comments
Attachments: image001.jpg; 102214-23-USN_122916.pdf

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [mailto:kendall.campbell1@navy.mil]
Sent: Wednesday, January 25, 2017 8:21 PM
To: Padgett, Lisa M CIV USFF, N46 <Lisa.Padgett@navy.mil>; Stallings, Sarah CIV NAVFAC Atlantic <sarah.stallings@navy.mil>; Romero, Joseph CAPT USFF, N01L <joseph.romero1@navy.mil>
Cc: Lyz Ellis <lyzellis@gmail.com>; Bianchi, Michael C NAVFAC NW, PRW4 <michael.bianchi1@navy.mil>; Williamson, Todd H CIV NAVFAC LANT, EV <todd.h.williamson1@navy.mil>; Shurling, Cynthia <CShurling@ene.com>
Subject: FW: Growler DEIS Comments

I just received SHPO's response to the DEIS. The response is timely for discussion in the proposed CR meeting next week.

I have only had the opportunity to skim the letter, but it does not appear that there is anything unanticipated.

All My Best,
Kendall

-----Original Message-----

From: Griffith, Greg (DAHP) [mailto:Greg.Griffith@DAHP.WA.GOV]
Sent: Wednesday, January 25, 2017 4:47 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Cc: Brooks, Allyson (DAHP); Whitlam, Rob (DAHP); Griffith, Greg (DAHP)
Subject: [Non-DoD Source] Growler DEIS Comments

Hi Kendall, it is my understanding that the comment period on the DEIS on Growler Operations at NASWI has been extended to 2/24/2017. However, just to make sure, I am attaching a pdf of our comments to you as a place holder if I am mistaken on the time extension.

As usual, let us know if you have any questions.

Thank you

Greg Griffith

Deputy State Historic Preservation Officer

Washington State/Department of Archaeology & Historic Preservation

Greg.Griffith@dahp.wa.gov

360-586-3073 (desk)

360-890-2617 (mobile)

POB 48343/Olympia 98504-8343

My regular office hours are Monday through Friday, 8:00 am to 5:00 pm

Get involved! Check out Washington's State Historic Preservation Plan 2014-19: Getting the Future Right at www.dahp.wa.gov <<http://www.dahp.wa.gov/>>

Description: logo option FINAL - Small

Please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>.



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1522
May 1, 2017

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station (NAS) Whidbey Island is continuing consultation on the definition of the Area of Potential Effect (APE) for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosure 1). The Navy thanks you for your comments and feedback on our initial APE and appreciates your continued participation in the Section 106 consultation.

Per 36 CFR §800.4(a), the Navy defined the APE based on the scale and scope of the undertaking, and after considering the comments received from the Washington State Historic Preservation Officer (SHPO) and the following participating parties, the Navy believes the APE as initially proposed is most appropriate for the reasons discussed on the following pages.

- Advisory Council on Historic Preservation
- Island County Commissioners (Districts 1, 2, and 3)
- Town of Coupeville
- City of Port Townsend
- National Park Service
- Trust Board of Ebey's Landing National Historical Reserve
- Washington State Parks
- Seattle Pacific University
- David Day
- Citizens of Ebey's Reserve (COER)
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation

- Tulalip Tribes
- Suquamish Tribe
- Jamestown S'Klallam Tribe

NAS Whidbey Island has supported the Airborne Electronic Attack (AEA) mission since 1970 and is the only home base location of the Navy's AEA community in the continental United States. Today, NAS Whidbey Island provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS).

Currently, the only aircraft capable of performing the AEA mission for the entire Department of Defense is the EA-18G, commonly called the Growler. The EA-18G began operations at NAS Whidbey Island in 2007. The full transition from the EA-6B to the EA-18G aircraft was completed on June 27, 2015. The Navy consulted with WA SHPO on the transition of the AEA mission aircraft to the new EA-18G in 2004. SHPO concurred with the Navy's finding of No Historic Properties Affected on November 3, 2004 (Log No. 110304-05-USN).

The proposed undertaking increases the number of EA-18G aircraft operating at NAS Whidbey Island and expands the number of annual airfield operations at NAS Whidbey Island's primary airport, Ault Field, as well as Outlying Landing Field (OLF) Coupeville. Airfield operations at Ault Field and OLF Coupeville occur within airspace controlled by NAS Whidbey Island and all operations are conducted consistent with FAA rules and regulations. Airfield operations specific to this undertaking include EA-18G take offs and landings, inter-facility transit, and Field Carrier Landing Practice (FCLP) at Ault Field and OLF Coupeville (Enclosure 2).

Under the proposed undertaking, the number of operational EA-18G aircraft home-based at NAS Whidbey Island would increase from 82 aircraft by up to 36 aircraft, for a total of up to 118 aircraft. This increase in aircraft requires renovation and construction of facilities at Ault Field to accommodate the additional aircraft. Additionally, annual airfield operations of the EA-18G aircraft would increase by up to 47% (ranging between approximately 40,100 to 41,400 operations). This represents a return to past levels of operations occurring in the 1970's, 1980's and 1990's. Depending on the distribution of FCLPs between the two airfields, the total number of airfield operations at Ault Field would increase between 12,300 and 38,700 operations, while the increase in annual airfield operations at OLF Coupeville would range from 2,200 to 29,000 operations.

As part of the Navy's public outreach, a detailed description and discussion of the APE was included in the Section 106 display and handout material presented at public meetings held December 5, 6, 7, 8, and 9 at Port Townsend, Oak Harbor, Lopez Island, Anacortes, and Coupeville, respectively. A cultural resource expert was present at the meetings to answer questions. Over 1,013 people attended those meetings, and over 4,300 comment submittals were received during the 105-day public comment period. Of the comments received, 12 individual

letters referenced the Navy's proposed APE. The material used at the public meetings remains available on the project website.

In our previous consultation, we proposed the use of the 65 decibel Day Night Sound Level (65 DNL) contour as a basis for the APE, which is the federal standard for land-use planning (Enclosure 3). The Navy carefully considered suggestions to use alternative noise measuring methodologies to define the APE, such as methods to measure noise from single events. However, we believe the use of 65 DNL contour is the most equitable and consistent methodology for defining the APE. Deviation from the 65 DNL had the effect of arbitrarily or preferentially including some historic properties for consideration over others. The Navy believes that the 65 DNL focuses the analysis on those historic properties that are routinely and repeatedly exposed to higher decibel levels of noise from military aircraft noise, as opposed to properties that are only occasionally exposed to aircraft noise or exposed to lower-levels of background noise from other community sources such as road traffic. The 65 DNL also best facilitates the determination of cumulative effects to historic properties as it encompasses areas that are routinely and repeatedly exposed to military aircraft noise.

Use of the 65 DNL to define the APE is consistent with long-standing practice among federal agencies, including the U.S. Environmental Protection Agency (EPA), Office of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), and the Department of Defense (DoD). Island County has also adopted the 65DNL for their land use planning authorities. It is common practice for noise levels greater than 65 DNL to be considered inconsistent with certain land uses, including the use of certain historic properties. For example, the FAA in 14 CFR Part 150 has created guidelines for evaluating land use compatibility with regard to noise exposure, and in practice, uses these guidelines to identify noise levels in excess of 65 DNL as an indirect impact that potentially diminishes the integrity of the historical property.

During our consultation, the National Park Service expressed concern that some portions of Ebey's Reserve fell outside the 65 DNL and suggested expanding the APE to the 60dB Sound Pressure Level (SPL); however, the 60 dB SPL threshold would capture noise levels consistent with common background noise and even human conversation. Such an overly inclusive threshold would provide little insight into the effects of aircraft noise on the Reserve. When based on the 65 DNL, the APE captures nearly the entirety of Ebey's Reserve. Therefore, the entire reserve will be considered in the Navy's analysis of determination of effects to historic properties (Enclosure 3). We will reconsider our defined APE if our identification of historic properties, determination of eligibility, or assessment of adverse effects reveals properties with significant historic features affected by sound levels.

The Navy has determined that the undertaking has the potential to impact historic properties both directly and indirectly, and has defined the APE by taking into consideration the following three components:

- On-installation Direct Effect Areas: Areas on the installation where historic properties could be directly impacted (i.e. ground disturbance, demolition, alteration).

- On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB Day Night Sound Level (DNL) noise contours where historic properties could remain undisturbed (i.e. introduction of visual, atmospheric, or audible elements).
- Off-installation Indirect Effect Area: Areas off installation but within operational areas potentially bounded by the 65 DNL noise contours (i.e. introduction of visual, atmospheric, or audible elements).

The Area of Potential Effect (APE) for this undertaking includes the location of all direct and indirect effects both on and off the installation within the 65 DNL contours (Enclosures 4 and 5).

Construction at NAS Whidbey Island, primarily at Ault Field, to accommodate the increase in EA-18G aircraft may have the following direct effects to historic properties:

- “Physical destruction of or damage to all or part of the property” [36 CFR 800.5(a)(2)(i)];
- “Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation” [36 CFR 800.5(a)(2)(ii)];
- “Removal of a property from its historic location” [36 CFR 800.5(a)(2)(iii)]; and
- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)].

An increase in airfield operations at Ault Field and OLF Coupeville may have the following indirect effects to historic properties both on and off the installation:

- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)]; and
- “Introduction of visual, atmospheric or audible elements” [36 CFR 800.5(a)(2)(v)].

The Navy also understands that the APE may include properties of cultural importance and significance to members of the traditional cultural groups of Whidbey Island. To identify properties with possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the following tribes:

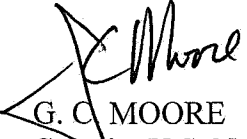
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation
- Tulalip Tribes
- Suquamish Tribe
- Jamestown S’Klallam Tribe

The Navy looks forward to continued consultations with you as we begin our historic resource identification effort. If during the identification and evaluation of historic properties the

5090
Ser N44/1522
May 1, 2017

Navy determines it necessary to expand the APE, we will consult with SHPO and our other consulting parties to amend the APE. If you require additional information, please contact Kendall Campbell, NAS Whidbey Island Cultural Resources Program Manager at (360) 257-6780 or kendall.campbell1@navy.mil.

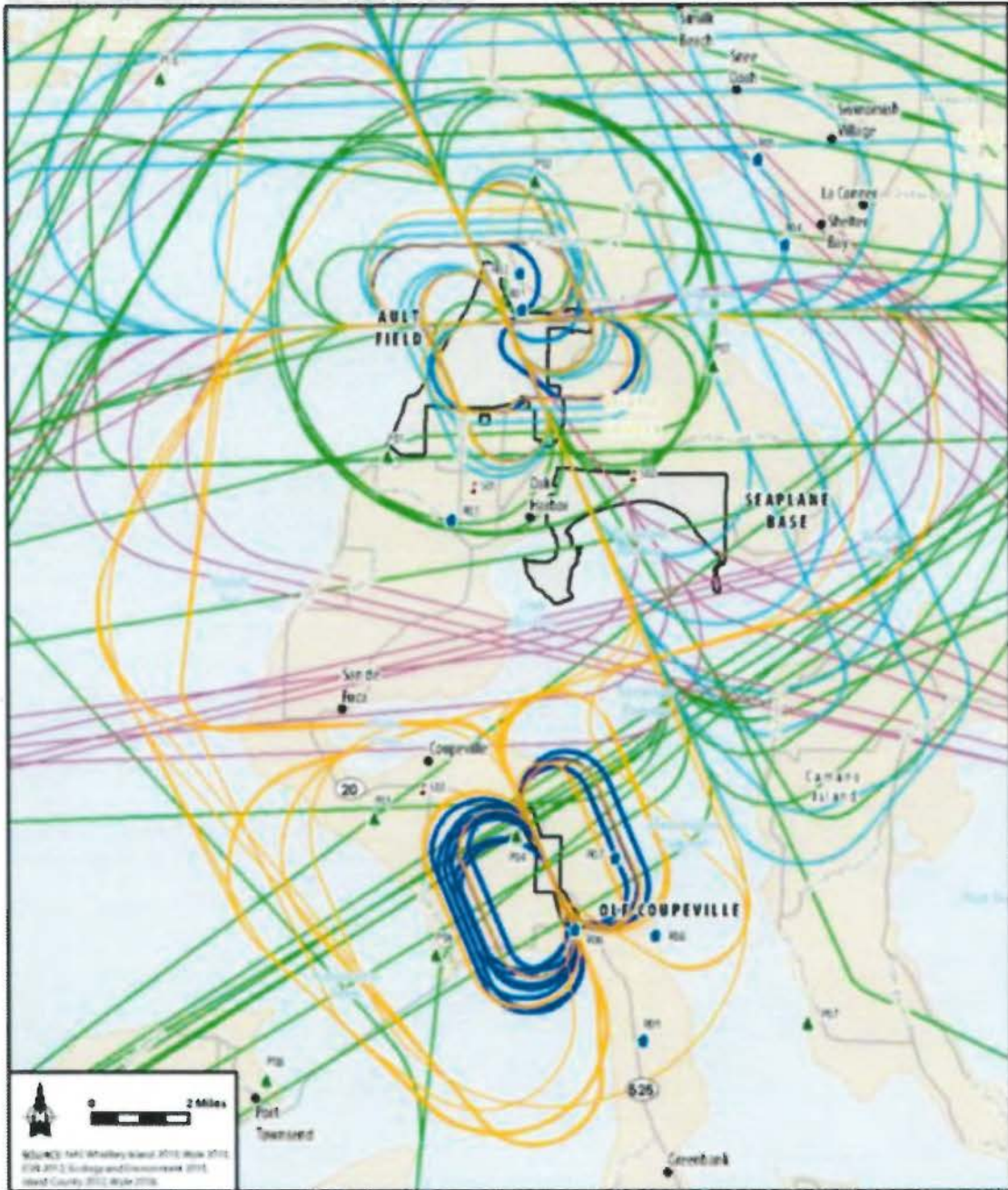
Sincerely,


G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosures:

1. NAS Whidbey Island Site Locations
2. Airfield Operations
3. Most Expansive Aggregate 65 DNL Noise Contour
4. Area of Potential Direct Effect
5. Area of Potential Indirect Effects





- City
- County Boundary
- Major Road
- Interfacility Track
- ICLP Flight Tracks
- Pattern Operations Flight Tracks
- Departure Flight Tracks
- Arrival Flight Tracks
- ▭ Installation Area
- Points of Interest (POI)
- ▲ Park
- Residential
- School

Figure 2
Flight Tracks
Whidbey Island, Island County, WA

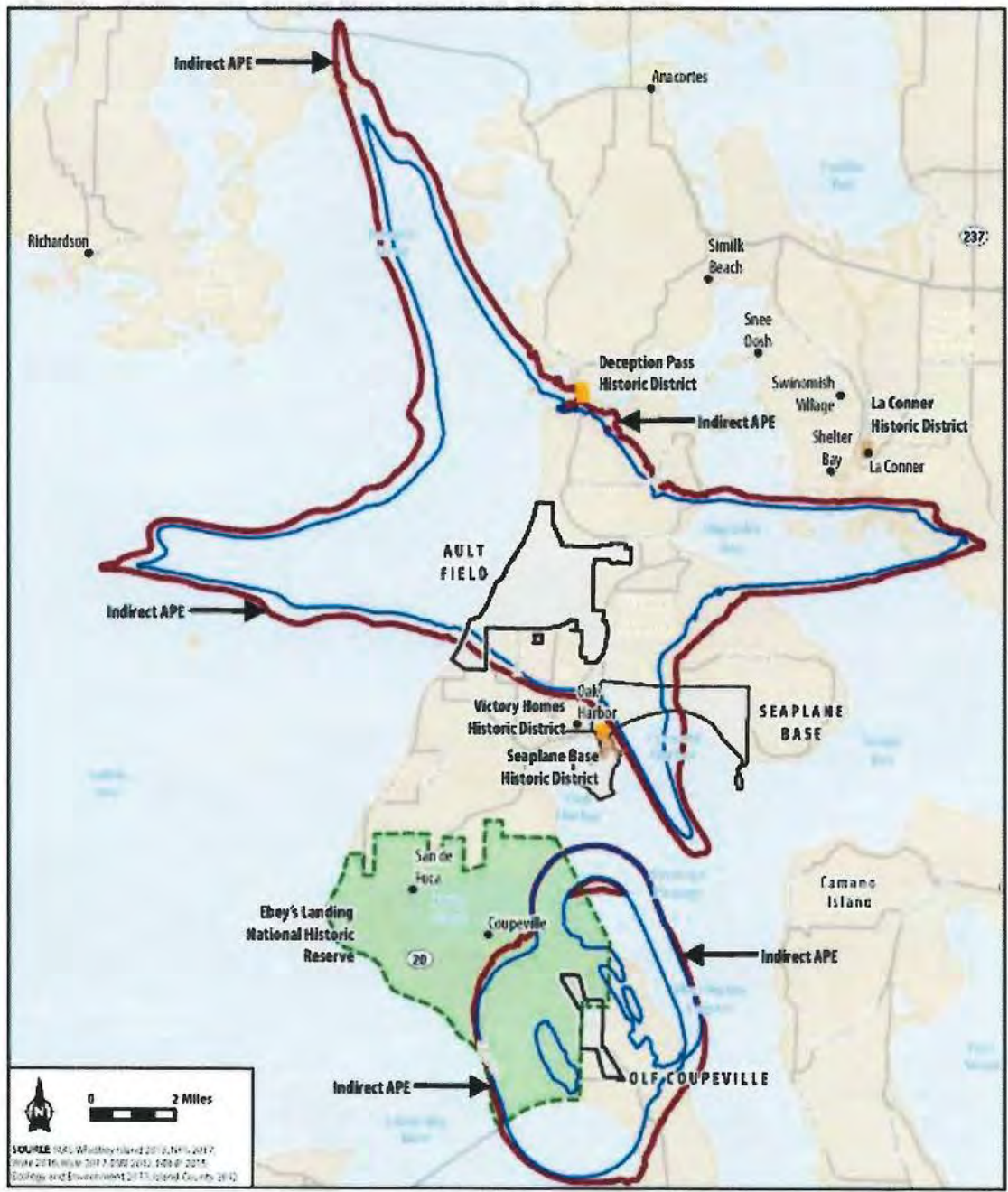


Figure 1
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA

● City
 — County Boundary
 — Major Road
 - - - Aggregate 65 DNL (Average) Noise Contour (dotted)
 ■ Historic District
 ■ Historic Reserve
 □ Insulator Area

*The Aggregate 65 DNL is an area created by combining all Average 65 DNL airports. This is the same as the 65 Area of Potential Effect (APE).





- City
- County Boundary
- Major Road
- Indirect APE Aggregate 65 DNL (Overage) Noise Contour IDBt
- No Action 65 DNL (Overage) Noise Contour IDBt
- Historic District
- Historic Reserve
- Installation Area

*The Aggregate 65 DNL is an area created by combining all Average 65 DNL options. This is the same as the 65 Area of Potential Effect (APE).

Enclosure 5
Indirect APE Aggregate 65 DNL and
No Action 65 DNL Noise Contours
 Whidbey Island, Island County, WA



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1536
May 1, 2017

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: CONTINUING SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station (NAS) Whidbey Island is continuing consultation on the definition of the Area of Potential Effect (APE) for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosure 1). The Navy thanks you for your comments and feedback on our initial APE and appreciates your continued participation in the Section 106 consultation.

Per 36 CFR §800.4(a), the Navy defined the APE based on the scale and scope of the undertaking, and after considering the comments received from the Washington State Historic Preservation Officer (SHPO) and the following participating parties, the Navy believes the APE as initially proposed is most appropriate for the reasons discussed on the following pages.

- Advisory Council on Historic Preservation
- Island County Commissioners (Districts 1, 2, and 3)
- Town of Coupeville
- City of Port Townsend
- National Park Service
- Trust Board of Ebey's Landing National Historical Reserve
- Washington State Parks
- Seattle Pacific University
- David Day
- Citizens of Ebey's Reserve (COER)
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington

- Lummi Nation
- Tulalip Tribes
- Suquamish Tribe
- Jamestown S'Klallam Tribe

NAS Whidbey Island has supported the Airborne Electronic Attack (AEA) mission since 1970 and is the only home base location of the Navy's AEA community in the continental United States. Today, NAS Whidbey Island provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS).

Currently, the only aircraft capable of performing the AEA mission for the entire Department of Defense is the EA-18G, commonly called the Growler. The EA-18G began operations at NAS Whidbey Island in 2007. The full transition from the EA-6B to the EA-18G aircraft was completed on June 27, 2015. The Navy consulted with WA SHPO on the transition of the AEA mission aircraft to the new EA-18G in 2004. SHPO concurred with the Navy's finding of No Historic Properties Affected on November 3, 2004 (Log No. 110304-05-USN).

The proposed undertaking increases the number of EA-18G aircraft operating at NAS Whidbey Island and expands the number of annual airfield operations at NAS Whidbey Island's primary airport, Ault Field, as well as Outlying Landing Field (OLF) Coupeville. Airfield operations at Ault Field and OLF Coupeville occur within airspace controlled by NAS Whidbey Island and all operations are conducted consistent with FAA rules and regulations. Airfield operations specific to this undertaking include EA-18G take offs and landings, inter-facility transit, and Field Carrier Landing Practice (FCLP) at Ault Field and OLF Coupeville (Enclosure 2).

Under the proposed undertaking, the number of operational EA-18G aircraft home-based at NAS Whidbey Island would increase from 82 aircraft by up to 36 aircraft, for a total of up to 118 aircraft. This increase in aircraft requires renovation and construction of facilities at Ault Field to accommodate the additional aircraft. Additionally, annual airfield operations of the EA-18G aircraft would increase by up to 47% (ranging between approximately 40,100 to 41,400 operations). This represents a return to past levels of operations occurring in the 1970's, 1980's and 1990's. Depending on the distribution of FCLPs between the two airfields, the total number of airfield operations at Ault Field would increase between 12,300 and 38,700 operations, while the increase in annual airfield operations at OLF Coupeville would range from 2,200 to 29,000 operations.

As part of the Navy's public outreach, a detailed description and discussion of the APE was included in the Section 106 display and handout material presented at public meetings held December 5, 6, 7, 8, and 9 at Port Townsend, Oak Harbor, Lopez Island, Anacortes, and Coupeville, respectively. A cultural resource expert was present at the meetings to answer questions. Over 1,013 people attended those meetings, and over 4,300 comment submittals were received during the 105-day public comment period. Of the comments received, 12 individual

letters referenced the Navy's proposed APE. The material used at the public meetings remains available on the project website.

In our previous consultation, we proposed the use of the 65 decibel Day Night Sound Level (65 DNL) contour as a basis for the APE, which is the federal standard for land-use planning (Enclosure 3). The Navy carefully considered suggestions to use alternative noise measuring methodologies to define the APE, such as methods to measure noise from single events. However, we believe the use of 65 DNL contour is the most equitable and consistent methodology for defining the APE. Deviation from the 65 DNL had the effect of arbitrarily or preferentially including some historic properties for consideration over others. The Navy believes that the 65 DNL focuses the analysis on those historic properties that are routinely and repeatedly exposed to higher decibel levels of noise from military aircraft noise, as opposed to properties that are only occasionally exposed to aircraft noise or exposed to lower-levels of background noise from other community sources such as road traffic. The 65 DNL also best facilitates the determination of cumulative effects to historic properties as it encompasses areas that are routinely and repeatedly exposed to military aircraft noise.

Use of the 65 DNL to define the APE is consistent with long-standing practice among federal agencies, including the U.S. Environmental Protection Agency (EPA), Office of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), and the Department of Defense (DoD). Island County has also adopted the 65DNL for their land use planning authorities. It is common practice for noise levels greater than 65 DNL to be considered inconsistent with certain land uses, including the use of certain historic properties. For example, the FAA in 14 CFR Part 150 has created guidelines for evaluating land use compatibility with regard to noise exposure, and in practice, uses these guidelines to identify noise levels in excess of 65 DNL as an indirect impact that potentially diminishes the integrity of the historical property.

During our consultation, the National Park Service expressed concern that some portions of Ebey's Reserve fell outside the 65 DNL and suggested expanding the APE to the 60dB Sound Pressure Level (SPL); however, the 60 dB SPL threshold would capture noise levels consistent with common background noise and even human conversation. Such an overly inclusive threshold would provide little insight into the effects of aircraft noise on the Reserve. When based on the 65 DNL, the APE captures nearly the entirety of Ebey's Reserve. Therefore, the entire reserve will be considered in the Navy's analysis of determination of effects to historic properties (Enclosure 3). We will reconsider our defined APE if our identification of historic properties, determination of eligibility, or assessment of adverse effects reveals properties with significant historic features affected by sound levels.

The Navy has determined that the undertaking has the potential to impact historic properties both directly and indirectly, and has defined the APE by taking into consideration the following three components:

- On-installation Direct Effect Areas: Areas on the installation where historic properties could be directly impacted (i.e. ground disturbance, demolition, alteration).

- On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB Day Night Sound Level (DNL) noise contours where historic properties could remain undisturbed (i.e. introduction of visual, atmospheric, or audible elements).
- Off-installation Indirect Effect Area: Areas off installation but within operational areas potentially bounded by the 65 DNL noise contours (i.e. introduction of visual, atmospheric, or audible elements).

The Area of Potential Effect (APE) for this undertaking includes the location of all direct and indirect effects both on and off the installation within the 65 DNL contours (Enclosures 4 and 5).

Construction at NAS Whidbey Island, primarily at Ault Field, to accommodate the increase in EA-18G aircraft may have the following direct effects to historic properties:

- “Physical destruction of or damage to all or part of the property” [36 CFR 800.5(a)(2)(i)];
- “Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation” [36 CFR 800.5(a)(2)(ii)];
- “Removal of a property from its historic location” [36 CFR 800.5(a)(2)(iii)]; and
- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)].

An increase in airfield operations at Ault Field and OLF Coupeville may have the following indirect effects to historic properties both on and off the installation:

- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)]; and
- “Introduction of visual, atmospheric or audible elements” [36 CFR 800.5(a)(2)(v)].

The Navy also understands that the APE may include properties of cultural importance and significance to members of the traditional cultural groups of Whidbey Island. To identify properties with possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the following tribes:

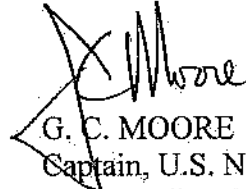
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation
- Tulalip Tribes
- Suquamish Tribe
- Jamestown S’Klallam Tribe

The Navy looks forward to continued consultations with you as we begin our historic resource identification effort. If during the identification and evaluation of historic properties the

5090
Ser N44/1536
May 1, 2017

Navy determines it necessary to expand the APE, we will consult with SHPO and our other consulting parties to amend the APE. If you require additional information, please contact Kendall Campbell, NAS Whidbey Island Cultural Resources Program Manager at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



G. C. MOORE
Captain, U.S. Navy
Commanding Officer

- Enclosures:
1. NAS Whidbey Island Site Locations
 2. Airfield Operations
 3. Most Expansive Aggregate 65 DNL Noise Contour
 4. Area of Potential Direct Effect
 5. Area of Potential Indirect Effects



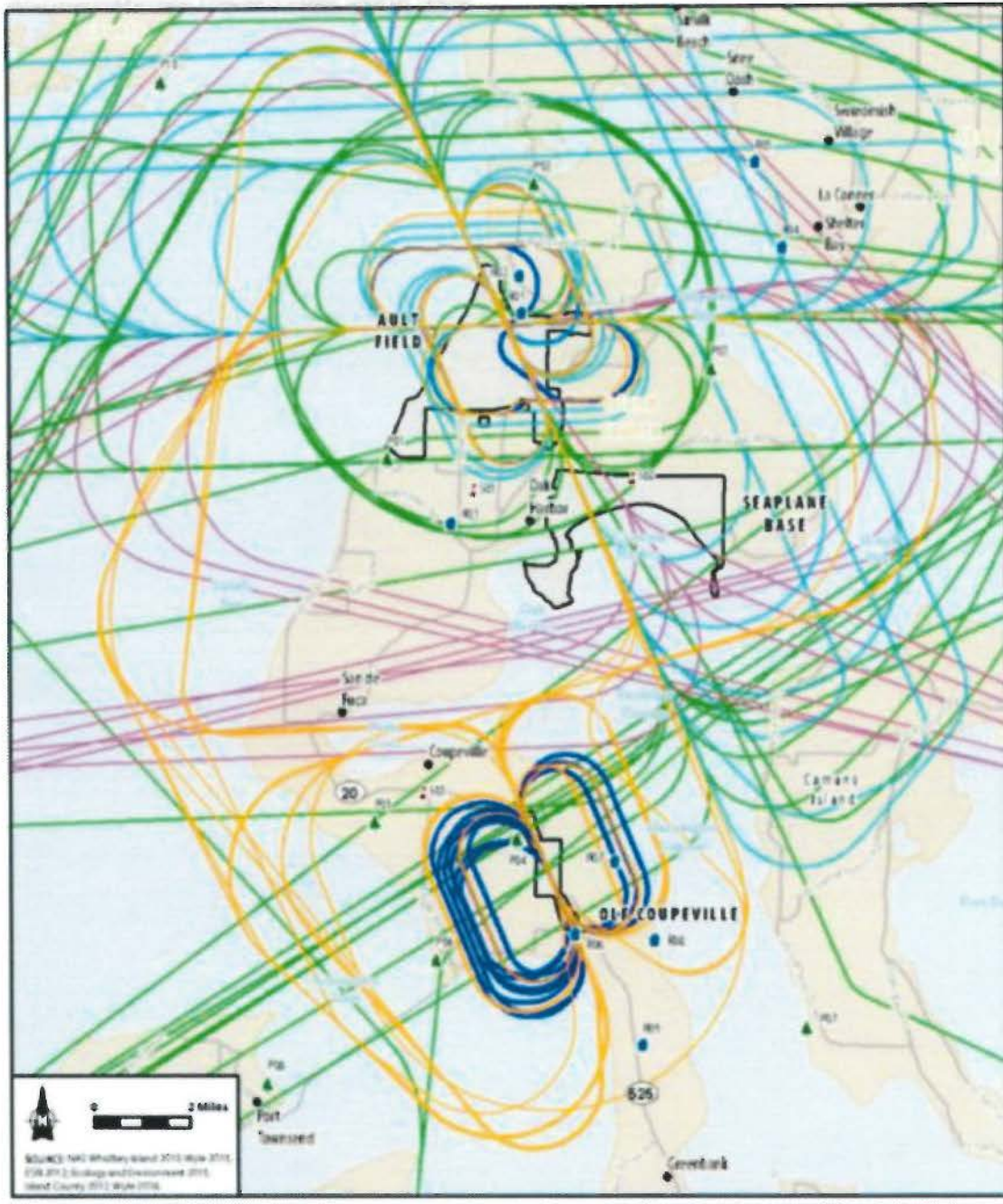




Figure 2
Flight Tracks
 Whitley Island, Island County, WA



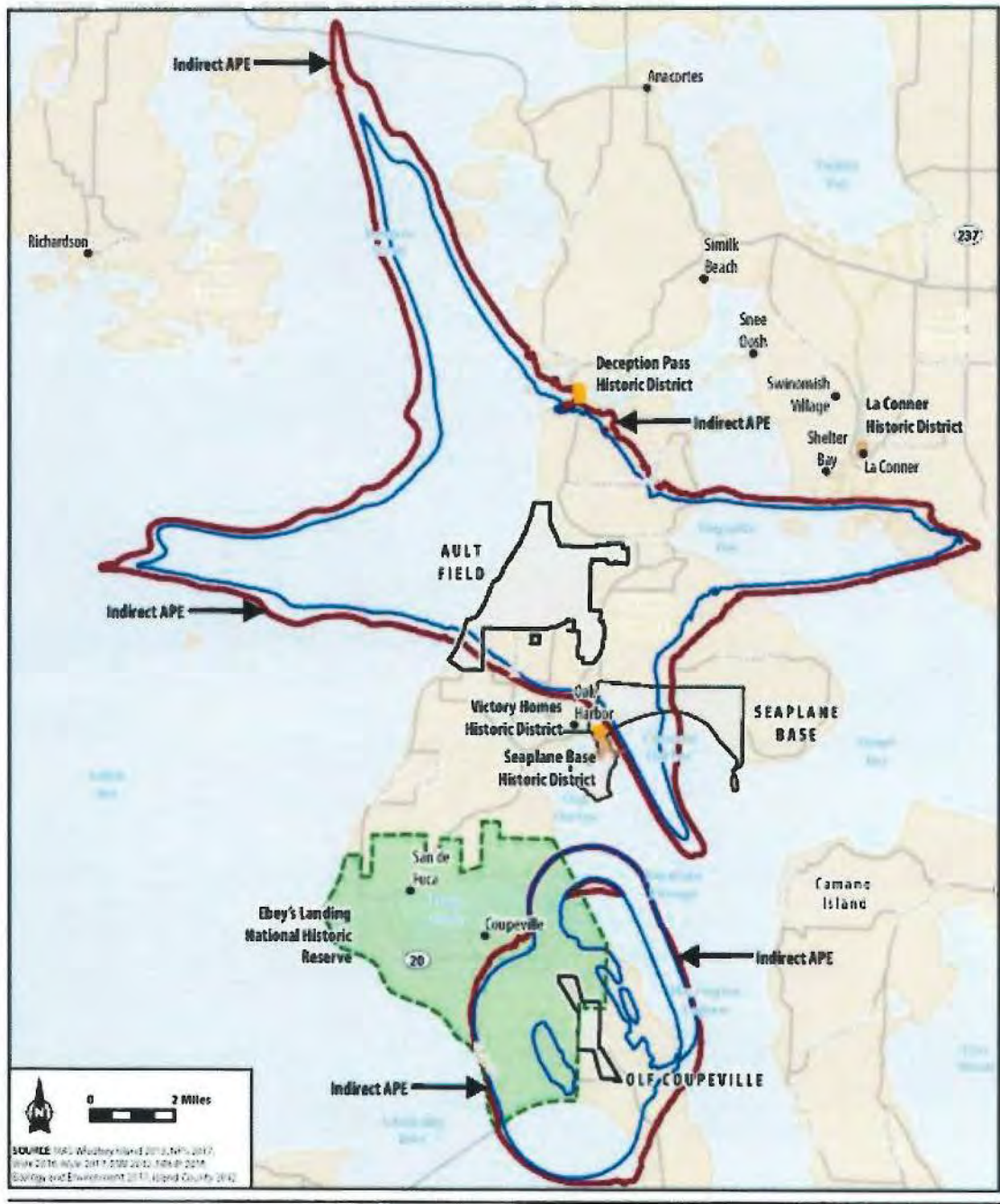
SOURCE: FAA/Whidbey Island 2010, July 2011; RFP 2012, Ecology and Environment 2010, Island County, 2011, July 2014.

- City
- County Boundary
- Major Road
- Aggregate 65 DNL (Average) Noise Contour (DNL)
- Historic District
- Historic Reserve
- Installation Area

*The Aggregate 65 DNL noise area created by combining all Average 65 DNL systems. This is the same as the 65 Day of Exceedance (DNL) area.

Figure 1
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA





- City
 - County Boundary
 - Major Road
 - Indirect APE Aggregate 65 DNL (Average Noise Contour IdB)
 - No Action 65 DNL (Average Noise Contour IdB)
 - Historic District
 - Historic Reserve
 - Installation Area
- *The Aggregate 65 DNL is an area created by combining all Average 65 DNL studies. This is the same as the 65 Day of Potential Best OARs.

Enclosure 5
Indirect APE Aggregate 65 DNL and
No Action 65 DNL Noise Contours
 Whidbey Island, Island County, WA



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1527
May 1, 2017

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station (NAS) Whidbey Island is continuing consultation on the definition of the Area of Potential Effect (APE) for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosure 1). The Navy thanks you for your comments and feedback on our initial APE and appreciates your continued participation in the Section 106 consultation.

Per 36 CFR §800.4(a), the Navy defined the APE based on the scale and scope of the undertaking, and after considering the comments received from the Washington State Historic Preservation Officer (SHPO) and the following participating parties, the Navy believes the APE as initially proposed is most appropriate for the reasons discussed on the following pages.

- Advisory Council on Historic Preservation
- Island County Commissioners (Districts 1, 2, and 3)
- Town of Coupeville
- City of Port Townsend
- National Park Service
- Trust Board of Ebey's Landing National Historical Reserve
- Washington State Parks
- Seattle Pacific University
- David Day
- Citizens of Ebey's Reserve (COER)
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation

- Tulalip Tribes
- Suquamish Tribe
- Jamestown S’Klallam Tribe

NAS Whidbey Island has supported the Airborne Electronic Attack (AEA) mission since 1970 and is the only home base location of the Navy’s AEA community in the continental United States. Today, NAS Whidbey Island provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS).

Currently, the only aircraft capable of performing the AEA mission for the entire Department of Defense is the EA-18G, commonly called the Growler. The EA-18G began operations at NAS Whidbey Island in 2007. The full transition from the EA-6B to the EA-18G aircraft was completed on June 27, 2015. The Navy consulted with WA SHPO on the transition of the AEA mission aircraft to the new EA-18G in 2004. SHPO concurred with the Navy’s finding of No Historic Properties Affected on November 3, 2004 (Log No. 110304-05-USN).

The proposed undertaking increases the number of EA-18G aircraft operating at NAS Whidbey Island and expands the number of annual airfield operations at NAS Whidbey Island’s primary airport, Ault Field, as well as Outlying Landing Field (OLF) Coupeville. Airfield operations at Ault Field and OLF Coupeville occur within airspace controlled by NAS Whidbey Island and all operations are conducted consistent with FAA rules and regulations. Airfield operations specific to this undertaking include EA-18G take offs and landings, inter-facility transit, and Field Carrier Landing Practice (FCLP) at Ault Field and OLF Coupeville (Enclosure 2).

Under the proposed undertaking, the number of operational EA-18G aircraft home-based at NAS Whidbey Island would increase from 82 aircraft by up to 36 aircraft, for a total of up to 118 aircraft. This increase in aircraft requires renovation and construction of facilities at Ault Field to accommodate the additional aircraft. Additionally, annual airfield operations of the EA-18G aircraft would increase by up to 47% (ranging between approximately 40,100 to 41,400 operations). This represents a return to past levels of operations occurring in the 1970’s, 1980’s and 1990’s. Depending on the distribution of FCLPs between the two airfields, the total number of airfield operations at Ault Field would increase between 12,300 and 38,700 operations, while the increase in annual airfield operations at OLF Coupeville would range from 2,200 to 29,000 operations.

As part of the Navy’s public outreach, a detailed description and discussion of the APE was included in the Section 106 display and handout material presented at public meetings held December 5, 6, 7, 8, and 9 at Port Townsend, Oak Harbor, Lopez Island, Anacortes, and Coupeville, respectively. A cultural resource expert was present at the meetings to answer questions. Over 1,013 people attended those meetings, and over 4,300 comment submittals were received during the 105-day public comment period. Of the comments received, 12 individual

letters referenced the Navy's proposed APE. The material used at the public meetings remains available on the project website.

In our previous consultation, we proposed the use of the 65 decibel Day Night Sound Level (65 DNL) contour as a basis for the APE, which is the federal standard for land-use planning (Enclosure 3). The Navy carefully considered suggestions to use alternative noise measuring methodologies to define the APE, such as methods to measure noise from single events. However, we believe the use of 65 DNL contour is the most equitable and consistent methodology for defining the APE. Deviation from the 65 DNL had the effect of arbitrarily or preferentially including some historic properties for consideration over others. The Navy believes that the 65 DNL focuses the analysis on those historic properties that are routinely and repeatedly exposed to higher decibel levels of noise from military aircraft noise, as opposed to properties that are only occasionally exposed to aircraft noise or exposed to lower-levels of background noise from other community sources such as road traffic. The 65 DNL also best facilitates the determination of cumulative effects to historic properties as it encompasses areas that are routinely and repeatedly exposed to military aircraft noise.

Use of the 65 DNL to define the APE is consistent with long-standing practice among federal agencies, including the U.S. Environmental Protection Agency (EPA), Office of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), and the Department of Defense (DoD). Island County has also adopted the 65DNL for their land use planning authorities. It is common practice for noise levels greater than 65 DNL to be considered inconsistent with certain land uses, including the use of certain historic properties. For example, the FAA in 14 CFR Part 150 has created guidelines for evaluating land use compatibility with regard to noise exposure, and in practice, uses these guidelines to identify noise levels in excess of 65 DNL as an indirect impact that potentially diminishes the integrity of the historical property.

During our consultation, the National Park Service expressed concern that some portions of Ebey's Reserve fell outside the 65 DNL and suggested expanding the APE to the 60dB Sound Pressure Level (SPL); however, the 60 dB SPL threshold would capture noise levels consistent with common background noise and even human conversation. Such an overly inclusive threshold would provide little insight into the effects of aircraft noise on the Reserve. When based on the 65 DNL, the APE captures nearly the entirety of Ebey's Reserve. Therefore, the entire reserve will be considered in the Navy's analysis of determination of effects to historic properties (Enclosure 3). We will reconsider our defined APE if our identification of historic properties, determination of eligibility, or assessment of adverse effects reveals properties with significant historic features affected by sound levels.

The Navy has determined that the undertaking has the potential to impact historic properties both directly and indirectly, and has defined the APE by taking into consideration the following three components:

- On-installation Direct Effect Areas: Areas on the installation where historic properties could be directly impacted (i.e. ground disturbance, demolition, alteration).

- On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB Day Night Sound Level (DNL) noise contours where historic properties could remain undisturbed (i.e. introduction of visual, atmospheric, or audible elements).
- Off-installation Indirect Effect Area: Areas off installation but within operational areas potentially bounded by the 65 DNL noise contours (i.e. introduction of visual, atmospheric, or audible elements).

The Area of Potential Effect (APE) for this undertaking includes the location of all direct and indirect effects both on and off the installation within the 65 DNL contours (Enclosures 4 and 5).

Construction at NAS Whidbey Island, primarily at Ault Field, to accommodate the increase in EA-18G aircraft may have the following direct effects to historic properties:

- “Physical destruction of or damage to all or part of the property” [36 CFR 800.5(a)(2)(i)];
- “Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation” [36 CFR 800.5(a)(2)(ii)];
- “Removal of a property from its historic location” [36 CFR 800.5(a)(2)(iii)]; and
- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)].

An increase in airfield operations at Ault Field and OLF Coupeville may have the following indirect effects to historic properties both on and off the installation:

- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)]; and
- “Introduction of visual, atmospheric or audible elements” [36 CFR 800.5(a)(2)(v)].

The Navy understands that the project area and its surrounding location may have cultural importance and significance to the Jamestown S’Klallam Tribe. Section 106 of the NHPA requires federal agencies to seek information from tribes likely to have knowledge of, or concerns with, historic resources within the project’s APE. We are specifically seeking your comments on our proposed APE and will continue consultation in the near future to identify properties that may have religious or cultural significance and may be eligible for listing in the National Register of Historic Places, including Traditional Cultural Properties.

We appreciate any assistance you could provide us in our efforts to comply with Section 106 of the NHPA. Please be assured that the Navy will treat any information you share with us with the degree of confidentiality that is required in Section 800.11(c) of the NHPA, or with any other special restrictions you may require.

The Navy looks forward to continued consultations with you as we begin our historic resource identification effort. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE, we will consult with SHPO and our other consulting parties to amend the APE. If you require additional information, please contact

5090
Ser N44/1527
May 1, 2017

Kendall Campbell, NAS Whidbey Island Cultural Resources Program Manager at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "G. C. Moore". The signature is written in a cursive style with a large, stylized initial "G".

G. C. MOORE
Captain, U.S. Navy
Commanding Officer

- Enclosures:
1. NAS Whidbey Island Site Locations
 2. Airfield Operations
 3. Most Expansive Aggregate 65 DNL Noise Contour
 4. Area of Potential Direct Effect
 5. Area of Potential Indirect Effects



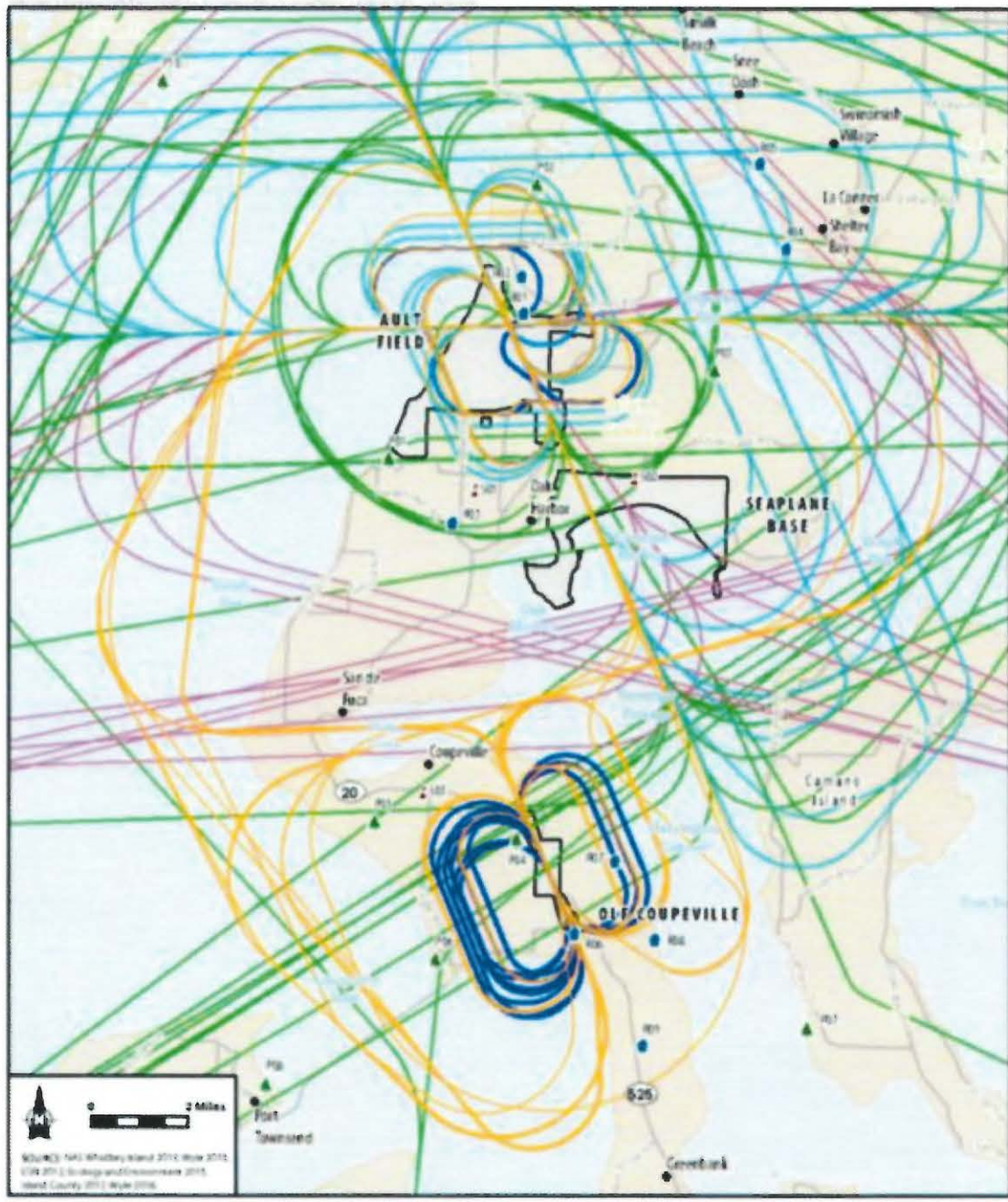



Figure 2
Flight Tracks
 Whistler Island, Island County, WA




 0 2 Miles
 SOURCE: Snohomish County 2010, WSP 2011, FWA 2011, Ecology and Environment 2010, Skagit County 2011, date 07/14

- City
- County Boundary
- Major Road
- Aggregate 65 DNL (Average) Noise Contour (dashed red line)
- Historic District
- Historic Reserve
- Installation Area

*The Aggregate 65 DNL noise area created by combining all Average 65 DNL options. This is the same as the 65 Area of Potential Noise (APN).

Figure 1
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA





- City
- County Boundary
- Major Road
- Indirect APE Aggregate 65 DNL (Average) Noise Contour (dB)
- No Action 65 DNL (Average) Noise Contour (dB)
- Historic District
- Historic Reserve
- Installation Area

*The Aggregate 65 DNL is an area created by combining all Average 65 DNL contours. This is the same as the 65 Area of Potential Effect (APE).

Enclosure 5
Indirect APE Aggregate 65 DNL and
No Action 65 DNL Noise Contours
 Whidbey Island, Island County, WA



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1523
May 1, 2017

Mr. Ken Pickard
President
Citizens of Ebey's Reserve
P.O. Box 202
Coupeville, WA 98239

Dear Mr. Pickard:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL EFFECT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station (NAS) Whidbey Island is continuing consultation on the definition of the Area of Potential Effect (APE) for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosure 1). The Navy thanks you for your comments and feedback on our initial APE and appreciates your continued participation in the Section 106 consultation.

Per 36 CFR §800.4(a), the Navy defined the APE based on the scale and scope of the undertaking, and after considering the comments received from the Washington State Historic Preservation Officer (SHPO) and the following participating parties, the Navy believes the APE as initially proposed is most appropriate for the reasons discussed on the following pages.

- Advisory Council on Historic Preservation
- Island County Commissioners (Districts 1, 2, and 3)
- Town of Coupeville
- City of Port Townsend
- National Park Service
- Trust Board of Ebey's Landing National Historical Reserve
- Washington State Parks
- Seattle Pacific University
- David Day
- Citizens of Ebey's Reserve (COER)
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation

- Tulalip Tribes
- Suquamish Tribe
- Jamestown S’Klallam Tribe

NAS Whidbey Island has supported the Airborne Electronic Attack (AEA) mission since 1970 and is the only home base location of the Navy’s AEA community in the continental United States. Today, NAS Whidbey Island provides facilities and support services for nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron, and one Fleet Replacement Squadron (FRS).

Currently, the only aircraft capable of performing the AEA mission for the entire Department of Defense is the EA-18G, commonly called the Growler. The EA-18G began operations at NAS Whidbey Island in 2007. The full transition from the EA-6B to the EA-18G aircraft was completed on June 27, 2015. The Navy consulted with WA SHPO on the transition of the AEA mission aircraft to the new EA-18G in 2004. SHPO concurred with the Navy’s finding of No Historic Properties Affected on November 3, 2004 (Log No. 110304-05-USN).

The proposed undertaking increases the number of EA-18G aircraft operating at NAS Whidbey Island and expands the number of annual airfield operations at NAS Whidbey Island’s primary airport, Ault Field, as well as Outlying Landing Field (OLF) Coupeville. Airfield operations at Ault Field and OLF Coupeville occur within airspace controlled by NAS Whidbey Island and all operations are conducted consistent with FAA rules and regulations. Airfield operations specific to this undertaking include EA-18G take offs and landings, inter-facility transit, and Field Carrier Landing Practice (FCLP) at Ault Field and OLF Coupeville (Enclosure 2).

Under the proposed undertaking, the number of operational EA-18G aircraft home-based at NAS Whidbey Island would increase from 82 aircraft by up to 36 aircraft, for a total of up to 118 aircraft. This increase in aircraft requires renovation and construction of facilities at Ault Field to accommodate the additional aircraft. Additionally, annual airfield operations of the EA-18G aircraft would increase by up to 47% (ranging between approximately 40,100 to 41,400 operations). This represents a return to past levels of operations occurring in the 1970’s, 1980’s and 1990’s. Depending on the distribution of FCLPs between the two airfields, the total number of airfield operations at Ault Field would increase between 12,300 and 38,700 operations, while the increase in annual airfield operations at OLF Coupeville would range from 2,200 to 29,000 operations.

As part of the Navy’s public outreach, a detailed description and discussion of the APE was included in the Section 106 display and handout material presented at public meetings held December 5, 6, 7, 8, and 9 at Port Townsend, Oak Harbor, Lopez Island, Anacortes, and Coupeville, respectively. A cultural resource expert was present at the meetings to answer questions. Over 1,013 people attended those meetings, and over 4,300 comment submittals were received during the 105-day public comment period. Of the comments received, 12 individual

letters referenced the Navy's proposed APE. The material used at the public meetings remains available on the project website.

In our previous consultation, we proposed the use of the 65 decibel Day Night Sound Level (65 DNL) contour as a basis for the APE, which is the federal standard for land-use planning (Enclosure 3). The Navy carefully considered suggestions to use alternative noise measuring methodologies to define the APE, such as methods to measure noise from single events. However, we believe the use of 65 DNL contour is the most equitable and consistent methodology for defining the APE. Deviation from the 65 DNL had the effect of arbitrarily or preferentially including some historic properties for consideration over others. The Navy believes that the 65 DNL focuses the analysis on those historic properties that are routinely and repeatedly exposed to higher decibel levels of noise from military aircraft noise, as opposed to properties that are only occasionally exposed to aircraft noise or exposed to lower-levels of background noise from other community sources such as road traffic. The 65 DNL also best facilitates the determination of cumulative effects to historic properties as it encompasses areas that are routinely and repeatedly exposed to military aircraft noise.

Use of the 65 DNL to define the APE is consistent with long-standing practice among federal agencies, including the U.S. Environmental Protection Agency (EPA), Office of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), and the Department of Defense (DoD). Island County has also adopted the 65DNL for their land use planning authorities. It is common practice for noise levels greater than 65 DNL to be considered inconsistent with certain land uses, including the use of certain historic properties. For example, the FAA in 14 CFR Part 150 has created guidelines for evaluating land use compatibility with regard to noise exposure, and in practice, uses these guidelines to identify noise levels in excess of 65 DNL as an indirect impact that potentially diminishes the integrity of the historical property.

During our consultation, the National Park Service expressed concern that some portions of Ebey's Reserve fell outside the 65 DNL and suggested expanding the APE to the 60dB Sound Pressure Level (SPL); however, the 60 dB SPL threshold would capture noise levels consistent with common background noise and even human conversation. Such an overly inclusive threshold would provide little insight into the effects of aircraft noise on the Reserve. When based on the 65 DNL, the APE captures nearly the entirety of Ebey's Reserve. Therefore, the entire reserve will be considered in the Navy's analysis of determination of effects to historic properties (Enclosure 3). We will reconsider our defined APE if our identification of historic properties, determination of eligibility, or assessment of adverse effects reveals properties with significant historic features affected by sound levels.

The Navy has determined that the undertaking has the potential to impact historic properties both directly and indirectly, and has defined the APE by taking into consideration the following three components:

- On-installation Direct Effect Areas: Areas on the installation where historic properties could be directly impacted (i.e. ground disturbance, demolition, alteration).

- On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB Day Night Sound Level (DNL) noise contours where historic properties could remain undisturbed (i.e. introduction of visual, atmospheric, or audible elements).
- Off-installation Indirect Effect Area: Areas off installation but within operational areas potentially bounded by the 65 DNL noise contours (i.e. introduction of visual, atmospheric, or audible elements).

The Area of Potential Effect (APE) for this undertaking includes the location of all direct and indirect effects both on and off the installation within the 65 DNL contours (Enclosures 4 and 5).

Construction at NAS Whidbey Island, primarily at Ault Field, to accommodate the increase in EA-18G aircraft may have the following direct effects to historic properties:

- “Physical destruction of or damage to all or part of the property” [36 CFR 800.5(a)(2)(i)];
- “Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation” [36 CFR 800.5(a)(2)(ii)];
- “Removal of a property from its historic location” [36 CFR 800.5(a)(2)(iii)]; and
- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)].

An increase in airfield operations at Ault Field and OLF Coupeville may have the following indirect effects to historic properties both on and off the installation:

- “Change of the character of the property’s use or of physical features within the property’s settings” [36 CFR 800.5(a)(2)(iv)]; and
- “Introduction of visual, atmospheric or audible elements” [36 CFR 800.5(a)(2)(v)].

The Navy also understands that the APE may include properties of cultural importance and significance to members of the traditional cultural groups of Whidbey Island. To identify properties with possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the following tribes:

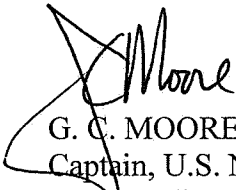
- Swinomish Indian Tribal Community
- Upper Skagit Tribe
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Lummi Nation
- Tulalip Tribes
- Suquamish Tribe
- Jamestown S’Klallam Tribe

The Navy looks forward to continued consultations with you as we begin our historic resource identification effort. If during the identification and evaluation of historic properties the

5090
Ser N44/1523
May 1, 2017

Navy determines it necessary to expand the APE, we will consult with SHPO and our other consulting parties to amend the APE. If you require additional information, please contact Kendall Campbell, NAS Whidbey Island Cultural Resources Program Manager at (360) 257-6780 or kendall.campbell1@navy.mil.

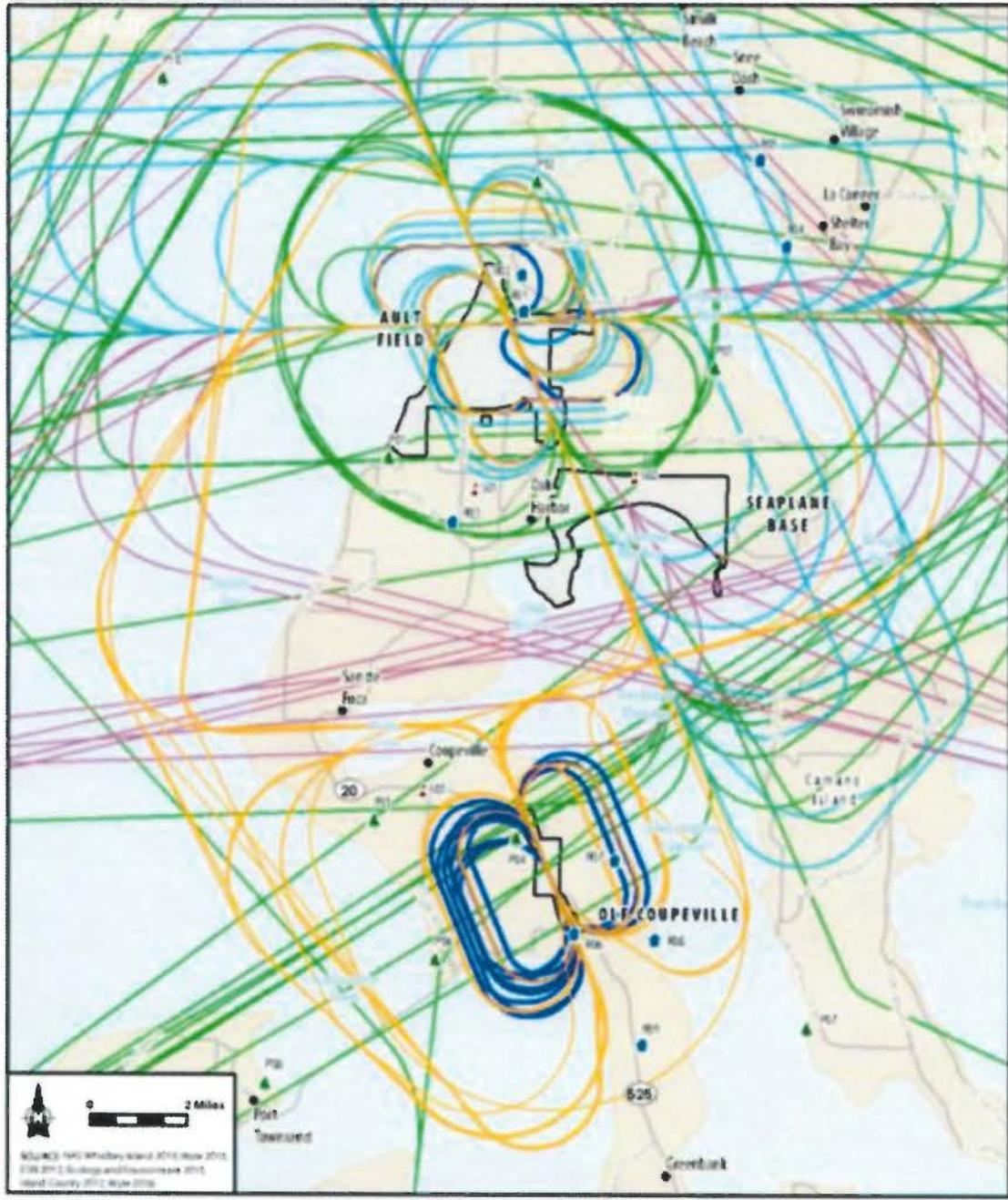
Sincerely,


G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosures:

1. NAS Whidbey Island Site Locations
2. Airfield Operations
3. Most Expansive Aggregate 65 DNL Noise Contour
4. Area of Potential Direct Effect
5. Area of Potential Indirect Effects





- City
- County Boundary
- Major Road
- Interfacility Track
- ICLP Flight Tracks
- Harbor Operations Flight Tracks
- Departure Flight Tracks
- Arrival Flight Tracks
- ▭ Installation Area
- Points of Interest (POI)
- Park
- Residential
- School

Figure 2
Flight Tracks
Whitby Island, Island County, WA



- City
- County Boundary
- Major Road
- Aggregate 65 DNL (Average) Noise Contour (65)
- Historic District
- Historic Reserve
- Industrial Area

* The Aggregate 65 DNL is an area created by combining all Average 65 DNL contours. This is the same as the 65 Area of Potential Effect (APE).

Figure 1
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA





SOURCE: IGC, Whidbey Island 2012, IGC, 2012
 June 2016, IGC, 2017, IGC, 2017, IGC, 2017
 Ecology and Environment 2017, Island County, 2012

- City
- County Boundary
- Major Road
- Indirect APE Aggregate 65 DNL (Average) Noise Contour (IDB)
- No Action 65 DNL (Average) Noise Contour (IDB)
- Historic District
- Historic Reserve
- Installation Area

*The Aggregate 65 DNL is an area created by combining all Average 65 DNL contours. This is the same as the RT-Noise of Potential Effect (APE).

Enclosure 5
Indirect APE Aggregate 65 DNL and
No Action 65 DNL Noise Contours
 Whidbey Island, Island County, WA



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

May 10, 2017

Captain G.C. Moore
Commanding Officer
US Dept. of the Navy
3730 North Charles Porter Ave.
Oak Harbor, WA98278-5000

In future correspondence please refer to:

Project Tracking Code: 102214-23-USN

Property: Whidbey Island Naval Air Station and OLF Coupeville

Re: Definition of the Area of Potential Effect for the Proposed Increase in EA-18G Growler Operations at Naval Air Station Whidbey Island

Dear Captain Moore:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. We are responding to your letter of May 1, 2017, providing a description and map of the proposed area of potential effect (APE) for EA-18G Growler operations.

As a result of our review, we **disagree** with the APE in your proposed letter. As a compromise we are proposing a more reasonable and comprehensive APE that is bounded by the yellow Inter Facility Track line, as identified in Figure 2 in your letter of May 1, 2017. We contend that the yellow Inter Facility Tract line is more reasonable based on the nature of the undertaking, recognizes the Naval Air Station Whidbey Island as an interconnected complex, and includes the historic properties that will be affected by this undertaking.

Please provide us with your survey methodology before proceeding with any inventories. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Finally, please note that in order to streamline responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>.



Captain G.C. Moore
May 10, 2017
Page Two

To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,



Allyson Brooks, Ph.D.
State Historic Preservation Officer
(360 586-3066
Allyson.Brooks@dahp.wa.gov

C: Jim Baumgart, Governor's Policy Office
Kendall Campbell, WINAS Cultural Resources
Katherine Kerr, Advisory Council on Historic Preservation
Lisa Padgett, WINAS, NEPA Lead





DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2535
14 June 17

Dr. Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: CONTINUING SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL EFFECT AND SCOPE OF IDENTIFICATION EFFORT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. The Navy thanks you for your comments and feedback on our APE and appreciates your continued participation in the Section 106 consultation. We are currently reviewing the Area of Potential Effect (APE) you proposed in your letter on May 10, 2017 and will continue our consultations once the Navy has fully discussed and considered your proposal. This letter is to provide you with the details you requested concerning our identification effort.

Our identification effort will be performed as outlined in 36 CFR section 800.4 and in accordance with existing guidance on meeting the "reasonable and good faith" identification standard from the Advisory Council of Historic Preservation (ACHP), dated November 10, 2011. Accordingly, the Navy's identification effort will consist of the following:

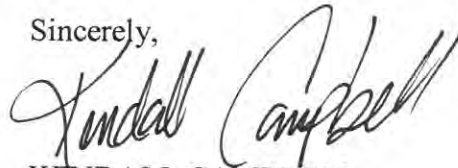
- Gathering of existing information on known and potential historic properties within the APE from others who may have knowledge of historic properties in the area including the State Historic Preservation Officer, and Native American Tribes, as well as, but not limited to, the National Register of Historic Places, the Ebey's Landing National Historical Reserve, the Washington Heritage Record, the Historic Barn Registry, and the Island County Historic Society.
- Gathering of information from Native American tribes to facilitate identification of properties that may have religious and cultural significance to the tribes.
- Documentation of the vertical and horizontal extent of the APE.
- A summary of the undertaking's magnitude and anticipated effects on any historic properties that might exist in the APE to inform the content and intensity of the identification effort.

5090
Ser N44/2535
14 June 17

- A review of existing information on historic properties within the APE, including information about possible historic properties not yet identified;
- Recordation and evaluation of any properties directly impacted by the undertaking using WA State Historic Property Inventory Forms and methodologies consistent with other historic property surveys in the area that have been effective in terms of time and cost;
- If further investigations are needed to determine the presence or absence of historic properties within the APE, the Navy will outline the steps to be taken during field reconnaissance, analysis, and subsequent reporting.

The Navy looks forward to continued consultations with you as we consider the APE comments and as we begin our historic resource identification effort. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with SHPO and our other consulting parties to amend the APE and inventory plan. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



KENDALL CAMPBELL

NASWI Cultural Resources Program Manager and
Archaeologist

By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2740
July 14, 2017

Dr. Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: CONTINUING SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL EFFECTS FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR Part 800, Naval Air Station (NAS) Whidbey Island is continuing consultation on the definition of the Area of Potential Effects (APE) for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington (Enclosure 1).

The Navy appreciates the feedback you provided during our meeting on May 10, 2017 and in your May 10, 2017 letter. The Navy has given careful consideration to the concerns you raised and recognizes the controversial nature of aircraft noise. However, the requirement under 36 CFR 800.4(a) is to define the APE based on the geographic area within which the undertaking may directly or indirectly affect the character or use of historic properties. It is the Navy's decision that 65 decibel (dB) Day Night Sound Level (DNL) contour line remain the basis for the indirect APE because it is the most appropriate standard for assessing potential indirect effects to historic properties for this undertaking.

The Navy carefully considered the proposed alternative APE to use the Inter Facility Track line as opposed to the aggregated 65 dB DNL contour line (Enclosure 2). In assessing the geographic areas within which the undertaking may directly or indirectly cause alterations in the character or use of historic properties, the Navy determined that the Inter Facility Track line did not equitably account for the potential effects to historic properties surrounding both Ault Field and OLF Coupeville. The Inter Facility Track line represents operations that primarily occur over water and are designated to mitigate aircraft noise on the communities surrounding NAS Whidbey Island Air Fields. In addition to adopting local flight noise abatement patterns that direct inter facility flights away from land as much as possible, the NAS Whidbey Island Operations Manual standards for inter facility transit are above minimum flight altitude standards set by the FAA. During inter facility transit the Navy flies at a minimum of 1000 ft. over land

and populated areas. As a result, use of the Inter Facility Track lines would include areas where the undertaking would have no effect on historic properties, and arbitrarily exclude areas where there may be potential effects as shown in enclosure (2).

To ensure the APE fully encompasses any historic properties with a potential be affected by the undertaking, the Navy has chosen the most expansive aggregate 65dB DNL contour, which encompasses all of the proposed alternatives in the DEIS (Enclosure 3). For your awareness, during the consideration of comments on the APE, the Navy updated its noise analysis using the latest approved noise model and has revised portions of the 65 dB DNL contour reflecting slight growth in certain locations. The updated 65 dB DNL contour is reflected in enclosure (2). Finally, the Navy will also include all of the Ebey's Landing National Historic Reserve in the effects analysis to ensure all potential effects to the Central Whidbey Historic District are fully evaluated.

The Navy recognizes that aircraft noise can adversely affect the setting of certain noise-sensitive historic properties. However, 65dB DNL is the widely accepted threshold for assessing potential effects from noise. Moreover, its use to define the APE is consistent with long-standing practice among federal agencies, including the U.S. Environmental Protection Agency (EPA), Office of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), and the Department of Defense (DoD).

DNL is highly correlated with all standard, sensible measures of aircraft and highway noise. It is a conservative and comprehensive standard that factors the number, frequency, and energy (loudness) of noise events. The 65dB DNL for the DEIS was modeled using the latest approved noise modeling program called NOISEMAP 7.3. NOISEMAP draws from a library of actual aircraft noise measurements and then incorporates site-specific operational data (types of aircraft, number of operations, flight tracks, altitude, speed of aircraft, engine power settings, and engine maintenance run-ups), site specific environmental data (average humidity and temperature), and site specific surface hardness and terrain that contribute to the noise environment. The result is a site specific geographical depiction of levels of noise. Because of the orientation of the runways and flight paths and the altitude of aircraft traveling between Ault Field and OLF Coupeville, the 65 dB DNL is not contiguous.

DNL represents long term noise exposure rather than a level heard at any given time, which makes it appropriate for assessing long-term direct and indirect impacts to historic properties. The DNL values are average quantities, mathematically representing the continuous sound level that would be present if all of the variations in sound level that occur over a 24-hour period were averaged to have the same total sound energy. The DNL metric quantifies the total sound energy received and is therefore a cumulative measure, but it does not provide specific information on

the number of noise events or the individual sound levels that occur during the 24-hour day. The DNL metric also adds an additional 10 dB to nighttime (10:00 p.m. to 7:00 a.m., also known as “acoustic night”) sound levels to account for heightened human sensitivity to noise when ambient sound levels are low, such as when sleep disturbance could occur. See enclosure (4) for examples of sound levels (in dB) from typical sources. For more information about noise metrics and modeling, see section 3.2.2 and Appendix A of the DEIS.

In summary, after careful review and consideration, the Navy finds that the objective, industry standard is the most reliable basis of analyzing potential indirect effects and has accordingly selected the 65 dB DNL to delineate the APE. To fully evaluate the potential direct and indirect effects of the undertaking on historic properties, the Navy has included the most expansive aggregate 65 dB DNL contour within the APE to assess indirect effects and all on-installation areas where historic properties could be directly impacted by future construction activities within the APE to assess direct effects (Enclosures 5 and 6). Accordingly, the APE includes the following three components:

- On-installation Direct Effect Areas: Areas on the installation where historic properties could be directly impacted (i.e. ground disturbance, demolition, alteration).
- On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB DNL noise contours where historic properties could remain undisturbed (i.e. introduction of visual, atmospheric, or audible elements).
- Off-installation Indirect Effect Area: Areas off installation but within operational areas potentially bounded by the noise contours (i.e. introduction of visual, atmospheric, or audible elements).

Due to the unique nature of Ebey’s Landing National Historic Reserve and because the 65 dB DNL contour covers a large portion of the Reserve, the Navy will include all of the Reserve in the effects analysis to ensure all potential effects to the historic district are fully evaluated.

The Navy looks forward to continued consultations with you as we begin our historic resource identification effort. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE, we will consult with SHPO and our other consulting parties to amend the APE.

5090
Ser N44/2740
July 14, 2017

If you require additional information, please contact Mrs. Kendall Campbell, NAS Whidbey Island Cultural Resources Program Manager at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



G. C. MOORE
Captain, U.S. Navy
Commanding Officer

- Enclosures:
1. NAS Whidbey Island Site Locations
 2. Most Expansive Aggregate 65 dB DNL Noise Contour and Inter Facility Tracks
 3. Most Expansive Aggregate 65 dB DNL Noise Contour
 4. Sound Levels from Typical Sources
 5. Area of Potential Direct Effect
 6. Area of Potential Indirect Effects



Enclosure (1)



SOURCE: <http://www.wa.gov/transportation/airports/whidbey-island-airport>

 Modified from 2011 data by WSP

- City
- Interstate Road
- County Boundary
- Major Road
- Aggregate 65 DNL (Average) Noise Contour (dB)
- Historic District
- Historic Reserve
- Installation Area
- MPO proposed APE

Enclosure 3
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA

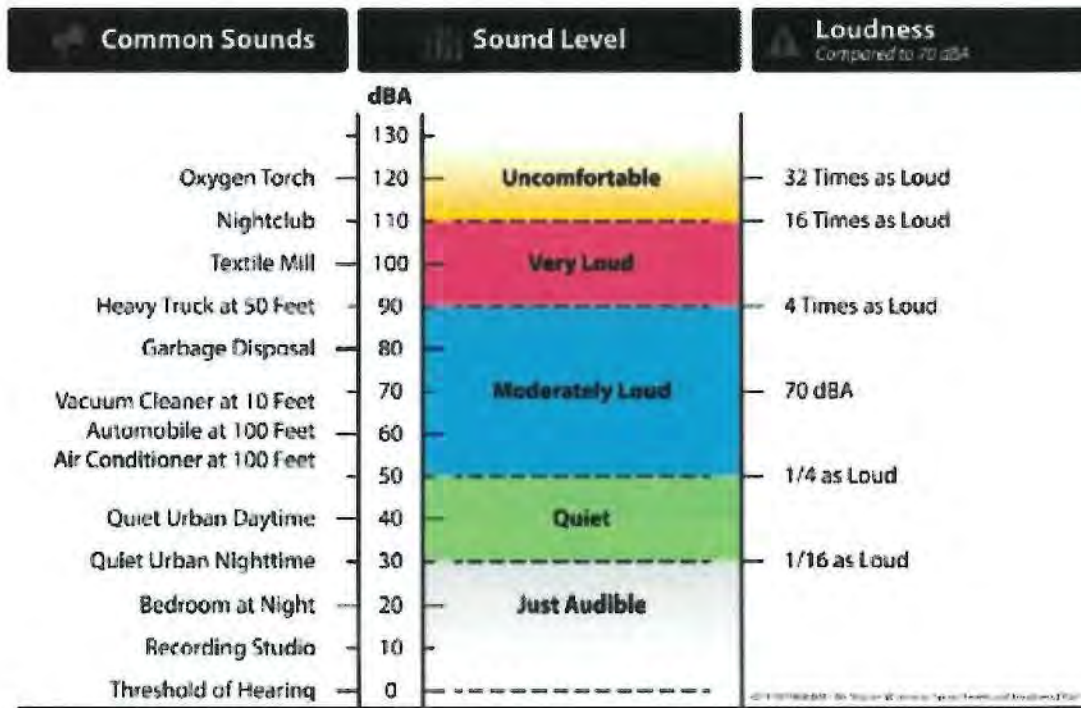
*The Aggregate 65 DNL contour is based on the 2011 data and is not a prediction of future noise levels. The noise levels are based on the 2011 data and are not a prediction of future noise levels.

Enclosure (2)



Figure 1
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA

Enclosure (3)



Sources: Harris, 1979; FICAN (Federal Interagency Committee on Aviation Noise), 1997

Enclosure (4)



Enclosure (5)



Figure 1
Aggregate 65 DNL
Noise Contour
 Whidbey Island, Island County, WA

*The Aggregate 65 DNL noise area created by combining all Average 65 DNL contours. This is the same as the 65 Area of Potential Effect (APE).

Enclosure (6)



July 14, 2017

Ms. Kendall Campbell
Cultural Resources
US Dept. of the Navy
3730 North Charles Porter Ave.
Oak Harbor, WA98278-5000

In future correspondence please refer to:

Project Tracking Code: 102214-23-USN

Re: Proposed Survey Methodology: Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and Development of Support Facilities

Dear Ms. Campbell:

Thank you for your letter of June 14, 2017 to the State Historic Preservation Officer (SHPO) in continuation of the U.S. Navy's Section 106 consultation on the definition of the Area of Potential Effect (APE) and Scope of Identification Effort for the proposed increase in EA-18G Growler Operations at Naval Air Station Whidbey Island (NASWI). Your letter is in response to our request for your methodology for identifying cultural and historic resources within the proposed APE. The above referenced project has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. As a result of our review, we concur with the seven identification tasks listed in your letter. In addition, we provide the following comments and recommendations for your consideration:

- 1) We note that the draft methodology focuses on existing data already captured in various databases like WISAARD and by the National Park Service for Ebey's Landing National Historical Reserve (EBLA). What is not clear is the anticipated extent of updating existing site forms and recording newly identified historic properties. Therefore, we request a survey planning meeting with you to review maps and the properties you have identified to date so that we each have a clear understanding of the actual acreage and number of site forms that will need to be updated/completed to current standards.
- 2) Developing a historic context document and associated sub-themes is an important first step in understanding the pre-contact and historical development of the APE and also evaluating inventoried properties. There is likely a substantial level of contextual information already established for the study area.
- 3) In the first bullet point in your letter, the correct reference would be to the "Washington Heritage Register" and the Washington Heritage Barn Register.
- 4) Updating existing and creating new Archaeology Site forms and Historic Property Inventory (HPIP forms shall be completed in DAHP's WISAARD database. Completing inventory forms shall follow DAHP's Standards for Cultural Resources Reporting found



Ms. Kendall Campbell
July 14, 2017
Page Two

at this link:

<http://dahp.wa.gov/sites/default/files/CR%20Update%20February%202017.pdf>. Also, personnel conducting the survey and inventory effort shall meet National Park Service Professional Qualification Standards as found in 36 CFR Part 61(https://www.nps.gov/history/local-law/arch_stnds_9.htm) in the appropriate area of expertise.

- 5) Given that Ebey's Landing comprises much of the proposed APE, the National Park Service and the Trust Board of Ebey's Landing are considered important sources of information for survey and inventory identification and evaluation of cultural and historic resources.
- 6) Also, the presence of EBLA underscores the importance of historic landscapes and landscape features in the proposed APE; landscapes should be recorded in their entirety even if they extend beyond APE boundaries.
- 7) Survey and inventory efforts should include Traditional Cultural Places (TCPs). In regard to your identification effort of TCPs, we strongly recommend that the U.S. Navy follow tribal consultation protocols to engage with Tribal Historic Preservation Officers (THPOs), their staff/cultural resource committee members, and appropriate tribal officials for an effective and efficient process to identify TCPs.
- 8) Please do not overlook good and intact examples of mid-20th Century resources constructed after World War II and up to 1970; there may be examples in the APE especially in Oak Harbor and vicinity.
- 9) Please plan to incorporate time and a process for review and comment by DAHP staff of draft materials such as context documents and inventory forms.

The above comments are made on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.



Ms. Kendall Campbell
July 17, 2017
Page Two

Thank you for the opportunity to review and comment on your draft survey methodology. If you have any questions, please contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Kristen Griffin, Trust Board of Ebey's Landing





DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2786
July 19, 2017

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE IDENTIFICATION EFFORT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. This letter is to provide you an update on our effort to identify historic properties within the area of potential effect (APE). The Navy welcomes your comments or any further information about historic properties in the area.

We are currently in the process of gathering information on historic properties in the APE. To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation (DAHP) Geographic Information System (GIS) data, the National Register of Historic Places (NRHP), NAS Whidbey Island records, and the 2016 Ebey's Landing National Historical Reserve (ELNHR) Historic Building Inventory Update (Enclosures 1-4). The summary tables comprise data gathered from existing information and provided by consulting parties. The summary tables include:

Enclosure 1. Historic properties identified in the 65 dB DNL contour line.

Enclosure 2. Historic buildings identified in the ELNHR derived from the ELNHR's 2016 Inventory Update.

Enclosure 3. Historic properties identified in the ELNHR.

Enclosure 4. All listed historic properties in the NRHP.

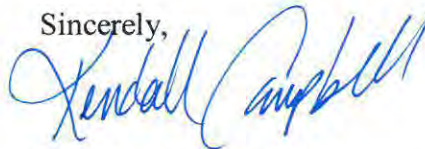
Data provided in enclosures (2) and (3) may be duplicate in some instances for buildings and structures.

5090
Ser N44/2786
July 19, 2017

In addition, the Navy invites you to comment on our preliminary context bibliography (Enclosure 5). The unique juxtaposition of federal properties and the ELNHR, with a community that celebrates the local and national historic setting provides a wealth of contextual information to expand upon. The enclosed bibliography draws upon existing information and provides a foundation to elaborate upon the broad description and patterns of historical development within the APE.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with SHPO and our other consulting parties. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

- Enclosures:
1. Historic properties in the 65 dB DNL contour line
 2. Historic buildings in the ELNHR derived from the ELNHR's 2016 Inventory
 3. Historic properties identified in the ELHNR
 4. All listed historic properties in the NRHP
 5. Historic Context Bibliography

Historic Properties on DAHP GIS Data

HISTORIC_I	ResourceID	SiteNameHi	Loc_FullAd	TaxParcel	RegisterTy	BuiltYear
112742	65789	Private	Oak Harbor		Determined Not Eligible	1954
669783	616624	Island Property Management	Oak Harbor		Determined Not Eligible	1940
671319	618039	Private	Oak Harbor		Determined Not Eligible	1952
671568	618271	Building 985 - Survival Equipment Shop, Building 985 - Survival Equipment Shop	NAS Whidbey Island		Determined Not Eligible	1967
115030	67745	Buildings 360-363, Fuel Storage	NAS Whidbey Island		Determined Not Eligible	1952
115031	67746	Fuel Tanks, Fuel Tanks Building 235-236	NAS Whidbey Island		Determined Not Eligible	1942
115033	67748	Building 368, Electrical Utility Vault	NAS Whidbey Island		Determined Not Eligible	1955
115034	67749	Building 369, Warehouse, Warehouse	NAS Whidbey Island		Determined Not Eligible	1954
115146	67861	Pier Approach and Fuel Pier, Facility 479, Pier/Breakwater	NAS Whidbey Island		Determined Not Eligible	1943
115149	67864	Mess Hall, Building 113, IRM/NMCI/PSD/ENV	NAS Whidbey Island		Determined Not Eligible	1943
115150	67865	Maintenance Shop, Building 115, Weapons/AIMD/Supply	NAS Whidbey Island		Determined Not Eligible	1942
115151	67866	Garage, Building 124, CDC Vehicle Maintenance  HW Storage	NAS Whidbey Island		Determined Not Eligible	1942
115152	67867	Free Gunnery Range Gate House, Building 128, Ladies Golf Clubhouse	NAS Whidbey Island		Determined Not Eligible	1942
115153	67868	Ordnance Building, Building 130, Duffer's Cove / Golf Clubhouse	NAS Whidbey Island		Determined Not Eligible	1942
115155	67870	High Explosive Magazine, Building 137, High Explosive Magazine	NAS Whidbey Island		Determined Not Eligible	1943
115156	67871	Chief Petty Officer's Club (CPO), Building 138, Chief Petty Officer's Club (CPO)	NAS Whidbey Island		Determined Not Eligible	1943
115157	67872	Skeet and Trap Shooting Office, Building 170, Rod and Gun Club Office	NAS Whidbey Island		Determined Not Eligible	1943
115158	67873	Skeet and Trap Range, Facility 171, Vacant/Not in Use	NAS Whidbey Island		Determined Not Eligible	1943
115159	67874	Ready Locker, Building 175, Rod and Gun Club Storehouse	NAS Whidbey Island		Determined Not Eligible	1943
115160	67875	Agricultural Barn, Building 189, MVR Warehouse	NAS Whidbey Island		Determined Not Eligible	1920
115161	67876	Granary, Building 206, Skookum Storage/ Maintenance Building	NAS Whidbey Island		Determined Not Eligible	1930
115163	67878	Original function unknown, Building 278, A/C Refueler Contract Building	NAS Whidbey Island		Determined Not Eligible	1945
115164	67879	Electrical Utility Building, Building 281, Electric Support at FF3	NAS Whidbey Island		Determined Not Eligible	1942
115165	67880	Water Pump House, Building 284, Water Pump House	NAS Whidbey Island		Determined Not Eligible	1942
115166	67881	Water Pump House, Building 337, Water Pump House	NAS Whidbey Island		Determined Not Eligible	1943
115167	67882	Ready Locker Magazines, Building 353, 462-466, 469-471 Ready Locker Magazines	NAS Whidbey Island		Determined Not Eligible	1949
115168	67883	Hangar 5, Building 386, Hangar 5	NAS Whidbey Island		Determined Eligible	1953
115170	67885	Airfield Utility Vault, Building 2678, Low Frequency Homer Beacon	NAS Whidbey Island		Determined Not Eligible	1945
115171	67886	CPO Club Utility Building, Building 492, CPO Club Storage	NAS Whidbey Island		Determined Not Eligible	1943
115172	67887	OLF Coupeville Runway, OLF Coupeville Runway	NAS Whidbey Island		Determined Not Eligible	1943
102224	57706	Ault Field - Building 371, BOSC Maintenance Shops	NAS Whidbey Island		Determined Not Eligible	1954
102244	57726	Ault Field - Building 2525, Jet Engine Test Cell	NAS Whidbey Island		Determined Not Eligible	1971
102267	57749	Ault Field - Site 201211, Golf Course	NAS Whidbey Island		Determined Not Eligible	1945

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
102303	57785	Ault Field - Administration and Instruction Building, Building 126, Applied Instruction Building	NAS Whidbey Island		Determined Not Eligible	1942
102355	57837	Ault Field - Agricultural Barn, Building 262, NMCI Computer Warehouse	NAS Whidbey Island		Determined Not Eligible	1935
672688	619317	Private	Coupeville		Determined Eligible	1890
158782	106646				Not Determined	1941
158783	106647				Not Determined	1941
158784	106648				Not Determined	1941
158785	106649				Not Determined	1941
158788	106652				Not Determined	1941
158789	106653				Not Determined	1941
158790	106654				Not Determined	1941
158791	106655				Not Determined	1941
158794	106658				Not Determined	1921
158798	106662				Not Determined	1904
158806	106670				Not Determined	1904
158807	106671				Not Determined	1904
158811	106675				Not Determined	1904
158812	106676				Not Determined	1900
159241	107092	Fort Casey Barracks	Coupeville		Not Determined	1940, 1941
159242	107093	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159244	107095	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159245	107096		Coupeville		Not Determined	1941
159247	107098	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159248	107099	Fort Casey Company Quarters	Coupeville		Not Determined	1941
673907	620464	Ault Field - Operational Storage, Building 2704	NAS Whidbey Island		Determined Not Eligible	1984
673908	620465	Ault Field - Shop Space, Building R-14	NAS Whidbey Island		Determined Not Eligible	1976
673909	620466	Ault Field - Shop Space, Building R-12	NAS Whidbey Island		Determined Not Eligible	1976
673910	620467	Ault Field - LOX Cart Shelter, Building 2732	NAS Whidbey Island		Determined Not Eligible	1987
673911	620468	Ault Field - Pump House/Air Craft Rince Facility, Building 2635	NAS Whidbey Island		Determined Not Eligible	1978
673912	620469	Ault Field - Inert Store House, Building 2666	NAS Whidbey Island		Determined Not Eligible	1984
673913	620470	Ault Field - Airfield Taxiways and Aprons	NAS Whidbey Island		Determined Not Eligible	1954, 1964
674221	620767	Fort Casey Building 2, Campground Comfort Station	NAS Whidbey Island		Determined Not Eligible	1964
672825	619442	Ault Field - Quarters G, Building 3230	NAS Whidbey Island		Determined Eligible	1935
672826	619443	Ault Field - Quarters R, Building 3220	NAS Whidbey Island		Determined Eligible	1930
672828	619445	Ault Field - Quarters P, Building 1140	NAS Whidbey Island		Determined Eligible	1900

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
672829	619446	Ault Field - Riksen Farm House, Quarters O, Building 920	NAS Whidbey Island		Determined Eligible	1900
672830	619447	Ault Field - Quarters F, Building 3305	NAS Whidbey Island		Determined Eligible	1935
672831	619448	Ault Field - Quarters E, Building 3295	NAS Whidbey Island		Determined Eligible	1935
673039	619640	Naval Air Station Whidbey - Whidbey Lanes Bowling Alley, BUILDING 2510	NAS Whidbey Island		Determined Not Eligible	1969
209252	157064				Not Determined	1941
209253	157065				Not Determined	1941
209257	157069				Not Determined	1941
209259	157071				Not Determined	1941
209260	157072				Not Determined	1941
209261	157073				Not Determined	1941
209262	157074				Not Determined	1941
209265	157077				Not Determined	1941
209266	157078				Not Determined	1941
209267	157079				Not Determined	1941
209268	157080				Not Determined	1941
209271	157083				Not Determined	1921
209275	157087				Not Determined	1904
209283	157095				Not Determined	1904
209284	157096				Not Determined	1904
209288	157100				Not Determined	1904
209289	157101				Not Determined	1900
672297	618956	NAS Whidbey Island- Building 2699, Hangar 10	NAS Whidbey Island		Determined Not Eligible	1986
672298	618957	OLF Coupeville, Aircraft Operations Tower (Building 1), Building 1, Aircraft Operations Tower	NAS Whidbey Island		Determined Eligible	1944
672355	619010	Building 219 - Airplane Parts Storehouse, Building 219 - VAQ Storage, Naval Depot, and ISR Depot	NAS Whidbey Island		Determined Not Eligible	1944
672367	619020	Ground Support Equipment (GSE) Shop, GSE Compound - Building 995	NAS Whidbey Island		Determined Not Eligible	1969
672368	619021	South Parking Shed, Ground Support Equipment (GSE) Compound - Building 995A	NAS Whidbey Island		Determined Not Eligible	1969
672417	619067	Equipment Shelter, Building 2577 - Ault Field Equipment Shelter	NAS Whidbey Island		Determined Not Eligible	1974
672419	619069	AN/SPN 42T3 Generator Building , Building 2524 - Ault Field AN/SPN 42T3 Generator Building	NAS Whidbey Island		Determined Not Eligible	1970
672420	619070	Precision Approach Radar (PAR) , Facility 201821 - Ault Field PAR	NAS Whidbey Island		Determined Not Eligible	1963
672423	619073	WWII-era navigation marker , Ault Field - WWII-era navigation marker	NAS Whidbey Island		Determined Not Eligible	1942
672433	619083	Building 2734, Air Passenger Terminal, Building 2734, Air Passenger Terminal	NAS Whidbey Island		Determined Not Eligible	1988
672434	619084	Building 2631, Building 2631 - VP AW Training	NAS Whidbey Island		Determined Not Eligible	1978
672435	619085	Building 2584, POD Administration/Avionics and Storage, Building 2584, POD Administration/Avionics and Storage	NAS Whidbey Island		Determined Not Eligible	1975
672436	619086	Building 2621 - Liquid Oxygen (LOX) Facility, Building 2621 - LOX Facility	NAS Whidbey Island		Determined Not Eligible	1978

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
672437	619087	OLF Coupeville - Building 10, Runway Lighting Vault, Building 10, Runway Lighting Vault	NAS Whidbey Island		Determined Not Eligible	1967
672438	619088	OLF Coupeville - Building 11, Potable Water Well Pump House, Building 11, Potable Water Well Pump House	NAS Whidbey Island		Determined Not Eligible	1967
672439	619089	OLF Coupeville - Building 2709, Crash Truck Shelter, Building 2709, Crash Truck Shelter	NAS Whidbey Island		Determined Not Eligible	1986
672440	619090	OLF Coupeville - Radome, Radome	NAS Whidbey Island		Determined Not Eligible	0
672441	619091	OLF Coupeville, Runway 14-32, Runway 14-32	NAS Whidbey Island		Determined Eligible	1943
672445	619095	Low Frequency Homer Beacon Building , Ault Field - Building 2678, Low Frequency Homer Beacon Building	NAS Whidbey Island		Determined Not Eligible	1945
672446	619096	Tactical Air Navigation (TACAN) Building , Building 2596 - Ault Field TACAN Building	NAS Whidbey Island		Determined Not Eligible	1976
672447	619097	Jet Aircraft Power Check Facility , Facility 201796 - Ault Field Jet Aircraft Power Check Facility	NAS Whidbey Island		Determined Not Eligible	1944
672449	619099	Chaff Build-Up Facility , Building 2561 - Ault Field Chaff Build-Up Facility	NAS Whidbey Island		Determined Not Eligible	1973
672450	619100	Building 976 - Systems Training Building , Building 976 - Aircraft Systems Training Building	NAS Whidbey Island		Determined Not Eligible	1966
126904	74818		WA		Not Determined	1941
126905	74819		WA		Not Determined	1941
126906	74820		WA		Not Determined	1941
126907	74821		WA		Not Determined	1941
126910	74824		WA		Not Determined	1941
126911	74825		WA		Not Determined	1941
126912	74826		WA		Not Determined	1941
126913	74827		WA		Not Determined	1941
126916	74830		WA		Not Determined	1921
126920	74834		WA		Not Determined	1904
126928	74842		WA		Not Determined	1904
126929	74843		WA		Not Determined	1904
126933	74847		WA		Not Determined	1904
126934	74848		WA		Not Determined	1900
674532	621065	Campground Comfort Station, Comfort Station #6	Oak Harbor		Determined Not Eligible	1965
625488	572741		Coupeville	R13103-361-0370	Not Determined	1863
625514	572755		Coupeville	R13104-098-3880	Not Determined	1890
471	463	Bearss House, Barrett House	Coupeville	R13104-280-4190	Not Determined	1890
467	459	Wanamaker, James, House, Martin House	Coupeville	R13104-331-4200	Not Determined	1890
625527	572760	Frain House/Burton-Engle House	Coupeville	R13104-373-3330	Not Determined	1892
625529	572761		Coupeville	R13104-323-3820	Not Determined	1893
458	450	Sergeant Clark House, Madsen House	Coupeville	R13104-493-4210	Not Determined	1895
625535	572764	Keith, Sam, Farm	Coupeville	R13103-078-2490	Not Determined, Washington Heritage Barn Register	1898

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625537	572766		Coupeville	R13111-248-4630	Not Determined	1900
625538	572767		Coupeville	S8150-00-01008-0	Not Determined	1900
625644	572858		Coupeville	R23106-082-3080	Not Determined	1938
625649	572863		Coupeville	S8010-00-00070-0	Not Determined	1940
625652	572866		Coupeville	R13234-382-4130	Not Determined	1940
625653	572867	Private	Coupeville	S8010-00-00061-0	Determined Not Eligible, Not Determined	1941, 1953
625655	572869		Coupeville	R13103-485-4710	Not Determined	1941
625657	572871		Coupeville	R13115-333-2810	Not Determined	1942
625666	572880		Coupeville	S8010-00-00089-0	Not Determined	1943
625667	572881		Coupeville	S7095-01-00009-0	Not Determined	1943
625668	572882		Coupeville	S8010-00-00022-0	Not Determined	1943
625670	572884		Coupeville	S8010-00-00006-0	Not Determined	1943
625679	572893		Coupeville	S8010-00-00084-0	Not Determined	1945
625684	572898		Coupeville	S8010-00-00064-0	Not Determined	1946
625685	572899		Coupeville	S7365-00-00004-0	Not Determined	1946
625688	572902		Coupeville	S8150-00-01009-0	Not Determined	1947
625689	572903		Coupeville	S8150-00-01010-0	Not Determined	1947
625690	572904		Coupeville	S8010-00-00018-0	Not Determined	1947
625694	572908		Coupeville	R13103-251-2330	Not Determined	1947
625698	572912		Coupeville	S8010-00-00039-0	Not Determined	1947
625704	572918		Coupeville	S8010-00-00085-0	Not Determined	1948
625705	572919		Coupeville	S8010-00-00001-2	Not Determined	1948
625706	572920		Coupeville	R13103-231-2300	Not Determined	1948
625708	572922		Coupeville	R13110-175-4500	Not Determined	1949
625709	572923		Coupeville	R23117-442-0700	Not Determined	1949
625710	572924		Coupeville	S8010-00-00015-2	Not Determined	1949
625715	572929		Coupeville	S8150-00-01014-0	Not Determined	1950
625716	572930		Coupeville	S7095-01-00015-0	Not Determined	1950
625718	572932	Private	Coupeville	S8010-00-00062-0	Determined Not Eligible, Not Determined	1941, 1950
625719	572933		Coupeville	R23106-090-3040	Not Determined	1950
625722	572936		Coupeville	S8010-00-00063-0	Not Determined	1950
625723	572937		Coupeville	R13103-200-2670	Not Determined	1950
625725	572939		Coupeville	S7490-00-00003-0	Not Determined	1950
625727	572941		Coupeville	S8440-00-00014-0	Not Determined	1950

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625730	572944	Private	Coupeville	R13103-270-2450	Determined Not Eligible, Not Determined	1950
625731	572945		Coupeville	R23107-459-3200	Not Determined	1950
625733	572947		Coupeville	R13103-245-1530	Not Determined	1950
625734	572948		Coupeville	R13113-212-0210	Not Determined	1951
625735	572949		Coupeville	R13114-204-3780	Not Determined	1951
625737	572951		Coupeville	S7365-00-00006-0	Not Determined	1951
625738	572952		Coupeville	S7365-00-00005-0	Not Determined	1951
625832	573044		Coupeville	R13103-120-2950	Not Determined	1958
625834	573046		Coupeville	S7400-00-03003-0	Not Determined	1958
625835	573047		Coupeville	S7400-00-02014-0	Not Determined	1958
625837	573049		Coupeville	R13235-326-0200	Not Determined	1958
625838	573050		Coupeville	R23107-523-3320	Not Determined	1958
625839	573051		Coupeville	S7400-00-01005-0	Not Determined	1958
625841	573053		Coupeville	S7400-00-01011-0	Not Determined	1958
625845	573057		Coupeville	S7400-00-03002-0	Not Determined	1958
625849	573061		Coupeville	R13104-109-4100	Not Determined	1958
625850	573062		Coupeville	R13110-222-4560	Not Determined	1959
625851	573063		Coupeville	S8300-00-01007-0	Not Determined	1959
625856	573068		Coupeville	R13103-110-3240	Not Determined	1959
625865	573077	Private	Coupeville	R13103-150-3420	Determined Not Eligible, Not Determined	1959
625867	573079		Coupeville	S7350-00-0A006-0	Not Determined	1959
625872	573084		Coupeville	S8300-00-02021-0	Not Determined	1960
625874	573086		Coupeville	R13109-005-3830	Not Determined	1960
625875	573087		Coupeville	R23107-080-5240	Not Determined	1960
625876	573088		Coupeville	S8300-00-01027-0	Not Determined	1960
625877	573089		Coupeville	R13116-507-3830	Not Determined	1960
625878	573090		Coupeville	S8010-00-00037-0	Not Determined	1960
625889	573101		Coupeville	S8010-00-00066-0	Not Determined	1960
625893	573105		Coupeville	S8010-00-00083-0	Not Determined	1960
625894	573106		Coupeville	S7400-00-01010-0	Not Determined	1960
625896	573108		Coupeville	S7400-00-02008-0	Not Determined	1960
625897	573109	Private	Coupeville	R13103-183-3330	Determined Not Eligible, Not Determined	1960
625900	573112		Coupeville	S8300-00-01017-0	Not Determined	1961
625904	573116		Coupeville	S8300-00-01037-0	Not Determined	1961

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625905	573117		Coupeville	S8300-00-01021-0	Not Determined	1961
625909	573121		Coupeville	S7490-00-00027-0	Not Determined	1961
625910	573122		Coupeville	S7095-01-00008-0	Not Determined	1961
625911	573123		Coupeville	S7400-00-01043-0	Not Determined	1961
625912	573124		Coupeville	S7400-00-01045-0	Not Determined	1961
625913	573125		Coupeville	S8010-00-00001-1	Not Determined	1961
625916	573128		Coupeville	S8300-00-01026-0	Not Determined	1962
625917	573129		Coupeville	S6370-00-58010-0	Not Determined	1962
625919	573131		Coupeville	S8150-00-01004-0	Not Determined	1962
625920	573132		Coupeville	S7400-00-02002-0	Not Determined	1962
625921	573133		Coupeville	S7400-00-01016-0	Not Determined	1962
470	462	Private	Coupeville	R13104-310-3980	Not Determined	1962
625923	573134		Coupeville	S7095-01-00006-0	Not Determined	1962
625924	573135		Coupeville	S7350-00-0A022-0	Not Determined	1962
625925	573136		Coupeville	S8150-00-01003-0	Not Determined	1963
626020	573231		Coupeville	S6010-00-01005-0	Not Determined	1967
626024	573235		Coupeville	S6010-00-01021-0	Not Determined	1967
626026	573237		Coupeville	S7400-00-01006-0	Not Determined	1967
626028	573239		Coupeville	R13234-333-4800	Not Determined	1967
626031	573242		Coupeville	S7350-00-0A016-0	Not Determined	1967
626033	573244		Coupeville	S7400-00-01001-0	Not Determined	1967
626035	573246		Coupeville	S6010-00-01042-0	Not Determined	1968
626036	573247		Coupeville	S6010-03-00171-0	Not Determined	1968
626037	573248		Coupeville	S6010-00-02024-0	Not Determined	1968
626038	573249		Coupeville	S6010-00-04033-0	Not Determined	1968
626039	573250		Coupeville	S8300-00-01006-0	Not Determined	1968
626040	573251		Coupeville	S6010-00-01023-0	Not Determined	1968
626042	573253		Coupeville	S6010-06-00073-0	Not Determined	1968
626043	573254		Coupeville	S6010-05-00092-0	Not Determined	1968
626044	573255		Coupeville	S6010-00-01004-0	Not Determined	1968
626045	573256		Coupeville	S6010-00-01041-0	Not Determined	1968
626046	573257		Coupeville	S8300-00-01029-0	Not Determined	1968
626047	573258		Coupeville	S6010-03-00027-0	Not Determined	1968
626050	573261		Coupeville	S6010-03-00147-0	Not Determined	1968
626051	573262		Coupeville	S8300-00-01009-0	Not Determined	1968

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
626053	573264		Coupeville	S8150-02-03020-0	Not Determined	1968
626054	573265		Coupeville	S6010-00-03013-0	Not Determined	1968
626055	573266		Coupeville	S6010-00-02030-0	Not Determined	1968
626056	573267		Coupeville	S6010-02-04009-0	Not Determined	1968
626057	573268		Coupeville	S6010-00-03021-0	Not Determined	1968
626059	573270		Coupeville	S6010-00-04039-0	Not Determined	1968
626060	573271		Coupeville	S8150-00-02011-0	Not Determined	1968
626064	573275		Coupeville	R13101-315-0190	Not Determined	1968
626067	573278		Coupeville	R13103-457-1910	Not Determined	1968
626068	573279		Coupeville	S8010-00-00091-0	Not Determined	1968
626070	573281		Coupeville	S8010-00-00023-0	Not Determined	1968
626071	573282		Coupeville	R13235-440-0630	Not Determined	1968
626074	573285		Coupeville	S7365-00-00003-0	Not Determined	1968
626075	573286		Coupeville	R13110-403-2890	Not Determined	1968
626077	573288		Coupeville	S7490-00-00029-0	Not Determined	1968
626078	573289		Coupeville	S7365-00-00002-0	Not Determined	1968
626079	573290		Coupeville	S6010-04-00019-0	Not Determined	1969
626081	573292		Coupeville	S6010-03-00038-0	Not Determined	1969
626082	573293		Coupeville	S8300-00-01032-0	Not Determined	1969
626085	573296		Coupeville	S6010-00-01013-0	Not Determined	1969
626087	573298		Coupeville	S6010-00-01035-0	Not Determined	1969
627599	574810		Oak Harbor	R13302-247-5150	Not Determined	1895
627600	574811		Oak Harbor	R13336-465-2400	Not Determined	1899
627603	574814		Oak Harbor	S7650-00-00001-0	Not Determined	1900
627604	574815		Oak Harbor	R23330-157-1110	Not Determined	1900
627608	574819	Private	Oak Harbor	R13436-479-1170	Not Determined	1910, 1913
627613	574824		Oak Harbor	R13301-230-1710	Not Determined	1906
627616	574827		Oak Harbor	R23330-375-4690	Not Determined	1907
627618	574829		Oak Harbor	R23306-269-2380	Not Determined	1908
627712	574923		Oak Harbor	R23307-191-3230	Not Determined	1925
627714	574925		Oak Harbor	R13335-487-0700	Not Determined	1925
627716	574927		Oak Harbor	R13436-106-0110	Not Determined	1925
627720	574931		Oak Harbor	R13312-146-1110	Not Determined	1925
627721	574932		Oak Harbor	R13312-345-5100	Not Determined	1925
627734	574945		Oak Harbor	R23318-350-4160	Not Determined	1925

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
627736	574947		Oak Harbor	R23318-402-5080	Not Determined	1927
627740	574951		Oak Harbor	R13336-119-0350	Not Determined	1927
627742	574953		Oak Harbor	R13324-242-2140	Not Determined	1928
627743	574954		Oak Harbor	R13324-069-2030	Not Determined	1928
627745	574956		Oak Harbor	R23318-186-0260	Not Determined	1928
627748	574959		Oak Harbor	R13301-282-3520	Not Determined	1928
627751	574962		Oak Harbor	R23308-268-0780	Not Determined	1928
627756	574967		Oak Harbor	R13313-299-0810	Not Determined	1928
627758	574969		Oak Harbor	R13312-243-0490	Not Determined	1929
627759	574970		Oak Harbor	R23330-324-4240	Not Determined	1929
627760	574971		Oak Harbor	R13311-028-1950	Not Determined	1929
627762	574973		Oak Harbor	R13311-495-4600	Not Determined	1930
627765	574976		Oak Harbor	R13327-293-1200	Not Determined	1930
627771	574982	Private	Oak Harbor	R13303-210-4850	Determined Not Eligible, Not Determined	1931
627773	574984		Oak Harbor	R23308-429-0900	Not Determined	1932
627778	574989		Oak Harbor	R23318-162-0360	Not Determined	1933
627779	574990		Oak Harbor	R13323-046-2810	Not Determined	1933
627780	574991		Oak Harbor	R13324-020-3510	Not Determined	1933
627784	574995		Oak Harbor	R13302-040-4840	Not Determined	1933
627788	574999		Oak Harbor	R13436-440-1590	Not Determined	1935
627789	575000		Oak Harbor	R23320-266-0390	Not Determined	1935
627791	575002		Oak Harbor	R13311-288-3200	Not Determined	1935
627796	575007		Oak Harbor	R13311-305-2050	Not Determined	1936
627802	575013		Oak Harbor	R13311-309-2840	Not Determined	1936
627908	575119		Oak Harbor	R23320-517-0300	Not Determined	1945
627911	575122		Oak Harbor	R13302-121-4750	Not Determined	1945
627923	575134		Oak Harbor	R23329-246-0260	Not Determined	1946
627925	575136		Oak Harbor	R23319-154-3290	Not Determined	1946
627927	575138		Oak Harbor	R13312-062-2900	Not Determined	1946
627931	575142		Oak Harbor	R23330-290-4390	Not Determined	1946
627932	575143		Oak Harbor	R23319-070-4950	Not Determined	1946
627942	575153		Oak Harbor	R13303-181-3890	Not Determined	1947
627950	575161		Oak Harbor	R23307-161-4440	Not Determined	1948
627952	575163		Oak Harbor	R23307-505-1000	Not Determined	1948

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
627956	575167		Oak Harbor	R13335-227-3990	Not Determined	1948
627963	575174		Oak Harbor	R13335-221-4330	Not Determined	1948
627972	575183		Oak Harbor	R13323-081-2520	Not Determined	1948
627977	575188		Oak Harbor	S7740-00-00041-0	Not Determined	1948
627982	575193		Oak Harbor	R23318-033-4910	Not Determined	1948
627992	575203		Oak Harbor	R13311-141-1940	Not Determined	1949
628093	575304		Oak Harbor	R23307-303-4470	Not Determined	1950
628094	575305		Oak Harbor	R13313-313-0150	Not Determined	1950
628096	575307		Oak Harbor	R23330-385-4220	Not Determined	1950
628098	575309		Oak Harbor	S7575-00-01024-0	Not Determined	1950
628101	575312		Oak Harbor	R23330-385-4920	Not Determined	1950
628104	575315		Oak Harbor	R13313-030-2320	Not Determined	1951
628111	575322		Oak Harbor	R13302-198-0680	Not Determined	1951
628123	575334		Oak Harbor	S7575-00-01028-0	Not Determined	1951
628132	575343		Oak Harbor	R13312-200-2450	Not Determined	1951
628133	575344		Oak Harbor	S7740-00-00043-0	Not Determined	1951
628140	575351		Oak Harbor	S7020-00-00001-1	Not Determined	1951
628146	575357		Oak Harbor	R13335-427-3400	Not Determined	1951
628164	575375		Oak Harbor	R13312-146-2380	Not Determined	1952
628170	575381		Oak Harbor	S6055-00-01008-0	Not Determined	1952
628171	575382		Oak Harbor	S7285-30-03008-0	Not Determined	1952
628173	575384		Oak Harbor	R13313-152-0130	Not Determined	1952
628181	575392		Oak Harbor	R13313-030-1990	Not Determined	1952
628182	575393		Oak Harbor	R13435-081-1760	Not Determined	1952
628279	575490		Oak Harbor	S6055-00-02002-0	Not Determined	1953
628283	575494		Oak Harbor	R23330-282-0700	Not Determined	1953
628285	575496		Oak Harbor	R13335-259-1300	Not Determined	1953
628290	575501		Oak Harbor	S7575-00-01029-0	Not Determined	1953
628299	575510		Oak Harbor	R23307-135-1920	Not Determined	1953
628300	575511		Oak Harbor	S6335-00-00013-0	Not Determined	1953
628301	575512		Oak Harbor	S6055-00-01007-0	Not Determined	1953
628306	575517		Oak Harbor	R13436-450-1370	Not Determined	1954
628308	575519		Oak Harbor	S6055-00-02007-0	Not Determined	1954
628314	575525		Oak Harbor	S8055-00-00003-0	Not Determined	1954
628315	575526		Oak Harbor	S6055-00-03006-0	Not Determined	1954

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628318	575529		Oak Harbor	R13313-233-2820	Not Determined	1954
628327	575538		Oak Harbor	R23307-129-1430	Not Determined	1954
628329	575540		Oak Harbor	R13302-297-5120	Not Determined	1954
628331	575542		Oak Harbor	R13436-462-1370	Not Determined	1954
628332	575543		Oak Harbor	S8055-00-00009-0	Not Determined	1954
628333	575544		Oak Harbor	S6055-00-03004-0	Not Determined	1954
628334	575545		Oak Harbor	S7295-00-00029-0	Not Determined	1954
628340	575551		Oak Harbor	R13436-414-1760	Not Determined	1954
628347	575558		Oak Harbor	S6055-00-03002-0	Not Determined	1954
628350	575561		Oak Harbor	R13323-063-2810	Not Determined	1954
628351	575562		Oak Harbor	R13335-427-3300	Not Determined	1954
628355	575566		Oak Harbor	S6055-00-01006-0	Not Determined	1954
628356	575567		Oak Harbor	R13436-017-0190	Not Determined	1954
628357	575568		Oak Harbor	R13436-445-2100	Not Determined	1954
628359	575570		Oak Harbor	S7295-00-00005-0	Not Determined	1955
628360	575571		Oak Harbor	S7295-00-00023-0	Not Determined	1955
628362	575573		Oak Harbor	S7295-00-00017-0	Not Determined	1955
628366	575577		Oak Harbor	R13302-313-0330	Not Determined	1955
628370	575581		Oak Harbor	S6055-00-02010-0	Not Determined	1955
628371	575582		Oak Harbor	S7295-00-00016-0	Not Determined	1955
628466	575677		Oak Harbor	S6600-00-01002-0	Not Determined	1956
628467	575678		Oak Harbor	S6055-00-02001-0	Not Determined	1956
628469	575680		Oak Harbor	R23307-250-0200	Not Determined	1956
628473	575684		Oak Harbor	R13313-106-2430	Not Determined	1956
628476	575687		Oak Harbor	S6055-00-02009-0	Not Determined	1956
628477	575688		Oak Harbor	S7295-00-00008-0	Not Determined	1956
628478	575689		Oak Harbor	S7295-00-00011-0	Not Determined	1956
628485	575696		Oak Harbor	S6055-00-03003-0	Not Determined	1956
628487	575698		Oak Harbor	S6600-00-05011-0	Not Determined	1956
628488	575699		Oak Harbor	S6055-00-03009-0	Not Determined	1956
628489	575700		Oak Harbor	S7295-00-00024-0	Not Determined	1956
628490	575701		Oak Harbor	R13336-210-0620	Not Determined	1956
628497	575708		Oak Harbor	S6600-00-02009-0	Not Determined	1957
628504	575715		Oak Harbor	S7285-21-00036-0	Not Determined	1957
628508	575719		Oak Harbor	S7285-21-00041-0	Not Determined	1957

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628510	575721		Oak Harbor	R13311-166-3870	Not Determined	1957
628513	575724		Oak Harbor	R13336-218-0190	Not Determined	1957
628531	575742		Oak Harbor	R23329-102-0060	Not Determined	1957
628539	575750		Oak Harbor	S7285-21-00037-0	Not Determined	1957
628556	575767		Oak Harbor	R13313-253-0590	Not Determined	1957
628558	575769		Oak Harbor	R23319-415-4900	Not Determined	1957
628657	575868		Oak Harbor	S6055-00-02004-0	Not Determined	1957
628662	575873		Oak Harbor	R13335-275-0940	Not Determined	1957
628663	575874		Oak Harbor	R23307-115-0260	Not Determined	1957
628665	575876		Oak Harbor	S6055-00-04009-0	Not Determined	1957
628674	575885		Oak Harbor	R13303-173-3900	Not Determined	1958
628676	575887		Oak Harbor	S7520-00-02016-0	Not Determined	1958
628678	575889		Oak Harbor	S7285-30-05006-0	Not Determined	1958
628680	575891		Oak Harbor	S7285-30-09005-0	Not Determined	1958
628681	575892		Oak Harbor	S7285-30-09008-0	Not Determined	1958
628684	575895		Oak Harbor	S7065-00-00008-0	Not Determined	1958
628685	575896		Oak Harbor	R23318-186-0510	Not Determined	1958
628688	575899		Oak Harbor	S7065-00-00002-0	Not Determined	1958
628690	575901		Oak Harbor	S7285-30-03009-0	Not Determined	1958
628691	575902		Oak Harbor	S7285-30-08005-0	Not Determined	1958
628692	575903		Oak Harbor	R13336-235-0190	Not Determined	1958
628693	575904		Oak Harbor	S7065-00-00016-0	Not Determined	1958
628695	575906		Oak Harbor	S7285-30-05003-0	Not Determined	1958
628696	575907		Oak Harbor	S7285-30-09002-0	Not Determined	1958
628698	575909		Oak Harbor	S6055-00-03005-0	Not Determined	1958
628699	575910		Oak Harbor	S7065-00-00006-0	Not Determined	1958
628700	575911		Oak Harbor	S7285-40-00002-0	Not Determined	1958
628701	575912		Oak Harbor	S7285-30-10002-0	Not Determined	1958
628702	575913		Oak Harbor	S7285-30-05002-0	Not Determined	1958
628703	575914		Oak Harbor	S7065-00-00011-0	Not Determined	1958
628704	575915		Oak Harbor	R13325-019-1000	Not Determined	1958
628708	575919		Oak Harbor	S7520-00-03004-0	Not Determined	1958
628712	575923		Oak Harbor	S7740-00-00026-0	Not Determined	1958
628713	575924		Oak Harbor	S7285-30-05001-0	Not Determined	1958
628716	575927		Oak Harbor	R13336-235-0080	Not Determined	1958

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628722	575933		Oak Harbor	S7065-00-00007-0	Not Determined	1958
628723	575934		Oak Harbor	S7285-40-00008-0	Not Determined	1958
628726	575937		Oak Harbor	S7285-30-09007-0	Not Determined	1958
628728	575939		Oak Harbor	S7520-00-02014-0	Not Determined	1958
628730	575941		Oak Harbor	S7285-40-00004-0	Not Determined	1958
628732	575943		Oak Harbor	S7065-00-00014-0	Not Determined	1958
628738	575949		Oak Harbor	R13313-055-0680	Not Determined	1958
628740	575951		Oak Harbor	S7285-30-03016-0	Not Determined	1958
628741	575952		Oak Harbor	S7295-00-00009-0	Not Determined	1958
628745	575956		Oak Harbor	R13436-445-0590	Not Determined	1958
628747	575958		Oak Harbor	S7065-00-00001-3	Not Determined	1958
628842	576053		Oak Harbor	R13336-218-0080	Not Determined	1958
628843	576054		Oak Harbor	S7065-00-00012-0	Not Determined	1958
628848	576059		Oak Harbor	S7655-00-01006-0	Not Determined	1958
628849	576060		Oak Harbor	S7285-30-04008-0	Not Determined	1958
628850	576061		Oak Harbor	S7285-30-08004-0	Not Determined	1958
628861	576072		Oak Harbor	S7065-00-00005-0	Not Determined	1958
628862	576073		Oak Harbor	S7285-30-04004-0	Not Determined	1958
628868	576079		Oak Harbor	S7065-00-00013-0	Not Determined	1958
628875	576086		Oak Harbor	S7285-30-04005-0	Not Determined	1958
628876	576087		Oak Harbor	S7285-30-06001-0	Not Determined	1958
628877	576088		Oak Harbor	S7285-30-03012-0	Not Determined	1958
628880	576091		Oak Harbor	S7295-00-00012-2	Not Determined	1958
628884	576095		Oak Harbor	S7655-00-01007-0	Not Determined	1958
628885	576096		Oak Harbor	S7285-30-10003-0	Not Determined	1958
628887	576098		Oak Harbor	S7285-40-00003-0	Not Determined	1958
628888	576099		Oak Harbor	R23319-039-2810	Not Determined	1958
628889	576100		Oak Harbor	S8055-00-00005-0	Not Determined	1958
628891	576102		Oak Harbor	R13336-461-4370	Not Determined	1958
628892	576103		Oak Harbor	S7065-00-00004-0	Not Determined	1958
628893	576104		Oak Harbor	S7655-00-01008-0	Not Determined	1958
628897	576108		Oak Harbor	S7285-30-04011-0	Not Determined	1958
628900	576111		Oak Harbor	S6055-00-02005-0	Not Determined	1958
628902	576113		Oak Harbor	S7285-30-03011-0	Not Determined	1958
628903	576114		Oak Harbor	S7520-00-03003-0	Not Determined	1958

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628904	576115		Oak Harbor	S7285-30-06002-0	Not Determined	1958
628907	576118		Oak Harbor	S8297-00-00009-0	Not Determined	1958
628908	576119		Oak Harbor	S7285-30-08002-0	Not Determined	1959
628913	576124		Oak Harbor	S6600-00-01005-0	Not Determined	1959
628916	576127		Oak Harbor	S6600-00-02005-0	Not Determined	1959
628920	576131		Oak Harbor	S7285-30-04012-0	Not Determined	1959
628925	576136		Oak Harbor	S7285-30-07001-0	Not Determined	1959
628926	576137		Oak Harbor	S6535-00-00012-0	Not Determined	1959
628927	576138		Oak Harbor	S7285-30-07004-0	Not Determined	1959
628929	576140		Oak Harbor	S7655-00-01010-0	Not Determined	1959
628930	576141		Oak Harbor	S7655-00-01009-0	Not Determined	1959
628935	576146		Oak Harbor	S6600-00-01011-0	Not Determined	1959
629029	576240		Oak Harbor	R13302-151-1520	Not Determined	1959
629030	576241		Oak Harbor	S6535-00-00015-0	Not Determined	1959
629032	576243		Oak Harbor	S7285-30-03014-0	Not Determined	1959
629035	576246		Oak Harbor	R13301-292-0100	Not Determined	1959
629037	576248		Oak Harbor	R13302-067-0530	Not Determined	1960
629039	576250		Oak Harbor	S6600-00-01009-0	Not Determined	1960
629041	576252		Oak Harbor	R23308-318-1000	Not Determined	1960
629045	576256		Oak Harbor	S7295-00-00019-0	Not Determined	1960
629046	576257		Oak Harbor	R13311-391-1770	Not Determined	1960
629052	576263		Oak Harbor	R23319-342-5150	Not Determined	1960
629053	576264		Oak Harbor	S7285-30-05010-0	Not Determined	1960
629055	576266		Oak Harbor	R23331-484-1370	Not Determined	1960
629056	576267		Oak Harbor	S7520-00-02018-0	Not Determined	1960
629057	576268		Oak Harbor	S7285-30-03002-0	Not Determined	1960
629058	576269		Oak Harbor	S6535-00-00006-0	Not Determined	1960
629059	576270		Oak Harbor	S8055-00-00007-0	Not Determined	1960
629069	576280		Oak Harbor	S7520-00-02019-0	Not Determined	1960
629070	576281		Oak Harbor	R13301-196-2760	Not Determined	1960
629073	576284	Private	Oak Harbor	S7655-02-03007-0	Determined Not Eligible, Not Determined	1960
629077	576288		Oak Harbor	R13436-408-1490	Not Determined	1960
629079	576290		Oak Harbor	S6515-00-03007-0	Not Determined	1960
629082	576293		Oak Harbor	R13303-122-4920	Not Determined	1960

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629083	576294		Oak Harbor	R23317-236-3500	Not Determined	1960
629084	576295		Oak Harbor	S6535-00-00008-0	Not Determined	1960
629085	576296		Oak Harbor	S6600-00-05006-0	Not Determined	1960
629086	576297		Oak Harbor	S7295-00-00004-0	Not Determined	1960
629088	576299		Oak Harbor	S7285-40-00006-0	Not Determined	1960
629089	576300		Oak Harbor	R13326-185-0060	Not Determined	1960
629091	576302		Oak Harbor	S7285-30-05012-0	Not Determined	1960
629093	576304		Oak Harbor	R13302-013-1210	Not Determined	1960
629094	576305		Oak Harbor	S6515-00-03002-0	Not Determined	1960
629095	576306		Oak Harbor	R13335-429-3050	Not Determined	1960
629096	576307		Oak Harbor	R23317-434-3570	Not Determined	1960
629097	576308		Oak Harbor	S6515-00-02004-0	Not Determined	1960
629100	576311		Oak Harbor	S6535-00-00001-0	Not Determined	1960
629105	576316		Oak Harbor	S7285-30-02014-0	Not Determined	1960
629107	576318		Oak Harbor	S7285-30-04002-0	Not Determined	1960
629108	576319		Oak Harbor	S6535-00-00007-0	Not Determined	1960
629109	576320		Oak Harbor	S7655-02-03006-0	Not Determined	1960
629110	576321		Oak Harbor	R13301-411-0100	Not Determined	1960
629111	576322		Oak Harbor	S7285-21-00033-0	Not Determined	1960
629112	576323		Oak Harbor	S6535-00-00005-0	Not Determined	1960
629114	576325		Oak Harbor	R13325-011-1850	Not Determined	1960
629115	576326		Oak Harbor	R13436-460-1660	Not Determined	1960
629116	576327		Oak Harbor	S6535-00-00017-2	Not Determined	1960
629117	576328		Oak Harbor	R23318-296-1240	Not Determined	1960
629118	576329		Oak Harbor	R13328-191-4110	Not Determined	1960
629119	576330		Oak Harbor	S7520-00-02020-0	Not Determined	1960
629120	576331		Oak Harbor	R13311-198-2970	Not Determined	1960
629123	576334		Oak Harbor	S7655-00-01012-0	Not Determined	1960
629218	576429		Oak Harbor	S7655-02-02000-0	Not Determined	1962
629219	576430		Oak Harbor	S7285-30-01007-0	Not Determined	1962
629225	576436		Oak Harbor	S7285-30-03005-0	Not Determined	1962
629226	576437		Oak Harbor	S6410-02-00002-0	Not Determined	1962
629227	576438		Oak Harbor	S7285-30-03004-0	Not Determined	1962
629230	576441		Oak Harbor	S6535-00-00016-0	Not Determined	1962
629232	576443		Oak Harbor	S7285-30-05013-0	Not Determined	1962

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629234	576445		Oak Harbor	S7285-30-02010-0	Not Determined	1962
629235	576446		Oak Harbor	R13325-010-2500	Not Determined	1962
629236	576447		Oak Harbor	S7285-30-02009-0	Not Determined	1962
629238	576449		Oak Harbor	S7655-02-03004-0	Not Determined	1962
629240	576451		Oak Harbor	S7285-30-02004-0	Not Determined	1962
629241	576452		Oak Harbor	S6515-00-01004-0	Not Determined	1962
629242	576453		Oak Harbor	S7285-30-03003-0	Not Determined	1962
629243	576454		Oak Harbor	S6515-00-04011-0	Not Determined	1962
629246	576457		Oak Harbor	S7285-30-04010-0	Not Determined	1962
629251	576462		Oak Harbor	R23318-306-0300	Not Determined	1962
629252	576463		Oak Harbor	R13335-454-3221	Not Determined	1963
629253	576464		Oak Harbor	R13302-317-1150	Not Determined	1963
629255	576466		Oak Harbor	S6515-02-08003-0	Not Determined	1963
629256	576467		Oak Harbor	R13327-265-1490	Not Determined	1963
629259	576470		Oak Harbor	S7520-00-03008-0	Not Determined	1963
629260	576471		Oak Harbor	R23320-062-0660	Not Determined	1963
629262	576473		Oak Harbor	S8140-00-01006-0	Not Determined	1963
629269	576480		Oak Harbor	R13436-148-0330	Not Determined	1963
629270	576481		Oak Harbor	R23306-016-2470	Not Determined	1963
629275	576486		Oak Harbor	S7655-02-03005-0	Not Determined	1963
629276	576487		Oak Harbor	S6535-00-00018-0	Not Determined	1963
629281	576492		Oak Harbor	R13301-232-0670	Not Determined	1963
629285	576496		Oak Harbor	S7520-00-02003-0	Not Determined	1963
629291	576502		Oak Harbor	S6535-00-00021-0	Not Determined	1963
629294	576505		Oak Harbor	S7520-00-02001-0	Not Determined	1963
629295	576506		Oak Harbor	S6535-00-00002-0	Not Determined	1963
629296	576507		Oak Harbor	S7655-02-04001-0	Not Determined	1963
629299	576510		Oak Harbor	R23319-384-5210	Not Determined	1963
629301	576512		Oak Harbor	S7295-00-00027-0	Not Determined	1963
629303	576514		Oak Harbor	S7285-30-05011-0	Not Determined	1963
629304	576515		Oak Harbor	R13336-238-0530	Not Determined	1963
629306	576517		Oak Harbor	R23318-036-4270	Not Determined	1963
629307	576518		Oak Harbor	R13336-238-0620	Not Determined	1963
629308	576519		Oak Harbor	S7520-00-03007-0	Not Determined	1963
629309	576520		Oak Harbor	S6525-00-03019-0	Not Determined	1963

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629310	576521		Oak Harbor	S7285-30-02003-0	Not Determined	1963
629406	576617		Oak Harbor	S6515-03-12010-0	Not Determined	1965
629414	576625		Oak Harbor	S8015-00-00007-0	Not Determined	1965
629417	576628		Oak Harbor	S7740-00-00002-0	Not Determined	1965
629418	576629		Oak Harbor	R13327-302-1500	Not Determined	1965
629423	576634		Oak Harbor	S6600-00-05003-0	Not Determined	1966
629427	576638		Oak Harbor	R23330-382-1480	Not Determined	1966
629429	576640		Oak Harbor	R23305-165-1200	Not Determined	1966
629433	576644		Oak Harbor	S7655-02-04004-0	Not Determined	1966
629436	576647		Oak Harbor	S6515-00-01007-0	Not Determined	1966
629438	576649		Oak Harbor	S6535-00-00019-0	Not Determined	1966
629439	576650		Oak Harbor	S7740-00-00006-0	Not Determined	1966
629441	576652		Oak Harbor	R13336-111-0340	Not Determined	1966
629442	576653		Oak Harbor	R23330-252-4280	Not Determined	1966
629443	576654		Oak Harbor	S6515-03-11004-0	Not Determined	1966
629444	576655		Oak Harbor	S7285-30-05008-0	Not Determined	1966
629446	576657		Oak Harbor	S7415-00-00002-0	Not Determined	1966
629450	576661		Oak Harbor	R13434-229-4010	Not Determined	1966
629451	576662		Oak Harbor	S7415-00-00004-0	Not Determined	1966
629453	576664		Oak Harbor	R23320-495-1180	Not Determined	1966
629455	576666		Oak Harbor	R13326-144-0680	Not Determined	1966
629456	576667		Oak Harbor	R23319-156-2230	Not Determined	1966
629457	576668		Oak Harbor	S8015-00-00006-0	Not Determined	1966
629459	576670		Oak Harbor	S6515-03-11003-0	Not Determined	1966
629461	576672		Oak Harbor	S7655-02-03008-0	Not Determined	1966
629464	576675		Oak Harbor	S7520-00-02011-0	Not Determined	1966
629467	576678		Oak Harbor	R13313-055-0970	Not Determined	1966
629470	576681		Oak Harbor	S7655-00-01002-0	Not Determined	1967
629473	576684		Oak Harbor	S7655-00-01004-0	Not Determined	1967
629477	576688		Oak Harbor	S6600-00-05005-0	Not Determined	1967
629482	576693		Oak Harbor	S6515-04-00020-0	Not Determined	1967
629484	576695		Oak Harbor	S8015-00-00011-0	Not Determined	1967
629492	576703		Oak Harbor	S8015-00-00005-0	Not Determined	1967
629498	576709		Oak Harbor	R13312-072-4180	Not Determined	1967
629593	576804		Oak Harbor	R13327-302-1820	Not Determined	1968

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629594	576805		Oak Harbor	R13311-099-1880	Not Determined	1968
629601	576812		Oak Harbor	S8140-00-02021-0	Not Determined	1968
629605	576816		Oak Harbor	S8140-00-01003-0	Not Determined	1968
629607	576818		Oak Harbor	R13434-200-4000	Not Determined	1968
629609	576820		Oak Harbor	S8140-00-02013-0	Not Determined	1968
629610	576821		Oak Harbor	S7575-00-01002-0	Not Determined	1968
629613	576824		Oak Harbor	S8015-02-00013-0	Not Determined	1968
629614	576825		Oak Harbor	S8015-02-00020-0	Not Determined	1968
629616	576827		Oak Harbor	R13301-228-2110	Not Determined	1968
629617	576828		Oak Harbor	S8055-00-00008-0	Not Determined	1968
629618	576829		Oak Harbor	S8015-00-00009-0	Not Determined	1968
629619	576830		Oak Harbor	R13335-269-2310	Not Determined	1968
629620	576831		Oak Harbor	S8140-00-02001-0	Not Determined	1968
629621	576832		Oak Harbor	S8140-00-02020-0	Not Determined	1968
629624	576835		Oak Harbor	S8140-00-01004-0	Not Determined	1968
629626	576837		Oak Harbor	S8140-00-02024-0	Not Determined	1968
629628	576839		Oak Harbor	S7285-40-00005-0	Not Determined	1968
629630	576841		Oak Harbor	S8140-00-05012-0	Not Determined	1968
629631	576842		Oak Harbor	S6515-03-12008-0	Not Determined	1968
629633	576844		Oak Harbor	R13311-448-0820	Not Determined	1968
629637	576848		Oak Harbor	S8140-00-02018-0	Not Determined	1968
629638	576849		Oak Harbor	S8140-00-01002-0	Not Determined	1968
629639	576850		Oak Harbor	S6455-00-00021-0	Not Determined	1968
629640	576851		Oak Harbor	S8015-02-00022-0	Not Determined	1968
629644	576855		Oak Harbor	R13434-179-4010	Not Determined	1968
629648	576859		Oak Harbor	S8140-00-02017-0	Not Determined	1968
629652	576863		Oak Harbor	S8140-00-01001-0	Not Determined	1968
629654	576865		Oak Harbor	S6430-00-00003-0	Not Determined	1968
629655	576866		Oak Harbor	S6455-00-00020-0	Not Determined	1968
629658	576869		Oak Harbor	S8140-00-05013-0	Not Determined	1968
629660	576871		Oak Harbor	S8140-00-02014-0	Not Determined	1968
629662	576873		Oak Harbor	S8140-00-02015-0	Not Determined	1968
629666	576877		Oak Harbor	R13327-316-0980	Not Determined	1968
629668	576879		Oak Harbor	S8140-00-02019-0	Not Determined	1968
629670	576881		Oak Harbor	S8140-00-02002-0	Not Determined	1968

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629671	576882		Oak Harbor	S8015-02-00018-0	Not Determined	1968
629673	576884		Oak Harbor	S8140-00-05005-0	Not Determined	1968
629675	576886		Oak Harbor	S8140-00-05001-0	Not Determined	1968
629676	576887		Oak Harbor	S8140-00-02016-0	Not Determined	1968
629678	576889		Oak Harbor	S8140-00-05004-0	Not Determined	1968
629679	576890		Oak Harbor	S8140-00-05009-0	Not Determined	1968
629682	576893		Oak Harbor	R13303-254-3900	Not Determined	1968
629683	576894		Oak Harbor	S8140-00-02022-0	Not Determined	1968
629685	576896		Oak Harbor	S8015-00-00008-0	Not Determined	1968
629781	576992		Oak Harbor	S8140-00-01016-0	Not Determined	1969
629783	576994		Oak Harbor	R13301-008-3590	Not Determined	1969
629785	576996		Oak Harbor	R23307-123-0720	Not Determined	1969
629790	577001		Oak Harbor	S8140-00-04005-0	Not Determined	1969
629792	577003		Oak Harbor	S8140-00-01008-0	Not Determined	1969
629796	577007		Oak Harbor	S7575-00-01023-0	Not Determined	1969
629800	577011		Oak Harbor	R23307-380-0640	Not Determined	1969
629801	577012		Oak Harbor	R13311-021-3190	Not Determined	1969
629823	577033		Oak Harbor	R13335-422-0770	Not Determined	1913
629832	577042		Oak Harbor	R23329-068-0130	Not Determined	1935
629836	577046		Oak Harbor	R13312-248-5080	Not Determined	1940
629837	577047		Oak Harbor	R13326-150-0250	Not Determined	1942
629838	577048		Oak Harbor	R23318-307-2030	Not Determined	1943
629839	577049		Oak Harbor	R13312-256-5200	Not Determined	1943
629841	577051		Oak Harbor	S7740-00-00012-0	Not Determined	1943
629842	577052		Oak Harbor	R23308-359-0150	Not Determined	1943
629843	577053		Oak Harbor	S6525-00-03012-0	Not Determined	1943
629844	577054		Oak Harbor	S7740-00-00004-0	Not Determined	1943
629845	577055		Oak Harbor	R13311-505-1270	Not Determined	1943
629846	577056		Oak Harbor	S6525-00-0300A-0	Not Determined	1943
629847	577057		Oak Harbor	R13336-508-0550	Not Determined	1946
679857	626100	Building 2848: McDonald's,	NAS Whidbey Island		Determined Not Eligible	1984
629849	577059		Oak Harbor	R13336-511-0360	Not Determined	1946
629861	577071		Oak Harbor	R13335-483-4090	Not Determined	1958
629864	577074		Oak Harbor	S7740-00-00029-0	Not Determined	1960
629865	577075		Oak Harbor	R13325-017-1560	Not Determined	1960

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629873	577083		Oak Harbor	R13327-334-1130	Not Determined	1963
629886	577096		Oak Harbor	S8265-00-02004-0	Not Determined	1967
629982	577187		Oak Harbor	S7285-00-0A001-2	Not Determined	1958
629999	577203		Oak Harbor	S7285-00-0A001-4	Not Determined	1956
630048	577251		Oak Harbor	R13335-402-3810	Not Determined	1950
630049	577252		Oak Harbor	S7740-00-0000A-5	Not Determined	1953
630050	577253		Oak Harbor	S7740-00-0000A-4	Not Determined	1953
630054	577257		Oak Harbor	S7285-00-0A002-0	Not Determined	1956
630057	577260		Oak Harbor	S7740-00-0000B-3	Not Determined	1958
630061	577264		Oak Harbor	R13435-336-3050	Not Determined	1963
630062	577265		Oak Harbor	R13302-251-1430	Not Determined	1964
630063	577266		Oak Harbor	S7020-00-00009-2	Not Determined	1964
630064	577267		Oak Harbor	S7740-00-0000B-4	Not Determined	1965
630070	577273		Oak Harbor	S7020-01-00003-0	Not Determined	1969
630184	577379		Oak Harbor	R13326-314-2460	Not Determined	1945
630189	577384		Coupeville	R13104-375-5250	Not Determined	1950
630235	577430		Coupeville	R13109-465-4760	Not Determined	1891
630236	577431		Coupeville	R13110-085-1980	Not Determined	1902
630237	577432		Coupeville	R13103-332-1790	Not Determined	1910
630238	577433		Coupeville	R13109-500-4220	Not Determined	1948
630239	577434		Coupeville	R23119-235-0880	Not Determined	1963
630240	577435		Coupeville	R13103-502-4800	Not Determined	1969
630251	577446		Oak Harbor	R23332-443-0120	Not Determined	1917
630254	577449		Oak Harbor	R13435-064-3640	Not Determined	1924
630257	577452		Oak Harbor	R23330-143-4350	Not Determined	1926
630259	577454		Oak Harbor	R13436-065-1990	Not Determined	1930
630261	577456		Oak Harbor	R13313-305-3320	Not Determined	1945
630264	577459		Oak Harbor	R23330-312-0600	Not Determined	1956
630265	577460		Oak Harbor	R13325-184-3900	Not Determined	1957
665755	612872	Reynolds House	Coupeville	231403	Determined Not Eligible	1928
666001	613111	Private	Coupeville		Determined Not Eligible	1951
174	166	Old Al Comstock Place	Coupeville		Determined Eligible	1935
176	168	Gallagher/Schreck/Sherman Farm, Sherman, A., House	Coupeville		Not Determined, Washington Heritage Barn Register	1917
177	169	Aloha Farms, Hancock, Samuel E., House	Coupeville		Not Determined, Washington Heritage Barn Register	1953

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
186	178	Gus Reuble Farm	Coupeville		Not Determined, Washington Heritage Barn Register	1930
676138	622569	Naval Base - MWR Storage, Building 2511	NAS Whidbey Island		Determined Not Eligible	1968
675127	621612	R-21, Medical Storage	NAS Whidbey Island		Not Determined	1977
678955	625254	R-25, A/C Line Maintenance (6d)	NAS Whidbey Island		Determined Not Eligible	1976
678956	625255	R-24, A/C Line Maintenance (6d)	NAS Whidbey Island		Determined Not Eligible	1976
678957	625256	R-31, A/C Line Maintenance	NAS Whidbey Island		Determined Not Eligible	1976
678958	625257	Building 2511, Morale, Welfare, Recreation Storage	NAS Whidbey Island		Determined Not Eligible	1968
678959	625258	Building 2640, Compressor Building	NAS Whidbey Island		Determined Not Eligible	1972
51578	41581	Naval Air Station Whidbey Island - Building 386, Hangar 5	NAS Whidbey Island	Federal - NA	Determined Eligible	1953, 1955
677631	623985	WATER TANK-2712	NAS Whidbey Island		Determined Not Eligible	1965
677632	623986	Potable Water Tank - 867	NAS Whidbey Island		Not Determined	1986
677633	623987	Potable Water Reservoir 388/389	NAS Whidbey Island		Not Determined	1970
677634	623988	POTABLE WATER TANK - 2849	NAS Whidbey Island		Not Determined	2004
676884	623274	TAXIWAY, FACILITY 201422	NAS Whidbey Island		Determined Not Eligible	1951
676890	623280	CHAIN ARRESTING GEAR, FACILITY 201926	NAS Whidbey Island		Determined Not Eligible	1967
676891	623281	CARRIER DECK LIGHTING, FACILITY 201926	NAS Whidbey Island		Determined Not Eligible	1968
676892	623282	RUNWAY EDGE LIGHTING, FACILITY 201929	NAS Whidbey Island		Determined Not Eligible	1968
676893	623283	OPTICAL LANDING SYSTEM, FACILITY 201961	NAS Whidbey Island		Determined Not Eligible	1971
679301	625579	Building 2549: Automotive Hobby Shop, Building 2549: Automotive Hobby Shop	NAS Whidbey Island		Determined Not Eligible	1974
679302	625580	Building 2555: Public Works Storage, Building 2555: Ault Field Recycling Center	NAS Whidbey Island		Determined Not Eligible	1974
679303	625581	Building 2595: Navy Exchange Gas Station, Building 2595: Navy Exchange Gas Station	NAS Whidbey Island		Determined Not Eligible	1978
679304	625582	Building 2641: Arts and Crafts Hobby Shop, Building 2641: Security Training	NAS Whidbey Island		Determined Not Eligible	1980
679309	625587	Building 2537, Storage Tank Non Potable	NAS Whidbey Island		Determined Not Eligible	1970
678416	624736	HOSPITAL, BUILDING 993	NAS Whidbey Island		Determined Not Eligible	1969
178	170	Jenne, Edward and Agnes, Farm	Coupeville	R13109-330-4240	Not Determined, Washington Heritage Barn Register	1908
102306	57788	Ault Field - Celestial Navigation Training Facility, Building 180, Security	NAS Whidbey Island		Determined Eligible	1944
102307	57789	Ault Field - Boiler House, Building 209, Boiler House	NAS Whidbey Island		Determined Not Eligible	1944
102308	57790	Ault Field - Celestial Navigation Training Facility, Building 220, Security	NAS Whidbey Island		Determined Eligible	1945
102309	57791	Ault Field - Dispensary and Dental Clinic, Building 243, Legal	NAS Whidbey Island		Determined Not Eligible	1945
102310	57792	OLF Coupeville - Aircraft Control Tower, Building 1, Aircraft Operations Control Tower	NAS Whidbey Island		Determined Not Eligible	1944
102311	57793	OLF Coupeville - Building 2, Equipment Storage Building, Building 2, Equipment Storage Building	NAS Whidbey Island		Determined Eligible, Determined Not Eligible	1944
102321	57803	Sea Plane Base - Igloo Magazines, Buildings 35, 432-445, Inert Storehouses	NAS Whidbey Island		Determined Not Eligible	1942
102335	57817	Sea Plane Base - Water Pumphouse, Building 328, Water Pumphouse Well No. 5	NAS Whidbey Island		Determined Not Eligible	1943

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
102338	57820	Seaplane Base Pier and Breakwater, Facility 479 - Mooring Pier	NAS Whidbey Island		Determined Eligible	1943
102341	57823	Ault Field - Mess Hall, Building 113, IRM/NMCI/PSD/ENV	NAS Whidbey Island		Determined Not Eligible	1943
102342	57824	Ault Field - Maintenance Shop, Building 115, Weapons/AIMD/Supply	NAS Whidbey Island		Determined Not Eligible	1942
102343	57825	Ault Field - Garage, Building 124, CDC Vehicle Maintenance HW Storage	NAS Whidbey Island		Determined Not Eligible	1942
102344	57826	Ault Field - Free Gunnery Range Gate House, Building 128, Ladies Golf Clubhouse	NAS Whidbey Island		Determined Not Eligible	1942
102345	57827	Ault Field - Ordnance Building, Building 130, Duffer's Cove / Golf Clubhouse	NAS Whidbey Island		Determined Not Eligible	1942
102347	57829	Ault Field - High Explosive Magazine, Building 137, High Explosive Magazine	NAS Whidbey Island		Determined Not Eligible	1943
102348	57830	Ault Field - Chief Petty Officer's Club (CPO), Building 138, Chief Petty Officer's Club (CPO)	NAS Whidbey Island		Determined Not Eligible	1943
102349	57831	Ault Field - Skeet and Trap Shooting Office, Building 170, Rod and Gun Club Office, Bowman's Club	NAS Whidbey Island		Determined Not Eligible	1943
102350	57832	Ault Field - Skeet and Trap Range, Facility 171, Vacant/Not in Use	NAS Whidbey Island		Determined Not Eligible	1943
102351	57833	Ault Field - Ready Locker, Building 175, Rod and Gun Club Storehouse	NAS Whidbey Island		Determined Not Eligible	1943
102352	57834	Ault Field - Agricultural Barn, Building 189, MVR Warehouse	NAS Whidbey Island		Determined Not Eligible	1920
102353	57835	Ault Field - Granary, Building 206, Skookum Storage/ Maintenance Building	NAS Whidbey Island		Determined Not Eligible	1930
102354	57836	Ault Field - VAQ Storage, Building 219, VAQ Storage/NADEP ISR Depot RPR	NAS Whidbey Island		Determined Not Eligible	1944
102356	57838	Ault Field - Building 278,, A/C Refueler Contract Building	NAS Whidbey Island		Determined Not Eligible	1945
102357	57839	Ault Field - Electrical Utility Building, Building 281, Electric Support at FF3	NAS Whidbey Island		Determined Not Eligible	1942
102358	57840	Ault Field - Water Pump House, Building 284, Water Pump House	NAS Whidbey Island		Determined Not Eligible	1942
102359	57841	Ault Field - Water Pump House, Building 337, Water Pump House	NAS Whidbey Island		Determined Not Eligible	1943
102360	57842	Ault Field - Ready Locker Magazines, Building 353, 462-466, 469-471 Ready Locker Magazines	NAS Whidbey Island		Determined Not Eligible	1949
102362	57843	Ault Field - Homoja Huts, Buildings 402-403, Golf Cart Storage	NAS Whidbey Island		Determined Not Eligible	1945
102363	57844	Ault Field - Airfield Utility Vault, Building 2678, Low Frequency Homer Beacon	NAS Whidbey Island		Determined Not Eligible	1945
102364	57845	Ault Field - CPO Club Utility Building, Building 492, CPO Club Storage	NAS Whidbey Island		Determined Not Eligible	1943
671585	618288	Building 112, Hangar 1, Building 112, Hangar 1	NAS Whidbey Island		Determined Eligible	1942
671589	618292	Building 2681, Hangar 9, Building 2681, Hangar 9	NAS Whidbey Island		Determined Not Eligible	1984
680638	626833	Forest Loop Campground Comfort Station No. 2, Building 2	NAS Whidbey Island		Determined Not Eligible	1964
115036	67751	Buildings 373, 374, 375, 376, 377, 378, 379, Barracks/Olympic Hall	NAS Whidbey Island		Covered under PC	1954
115037	67752	Building 382, Admiral Nimitz Hall	NAS Whidbey Island		Determined Not Eligible	1954
115038	67753	Building 384, Central Heating Plant	NAS Whidbey Island		Determined Not Eligible	1954
115039	67754	Building 411, Contractor Storage	NAS Whidbey Island		Determined Not Eligible	1956
115040	67755	Building 414, Utility Vault	NAS Whidbey Island		Determined Not Eligible	1956
115041	67756	Building 415, Utility Vault, Storage	NAS Whidbey Island		Determined Not Eligible	1956
115042	67757	Building 420, Sewage Treatment, Classified Shredder Facility	NAS Whidbey Island		Determined Not Eligible	1958
115043	67758	Building 421, Sewage Pumping Station	NAS Whidbey Island		Determined Not Eligible	1958
115044	67759	Building 856, Air to Ground Communications Equipment Vault	NAS Whidbey Island		Determined Not Eligible	1959

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
115045	67760	Building 860, Storage	NAS Whidbey Island		Determined Not Eligible	1959
115046	67761	Building 873, Can Do Inn	NAS Whidbey Island		Determined Not Eligible	1961
115047	67762	Building 874, Communications Equipment Vault	NAS Whidbey Island		Determined Not Eligible	1961
115048	67763	Building 894, Generator Building	NAS Whidbey Island		Determined Not Eligible	1963
115049	67764	Building 895, Smoking Shelter	NAS Whidbey Island		Determined Not Eligible	1948
115050	67765	Airfield Lighting Vault , Building 889 - Ault Field Airfield Lighting Vault	NAS Whidbey Island		Determined Not Eligible	1962
115053	67768	Building 2593 - Electronic Attack Simulator, Building 2593 - Electronic Attack Simulator	NAS Whidbey Island		Determined Not Eligible	1976
115055	67770	Building 994, Calibration Lab	NAS Whidbey Island		Determined Not Eligible	1966
115056	67771	Building 976, Aircraft Systems Training	NAS Whidbey Island		Determined Not Eligible	1966
115057	67772	Building 2643, Shop Building/Office	NAS Whidbey Island		Determined Not Eligible	1960
115058	67773	Building 2738 - Flight Simulator Building , Building 2738 - Flight Simulator Building	NAS Whidbey Island		Determined Not Eligible	1989
115059	67774	Building 2544, Hangar 7	NAS Whidbey Island		Determined Not Eligible	1973
115060	67775	Building 2642, Hangar 8	NAS Whidbey Island		Determined Not Eligible	1980
115061	67776	Building 2681, Hangar 9	NAS Whidbey Island		Determined Not Eligible	1984
115062	67777	Building 2699, Hangar 10	NAS Whidbey Island		Determined Not Eligible	1986
115063	67778	Building 2733 - Hangar 11 , Building 2733 - Hangar 11	NAS Whidbey Island		Determined Not Eligible	1988
115064	67779	Building 2737, Hangar 12, Building 2737, Hangar 12	NAS Whidbey Island		Determined Not Eligible	1989
115068	67783	Facility 201705, Seawall	NAS Whidbey Island		Determined Eligible	1942
115070	67785	Building 390, Water Treatment Plant	NAS Whidbey Island		Determined Not Eligible	1954
115071	67786	Building 853, Alarm Control Center	NAS Whidbey Island		Determined Not Eligible	1958
115072	67787	Building 423, Ordnance Operations Building	NAS Whidbey Island		Determined Not Eligible	1958
115073	67788	Building 424 and 425, Magazines	NAS Whidbey Island		Determined Not Eligible	1958
115074	67789	Building 430, Generator Building	NAS Whidbey Island		Determined Not Eligible	1958
115075	67790	Building 487, Pressure Washing Facility	NAS Whidbey Island		Determined Not Eligible	1943
115078	67793	Building 340, Public Toilet/Shower, Rocky Point Recreation Area	NAS Whidbey Island		Determined Not Eligible	1949
115079	67794	Building 198, Water Treatment Plant	NAS Whidbey Island		Determined Not Eligible	1959
115081	67796	Building 946, Maintenance Garage for Whidbey Apartments	NAS Whidbey Island		Determined Not Eligible	1952
115082	67797	Building 2700 - Naval Facility Whidbey Island, Building 2700, Building 2700 - Naval Facility Whidbey Island, Building 2700 - Naval Ocean Processing Facility	NAS Whidbey Island		Determined Eligible	1986
115084	67799	Building 388, Water Reservoir	NAS Whidbey Island		Determined Not Eligible	1954
115085	67800	Garage, Building R-38	NAS Whidbey Island		Determined Not Eligible	1925
115086	67801	Runway 7-25 and Taxiways, Facilities 201247-201248	NAS Whidbey Island		Determined Not Eligible	1952
115087	67802	Runway 13-31, Facility 201715, Runway 14-32	NAS Whidbey Island		Determined Not Eligible	1962
115089	67804	Storage Building, Building 285	NAS Whidbey Island		Determined Not Eligible	1948
115090	67805	Building 353, Ordnance Storage	NAS Whidbey Island		Determined Not Eligible	1949

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
115091	67806	Inert Storehouse, Building 37	NAS Whidbey Island		Determined Not Eligible	1942
115092	67807	Ault Theater, Skywarrior Theater, Building 118	NAS Whidbey Island		Determined Eligible	1942
115107	67822	Barracks #8, Building 100, Post Office/Training/Weapons	NAS Whidbey Island		Determined Not Eligible	1942
115108	67823	Barracks # 11, Building 103, Public Works/ROICC	NAS Whidbey Island		Determined Not Eligible	1942
115109	67824	Barracks #16, Building 108, Marine Aviation Training Support Group/Poa	NAS Whidbey Island		Determined Not Eligible	1942
115110	67825	Hangar 1, Ready Lockers, Building 112 and Support Buildings 457 and 458, Hangar 1 and Ready Lockers	NAS Whidbey Island		Determined Eligible	1942
115111	67826	Recreation Building, Building 117, Recreation Building	NAS Whidbey Island		Determined Not Eligible	1942
115116	67831	Boiler House, Building 209, Boiler House	NAS Whidbey Island		Determined Not Eligible	1944
115118	67833	Dispensary and Dental Clinic, Building 243, Legal	NAS Whidbey Island		Determined Not Eligible	1945
115119	67834	Aircraft Control Tower, Building 1, Aircraft Operations Control Tower	NAS Whidbey Island		Determined Not Eligible	1944
115120	67835	Airfield Operations Building, Building 2, Airfield Equipment Storage Building	NAS Whidbey Island		Determined Not Eligible	1944
115130	67845	Magazines, Buildings 35, 432-445, Inert Storehouses	NAS Whidbey Island		Determined Not Eligible	1942
115035	67750	Building 371, BOSM Maintenance Shops	NAS Whidbey Island		Determined Not Eligible	1954
671824	618503	Building 126 - Administration and Instruction Building, Building 126 - Applied Instruction Building	NAS Whidbey Island		Determined Not Eligible	1942
159314	107163	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159319	107168	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159320	107169	Fort Casey Company Quarters	Coupeville		Not Determined	1940
159321	107170		Coupeville		Not Determined	1941
159322	107171	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159323	107172	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159327	107174		Coupeville		Not Determined	1921
159328	107175	Fort Casey Quartermaster Workshop: Building 22	Coupeville		Not Determined	1921
159329	107176	Fort Casey Guard House: Building 8	Coupeville		Not Determined	1921
159330	107177	Fort Casey Administration Building: Building 1	Coupeville		Not Determined	1940
159331	107178	Fort Casey Bachelor Officers Quarters	Coupeville		Not Determined	1940
159332	107179		Coupeville		Not Determined	1904, 1906
159333	107180		Coupeville		Not Determined	1930
159334	107181		Coupeville		Not Determined	1900, 1962
159335	107182	Fort Casey Munitions Bunkers	Coupeville		Not Determined	1900
159336	107183	Fort Casey Chapel	Coupeville		Not Determined	1941
159337	107184	Fort Casey Quarter Master and Storehouse: Building 21	Coupeville		Not Determined	1921
159338	107185	Fort Casey Firehouse: Building 15	Coupeville		Not Determined	1904
159339	107186	Fort Casey Commanding Officer's Quarters	Coupeville		Not Determined	1904
159340	107187	Fort Casey Officer's Quarters	Coupeville		Not Determined	1904

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
159341	107188	Fort Casey Officer's Quarters: Building 3	Coupeville		Not Determined	1904
159342	107189		Coupeville		Not Determined	1904
159343	107190		Coupeville		Not Determined	1904
159344	107191		Coupeville		Not Determined	1904
159345	107192		Coupeville		Not Determined	1904
184804	132628				Not Determined	1941
184805	132629				Not Determined	1941
184809	132633				Not Determined	1941
184811	132635				Not Determined	1941
184812	132636				Not Determined	1941
184813	132637				Not Determined	1941
184814	132638				Not Determined	1941
184817	132641				Not Determined	1941
184818	132642				Not Determined	1941
184819	132643				Not Determined	1941
184820	132644				Not Determined	1941
184823	132647				Not Determined	1921
184827	132651				Not Determined	1904
184835	132659				Not Determined	1904
184836	132660				Not Determined	1904
184840	132664				Not Determined	1904
184841	132665				Not Determined	1900
672587	619227	Whidbey Island Game Farm, Pacific Rim Institute for Environmental Stewardship	Coupeville		Determined Eligible	1946
672370	619023	North Parking Shed, Ground Support Equipment (GSE) Compound - Building 995B	NAS Whidbey Island		Determined Not Eligible	1969
672371	619024	Ground Support Equipment (GSE) Powder Coat Facility, GSE Compound - Building 995C	NAS Whidbey Island		Determined Not Eligible	1969
672379	619031	Facility 2525 - Turbo Fan Jet Engine Test Facility, Facility 2525 - Aircraft Turbo Jet Test Cell	NAS Whidbey Island		Determined Not Eligible	1971
672380	619032	Test Cell Fuel Storage Tanks , Facility 2525A - Test Cell Fuel Storage Tanks	NAS Whidbey Island		Determined Not Eligible	1971
672382	619034	Racon Hill - Building 2665, ASR-8 Radar Building	NAS Whidbey Island		Determined Not Eligible	1982
672399	619050	Building 2740 - Medium Attack Weapons School, Pacific, Building 2740 - Fleet Aviation Specialized Operational (FASO) Academic Training Building	NAS Whidbey Island		Determined Not Eligible	1988
672401	619051	Building 2528 - Air Start Building, Building 2528 - Air Start Building	NAS Whidbey Island		Determined Not Eligible	1970
672402	619052	Building 2557, South Wash Rack Control Building, Building 2557, South Wash Rack Control Building	NAS Whidbey Island		Determined Not Eligible	1973
672403	619053	Racon Hill - Facility 2664, Facility 2664 - Radar Tower	NAS Whidbey Island		Determined Not Eligible	1982
672404	619054	Building 2558, North Wash Rack Control Building, Building 2558, North Wash Rack Control Building	NAS Whidbey Island		Determined Not Eligible	1973

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
672405	619055	Building 2581, Air Start/Compression Building, Building 2581, Air Start/Compression Building	NAS Whidbey Island		Determined Not Eligible	1975
672415	619065	Fire and Rescue, Vehicle Alert , Facility 201714 - Ault Field Fire and Rescue, Vehicle Alert	NAS Whidbey Island		Determined Not Eligible	1962
26	20	Naval Air Station Whidbey Island - Outlying Field, Coupeville, NAS Building 1 & 2	NAS Whidbey Island		Determined Not Eligible	1944
674821	621340	R-13	NAS Whidbey Island		Determined Not Eligible	1976
674429	620963	Auto Hobby Shop, Bldg 2549	NAS Whidbey Island		Determined Not Eligible	1974
674430	620964	PER SUPPORT, 2641	NAS Whidbey Island		Determined Not Eligible	1980
674432	620966	CHILD DEVELOPMENT CENTER, BLDG 2679	NAS Whidbey Island		Determined Not Eligible	1984
674433	620967	MT RAINIER BLDG, BARRACKS #13, BLDG 2701	NAS Whidbey Island		Covered under 2006 ACHP PC	1988
665633	612759	North Fork Levee, North Fork Levee	N/A N/A, Skagit City, WA N/A	33030900140003/P 15559	Not Determined	1885, 1935
665634	612760	Dugualla Bay Levee, Dugualla Bay Levee	N/A N/A, Whidbey Island, WA N/A	R233070734030	Not Determined	1920
665641	612766	NASW Pump Station, NASW Pump Station	N/A N/A, Oak Harbor, WA		Not Determined	1952
623312	570568		Oak Harbor	R23330-102-1130	Not Determined	1900
623319	570575		Oak Harbor	S6430-00-00013-0	Not Determined	1900
623330	570586		Oak Harbor	R23330-037-1130	Not Determined	1900
623332	570588		Oak Harbor	R13326-092-0250	Not Determined	1912
623333	570589		Oak Harbor	R23330-095-2210	Not Determined	1920
623336	570592		Oak Harbor	R13326-272-3510	Not Determined	1943
623337	570593		Oak Harbor	R13312-167-2960	Not Determined	1952
623338	570594		Oak Harbor	R13312-146-2130	Not Determined	1959
623340	570596		Oak Harbor	R13312-235-4300	Not Determined	1962
623342	570598		Oak Harbor	R23320-096-0500	Not Determined	1963
623343	570599		Oak Harbor	R13312-450-0650	Not Determined	1966
623344	570600		Oak Harbor	R13323-074-2810	Not Determined	1966
623346	570602		Oak Harbor	R23330-484-0180	Not Determined	1967
623347	570603		Oak Harbor	R23308-369-1170	Not Determined	1967
623350	570606		Oak Harbor	S8265-00-01001-2	Not Determined	1968
623351	570607		Oak Harbor	R23319-386-2750	Not Determined	1968
623353	570609		Oak Harbor	S8265-02-03003-1	Not Determined	1969
623354	570610		Oak Harbor	R23307-419-0980	Not Determined	1969
623355	570611		Oak Harbor	R13328-363-4120	Not Determined	1969
623356	570612		Oak Harbor	R23319-302-3820	Not Determined	1969
625553	572777		Coupeville	R13114-120-5030	Not Determined	1910
625554	572778		Coupeville	R13115-273-1780	Not Determined	1910

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625555	572779	Schulke House/Steadman House, Valentine House	Coupeville	S6370-00-61005-0	Determined Eligible, Not Determined	1910
625557	572781		Coupeville	R13103-126-3340	Not Determined	1910
625563	572785		Coupeville	R13103-266-1530	Not Determined	1910
625565	572787	Frank Newberry House	Coupeville	R13104-471-4210	Not Determined	1912
625567	572789		Coupeville	R13110-338-3570	Not Determined	1912
625571	572793		Coupeville	R13101-343-4020	Not Determined	1915
625576	572796		Coupeville	R13102-500-0500	Not Determined	1918
625582	572801		Coupeville	R13103-410-2190	Not Determined	1920
625585	572804		Coupeville	R23107-391-0270	Not Determined	1925
625589	572808	Private	Coupeville	R13103-290-2150	Determined Not Eligible, Not Determined	1924, 1925
625591	572810		Coupeville	S8440-00-00025-0	Not Determined	1925
625597	572814		Coupeville	R13103-378-2330	Not Determined	1927
625600	572816		Coupeville	R13114-333-2200	Not Determined	1928
625602	572818		Coupeville	S6370-00-61010-0	Not Determined	1928
625608	572824		Coupeville	R13113-363-4620	Not Determined	1932
625615	572831		Coupeville	R13103-357-0630	Not Determined	1932
625617	572833		Coupeville	R13103-157-2690	Not Determined	1932
625620	572836		Coupeville	S8150-00-01006-0	Not Determined	1933
625621	572837		Coupeville	R13114-410-1250	Not Determined	1933
625624	572839		Coupeville	R23106-508-1720	Not Determined	1933
625625	572840		Coupeville	R23106-501-1840	Not Determined	1934
625626	572841		Coupeville	S8150-00-01015-0	Not Determined	1935
625629	572844		Coupeville	S8150-02-03001-2	Not Determined	1935
625636	572851		Coupeville	R23106-076-3100	Not Determined	1936
625740	572954		Coupeville	S8150-02-03001-1	Not Determined	1952
625744	572957		Coupeville	R13103-128-2840	Not Determined	1952
625745	572958		Coupeville	S8010-00-00093-0	Not Determined	1952
625748	572961		Coupeville	R13103-045-1700	Not Determined	1952
625750	572963		Coupeville	S7095-01-00010-0	Not Determined	1952
625751	572964		Coupeville	S8010-00-00096-0	Not Determined	1952
625752	572965		Coupeville	S8010-00-00065-0	Not Determined	1952
625753	572966		Coupeville	R13111-060-0100	Not Determined	1953
625754	572967	Private	Coupeville	S7400-00-01026-0	Determined Not Eligible, Not Determined	1953
625756	572969		Coupeville	S8010-00-00004-0	Not Determined	1953

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625758	572971		Coupeville	S8010-00-00015-1	Not Determined	1953
625760	572973		Coupeville	S8010-00-00016-1	Not Determined	1953
625761	572974		Coupeville	R13103-274-1870	Not Determined	1953
625763	572976		Coupeville	R13115-345-4930	Not Determined	1954
625764	572977		Coupeville	S7400-00-04002-0	Not Determined	1954
625765	572978		Coupeville	S7400-00-03001-0	Not Determined	1954
625766	572979		Coupeville	S7400-00-01019-0	Not Determined	1954
625768	572981		Coupeville	S8010-00-00019-0	Not Determined	1954
625770	572983		Coupeville	S7400-00-01022-0	Not Determined	1954
625777	572990		Coupeville	R13115-269-1350	Not Determined	1955
625778	572991		Coupeville	R13103-375-1830	Not Determined	1955
625781	572994		Coupeville	S7490-00-00025-0	Not Determined	1955
625783	572996		Coupeville	S7400-00-01008-0	Not Determined	1955
625787	572999		Coupeville	R23117-435-1680	Not Determined	1956
625788	573000		Coupeville	S7400-00-01015-0	Not Determined	1956
625789	573001		Coupeville	S7400-00-01012-0	Not Determined	1956
625794	573006		Coupeville	S7400-00-03007-0	Not Determined	1956
625796	573008		Coupeville	S7400-00-01037-0	Not Determined	1956
625799	573011		Coupeville	S7400-00-01027-0	Not Determined	1956
625801	573013		Coupeville	R13113-422-4920	Not Determined	1957
625803	573015		Coupeville	R23106-029-3200	Not Determined	1957
625804	573016		Coupeville	R23107-450-3210	Not Determined	1957
625808	573020		Coupeville	S7400-00-05004-0	Not Determined	1957
625810	573022		Coupeville	S7400-00-03025-0	Not Determined	1957
625811	573023		Coupeville	S7400-00-01031-0	Not Determined	1957
625812	573024		Coupeville	S7400-00-02003-0	Not Determined	1957
625816	573028		Coupeville	S7400-00-03006-0	Not Determined	1957
625822	573034		Coupeville	S8300-00-01024-0	Not Determined	1958
625823	573035		Coupeville	S7400-00-02015-0	Not Determined	1958
625826	573038		Coupeville	S7400-00-02004-0	Not Determined	1958
625827	573039		Coupeville	S7490-00-00026-0	Not Determined	1958
625831	573043		Coupeville	S7400-00-03008-0	Not Determined	1958
625928	573139		Coupeville	S8150-02-03021-0	Not Determined	1963
625931	573142		Coupeville	S8150-00-01005-0	Not Determined	1963
625933	573144		Coupeville	S8440-00-00017-0	Not Determined	1963

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625936	573147		Coupeville	S7400-00-05012-0	Not Determined	1963
625937	573148		Coupeville	R13103-049-5150	Not Determined	1963
625942	573153		Coupeville	S8440-00-00028-0	Not Determined	1963
625945	573156		Coupeville	S6010-00-01016-0	Not Determined	1964
625946	573157		Coupeville	S6010-00-04028-0	Not Determined	1964
625947	573158		Coupeville	S6010-00-01028-0	Not Determined	1964
625948	573159		Coupeville	S8150-00-02005-0	Not Determined	1964
625949	573160		Coupeville	S6010-00-04019-0	Not Determined	1964
625950	573161		Coupeville	S6010-00-01025-0	Not Determined	1964
625951	573162		Coupeville	S8150-02-03011-0	Not Determined	1964
625952	573163		Coupeville	S8150-00-02004-0	Not Determined	1964
625953	573164		Coupeville	S6010-00-03029-0	Not Determined	1964
625954	573165		Coupeville	S6010-00-02025-0	Not Determined	1964
625956	573167		Coupeville	S6010-00-05016-0	Not Determined	1964
625957	573168		Coupeville	S8150-02-03008-0	Not Determined	1964
625958	573169		Coupeville	S6370-00-61008-0	Not Determined	1964
625959	573170		Coupeville	S6010-00-01010-0	Not Determined	1964
625960	573171		Coupeville	S6010-00-01015-0	Not Determined	1964
625961	573172		Coupeville	S8150-00-01012-0	Not Determined	1964
625962	573173		Coupeville	S8440-00-00032-0	Not Determined	1964
625963	573174		Coupeville	S8440-00-00016-0	Not Determined	1964
625964	573175		Coupeville	S8010-00-00082-0	Not Determined	1964
625966	573177		Coupeville	S7490-00-00010-0	Not Determined	1964
625967	573178		Coupeville	R13103-115-4620	Not Determined	1964
625969	573180		Coupeville	S7350-00-0A023-0	Not Determined	1964
625970	573181		Coupeville	S7400-00-05001-1	Not Determined	1964
625973	573184		Coupeville	S8150-02-04002-0	Not Determined	1965
625978	573189		Coupeville	S8300-00-01004-0	Not Determined	1965
625979	573190		Coupeville	S8150-02-03002-0	Not Determined	1965
625980	573191		Coupeville	S6010-00-02005-0	Not Determined	1965
625983	573194		Coupeville	S8010-00-00036-0	Not Determined	1965
625984	573195		Coupeville	S8440-00-00007-0	Not Determined	1965
625985	573196		Coupeville	S7365-00-00007-0	Not Determined	1965
625987	573198		Coupeville	S8440-00-00030-0	Not Determined	1965
625988	573199		Coupeville	R13103-270-2050	Not Determined	1965

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625990	573201		Coupeville	R13234-381-4590	Not Determined	1965
625991	573202		Coupeville	S8010-00-00005-0	Not Determined	1965
625992	573203		Coupeville	R23106-022-3980	Not Determined	1965
625993	573204		Coupeville	S6010-02-01004-0	Not Determined	1966
625999	573210		Coupeville	S8150-02-03013-0	Not Determined	1966
626001	573212		Coupeville	S8300-00-01003-0	Not Determined	1966
626003	573214		Coupeville	R13114-116-3680	Not Determined	1966
626004	573215		Coupeville	S8150-00-02007-0	Not Determined	1966
626005	573216		Coupeville	S6010-00-04017-0	Not Determined	1966
626008	573219		Coupeville	R13234-317-5000	Not Determined	1966
626009	573220		Coupeville	S8010-00-00069-0	Not Determined	1966
626010	573221		Coupeville	R13103-407-4060	Not Determined	1966
626011	573222		Coupeville	S7400-00-01007-0	Not Determined	1966
626012	573223		Coupeville	R13103-105-2830	Not Determined	1966
626013	573224		Coupeville	S8010-00-00068-0	Not Determined	1966
626014	573225		Coupeville	R23106-010-3450	Not Determined	1966
626016	573227		Coupeville	S6010-03-0000D-2	Not Determined	1967
626018	573229		Coupeville	S6010-06-00065-0	Not Determined	1967
627620	574831		Oak Harbor	R13327-497-1820	Not Determined	1908
627621	574832		Oak Harbor	S8420-00-00001-2	Not Determined	1909
627626	574837		Oak Harbor	R23331-420-4160	Not Determined	1910
627627	574838		Oak Harbor	R13312-099-3180	Not Determined	1910
627628	574839		Oak Harbor	R13435-083-4650	Not Determined	1910
627632	574843		Oak Harbor	R13327-521-3910	Not Determined	1912
627634	574845		Oak Harbor	R13312-168-1600	Not Determined	1912
627635	574846		Oak Harbor	R13303-121-4290	Not Determined	1912
627640	574851		Oak Harbor	S7740-00-00032-0	Not Determined	1913
627643	574854		Oak Harbor	R13436-463-0820	Not Determined	1913
627645	574856		Oak Harbor	R13336-443-1500	Not Determined	1913
627646	574857		Oak Harbor	R23320-295-0400	Not Determined	1913
627650	574861		Oak Harbor	R23330-049-5120	Not Determined	1914
627660	574871		Oak Harbor	S7295-00-00025-0	Not Determined	1915
627661	574872		Oak Harbor	R23319-445-5110	Not Determined	1915
627662	574873		Oak Harbor	R13311-034-5090	Not Determined	1915
627665	574876		Oak Harbor	R23330-239-4990	Not Determined	1917

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
627670	574881		Oak Harbor	R13326-039-0630	Not Determined	1918
627674	574885		Oak Harbor	R23329-484-0390	Not Determined	1918
627675	574886		Oak Harbor	R23318-329-2390	Not Determined	1918
627682	574893		Oak Harbor	R13312-175-4400	Not Determined	1920
627689	574900		Oak Harbor	R13311-503-1120	Not Determined	1922
627691	574902		Oak Harbor	R13303-141-5200	Not Determined	1922
627698	574909		Oak Harbor	R13311-067-4290	Not Determined	1923
627699	574910		Oak Harbor	R23318-298-1470	Not Determined	1923
627701	574912		Oak Harbor	S6055-00-0000B-0	Not Determined	1923
627707	574918		Oak Harbor	R23317-431-3670	Not Determined	1923
627708	574919		Oak Harbor	R13436-480-1340	Not Determined	1923
627709	574920		Oak Harbor	R13435-150-3530	Not Determined	1924
627711	574922		Oak Harbor	R23306-462-0260	Not Determined	1924
627807	575018		Oak Harbor	R23330-314-4920	Not Determined	1937
627808	575019		Oak Harbor	R23320-469-3160	Not Determined	1937
627813	575024		Oak Harbor	R23330-350-4900	Not Determined	1938
627814	575025		Oak Harbor	S8420-00-00001-1	Not Determined	1938
627820	575031		Oak Harbor	R13312-064-0060	Not Determined	1939
627832	575043		Oak Harbor	S7575-00-03016-0	Not Determined	1940
627836	575047		Oak Harbor	R13302-429-4610	Not Determined	1940
627840	575051		Oak Harbor	R13313-190-2060	Not Determined	1940
627849	575060		Oak Harbor	R23317-450-2020	Not Determined	1941
627853	575064		Oak Harbor	R13301-033-1640	Not Determined	1941
627854	575065		Oak Harbor	R23306-182-0340	Not Determined	1942
627864	575075		Oak Harbor	R13303-331-4980	Not Determined	1942
627867	575078		Oak Harbor	R13326-371-0880	Not Determined	1942
627869	575080		Oak Harbor	R23318-304-2250	Not Determined	1943
627870	575081		Oak Harbor	R13302-282-1150	Not Determined	1943
627871	575082		Oak Harbor	S6525-00-0300B-0	Not Determined	1943
627872	575083		Oak Harbor	S7740-00-00033-0	Not Determined	1943
627874	575085		Oak Harbor	S6525-00-0300C-0	Not Determined	1943
627878	575089		Oak Harbor	R13326-086-0670	Not Determined	1943
627879	575090		Oak Harbor	S6525-00-02004-0	Not Determined	1943
627880	575091		Oak Harbor	R23318-304-2370	Not Determined	1943
627881	575092		Oak Harbor	R13326-120-0040	Not Determined	1943

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
627882	575093		Oak Harbor	R23318-300-1820	Not Determined	1943
627883	575094		Oak Harbor	S6525-00-02002-0	Not Determined	1943
627885	575096		Oak Harbor	R23318-255-2570	Not Determined	1943
627886	575097		Oak Harbor	R13301-298-0460	Not Determined	1943
627887	575098		Oak Harbor	R13303-092-3820	Not Determined	1943
627888	575099		Oak Harbor	R13312-496-0340	Not Determined	1943
627889	575100		Oak Harbor	R23318-305-2500	Not Determined	1943
627890	575101		Oak Harbor	S6525-00-02003-0	Not Determined	1943
627892	575103		Oak Harbor	S6525-00-02001-0	Not Determined	1943
627893	575104		Oak Harbor	S7055-00-00009-0	Not Determined	1943
627899	575110		Oak Harbor	R23330-302-4720	Not Determined	1944
628002	575213		Oak Harbor	R13311-158-1590	Not Determined	1949
628009	575220		Oak Harbor	R23307-331-4800	Not Determined	1949
628031	575242		Oak Harbor	R13313-348-0320	Not Determined	1950
628033	575244		Oak Harbor	R23307-191-2840	Not Determined	1950
628039	575250		Oak Harbor	R13324-495-0500	Not Determined	1950
628043	575254		Oak Harbor	R13311-128-2550	Not Determined	1950
628049	575260		Oak Harbor	R23318-333-3000	Not Determined	1950
628055	575266		Oak Harbor	R13303-147-3780	Not Determined	1950
628056	575267		Oak Harbor	S7575-00-01027-0	Not Determined	1950
628058	575269	John & Connie Hudgins	Oak Harbor	R13303-165-3850	Determined Not Eligible, Not Determined	1950
628060	575271		Oak Harbor	R23330-202-5010	Not Determined	1950
628062	575273		Oak Harbor	R23307-103-1050	Not Determined	1950
628072	575283		Oak Harbor	R13312-280-0330	Not Determined	1950
628076	575287		Oak Harbor	S7575-00-01026-0	Not Determined	1950
628077	575288		Oak Harbor	R13312-084-1130	Not Determined	1950
628084	575295		Oak Harbor	R13301-456-0630	Not Determined	1950
628085	575296		Oak Harbor	R13303-158-3780	Not Determined	1950
628193	575404		Oak Harbor	S6335-00-00007-0	Not Determined	1952
628195	575406		Oak Harbor	R13335-394-3230	Not Determined	1952
628199	575410		Oak Harbor	S7740-00-00018-0	Not Determined	1952
628213	575424		Oak Harbor	R13436-407-1940	Not Determined	1952
628214	575425		Oak Harbor	S7740-00-00044-0	Not Determined	1952
628216	575427		Oak Harbor	R13302-110-1160	Not Determined	1952

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628218	575429		Oak Harbor	R23319-055-3650	Not Determined	1952
628222	575433		Oak Harbor	R13303-139-3950	Not Determined	1952
628225	575436		Oak Harbor	R13312-099-2070	Not Determined	1952
628231	575442		Oak Harbor	R13328-483-4730	Not Determined	1953
628247	575458		Oak Harbor	R23318-306-2630	Not Determined	1953
628255	575466		Oak Harbor	R13326-313-3310	Not Determined	1953
628263	575474		Oak Harbor	S7020-00-00002-0	Not Determined	1953
628373	575584		Oak Harbor	S6055-00-02006-0	Not Determined	1955
628374	575585		Oak Harbor	R23305-154-2920	Not Determined	1955
628377	575588		Oak Harbor	R13335-422-3530	Not Determined	1955
628382	575593		Oak Harbor	S7295-00-00015-0	Not Determined	1955
628388	575599		Oak Harbor	R13312-115-0720	Not Determined	1955
628397	575608		Oak Harbor	S7295-00-00013-0	Not Determined	1955
628401	575612		Oak Harbor	R13436-469-0930	Not Determined	1955
628402	575613		Oak Harbor	S6055-00-03007-0	Not Determined	1955
628404	575615		Oak Harbor	R13313-299-0480	Not Determined	1955
628405	575616		Oak Harbor	S7575-00-01019-0	Not Determined	1955
628407	575618		Oak Harbor	S6055-00-04008-0	Not Determined	1955
628408	575619		Oak Harbor	S6055-00-01003-0	Not Determined	1955
628409	575620		Oak Harbor	R13313-281-0170	Not Determined	1955
628413	575624		Oak Harbor	R23330-324-4920	Not Determined	1955
628416	575627		Oak Harbor	R13328-241-4830	Not Determined	1955
628418	575629		Oak Harbor	S6055-00-02011-0	Not Determined	1955
628420	575631		Oak Harbor	S7575-00-11015-0	Not Determined	1955
628421	575632		Oak Harbor	S7295-00-00002-0	Not Determined	1956
628424	575635		Oak Harbor	S7295-00-00022-0	Not Determined	1956
628425	575636		Oak Harbor	S7295-00-00014-0	Not Determined	1956
628428	575639		Oak Harbor	S7295-00-00003-0	Not Determined	1956
628430	575641	Barn, Maurer Barn	Oak Harbor	R13435-015-1720	Not Determined, Washington Heritage Barn Register	1956
628431	575642		Oak Harbor	R13335-221-4160	Not Determined	1956
628436	575647		Oak Harbor	S7295-00-00021-0	Not Determined	1956
628444	575655		Oak Harbor	S6600-00-05009-0	Not Determined	1956
628449	575660		Oak Harbor	R13312-146-2280	Not Determined	1956
628455	575666		Oak Harbor	R13325-122-1680	Not Determined	1956

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628458	575669		Oak Harbor	S7295-00-00018-0	Not Determined	1956
628461	575672		Oak Harbor	S7295-00-00001-0	Not Determined	1956
628565	575776		Oak Harbor	R13335-390-0580	Not Determined	1957
628568	575779		Oak Harbor	R23331-427-1900	Not Determined	1957
628569	575780		Oak Harbor	R13436-442-1940	Not Determined	1957
628573	575784		Oak Harbor	S7285-21-00035-0	Not Determined	1957
628577	575788		Oak Harbor	R13311-455-1770	Not Determined	1957
628578	575789		Oak Harbor	R13436-478-1060	Not Determined	1957
628584	575795		Oak Harbor	S6055-00-01004-0	Not Determined	1957
628586	575797		Oak Harbor	R23308-345-0950	Not Determined	1957
628587	575798		Oak Harbor	S7520-00-01001-0	Not Determined	1957
628590	575801		Oak Harbor	S6055-00-02003-0	Not Determined	1957
628592	575803		Oak Harbor	S6055-00-03008-0	Not Determined	1957
628598	575809		Oak Harbor	R13301-319-0100	Not Determined	1957
628599	575810		Oak Harbor	R23331-415-2680	Not Determined	1957
628612	575823		Oak Harbor	S6600-00-01001-0	Not Determined	1957
628620	575831		Oak Harbor	S6600-00-02008-0	Not Determined	1957
628622	575833		Oak Harbor	R13301-303-0100	Not Determined	1957
628626	575837		Oak Harbor	S6055-00-03010-0	Not Determined	1957
628636	575847		Oak Harbor	R13326-185-0350	Not Determined	1957
628638	575849		Oak Harbor	R13324-091-2150	Not Determined	1957
628643	575854		Oak Harbor	R23318-379-4850	Not Determined	1957
628749	575960		Oak Harbor	S7285-30-03010-0	Not Determined	1958
628751	575962		Oak Harbor	S7285-30-11002-0	Not Determined	1958
628752	575963		Oak Harbor	R23307-140-2510	Not Determined	1958
628753	575964		Oak Harbor	S7285-30-04016-0	Not Determined	1958
628754	575965		Oak Harbor	S7285-30-09003-0	Not Determined	1958
628756	575967		Oak Harbor	S7520-00-02015-0	Not Determined	1958
628757	575968		Oak Harbor	S7285-30-09001-0	Not Determined	1958
628762	575973		Oak Harbor	S7520-00-02012-0	Not Determined	1958
628764	575975		Oak Harbor	S7285-30-09006-0	Not Determined	1958
628765	575976		Oak Harbor	S7285-30-04015-0	Not Determined	1958
628769	575980		Oak Harbor	S7285-30-04003-0	Not Determined	1958
628771	575982		Oak Harbor	S7285-40-00007-0	Not Determined	1958
628775	575986		Oak Harbor	S6600-00-05010-0	Not Determined	1958

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628783	575994		Oak Harbor	S7520-00-03002-0	Not Determined	1958
628787	575998		Oak Harbor	S7285-30-10001-0	Not Determined	1958
628788	575999		Oak Harbor	S7285-30-11001-0	Not Determined	1958
628793	576004		Oak Harbor	S7520-00-02013-0	Not Determined	1958
628797	576008		Oak Harbor	S7285-30-08006-0	Not Determined	1958
628799	576010		Oak Harbor	S6515-00-01010-0	Not Determined	1958
628805	576016		Oak Harbor	S7285-30-04013-0	Not Determined	1958
628807	576018		Oak Harbor	S7285-30-05005-0	Not Determined	1958
628809	576020		Oak Harbor	R23329-502-1030	Not Determined	1958
628816	576027		Oak Harbor	S7285-30-04001-0	Not Determined	1958
628817	576028		Oak Harbor	R13335-433-3520	Not Determined	1958
628822	576033		Oak Harbor	R23317-425-0400	Not Determined	1958
628824	576035		Oak Harbor	S7285-30-04006-0	Not Determined	1958
628825	576036		Oak Harbor	S7285-30-04014-0	Not Determined	1958
628826	576037		Oak Harbor	S7065-00-00015-0	Not Determined	1958
628827	576038		Oak Harbor	S7520-00-02017-0	Not Determined	1958
628829	576040		Oak Harbor	R13328-206-4900	Not Determined	1958
628832	576043		Oak Harbor	S7065-00-00003-0	Not Determined	1958
628840	576051		Oak Harbor	S7285-30-05004-0	Not Determined	1958
628938	576149		Oak Harbor	S7285-30-03013-0	Not Determined	1959
628940	576151		Oak Harbor	S7285-30-09004-0	Not Determined	1959
628941	576152		Oak Harbor	S6535-00-00010-0	Not Determined	1959
628947	576158		Oak Harbor	S6600-00-05008-0	Not Determined	1959
628951	576162		Oak Harbor	R23331-419-2500	Not Determined	1959
628953	576164		Oak Harbor	S6600-00-01006-0	Not Determined	1959
628955	576166		Oak Harbor	S6600-00-02007-0	Not Determined	1959
628960	576171		Oak Harbor	S6600-00-02006-0	Not Determined	1959
628961	576172		Oak Harbor	S6600-00-01010-0	Not Determined	1959
628964	576175		Oak Harbor	S7285-30-07003-0	Not Determined	1959
628965	576176		Oak Harbor	S7285-30-02016-0	Not Determined	1959
628972	576183		Oak Harbor	S7285-30-03015-0	Not Determined	1959
628973	576184		Oak Harbor	R13335-221-4240	Not Determined	1959
628976	576187		Oak Harbor	S7520-00-03005-0	Not Determined	1959
628980	576191		Oak Harbor	S6600-00-01004-0	Not Determined	1959
628981	576192		Oak Harbor	S7655-00-01014-0	Not Determined	1959

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628987	576198		Oak Harbor	S7285-30-04007-0	Not Determined	1959
628991	576202		Oak Harbor	S6535-00-00011-0	Not Determined	1959
628993	576204		Oak Harbor	S7285-40-00009-0	Not Determined	1959
628994	576205		Oak Harbor	S6600-00-05007-0	Not Determined	1959
628996	576207		Oak Harbor	S7295-00-00010-0	Not Determined	1959
628999	576210		Oak Harbor	S6515-00-01008-0	Not Determined	1959
629001	576212		Oak Harbor	S6535-00-00014-0	Not Determined	1959
629005	576216		Oak Harbor	S7285-30-02015-0	Not Determined	1959
629008	576219		Oak Harbor	S6600-00-01012-0	Not Determined	1959
629009	576220		Oak Harbor	S7285-30-05007-0	Not Determined	1959
629010	576221		Oak Harbor	S6600-00-01007-0	Not Determined	1959
629013	576224		Oak Harbor	S7285-30-08001-0	Not Determined	1959
629014	576225		Oak Harbor	S7285-40-00001-0	Not Determined	1959
629015	576226		Oak Harbor	S7285-30-07002-0	Not Determined	1959
629016	576227		Oak Harbor	S7285-30-11004-0	Not Determined	1959
629019	576230		Oak Harbor	R23330-418-0700	Not Determined	1959
629020	576231		Oak Harbor	S6600-00-01003-0	Not Determined	1959
629024	576235		Oak Harbor	S7285-30-06003-0	Not Determined	1959
629025	576236		Oak Harbor	S6600-00-02004-0	Not Determined	1959
629026	576237		Oak Harbor	S7285-30-03001-0	Not Determined	1959
629124	576335		Oak Harbor	S6535-00-00004-0	Not Determined	1960
629125	576336		Oak Harbor	S7285-30-05015-0	Not Determined	1960
629130	576341		Oak Harbor	R23318-196-0140	Not Determined	1960
629136	576347		Oak Harbor	R13435-165-4310	Not Determined	1961
629138	576349		Oak Harbor	S7285-30-05016-0	Not Determined	1961
629145	576356		Oak Harbor	S7285-30-02006-0	Not Determined	1961
629147	576358		Oak Harbor	S7285-30-02005-0	Not Determined	1961
629150	576361		Oak Harbor	R13336-236-0710	Not Determined	1961
629151	576362		Oak Harbor	R13336-128-0340	Not Determined	1961
629153	576364		Oak Harbor	S7285-30-05009-0	Not Determined	1961
629156	576367		Oak Harbor	S6525-00-01008-0	Not Determined	1961
629159	576370		Oak Harbor	S7285-30-01003-0	Not Determined	1961
629163	576374		Oak Harbor	R13312-280-4040	Not Determined	1961
629164	576375		Oak Harbor	R23307-282-0080	Not Determined	1961
629166	576377		Oak Harbor	S7285-30-01006-0	Not Determined	1961

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629168	576379		Oak Harbor	S7285-30-01002-0	Not Determined	1961
629169	576380		Oak Harbor	S6515-00-04002-0	Not Determined	1961
629170	576381		Oak Harbor	S7285-30-02013-0	Not Determined	1961
629172	576383		Oak Harbor	S7655-02-03003-0	Not Determined	1961
629173	576384		Oak Harbor	R13303-141-4400	Not Determined	1961
629174	576385		Oak Harbor	S7655-02-04007-0	Not Determined	1961
629175	576386		Oak Harbor	S7285-30-05014-0	Not Determined	1961
629178	576389		Oak Harbor	S6515-00-01001-0	Not Determined	1961
629181	576392		Oak Harbor	S7520-00-03010-0	Not Determined	1962
629185	576396		Oak Harbor	S6515-02-10005-0	Not Determined	1962
629186	576397		Oak Harbor	S7520-00-03009-0	Not Determined	1962
629187	576398		Oak Harbor	S7285-30-02007-0	Not Determined	1962
629189	576400		Oak Harbor	S6535-00-00009-0	Not Determined	1962
629192	576403		Oak Harbor	S6055-00-01005-0	Not Determined	1962
629196	576407		Oak Harbor	S7740-00-00009-0	Not Determined	1962
629197	576408		Oak Harbor	R13324-495-1150	Not Determined	1962
629199	576410		Oak Harbor	S8468-00-00021-0	Not Determined	1962
629204	576415		Oak Harbor	S7285-30-01008-0	Not Determined	1962
629207	576418		Oak Harbor	R13324-247-4930	Not Determined	1962
629208	576419		Oak Harbor	S7655-02-04009-0	Not Determined	1962
629209	576420		Oak Harbor	R23318-208-1700	Not Determined	1962
629213	576424		Oak Harbor	S7285-30-01005-0	Not Determined	1962
629215	576426		Oak Harbor	R13326-071-0230	Not Determined	1962
629216	576427		Oak Harbor	S7285-30-01004-0	Not Determined	1962
629313	576524		Oak Harbor	S7655-02-03002-0	Not Determined	1964
629315	576526		Oak Harbor	S7285-30-02011-0	Not Determined	1964
629318	576529		Oak Harbor	S6515-02-08004-0	Not Determined	1964
629320	576531		Oak Harbor	S6515-00-05005-0	Not Determined	1964
629321	576532		Oak Harbor	S8415-00-00004-0	Not Determined	1964
629325	576536		Oak Harbor	R13327-147-1120	Not Determined	1964
629326	576537		Oak Harbor	S7415-00-00003-0	Not Determined	1964
629328	576539		Oak Harbor	S7285-30-08003-0	Not Determined	1964
629329	576540		Oak Harbor	S8415-00-00010-0	Not Determined	1964
629332	576543		Oak Harbor	S6055-00-01009-0	Not Determined	1964
629337	576548		Oak Harbor	S7655-02-04005-0	Not Determined	1964

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629338	576549		Oak Harbor	S7520-00-02002-0	Not Determined	1964
629341	576552		Oak Harbor	S7655-02-04002-0	Not Determined	1964
629342	576553		Oak Harbor	S7520-00-02009-0	Not Determined	1964
629344	576555		Oak Harbor	S7285-30-02008-0	Not Determined	1964
629345	576556		Oak Harbor	R13436-407-2330	Not Determined	1964
629346	576557		Oak Harbor	S7655-02-04006-0	Not Determined	1964
629347	576558		Oak Harbor	S7285-30-04009-0	Not Determined	1964
629350	576561		Oak Harbor	R13301-237-0140	Not Determined	1964
629351	576562		Oak Harbor	R23319-227-0300	Not Determined	1964
629355	576566		Oak Harbor	S7520-00-02010-0	Not Determined	1964
629357	576568		Oak Harbor	S7520-00-02004-0	Not Determined	1964
629358	576569		Oak Harbor	S6410-03-00039-0	Not Determined	1964
629359	576570		Oak Harbor	S7520-00-02008-0	Not Determined	1964
629361	576572		Oak Harbor	S8255-00-00016-0	Not Determined	1964
629363	576574		Oak Harbor	R13436-084-1780	Not Determined	1964
629368	576579		Oak Harbor	R13434-100-4030	Not Determined	1965
629370	576581		Oak Harbor	S8015-00-00001-0	Not Determined	1965
629371	576582		Oak Harbor	S6535-00-00020-0	Not Determined	1965
629372	576583		Oak Harbor	S7655-02-03010-0	Not Determined	1965
629374	576585		Oak Harbor	R13326-444-2810	Not Determined	1965
629379	576590		Oak Harbor	S6055-00-02012-0	Not Determined	1965
629380	576591		Oak Harbor	S7520-00-03006-0	Not Determined	1965
629389	576600		Oak Harbor	R23320-173-4980	Not Determined	1965
629391	576602		Oak Harbor	R13312-167-3620	Not Determined	1965
629394	576605		Oak Harbor	S6535-00-00003-0	Not Determined	1965
629398	576609		Oak Harbor	S7655-02-04008-0	Not Determined	1965
629500	576711		Oak Harbor	S6600-00-05004-0	Not Determined	1967
629505	576716		Oak Harbor	S7520-00-02007-0	Not Determined	1967
629506	576717		Oak Harbor	R23330-495-2340	Not Determined	1967
629507	576718		Oak Harbor	R13324-151-4860	Not Determined	1967
629508	576719		Oak Harbor	R13326-014-0230	Not Determined	1967
629510	576721		Oak Harbor	S7295-00-00028-0	Not Determined	1967
629516	576727		Oak Harbor	S7295-00-00026-0	Not Determined	1967
629517	576728		Oak Harbor	S6515-05-15003-0	Not Determined	1967
629520	576731		Oak Harbor	R13303-106-3830	Not Determined	1967

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629527	576738		Oak Harbor	R23319-178-0820	Not Determined	1967
629530	576741		Oak Harbor	S7285-30-03006-0	Not Determined	1967
629537	576748		Oak Harbor	S8015-02-00024-0	Not Determined	1967
629541	576752		Oak Harbor	S7415-00-00005-0	Not Determined	1967
629550	576761		Oak Harbor	R13326-288-3170	Not Determined	1967
629551	576762		Oak Harbor	R23330-133-1720	Not Determined	1967
629552	576763		Oak Harbor	S8015-00-00010-0	Not Determined	1967
629553	576764		Oak Harbor	R13325-513-3740	Not Determined	1967
629554	576765		Oak Harbor	S7285-30-03007-0	Not Determined	1967
629556	576767		Oak Harbor	R13313-231-1530	Not Determined	1967
629560	576771		Oak Harbor	S8015-00-00004-0	Not Determined	1967
629563	576774		Oak Harbor	S8265-00-01010-0	Not Determined	1967
629566	576777		Oak Harbor	S8140-00-02025-0	Not Determined	1968
629568	576779		Oak Harbor	S8140-00-05010-0	Not Determined	1968
629570	576781		Oak Harbor	S7575-00-11028-0	Not Determined	1968
629571	576782		Oak Harbor	R13325-249-3660	Not Determined	1968
629572	576783		Oak Harbor	S8140-00-05002-0	Not Determined	1968
629574	576785		Oak Harbor	S8140-00-05014-0	Not Determined	1968
629580	576791		Oak Harbor	S8140-00-05003-0	Not Determined	1968
629583	576794		Oak Harbor	S8140-00-02023-0	Not Determined	1968
629584	576795		Oak Harbor	S6515-03-12015-0	Not Determined	1968
629586	576797		Oak Harbor	S6515-07-00049-0	Not Determined	1968
629588	576799		Oak Harbor	S6455-00-00003-0	Not Determined	1968
629590	576801		Oak Harbor	S8055-00-00010-0	Not Determined	1968
629591	576802		Oak Harbor	S8140-00-05011-0	Not Determined	1968
629688	576899		Oak Harbor	R13327-369-1850	Not Determined	1968
629689	576900		Oak Harbor	S8140-00-05008-0	Not Determined	1968
629690	576901		Oak Harbor	R23330-493-3080	Not Determined	1968
629694	576905		Oak Harbor	S6515-00-02007-0	Not Determined	1968
629696	576907		Oak Harbor	S7655-00-01011-0	Not Determined	1968
629697	576908		Oak Harbor	S8140-00-05007-0	Not Determined	1968
629698	576909		Oak Harbor	S8265-00-01003-1	Not Determined	1968
629701	576912		Oak Harbor	S8140-00-05006-0	Not Determined	1968
629704	576915		Oak Harbor	S8015-02-00025-0	Not Determined	1968
629707	576918		Oak Harbor	S8140-00-01005-0	Not Determined	1969

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629715	576926		Oak Harbor	S6515-03-12009-0	Not Determined	1969
629717	576928		Oak Harbor	S8140-00-01014-0	Not Determined	1969
629718	576929		Oak Harbor	S8140-00-01009-0	Not Determined	1969
629719	576930		Oak Harbor	R13434-220-4010	Not Determined	1969
629720	576931		Oak Harbor	S8015-02-00021-0	Not Determined	1969
629721	576932		Oak Harbor	S8140-00-01017-0	Not Determined	1969
629723	576934		Oak Harbor	R13324-035-3100	Not Determined	1969
629725	576936		Oak Harbor	S8140-00-01019-0	Not Determined	1969
629726	576937		Oak Harbor	S6305-00-00021-0	Not Determined	1969
629727	576938		Oak Harbor	S8140-00-01007-0	Not Determined	1969
629729	576940		Oak Harbor	R13311-442-1520	Not Determined	1969
629731	576942		Oak Harbor	S8140-00-01012-0	Not Determined	1969
629732	576943		Oak Harbor	S7575-00-03051-0	Not Determined	1969
629741	576952		Oak Harbor	S6455-00-00057-0	Not Determined	1969
629742	576953		Oak Harbor	S8140-00-02011-0	Not Determined	1969
629743	576954		Oak Harbor	R23330-035-1770	Not Determined	1969
629745	576956		Oak Harbor	S8140-00-02012-0	Not Determined	1969
629746	576957		Oak Harbor	S6515-03-12002-0	Not Determined	1969
629748	576959		Oak Harbor	R13324-202-4130	Not Determined	1969
629753	576964		Oak Harbor	S8140-00-01013-0	Not Determined	1969
629754	576965		Oak Harbor	S8140-00-01010-0	Not Determined	1969
629756	576967		Oak Harbor	S8140-00-04003-0	Not Determined	1969
629760	576971		Oak Harbor	S7575-00-07001-0	Not Determined	1969
629762	576973		Oak Harbor	S8015-02-00014-0	Not Determined	1969
629764	576975		Oak Harbor	S8055-00-00002-0	Not Determined	1969
629766	576977		Oak Harbor	S8140-00-01015-0	Not Determined	1969
629768	576979		Oak Harbor	S8140-00-02003-0	Not Determined	1969
629776	576987		Oak Harbor	S8140-00-01011-0	Not Determined	1969
629777	576988		Oak Harbor	R13303-150-4990	Not Determined	1969
629778	576989		Oak Harbor	R13311-108-3050	Not Determined	1969
629780	576991		Oak Harbor	S8140-00-01018-0	Not Determined	1969
629889	577099		Oak Harbor	R23307-139-2170	Not Determined	1967
629893	577103		Oak Harbor	S7740-00-0000B-5	Not Determined	1968
629894	577104		Oak Harbor	S8265-02-04001-0	Not Determined	1968
629895	577105		Oak Harbor	S7285-21-00034-0	Not Determined	1968

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629904	577114		Oak Harbor	R13326-150-0350	Not Determined	1942
629906	577116		Oak Harbor	R13326-045-0230	Not Determined	1942
629907	577117		Oak Harbor	R13311-274-2180	Not Determined	1943
629908	577118		Oak Harbor	R13335-513-4360	Not Determined	1943
629909	577119		Oak Harbor	R23318-240-2180	Not Determined	1943
629910	577120		Oak Harbor	S7740-00-00001-0	Not Determined	1943
629912	577122		Oak Harbor	R13335-297-0280	Not Determined	1950
629913	577123		Oak Harbor	R13311-462-1390	Not Determined	1952
629925	577135		Coupeville	S7246-00-00012-0	Not Determined	1890
629928	577138		Oak Harbor	R13327-198-1980	Not Determined	1922
629929	577139		Oak Harbor	R13335-444-1230	Not Determined	1938
629930	577140		Oak Harbor	R23330-167-5220	Not Determined	1950
629931	577141		Oak Harbor	R13335-316-1140	Not Determined	1957
629933	577143		Oak Harbor	R13335-412-4330	Not Determined	1958
629934	577144		Oak Harbor	R13301-350-2950	Not Determined	1968
629936	577145		Coupeville	R13102-427-4250	Not Determined	1955
629938	577147		Oak Harbor	R13325-106-0190	Not Determined	1957
629940	577149		Oak Harbor	R13335-367-4010	Not Determined	1959
629942	577151		Coupeville	S8300-00-01002-0	Not Determined	1959
629946	577155		Oak Harbor	R13326-421-2780	Not Determined	1945
629947	577156		Oak Harbor	R13326-338-2970	Not Determined	1946
629957	577162		Coupeville	R13104-460-4100	Not Determined	1920
629960	577165		Coupeville	R13104-427-3800	Not Determined	1968
629969	577174		Coupeville	R13104-409-3940	Not Determined	1952
629970	577175		Oak Harbor	S7740-00-0000A-6	Not Determined	1954
629975	577180		Oak Harbor	R13335-275-3920	Not Determined	1956
629976	577181		Oak Harbor	R13335-517-4710	Not Determined	1963
629977	577182		Oak Harbor	R13327-502-2520	Not Determined	1963
630079	577282		Oak Harbor	S7285-00-0A001-1	Not Determined	1968
630081	577284	Chapman Rental House	Coupeville	R13104-436-3940	Not Determined	1918
630087	577290		Oak Harbor	R13335-261-3850	Not Determined	1959
630088	577291		Oak Harbor	S7285-01-00003-0	Not Determined	1960
630092	577295		Oak Harbor	R13335-386-3750	Not Determined	1967
630093	577296		Oak Harbor	R13335-275-2640	Not Determined	1968
463	455	Dixon House, Partridge House, Community Alcohol Center, Penn Cove Veterinary	Coupeville	R13104-428-3940	Not Determined	1918

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
		Clinic				
630116	577316		Oak Harbor	S7285-01-00001-0	Not Determined	1959
630121	577321		Oak Harbor	R13326-341-0520	Not Determined	1968
630131	577330		Coupeville	R13122-410-0750	Not Determined	1940
630132	577331		Coupeville	R13116-271-4200	Not Determined	1940
630151	577350		Oak Harbor	R13335-414-3700	Not Determined	1950
630156	577355		Oak Harbor	R13326-012-3520	Not Determined	1964
630157	577356		Oak Harbor	R13335-320-2850	Not Determined	1964
630158	577357		Oak Harbor	R13326-365-0580	Not Determined	1965
630159	577358		Oak Harbor	R13326-484-2530	Not Determined	1967
630270	577465		Oak Harbor	R13324-462-1970	Not Determined	1948
630273	577468		Oak Harbor	R13435-084-0670	Not Determined	1910
630276	577471		Oak Harbor	S8475-00-00003-0	Not Determined	1967
676190	622616	Private	Oak Harbor		Determined Not Eligible	1950
675467	621933	R-45, Line Maintenance Shelter	NAS Whidbey Island		Determined Not Eligible	1976
675601	622058	Potable Water Tank, Building 197, Water Tank	Oak Harbor		Determined Not Eligible	1944
55501	44327	Mortar Battery Secondary Station, Fort Casey, None	Coupeville	Lot 1 of R13116-495-2950	Determined Eligible	1908
42	35	NAS Whidbey Island - Building 410, Hangar 6, Building 410, Hangar 6	NAS Whidbey Island		Determined Eligible	1942, 1955, 1957
676910	623297	FLEET & FAMILY INFO CENTER, BUILDING 2556	NAS Whidbey Island		Determined Not Eligible	1975
676911	623298	TEST CELL II, BUILDING 2765	NAS Whidbey Island		Determined Not Eligible	1994
676950	623337	Crew Shelter, R-75	NAS Whidbey Island		Determined Not Eligible	1970
678355	624678	Building 2614, Waste Water Treatment Plant	NAS Whidbey Island		Determined Not Eligible	1977
679036	625331	Building 2753, CNAF/FITT Team	NAS Whidbey Island		Determined Not Eligible	1973
88926	48429	Kineth, John Jr., Barn, Salmagundie Farms	Coupeville	R13101-287-1000	Not Determined, National Register, Not Determined, Washington Heritage Barn Register, Not Determined, Washington Heritage Register	1903
88927	48430	Crockett, Colonel Walter, Barn, Colonel Walter Crockett Farm	Coupeville	R13115-220-2200	Not Determined, National Register, Not Determined, Washington Heritage Barn Register, Not Determined, Washington Heritage Register	1895
88928	48431	Sherman Farm, Sherhill Vista Farms	Coupeville	R13109-086-1990	Not Determined	1942
102219	57701	Ault Field - Buildings 360-363, Fuel Storage	NAS Whidbey Island		Determined Not Eligible	1952
102220	57702	Ault Field - Fuel Tanks, Fuel Tanks Building 235-236	NAS Whidbey Island		Determined Not Eligible	1942
102222	57704	Building 368, Electrical Utility Vault, Building 368, Taxiway Lighting Vault	NAS Whidbey Island		Determined Not Eligible	1954, 1955
102223	57705	Ault Field - Building 369, Warehouse, Warehouse	NAS Whidbey Island		Determined Not Eligible	1954

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
102225	57707	Ault Field - Buildings 373, 374, 375, 376, 377, 378, 379, Barracks/Olympic Hall	NAS Whidbey Island		Determined Not Eligible	1954
102226	57708	Ault Field - Building 382, Admiral Nimitz Hall	NAS Whidbey Island		Determined Not Eligible	1954
102227	57709	Ault Field - Building 384, Central Heating Plant	NAS Whidbey Island		Determined Not Eligible	1954
102228	57710	Building 385 - Operations Building, Building 385 - Operations Building	NAS Whidbey Island		Determined Not Eligible	1954
102229	57711	Ault Field - Building 411, Contractor Storage	NAS Whidbey Island		Determined Not Eligible	1956
102230	57712	Ault Field - Building 414, Utility Vault	NAS Whidbey Island		Determined Not Eligible	1956
102231	57713	Ault Field - Building 415, Utility Vault, Storage	NAS Whidbey Island		Determined Not Eligible	1956
102232	57714	Ault Field - Building 420, Sewage Treatment, Classified Shredder Facility	NAS Whidbey Island		Determined Not Eligible	1958
102233	57715	Ault Field - Building 421, Sewage Pumping Station	NAS Whidbey Island		Determined Not Eligible	1958
102234	57716	Air to Ground Communication Building , Building 856 - Ault Field Air to Ground Communication Building	NAS Whidbey Island		Determined Not Eligible	1959
102235	57717	Ault Field - Building 860, Storage	NAS Whidbey Island		Determined Not Eligible	1959
102236	57718	Rocky Point Rec Area - Building 873 Can Do Inn	NAS Whidbey Island		Determined Not Eligible	1961
102237	57719	Radio Transmitter Building , Building 874 - Ault Field Radio Transmitter Building	NAS Whidbey Island		Determined Not Eligible	1961
102238	57720	Precision Approach Radar (PAR) Generator Building, Building 894 - Ault Field PAR Generator Building	NAS Whidbey Island		Determined Not Eligible	1963
102239	57721	Ault Field - Building 895, Smoking Shelter	NAS Whidbey Island		Determined Not Eligible	1948
102240	57722	Ault Field - Building 889, Vault	NAS Whidbey Island		Determined Not Eligible	1962
102241	57723	Ault Field - Building 962, Officer's Mess Hall, Ault Field - Building 962, Officer's Mess Hall, Officers' Mess Hall	NAS Whidbey Island		Determined Not Eligible	1963
102242	57724	Ault Field - Building 960, Chapel, Ault Field - Building 960, Chapel, Chapel, Ault Field - Building 960, Chapel, NAS Whidbey Island: Chapel (Building 960)	NAS Whidbey Island		Determined Eligible	1963
102243	57725	Ault Field - Building 2593, Electronic Attack Simulator	NAS Whidbey Island		Determined Not Eligible	1976
102245	57727	Building 994, Calibration Lab, Building 994, Security	NAS Whidbey Island		Determined Not Eligible	1966, 1969
102246	57728	Ault Field - Building 976, Aircraft Systems Training	NAS Whidbey Island		Determined Not Eligible	1966
102247	57729	Ault Field - Building 2643, Shop Building/Office	NAS Whidbey Island		Determined Not Eligible	1960
102248	57730	Ault Field - Building 2738, Wing Simulator Center	NAS Whidbey Island		Determined Not Eligible	1989
102249	57731	Building 2544, Hangar 7, Building 2544, Hangar 7	NAS Whidbey Island		Determined Not Eligible	1973
102250	57732	Building 2642, Hangar 8, Building 2642, Hangar 8	NAS Whidbey Island		Determined Not Eligible	1980
102251	57733	Ault Field - Building 2681, Hangar 9	NAS Whidbey Island		Determined Not Eligible	1984
102252	57734	Ault Field - Building 2699, Hangar 10	NAS Whidbey Island		Determined Not Eligible	1986
102253	57735	Ault Field - Building 2733, Hangar 11	NAS Whidbey Island		Determined Not Eligible	1988
102258	57740	Sea Plane Base - Building 201705, Seawall	NAS Whidbey Island		Determined Not Eligible	1942
102259	57741	Racon Hill - Building 858, Building 858 Medium Range Radar Building	NAS Whidbey Island		Determined Not Eligible	1959
102260	57742	Racon Hill - Building 390	NAS Whidbey Island		Determined Not Eligible	1954
102261	57743	Racon Hill - Building 853, Alarm Control Center	NAS Whidbey Island		Determined Not Eligible	1958
102262	57744	Building 423, Ordnance Operations Building, Building 423, Ordnance Operations Building	NAS Whidbey Island		Determined Not Eligible	1958

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
102263	57745	Ault Field - Building 424 and 425, Magazines	NAS Whidbey Island		Determined Not Eligible	1958
102264	57746	Ault Field - Building 430, Generator Building	NAS Whidbey Island		Determined Not Eligible	1958
102265	57747	Ault Field - Building 487, Pressure Washing Facility	NAS Whidbey Island		Determined Not Eligible	1943
102268	57750	Ault Field - Building 340, Public Toilet/Shower, Rocky Point Recreation Area	NAS Whidbey Island		Determined Not Eligible	1949
102269	57751	Ault Field - Building 198, Water Treatment Plant	NAS Whidbey Island		Determined Not Eligible	1959
102270	57752	Ault Field - Building 855, Red Cross Storage	NAS Whidbey Island		Determined Not Eligible	1958
102271	57753	Ault Field - Building 946	NAS Whidbey Island		Determined Not Eligible	1952
102274	57756	Racon Hill - Building 388, Water Reservoir	NAS Whidbey Island		Determined Not Eligible	1954
102275	57757	Ault Field - Garage, Building R-38	NAS Whidbey Island		Determined Not Eligible	1945
102276	57758	Ault Field Airfield , Ault Field Airfield Facilities (Facilities 201247, 201715, 201436, 201935, 201685, 201703)	NAS Whidbey Island		Determined Not Eligible	1952, 1956, 1961, 1962, 1968
102277	57759	OLF Coupeville - Runway 13-31, Facility 201715, Runway 14-32	NAS Whidbey Island		Determined Not Eligible	1962
102278	57760	Building 2547 - Avionics Facility; Aircraft Intermediate Maintenance Dept., Building 2547, Building 2547 - Avionics Facility; Aircraft Intermediate Maintenance Dept., Building 2547 - Fleet Readiness Center Northwest	NAS Whidbey Island		Determined Not Eligible	1974
102279	57761	Ault Field - Storage Building, Building 285	NAS Whidbey Island		Determined Not Eligible	1948
102280	57762	Ault Field - Building 353, Ordnance Storage	NAS Whidbey Island		Determined Not Eligible	1949
102281	57763	Sea Plane Base - Inert Storehouse, Building 37	NAS Whidbey Island		Determined Not Eligible	1942
102282	57764	Ault Field - Ault Theater, Skywarrior Theater, Building 118	NAS Whidbey Island		Determined Eligible	1942
102296	57778	Sea Plane Base - Ready Lockers, Buildings 446, 447, 448, 449, 451, Storehouses	NAS Whidbey Island		Determined Eligible	1942
102298	57780	Building 100, Barracks #8, Building 100, Post Office/Training/Weapons	NAS Whidbey Island		Determined Not Eligible	1942
102299	57781	Ault Field - Barracks # 11, Building 103, Public Works/ROICC	NAS Whidbey Island		Determined Not Eligible	1942
102300	57782	Ault Field - Barracks #16, Building 108, Marine Aviation Training Support Group/Poa	NAS Whidbey Island		Determined Not Eligible	1942
102301	57783	Ault Field - Hangar 1, Ready Lockers, Building 112 and Support Buildings 457 and 458, Hangar 1 and Ready Lockers	NAS Whidbey Island		Determined Eligible	1942
102302	57784	Ault Field - Recreation Building, Building 117, Recreation Building	NAS Whidbey Island		Determined Not Eligible	1942
668319	615276	Island County Dike District # 3 Dike, Dugualla Bay Dike	Oak Harbor		Determined Not Eligible	1914
626088	573299		Coupeville	S6010-00-03019-0	Not Determined	1969
626090	573301		Coupeville	S6010-00-04004-0	Not Determined	1969
626091	573302		Coupeville	S6010-00-03015-0	Not Determined	1969
626092	573303		Coupeville	S6010-06-00087-0	Not Determined	1969
626093	573304		Coupeville	S6010-00-02031-0	Not Determined	1969
626095	573306		Coupeville	S6010-05-00016-0	Not Determined	1969
626097	573308		Coupeville	S6010-00-02041-0	Not Determined	1969
626098	573309		Coupeville	S7400-00-01024-0	Not Determined	1969
626101	573312		Coupeville	S8440-00-00004-0	Not Determined	1969

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
626103	573314		Coupeville	S7400-00-04005-0	Not Determined	1969
669208	616109	Private	Oak Harbor		Determined Not Eligible	1927
668248	615210	Private	Oak Harbor	R13323-0623-2810	Determined Not Eligible, Not Determined	1954
700759	663169	Crockett, Hugh, Barn, Boyer Farm	Coupeville		Determined Eligible, Washington Heritage Barn Register	1860
700454	662864	Barn, Summers Farm	Mount Vernon		Determined Eligible, Washington Heritage Barn Register	1895

Note: Properties with resource ID 0 removed. Duplicate inventory records (by ResourceID) removed. NAS Whidbey Island Register Type corrected and updated.

Historic Properties on DAHP GIS Data Summary Table

Historic Properties	Count
Determined Eligible for Local, State or National Register	32
Determined Not Eligible	256
Not Determined (Potentially Eligible)	1226
Total	1514

Washington Heritage Barn Register on DAHP GIS Data

SITE_ID	Comments	Elig_Name	STREET_ADD
IS00229	Kineth, John Jr., Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville
IS00340	Gus Reuble Farm	Washington Heritage Barn Register	Coupeville
IS00343	James, William and Florence, Farm	Washington Heritage Barn Register	Oak Harbor
IS00295	Jenne, Edward and Agnes, Farm	Washington Heritage Barn Register	Coupeville
IS00347	Aloha Farms	Washington Heritage Barn Register	Coupeville
IS00348	Barn	Washington Heritage Barn Register	Oak Harbor
IS00302	Calhoun, Thomas and Mary, Farm	Washington Heritage Barn Register	Coupeville
IS00353	Case Farm	Washington Heritage Barn Register	Oak Harbor
IS00354	Gallagher/Schreck/Sherman Farm	Washington Heritage Barn Register	Coupeville
IS00355	Crockett, Hugh, Barn	Washington Heritage Barn Register	Coupeville
IS00313	Boyer, Freeman, Barn	Washington Heritage Barn Register	Coupeville
IS00356	Hookstra, Lambert, Farm	Washington Heritage Barn Register	Oak Harbor
IS00314	Keith, Sam, Farm	Washington Heritage Barn Register	Coupeville

Washington Heritage Barn Register on DAHP GIS Data Summary Table

Washington Heritage Barn Register	Count
Listed	13

Historic Districts on DAHP GIS Data

SITE_ID	Comments	Elig_Name	STREET_ADD
DT00006	Central Whidbey Island Historic District	National Register, Washington Heritage Register	South of Oak Harbor, Roughly Six Miles Either Side of Coupeville, Coupeville, WA
DT00011	Sqwikwikwab	Determination of Eligibility to NR, Washington Heritage Register	Address Restricted, La Conner, WA

Historic Districts on DAHP GIS Data Summary Table

Historic Districts	Count
Determined Eligible	2

Cemetery Sites on DAHP GIS Data

SITE_ID	Comments	Elig_Name
IS00271	CEMETERY	Inventory
IS00082	PRE CONTACT	Determined Eligible
IS00272	SNAKLIN MONUMENT	Inventory
SK00099	PRE CONTACT	Survey/Inventory
IS00013	PRE CONTACT	Survey/Inventory
IS00014	PRE CONTACT	Survey/Inventory
IS00032	PRE CONTACT	Survey/Inventory
IS00037	PRE CONTACT	Survey/Inventory
SK00033	PRE CONTACT	Survey/Inventory
IS00279	FIRCREST CEMETERY	Inventory
SK00035	PRE CONTACT	Survey/Inventory
IS00280	MAPLE LEAF CEMETERY	Inventory
IS00300	PRE CONTACT	Survey/Inventory
IS00077	PRE CONTACT	Survey/Inventory
IS00030	PRE CONTACT	Survey/Inventory

Cemetery Sites on DAHP GIS Data Summary Table

Cemetery Sites	Count
Determined Eligible	1
Inventory	4
Survey/Inventory	10
Total	15

Washington Heritage Register Properties on DAHP GIS Data

SITE_ID	Comments	Elig_Name	STREET_ADD	Created_Da
SK00337	Barn	Washington Heritage Barn Register	Mount Vernon	01/01/09
IS00226	Crockett, Colonel Walter, Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville	01/01/09
IS00310	Deception Pass State Park	Washington Heritage Register	Oak Harbor	26/12/12

Washington Heritage Register Properties on DAHP GIS Data Summary Table

Washington Heritage Register	Count
Listed	3

Archaeological Sites on DAHP GIS Data Summary Table

Archaeological Sites	Count
Determined Eligible	2
Determined Not Eligible	2
Potentially Eligible	15
Unevaluated (Potentially Eligible)	79
Total	98

Archaeological Districts on DAHP GIS Data Summary Table

Historic Districts	Count
Determined Eligible	1

Enclosure (1)

Ebey's Landing National Historical Reserve Historic Building Inventory (2016 Update)

Name	Status	Area
"Fairhaven"	Contributing	Coupeville
A. Kineth House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
A.B. Coates House	Contributing	Coupeville
A.S. Coates House	Not Contributing	Coupeville
A.W. Monroe House	Contributing	San De Fuca Uplands
A.W. Monroe/Vande Werfhorst Place	Contributing	San De Fuca Uplands
Abbott House	Not Contributing	Coupeville
Abbott/Knowles House	Contributing	Coupeville
Albert Kineth House	Contributing	Coupeville
Alexander Blockhouse	Contributing	Coupeville
Almberg House	Not Contributing	Coupeville
Alvah D. Blowers House	Contributing	Coupeville
Andherst Cottage	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Armstrong/Scoby House	Contributing	San De Fuca Uplands
Armstrong/Trumball House	Contributing	San De Fuca Uplands
Arnold Farm	Contributing	San De Fuca Uplands
Art Holmburg Place	Contributing	San De Fuca Uplands
Babcock Place	Not Contributing	Coupeville
Baher House/San de Fuca Cottage	Not Contributing	San De Fuca Uplands
Bearss/Barrett House	Contributing	Coupeville
Benson Confectionery	Contributing	Coupeville
Benson House	Contributing	Coupeville
Benson/Bunting House	Not Contributing	Coupeville
Benson/Robinett House	Not Contributing	San De Fuca Uplands
Bergman House	Contributing	Coupeville
Black/Lindsey House	Contributing	Coupeville
Bob Cushen House	Not Contributing	Coupeville
Boothe House	Contributing	Coupeville
Bradt House	Not Contributing	Coupeville
Brown Cottage/Shelton House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie

Name	Status	Area
Calhoun House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Capt. R.B. Holbrook House	Contributing	San De Fuca Uplands
Capt. Thomas Coupe House	Contributing	Coupeville
Capt. Thos. Kinney House	Contributing	Coupeville
Captain Barrington House	Not Contributing	San De Fuca Uplands
Captain Clapp House	Contributing	Coupeville
Captain Whidbey Inn	Contributing	San De Fuca Uplands
Carl Gillespie House	Contributing	Coupeville
Carl Marsh House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Case Cabin/Evans House	Not Contributing	San De Fuca Uplands
Cawsey House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Ceci House	Not Contributing	Coupeville
Chansey House	Contributing	Coupeville
Chapman House	Contributing	Coupeville
Charles Angel House	Contributing	Coupeville
Charles Grimes House	Not Contributing	San De Fuca Uplands
Charles T. Terry House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Charlie Mitchell Barn	Contributing	San De Fuca Uplands
Chris Solid House	Contributing	Coupeville
Chromy House	Contributing	Coupeville
Clapp/Ghormley House	Contributing	Coupeville
Clarence Wanamaker Farm	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Clark House	Contributing	Coupeville
Col. Granville Haller House	Contributing	Coupeville
Col. Walter Crockett Farmhouse & Blockhouse	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Comstock Barn	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Comstock/Sherman House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Congregational Church	Contributing	Coupeville
Conrad House	Contributing	Coupeville
Cook/Sherman House	Contributing	San De Fuca Uplands
County Jail/Boy Scout Building	Not Contributing	Coupeville

Name	Status	Area
Coupeville Cash Store	Contributing	Coupeville
Coupeville City Hall	Contributing	Coupeville
Coupeville Courier Printing Office	Contributing	Coupeville
Courthouse Vault	Contributing	Coupeville
Cove Cottage	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Crockett/Boyer Barn	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Cushen Ford Garage	Not Contributing	Coupeville
Cushen House	Contributing	Coupeville
Davis Blockhouse & Sunnyside Cemetery	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Dean House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Dean/Patmore/Zustiak House	Not Contributing	Coupeville
Dominick House	Not Contributing	Coupeville
Dr. White House	Contributing	Coupeville
Dr. White's Office	Contributing	Coupeville
Duvall House	Contributing	Coupeville
E.O. Lovejoy/Yorioka House	Contributing	Coupeville
Earlywine/Nienhuis Property	Contributing	San De Fuca Uplands
Ed Clark House	Contributing	Coupeville
Ed Jenne House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Edmonds House (Pinkston House)	Contributing	Coupeville
Edwards House	Not Contributing	Coupeville
Eerkes/Cleaver House	Not Contributing	San De Fuca Uplands
Eldred Van Dam House	Not Contributing	San De Fuca Uplands
Elisha Rockwell House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Elkhorn Saloon	Contributing	Coupeville
Ernest Watson House	Contributing	Coupeville
Farrell/Johnson House	Not Contributing	San De Fuca Uplands
Ferry House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fire Hall	Contributing	Coupeville
First Methodist Parsonage	Contributing	Coupeville
Fisher Place	Contributing	San De Fuca Uplands

Name	Status	Area
Fisher/Hingston/Trumball General Store	Contributing	San De Fuca Uplands
Flora A.P. Engle House	Contributing	Coupeville
Fort Casey Housing/Smith House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fort Casey Military Reservation/Camp Casey	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fort Casey Military Reservation/Fort Casey State Park	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fort Casey Officers' Quarters	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fort Casey Pump House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fort Casey Storage Buildings	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fort Ebey State Park	Contributing	San De Fuca Uplands
Frain/Burton Engle House	Contributing	Coupeville
Francis A. LeSourd House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Frank Newberry House	Contributing	Coupeville
Frank Pratt House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Fred Nuttall's House	Contributing	Coupeville
Frey/Stone House	Not Contributing	San De Fuca Uplands
Fullington House	Contributing	Coupeville
Gabriel/Reynolds House	Not Contributing	San De Fuca Uplands
Gallagher/Shreck/Sherman Place	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Garrison House	Not Contributing	San De Fuca Uplands
Gates House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Gelb/Alexander House	Not Contributing	San De Fuca Uplands
George Libbey House	Contributing	San De Fuca Uplands
Gilbert Place/Eggerman Farm	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Gillespie House/Reuble Farm	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Gillespie Meat Market	Contributing	Coupeville
Glazier/Herrett House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Glenwood Hotel	Contributing	Coupeville
Gouchin/Criswell House	Not Contributing	San De Fuca Uplands
Gould/Canty House	Contributing	Coupeville
H.H. Rhodes Place	Contributing	San De Fuca Uplands

Name	Status	Area
Hancock Granary	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Hancock/Partridge House	Contributing	Coupeville
Hanks House	Not Contributing	Coupeville
Hapton/Gould House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Harmon/Pearson/Engle House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Harp Place	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Hart House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Heckenbury House	Contributing	Coupeville
Henry Arnold/Grasser House	Contributing	San De Fuca Uplands
Hesselgrave House	Contributing	Coupeville
Hesselgrave/Folkart House	Not Contributing	Coupeville
Highwarden House	Contributing	Coupeville
Hingston House	Contributing	San De Fuca Uplands
Hingston/Trumball Store	Contributing	San De Fuca Uplands
Horace Holbrook House	Contributing	Coupeville
Hordyk Place/VanderVoet Farm	Contributing	San De Fuca Uplands
Howard House	Contributing	Coupeville
Howell/Harpole House	Contributing	Coupeville
Isaacson/Rector House	Not Contributing	San De Fuca Uplands
Island County Abstract Office	Contributing	Coupeville
Island County Bank	Contributing	Coupeville
Island County Times Building	Contributing	Coupeville
Ives House	Contributing	Coupeville
Jacob & Sarah Ebey House & Blockhouse	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Jacob Jenne House	Contributing	Coupeville
Jacob Straub House	Contributing	Coupeville
James Gillespie House	Contributing	Coupeville
James Place	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
James Wanamaker House	Contributing	Coupeville
James Zylstra House	Contributing	Coupeville
Jefferds House	Contributing	Coupeville

Name	Status	Area
John and Jane Kineth Sr. House	Contributing	Coupeville
John Gould House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
John LeSourd House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
John Robertson House	Contributing	Coupeville
John Robertson's Store	Contributing	Coupeville
Johnson House	Not Contributing	Coupeville
Joseph Libbey House	Contributing	Coupeville
Judge Still Law Office	Contributing	Coupeville
Keith House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Keystone Cottage	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Larios House	Not Contributing	Coupeville
Leach House	Contributing	Coupeville
Lee/Hall House	Not Contributing	San De Fuca Uplands
Lewis Shop	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Libbey House	Not Contributing	Coupeville
Liberal League Hall/	Contributing	San De Fuca Uplands
Lupien House	Not Contributing	San De Fuca Uplands
Maddex House	Not Contributing	San De Fuca Uplands
Masonic Lodge No. 15	Contributing	Coupeville
Maxwell Cottage	Not Contributing	San De Fuca Uplands
McCutcheon Honeymoon Cottage	Not Contributing	Coupeville
McWilliams Bungalow	Contributing	San De Fuca Uplands
Melvin Grasser House	Contributing	San De Fuca Uplands
Methodist Church	Contributing	Coupeville
Methodist Parsonage	Contributing	Coupeville
Meyer House	Not Contributing	Coupeville
Mock House	Contributing	Coupeville
Morris House	Contributing	Coupeville
Morris Place	Contributing	San De Fuca Uplands
Morrow/Franzen House	Not Contributing	Coupeville
Mulder House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie

Name	Status	Area
Munson House	Contributing	Coupeville
Muzzall Farm	Contributing	San De Fuca Uplands
Muzzall Rental House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Myers Property	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Newcomb House	Contributing	Coupeville
Newcomb Property	Contributing	Coupeville
Nienhuis/Leach Place	Contributing	San De Fuca Uplands
NPS Sheep Barn	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
O'Dell/F. Reuble House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Anderson Place	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Art Black Barn	Contributing	Coupeville
Old Boyer Place	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old County Courthouse/Grennan & Cranney Store	Contributing	San De Fuca Uplands
Old Fort Casey Wharf	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Grade School/Priest Place	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Hewitt Place	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Hunting Lodge	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Marvin Place	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Old Power Place	Contributing	San De Fuca Uplands
Oly Allison/Burke House	Not Contributing	San De Fuca Uplands
Partridge House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Pat's Place	Contributing	Coupeville
Pennington Farmhouse	Not Contributing	Coupeville
Peralta House	Not Contributing	Coupeville
Pickard House	Not Contributing	Coupeville
Polly Harpole's Maternity Home	Contributing	Coupeville
Pontiac Dealership/Auto Barn	Contributing	Coupeville
Post Office	Contributing	Coupeville
Powell House	Contributing	Coupeville
Prairie Center Mercantile	Not Contributing	Coupeville

Name	Status	Area
Preacher Lowdy Place	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Puget Race Drug Store	Contributing	Coupeville
Quonset House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
R.C. Hill Home/J.T. Fielding Place	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Ralph Engle Worker Housing	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Reuble Farm	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Reuble Squash Barn	Contributing	Coupeville
Reverend Lindsey House	Contributing	Coupeville
Robart Cottage	Contributing	San De Fuca Uplands
Sabin House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Sabin Shop	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Samsel/Zylstra Law Office	Contributing	Coupeville
Samuel E. Hancock House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Samuel Libbey Ranch	Contributing	San De Fuca Uplands
San de Fuca Community Chapel	Contributing	San De Fuca Uplands
San de Fuca Dock/Standard Oil Dock	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
San de Fuca School	Contributing	San De Fuca Uplands
Schroeder Rental House	Contributing	Coupeville
Schulke House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Sedge Building	Contributing	Coupeville
Sergeant Clark House	Contributing	Coupeville
Sherman Hog House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Sherman Squash Barn	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Sherman/Grasser House	Not Contributing	San De Fuca Uplands
Sherwood/Abbott/Franzen House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Sill/Alexander House	Not Contributing	Coupeville
Silvia House	Not Contributing	San De Fuca Uplands
Smith/Davison House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Solid Granary	Not Contributing	Coupeville
Stark House	Not Contributing	Coupeville
Still Log Cabin	Contributing	San De Fuca Uplands

Name	Status	Area
Stoddard/Engle House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Stone House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Strong Farm	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Strong Granary	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Susie & Aleck House	Not Contributing	Coupeville
Telephone Exchange Building	Contributing	Coupeville
Terry's Dryer/Gillespie Livery Building	Contributing	Coupeville
Thomas E. Clark House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Thomas Griffith House	Contributing	Coupeville
Thomas/Sullivan House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Thomas/Sullivan/Patmore House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
TNC Sheep Barn	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Todd/Lovejoy House	Contributing	Coupeville
Tom Briscoe House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Tom Howell's Barbershop	Contributing	Coupeville
Tuft Cottage/Mrs. J. Arnold House	Contributing	San De Fuca Uplands
Tuft House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Van Dam Place	Contributing	San De Fuca Uplands
VandeWerfhorst House	Not Contributing	San De Fuca Uplands
Walden House	Not Contributing	San De Fuca Uplands
Wanamaker/Youderian House	Not Contributing	Coupeville
Wangness/Ryan House	Not Contributing	Coupeville
Ward/Clark House	Not Contributing	Coupeville
Waterman Logging House	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Weidenbach House	Contributing	San De Fuca Uplands
Well's Duplex	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Wharf Warehouse and Dock	Contributing	Coupeville
Whidbey Mercantile Co./Toby's	Contributing	Coupeville
Wiley Barn	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Will Jenne House	Contributing	Coupeville
Willard/Argent Place	Not Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie

Name	Status	Area
William Engle House	Contributing	Ebey's Prairie, Fort Casey Uplands, Crockett Prairie
Williams House	Contributing	Coupeville
Williams/Higgins House	Contributing	Coupeville
Zylstra/Sherod House	Contributing	San De Fuca Uplands

Note: Table compiled from Ebey's Landing National Historic Reserve Historic Building Inventory 2016 Update provided by Ebey's Landing National Historic Reserve.

Contributing Views Listed on the 1998 Central Whidbey Island Historic District National Register form.

Ebey's Prairie from the cemetery, and from Engle Road
 Entry to Coupeville (from Ebey's Prairie into Prairie Center, and along Main Street) and Front Street in Coupeville
 View from Front Street and the Wharf, across Penn Cove
 View to Crockett Prairie and Camp Casey from Wanamaker Road
 View to Crockett Prairie and uplands from the top of Patmore Road
 View to Crockett Prairie and uplands from Keystone Spit
 View to Grasser's Lagoon from Highway 20
 Views to and across Penn Cove along Madrona Way
 Views from the bluff trail to Ebey's Prairie and Coastal Strip
 View of Smith Prairie from Highway 20, entering the Reserve
 Views from Monroe's Landing across the cove to Coupeville
 Views from fort Casey across Keystone Spit and Crockett Lake
 View from Hwy 20 across Ebey's Prairie
 Engle Road to Uplands and west coast
 Views to Grasser's Hill from Madrona Way

Contributing Roads Listed on the 1998 Central Whidbey Island Historic District National Register form.

Fort Casey Road
 Engle Road
 Wanamaker Road
 Keystone Road
 Patmore Road

Parker Road
 Front Street
 Main Street
 Ebey Road
 Terry Road (Includes Broadway north of Hwy. 20)
 Sherman Road
 Cemetery Road
 Cook Road
 Madrona Way
 Libby Road
 Zylstra Road
 Pen Cove Road
 Monroe's Landing Road
 Scenic Heights Road
 Van Dam Road
 West Beach Road

Central Whidbey Island Historic District/Ebey's Landing National Historical Reserve Building Inventory Summary Tables

Recorded Buildings	Count
Contributing	193
Not Contributing	87
Total	280

Contributing Buildings	Contributing Roads	Contributing Views
193	15	21

Enclosure (2)

Historic Properties on DAHP GIS Data

HISTORIC_I	ResourceID	SiteNameHi	Loc_FullAd	TaxParcel_	RegisterTy	BuiltYear
112737	65784	Private	Oak Harbor		Determined Not Eligible	1964
112741	65788	Private	Coupeville		Determined Not Eligible	1950
670504	617272	Coupeville Water Treatment Building	Coupeville	699453R13233-169-4320	Determined Not Eligible	1968
671319	618039	Private	Coupeville		Determined Not Eligible	1952
672688	619317	Private	Coupeville		Determined Eligible	1890
158782	106646				Not Determined	1941
158783	106647				Not Determined	1941
158784	106648				Not Determined	1941
158785	106649				Not Determined	1941
158787	106651				Not Determined	1941
158788	106652				Not Determined	1941
158789	106653				Not Determined	1941
158790	106654				Not Determined	1941
158791	106655				Not Determined	1941
158792	106656				Not Determined	1941
158793	106657				Not Determined	1921
158794	106658				Not Determined	1921
158795	106659				Not Determined	1921
158798	106662				Not Determined	1904
158802	106666				Not Determined	1941
158803	106667				Not Determined	1921
158804	106668				Not Determined	1904
158805	106669				Not Determined	1904
158806	106670				Not Determined	1904
158807	106671				Not Determined	1904
158808	106672				Not Determined	1904
158809	106673				Not Determined	1904
158810	106674				Not Determined	1904
158811	106675				Not Determined	1904
158812	106676				Not Determined	1900
158813	106677				Not Determined	1941
158814	106678				Not Determined	1880
158815	106679	San de Fuca School			Not Determined	1902

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
158835	106699	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
159241	107092	Fort Casey Barracks	Coupeville		Not Determined	1940, 1941
159242	107093	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159244	107095	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159245	107096		Coupeville		Not Determined	1941
159247	107098	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159248	107099	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159352	107196	Benson Confectionery	Coupeville		Not Determined	1916
391	383	Whidbey Mercantile Company, Toby's Tavern	Coupeville		Not Determined	1875, 1895
159365	107201	Tom Howell's Barbershop	Coupeville		Not Determined	1936
159368	107202	Admiralty Head Lighthouse	Coupeville		Not Determined	1861
159369	107203	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
404	396	Wharf Warehouse and Dock	Coupeville		Not Determined	1905
184801	132625				Not Determined	1941
184802	132626				Not Determined	1941
674221	620767	Fort Casey Building 2, Campground Comfort Station	Coupeville		Determined Not Eligible	1964
184864	132688	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
209249	157061				Not Determined	1941
209250	157062				Not Determined	1941
209252	157064				Not Determined	1941
209253	157065				Not Determined	1941
209255	157067				Not Determined	1941
209256	157068				Not Determined	1941
209257	157069				Not Determined	1941
209258	157070				Not Determined	1941
209259	157071				Not Determined	1941
209260	157072				Not Determined	1941
209261	157073				Not Determined	1941
209262	157074				Not Determined	1941
209264	157076				Not Determined	1941
209265	157077				Not Determined	1941
209266	157078				Not Determined	1941
209267	157079				Not Determined	1941
209268	157080				Not Determined	1941

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
209269	157081				Not Determined	1941
209270	157082				Not Determined	1921
209271	157083				Not Determined	1921
209272	157084				Not Determined	1921
209275	157087				Not Determined	1904
209279	157091				Not Determined	1941
209280	157092				Not Determined	1921
209281	157093				Not Determined	1904
209282	157094				Not Determined	1904
209283	157095				Not Determined	1904
209284	157096				Not Determined	1904
209285	157097				Not Determined	1904
209286	157098				Not Determined	1904
209287	157099				Not Determined	1904
209288	157100				Not Determined	1904
209289	157101				Not Determined	1900
209290	157102				Not Determined	1941
209291	157103				Not Determined	1880
209292	157104	San de Fuca School			Not Determined	1902
209312	157124	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
159361	107197	Puget Race Drug Store	Coupeville		Not Determined	1890
672268	618927	Private	Coupeville		Determined Not Eligible	1960
126904	74818		WA		Not Determined	1941
126905	74819		WA		Not Determined	1941
126906	74820		WA		Not Determined	1941
126907	74821		WA		Not Determined	1941
126909	74823		WA		Not Determined	1941
126910	74824		WA		Not Determined	1941
126911	74825		WA		Not Determined	1941
126912	74826		WA		Not Determined	1941
126913	74827		WA		Not Determined	1941
126914	74828		WA		Not Determined	1941
126915	74829		WA		Not Determined	1921
126916	74830		WA		Not Determined	1921
126917	74831		WA		Not Determined	1921

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
126920	74834		WA		Not Determined	1904
126924	74838		WA		Not Determined	1941
126925	74839		WA		Not Determined	1921
126926	74840		WA		Not Determined	1904
126927	74841		WA		Not Determined	1904
126928	74842		WA		Not Determined	1904
126929	74843		WA		Not Determined	1904
126930	74844		WA		Not Determined	1904
126931	74845		WA		Not Determined	1904
126932	74846		WA		Not Determined	1904
126933	74847		WA		Not Determined	1904
126934	74848		WA		Not Determined	1900
126935	74849		WA		Not Determined	1941
126936	74850		WA		Not Determined	1880
126937	74851	San de Fuca School	WA		Not Determined	1902
126957	74870	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
625481	572737	Grennan and Cranney's General Store, Island County Courthouse	Coupeville	R13230-167-2640	Not Determined	1851
625482	572738	Fairhaven	Coupeville	R13233-405-3070	Not Determined	1852
356	348	Coupe, Thomas, House	Coupeville	R13234-370-0150	Not Determined	1852
625486	572739	Duvall House	Coupeville	R13233-409-2860	Not Determined	1860
625487	572740		Coupeville	R13108-364-4680	Not Determined	1860
625488	572741		Coupeville	R13103-361-0370	Not Determined	1863
625490	572742		Coupeville	R13109-149-1990	Not Determined	1870
625492	572743		Coupeville	S8060-00-19004-1	Not Determined	1872
159363	107199	Haller, Colonel Granville House	Coupeville	R13233-379-4060	Not Determined	1866, 1875
625494	572744		Coupeville	S8060-00-09001-0	Not Determined	1880
625495	572745		Coupeville	R13233-330-3880	Not Determined	1885
625496	572746		Coupeville	S6415-00-19000-0	Not Determined	1886
625497	572747		Coupeville	R13104-267-2240	Not Determined	1888
625498	572748		Coupeville	R13233-054-1920	Not Determined	1888
625499	572749		Coupeville	S6005-00-06005-0	Not Determined	1888
343	335	Methodist Parsonage	Coupeville	S6415-00-11007-0	Not Determined	1889
335	327	Zylstra, James, House	Coupeville	S6415-00-22001-0	Not Determined	1890
625503	572750		Coupeville	R13233-008-3820	Not Determined	1890

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625504	572751		Coupeville	S8270-00-0E011-0	Not Determined	1890
354	346	Ervin Rental House	Coupeville	S6415-00-15001-0	Not Determined	1890
625506	572752		Coupeville	R13232-136-1940	Not Determined	1890
625507	572753		Coupeville	R13104-487-2140	Not Determined	1890
625508	572754		Coupeville	S6415-00-13004-0	Not Determined	1890
426	418	Lovejoy, E.O., House, Yorioka House	Coupeville	S6310-00-00011-0	Not Determined	1890
625514	572755		Coupeville	R13104-098-3880	Not Determined	1890
625517	572757		Coupeville	S6415-00-14001-0	Not Determined	1890
346	338	Straub, Jacob, House, Warder House	Coupeville	S6415-00-08008-0	Not Determined	1890
355	347	Gould, John, House, Canty House	Coupeville	S6425-00-02001-0	Not Determined	1890
348	340	Hesselgrave Rental House, Bagby Rental House	Coupeville	S6415-00-13003-0	Not Determined	1890
414	406	Stark House, Jefferds Rental House	Coupeville	S6415-00-13007-1	Not Determined	1890
352	344	Clapp House, Ghormley House	Coupeville	S6415-00-14002-0	Not Determined	1890
625525	572758		Coupeville	S8060-00-10010-0	Not Determined	1890
625526	572759		Coupeville	R13104-246-2030	Not Determined	1892
625527	572760	Frain House/Burton-Engle House	Coupeville	R13104-373-3330	Not Determined	1892
625529	572761		Coupeville	R13104-323-3820	Not Determined	1893
432	424	Black House, Lindsey House	Coupeville	R13233-323-1720	Not Determined	1894
625532	572762		Coupeville	S8060-00-17002-0	Not Determined	1895
625533	572763		Coupeville	S6415-00-24007-0	Not Determined	1895
625535	572764	Keith, Sam, Farm	Coupeville	R13103-078-2490	Not Determined, Washington Heritage Barn Register	1898
625536	572765		Coupeville	R13219-061-4150	Not Determined	1898
625537	572766		Coupeville	R13111-248-4630	Not Determined	1900
625540	572769		Coupeville	S8060-00-70002-0	Not Determined	1903
625541	572770		Coupeville	R13104-328-2240	Not Determined	1903
419	411	Mock House	Coupeville	S7215-00-01004-0	Not Determined	1904
625543	572771		Coupeville	S6415-00-18007-1	Not Determined	1904
360	352	Chromy House	Coupeville	S6005-00-04002-0	Not Determined	1904
625545	572772	Libbey, George and Annie House	Coupeville	R13230-154-2610	Not Determined	1904
625546	572773		Coupeville	R13232-004-4950	Not Determined	1905
625547	572774		Coupeville	S8060-00-10006-0	Not Determined	1905
625548	572775		Coupeville	S6420-00-00006-1	Not Determined	1905
359	351	Solid, Chris, House	Coupeville	R13234-334-0450	Not Determined	1906
625550	572776		Coupeville	R03225-234-4480	Not Determined	1906

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625645	572859		Coupeville	S8060-00-10013-0	Not Determined	1939
625647	572861		Coupeville	R13234-486-2900	Not Determined	1940
625648	572862		Coupeville	S6025-00-02003-0	Not Determined	1940
625649	572863		Coupeville	S8010-00-00070-0	Not Determined	1940
625650	572864		Coupeville	S8060-00-23010-0	Not Determined	1940
625651	572865		Coupeville	R13234-444-2960	Not Determined	1940
625652	572866		Coupeville	R13234-382-4130	Not Determined	1940
625653	572867	Private	Coupeville	S8010-00-00061-0	Determined Not Eligible, Not Determined	1941, 1953
625654	572868		Coupeville	R13232-118-0840	Not Determined	1941
625655	572869		Coupeville	R13103-485-4710	Not Determined	1941
625656	572870		Coupeville	R13234-390-2850	Not Determined	1941
625657	572871		Coupeville	R13115-333-2810	Not Determined	1942
625658	572872		Coupeville	S6005-00-13001-0	Not Determined	1942
625659	572873		Coupeville	S6005-00-13005-0	Not Determined	1942
625660	572874		Coupeville	S6415-00-36001-0	Not Determined	1942
625661	572875		Coupeville	S6415-00-23003-0	Not Determined	1942
625662	572876		Coupeville	R13230-060-2580	Not Determined	1942
625663	572877		Coupeville	R13230-280-0400	Not Determined	1942
625664	572878		Coupeville	S6415-00-24005-2	Not Determined	1942
625665	572879		Coupeville	S6005-00-13003-0	Not Determined	1942
625666	572880		Coupeville	S8010-00-00089-0	Not Determined	1943
625668	572882		Coupeville	S8010-00-00022-0	Not Determined	1943
625669	572883		Coupeville	R13105-282-4130	Not Determined	1943
625670	572884		Coupeville	S8010-00-00006-0	Not Determined	1943
625671	572885		Coupeville	S7530-01-0000B-0	Not Determined	1943
625672	572886		Coupeville	S6420-00-00004-2	Not Determined	1945
625673	572887		Coupeville	S6025-00-02001-0	Not Determined	1945
625674	572888		Coupeville	R13234-375-3030	Not Determined	1945
625675	572889		Coupeville	S7530-01-0000M-0	Not Determined	1945
625676	572890		Coupeville	S6415-00-16005-0	Not Determined	1945
625677	572891		Coupeville	S6415-00-07001-0	Not Determined	1945
625678	572892		Coupeville	S6415-00-38001-0	Not Determined	1945
625679	572893		Coupeville	S8010-00-00084-0	Not Determined	1945
625680	572894		Coupeville	S6415-00-07008-1	Not Determined	1945

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625681	572895		Coupeville	S7150-00-00011-0	Not Determined	1945
625682	572896		Coupeville	S6415-00-34005-2	Not Determined	1946
625683	572897		Coupeville	S6415-00-34003-0	Not Determined	1946
625684	572898		Coupeville	S8010-00-00064-0	Not Determined	1946
625686	572900		Coupeville	R13233-276-1160	Not Determined	1946
625687	572901		Coupeville	S6415-00-34005-1	Not Determined	1946
625690	572904		Coupeville	S8010-00-00018-0	Not Determined	1947
625691	572905		Coupeville	S6415-00-13001-0	Not Determined	1947
625692	572906		Coupeville	S6005-00-13004-0	Not Determined	1947
625693	572907		Coupeville	R13234-390-2760	Not Determined	1947
625694	572908		Coupeville	R13103-251-2330	Not Determined	1947
625695	572909		Coupeville	S6415-00-38004-0	Not Determined	1947
625696	572910		Coupeville	R13230-280-0050	Not Determined	1947
625697	572911		Coupeville	S6415-00-25002-0	Not Determined	1947
625698	572912		Coupeville	S8010-00-00039-0	Not Determined	1947
625699	572913		Coupeville	S6415-00-37001-0	Not Determined	1947
625702	572916		Coupeville	S7070-00-10004-0	Not Determined	1948
625703	572917		Coupeville	R13233-156-2300	Not Determined	1948
625704	572918		Coupeville	S8010-00-00085-0	Not Determined	1948
625705	572919		Coupeville	S8010-00-00001-2	Not Determined	1948
625706	572920		Coupeville	R13103-231-2300	Not Determined	1948
625707	572921		Coupeville	S6415-00-27003-0	Not Determined	1948
625708	572922		Coupeville	R13110-175-4500	Not Determined	1949
625710	572924		Coupeville	S8010-00-00015-2	Not Determined	1949
625711	572925		Coupeville	R13230-015-3660	Not Determined	1949
625712	572926		Coupeville	S8060-00-48002-0	Not Determined	1949
625713	572927		Coupeville	R13230-098-2310	Not Determined	1949
625714	572928		Coupeville	R13232-101-4900	Not Determined	1949
625717	572931		Coupeville	R13230-320-4740	Not Determined	1950
62+5718	572932	Private	Coupeville	S8010-00-00062-0	Determined Not Eligible, Not Determined	1941, 1950
625720	572934		Coupeville	S6005-00-13008-0	Not Determined	1950
625721	572935		Coupeville	R13232-091-1340	Not Determined	1950
625722	572936		Coupeville	S8010-00-00063-0	Not Determined	1950
625723	572937		Coupeville	R13103-200-2670	Not Determined	1950

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625724	572938		Coupeville	S8060-00-09032-0	Not Determined	1950
625726	572940		Coupeville	S6415-00-17001-0	Not Determined	1950
625728	572942		Coupeville	R13105-322-4370	Not Determined	1950
625729	572943		Coupeville	R13234-420-1300	Not Determined	1950
625730	572944	Private	Coupeville	R13103-270-2450	Determined Not Eligible, Not Determined	1950
625732	572946		Coupeville	R13231-459-3340	Not Determined	1950
625733	572947		Coupeville	R13103-245-1530	Not Determined	1950
625735	572949		Coupeville	R13114-204-3780	Not Determined	1951
625736	572950		Coupeville	S6415-00-18007-2	Not Determined	1951
625832	573044		Coupeville	R13103-120-2950	Not Determined	1958
625833	573045		Coupeville	S6415-00-33003-1	Not Determined	1958
625834	573046		Coupeville	S7400-00-03003-0	Not Determined	1958
625835	573047		Coupeville	S7400-00-02014-0	Not Determined	1958
625836	573048		Coupeville	S8060-00-0E016-0	Not Determined	1958
625837	573049		Coupeville	R13235-326-0200	Not Determined	1958
625839	573051		Coupeville	S7400-00-01005-0	Not Determined	1958
625840	573052		Coupeville	S8270-00-0F005-2	Not Determined	1958
625841	573053		Coupeville	S7400-00-01011-0	Not Determined	1958
625842	573054		Coupeville	R13233-182-4600	Not Determined	1958
625843	573055		Coupeville	R13230-345-0440	Not Determined	1958
625844	573056		Coupeville	S8270-00-0F004-1	Not Determined	1958
625845	573057		Coupeville	S7400-00-03002-0	Not Determined	1958
625846	573058		Coupeville	S8270-00-0F003-0	Not Determined	1958
625847	573059		Coupeville	S8270-00-0F005-1	Not Determined	1958
625848	573060		Coupeville	R13233-094-1050	Not Determined	1958
625849	573061		Coupeville	R13104-109-4100	Not Determined	1958
625850	573062		Coupeville	R13110-222-4560	Not Determined	1959
625854	573066		Coupeville	S8270-00-0E007-0	Not Determined	1959
625855	573067		Coupeville	S8270-00-0A010-0	Not Determined	1959
625856	573068		Coupeville	R13103-110-3240	Not Determined	1959
625857	573069		Coupeville	S8270-00-0G006-0	Not Determined	1959
625858	573070		Coupeville	S8270-00-0G007-0	Not Determined	1959
625859	573071	Coupeville Courier Printing Office	Coupeville	S6415-00-07006-0	Not Determined	1959
625860	573072		Coupeville	R03225-246-3560	Not Determined	1959

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625861	573073		Coupeville	S8270-00-0G005-0	Not Determined	1959
625862	573074		Coupeville	R13104-481-2280	Not Determined	1959
625863	573075		Coupeville	S8270-00-0A009-0	Not Determined	1959
625864	573076		Coupeville	S8270-00-0E006-0	Not Determined	1959
625865	573077	Private	Coupeville	R13103-150-3420	Determined Not Eligible, Not Determined	1959
625866	573078		Coupeville	S6415-00-07003-0	Not Determined	1959
625868	573080		Coupeville	S8270-00-0A008-2	Not Determined	1959
625869	573081		Coupeville	S7530-00-0B002-0	Not Determined	1959
625870	573082		Coupeville	S6415-00-06008-0	Not Determined	1959
625871	573083		Coupeville	S6415-00-06007-0	Not Determined	1959
625874	573086		Coupeville	R13109-005-3830	Not Determined	1960
625877	573089		Coupeville	R13116-507-3830	Not Determined	1960
625878	573090		Coupeville	S8010-00-00037-0	Not Determined	1960
625879	573091		Coupeville	R13105-454-5070	Not Determined	1960
625880	573092		Coupeville	S8270-00-0A013-1	Not Determined	1960
625881	573093		Coupeville	S8270-00-0A007-0	Not Determined	1960
625882	573094		Coupeville	S6415-00-16001-0	Not Determined	1960
625883	573095		Coupeville	R13105-493-4950	Not Determined	1960
625884	573096		Coupeville	S8270-00-0E009-1	Not Determined	1960
625885	573097		Coupeville	S8270-00-0A012-0	Not Determined	1960
625886	573098		Coupeville	R13234-442-4120	Not Determined	1960
625887	573099		Coupeville	S8270-00-0A011-0	Not Determined	1960
625888	573100		Coupeville	R13105-251-3790	Not Determined	1960
625889	573101		Coupeville	S8010-00-00066-0	Not Determined	1960
625890	573102		Coupeville	S8270-00-0A008-1	Not Determined	1960
625891	573103		Coupeville	S6415-00-39001-0	Not Determined	1960
625892	573104		Coupeville	S6415-00-33003-2	Not Determined	1960
625893	573105		Coupeville	S8010-00-00083-0	Not Determined	1960
625894	573106		Coupeville	S7400-00-01010-0	Not Determined	1960
625895	573107		Coupeville	S8270-00-0E008-0	Not Determined	1960
625896	573108		Coupeville	S7400-00-02008-0	Not Determined	1960
625897	573109	Private	Coupeville	R13103-183-3330	Determined Not Eligible, Not Determined	1960
625898	573110		Coupeville	R13232-126-2790	Not Determined	1960
625899	573111		Coupeville	R13232-191-5020	Not Determined	1960

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625911	573123		Coupeville	S7400-00-01043-0	Not Determined	1961
625912	573124		Coupeville	S7400-00-01045-0	Not Determined	1961
625913	573125		Coupeville	S8010-00-00001-1	Not Determined	1961
625917	573129		Coupeville	S6370-00-58010-0	Not Determined	1962
625920	573132		Coupeville	S7400-00-02002-0	Not Determined	1962
625921	573133		Coupeville	S7400-00-01016-0	Not Determined	1962
626026	573237		Coupeville	S7400-00-01006-0	Not Determined	1967
626027	573238		Coupeville	S7530-00-0B011-0	Not Determined	1967
626028	573239		Coupeville	R13234-333-4800	Not Determined	1967
626029	573240		Coupeville	R13219-237-3790	Not Determined	1967
626030	573241		Coupeville	R13234-460-2740	Not Determined	1967
626032	573243		Coupeville	R13233-354-1910	Not Determined	1967
626033	573244		Coupeville	S7400-00-01001-0	Not Determined	1967
626034	573245		Coupeville	S7070-00-08001-0	Not Determined	1967
626061	573272		Coupeville	R13109-162-0730	Not Determined	1968
626062	573273		Coupeville	S7450-00-00002-0	Not Determined	1968
626063	573274		Coupeville	S7760-00-01003-0	Not Determined	1968
626064	573275		Coupeville	R13101-315-0190	Not Determined	1968
626065	573276		Coupeville	S7150-00-00004-0	Not Determined	1968
626066	573277		Coupeville	S6310-00-00009-0	Not Determined	1968
626067	573278		Coupeville	R13103-457-1910	Not Determined	1968
626068	573279		Coupeville	S8010-00-00091-0	Not Determined	1968
626069	573280		Coupeville	S8160-00-19002-0	Not Determined	1968
626070	573281		Coupeville	S8010-00-00023-0	Not Determined	1968
626071	573282		Coupeville	R13235-440-0630	Not Determined	1968
626072	573283		Coupeville	R13219-363-3640	Not Determined	1968
626073	573284		Coupeville	R13233-320-1350	Not Determined	1968
626075	573286		Coupeville	R13110-403-2890	Not Determined	1968
626076	573287		Coupeville	S6415-00-33007-0	Not Determined	1968
626080	573291		Coupeville	R13109-141-0860	Not Determined	1969
627601	574812		Coupeville	R13221-061-3980	Not Determined	1899
627723	574934		Coupeville	R13221-015-2700	Not Determined	1925
627763	574974		Coupeville	R13221-471-5100	Not Determined	1930
627800	575011		Coupeville	R13222-490-4950	Not Determined	1936
627804	575015		Coupeville	S8050-00-02012-0	Not Determined	1937

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
627805	575016		Coupeville	R13222-060-2620	Not Determined	1937
627806	575017		Coupeville	R13220-188-3000	Not Determined	1937
627902	575113		Coupeville	S8060-00-35002-0	Not Determined	1945
627961	575172		Coupeville	S7730-00-00003-4	Not Determined	1948
627964	575175		Coupeville	R13223-415-0580	Not Determined	1948
627965	575176		Coupeville	S7730-00-00014-3	Not Determined	1948
627981	575192		Coupeville	S7730-00-00016-1	Not Determined	1948
627986	575197		Coupeville	R13216-026-5110	Not Determined	1949
628108	575319		Coupeville	R13228-519-1480	Not Determined	1951
628130	575341		Coupeville	S7730-00-00004-2	Not Determined	1951
628147	575358		Coupeville	S7730-00-00005-2	Not Determined	1951
628148	575359		Coupeville	S7730-00-00006-1	Not Determined	1951
628154	575365		Coupeville	R13222-361-0130	Not Determined	1951
628159	575370		Coupeville	S7730-00-00022-1	Not Determined	1951
628161	575372		Coupeville	R13221-152-5230	Not Determined	1952
628163	575374		Coupeville	S7730-00-00008-4	Not Determined	1952
628166	575377		Coupeville	S7730-00-00008-2	Not Determined	1952
628167	575378		Coupeville	S7730-00-00003-3	Not Determined	1952
628168	575379		Coupeville	S7730-00-00008-1	Not Determined	1952
628172	575383		Coupeville	S7730-02-00006-0	Not Determined	1952
628176	575387		Coupeville	R13223-329-0620	Not Determined	1952
628178	575389		Coupeville	S7730-00-00006-2	Not Determined	1952
628179	575390		Coupeville	S7730-00-00007-1	Not Determined	1952
628278	575489		Coupeville	S7730-00-00009-3	Not Determined	1953
628288	575499		Coupeville	S7730-02-00007-0	Not Determined	1953
628291	575502		Coupeville	S7730-00-00016-2	Not Determined	1953
628296	575507		Coupeville	S7730-00-00021-0	Not Determined	1953
628297	575508		Coupeville	S7730-00-00017-1	Not Determined	1953
628302	575513		Coupeville	S7730-02-00060-0	Not Determined	1953
628305	575516		Coupeville	S7730-00-00012-1	Not Determined	1954
628307	575518		Coupeville	S7730-02-00031-0	Not Determined	1954
628310	575521		Coupeville	S7730-00-00022-2	Not Determined	1954
628320	575531		Coupeville	S7730-00-00009-2	Not Determined	1954
628337	575548		Coupeville	R13221-087-3580	Not Determined	1954
628341	575552		Coupeville	S7725-00-00005-0	Not Determined	1954

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628345	575556		Coupeville	S7730-00-00012-3	Not Determined	1954
628354	575565		Coupeville	S7730-02-00044-0	Not Determined	1954
628481	575692		Coupeville	S7730-02-00061-0	Not Determined	1956
628511	575722		Coupeville	S7730-02-00037-1	Not Determined	1957
628516	575727		Coupeville	S7730-02-00082-0	Not Determined	1957
628527	575738		Coupeville	S7730-02-00069-0	Not Determined	1957
628534	575745		Coupeville	S7730-02-00067-0	Not Determined	1957
628554	575765		Coupeville	S7730-00-00001-0	Not Determined	1957
628658	575869		Coupeville	S7730-02-00021-0	Not Determined	1957
628668	575879		Coupeville	S7730-02-00034-0	Not Determined	1957
628669	575880		Coupeville	S7730-02-00036-2	Determined Not Eligible	1957
628671	575882		Coupeville	S7730-02-00035-1	Not Determined	1957
628707	575918		Coupeville	S8050-02-19004-0	Not Determined	1958
628725	575936		Coupeville	R13221-187-5200	Not Determined	1958
628865	576076		Coupeville	R13221-050-1970	Not Determined	1958
629047	576258		Coupeville	S8050-00-04007-0	Not Determined	1960
629054	576265		Coupeville	S7730-02-00084-0	Not Determined	1960
629061	576272		Coupeville	S8050-00-08042-0	Not Determined	1960
629068	576279		Coupeville	S7730-02-00096-0	Not Determined	1960
629072	576283		Coupeville	S7005-00-02015-0	Not Determined	1960
629074	576285		Coupeville	S8050-00-09012-0	Not Determined	1960
629080	576291		Coupeville	S7730-02-00003-0	Not Determined	1960
629081	576292		Coupeville	S8050-00-13003-0	Not Determined	1960
629098	576309		Coupeville	S7730-02-00030-0	Not Determined	1960
629102	576313		Coupeville	R13223-445-0580	Not Determined	1960
629103	576314		Coupeville	S8050-00-09022-0	Not Determined	1960
629113	576324		Coupeville	S8050-00-07031-0	Not Determined	1960
629223	576434		Coupeville	R13221-025-3670	Not Determined	1962
629261	576472		Coupeville	S7730-02-00008-0	Not Determined	1963
629265	576476		Coupeville	S8050-00-07010-0	Not Determined	1963
629267	576478		Coupeville	S7730-02-00090-0	Not Determined	1963
629311	576522		Coupeville	R13221-044-4240	Not Determined	1963
629405	576616		Coupeville	S8050-00-04008-0	Not Determined	1965
629415	576626		Coupeville	S8050-00-10041-0	Not Determined	1965
629419	576630		Coupeville	S7005-00-01003-0	Not Determined	1965

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629420	576631		Coupeville	S7730-02-00092-0	Not Determined	1966
629445	576656		Coupeville	S8050-00-05007-0	Not Determined	1966
629448	576659		Coupeville	S7730-00-00018-1	Not Determined	1966
629454	576665		Coupeville	S8050-00-05018-0	Not Determined	1966
629471	576682		Coupeville	S7730-02-00052-0	Not Determined	1967
629472	576683		Coupeville	S7730-00-00013-4	Not Determined	1967
629476	576687		Coupeville	S7730-02-00038-1	Not Determined	1967
629478	576689		Coupeville	S7730-02-00045-0	Not Determined	1967
629486	576697		Coupeville	S7730-02-00039-0	Not Determined	1967
629487	576698		Coupeville	S7730-02-00022-0	Not Determined	1967
629488	576699		Coupeville	S7730-02-00064-1	Not Determined	1967
629600	576811		Coupeville	R13221-510-5130	Not Determined	1968
629615	576826		Coupeville	S8050-02-18005-0	Not Determined	1968
629627	576838		Coupeville	S7730-02-00017-1	Not Determined	1968
629643	576854		Coupeville	S7005-00-0000R-3	Not Determined	1968
629653	576864		Coupeville	S7730-02-00086-0	Not Determined	1968
629684	576895		Coupeville	S7730-02-00018-0	Not Determined	1968
629687	576898		Coupeville	S7730-02-00086-1	Not Determined	1968
629786	576997		Coupeville	S7730-02-00077-0	Not Determined	1969
629793	577004		Coupeville	S7730-02-00091-0	Not Determined	1969
629797	577008		Coupeville	S7730-02-00076-2	Not Determined	1969
629802	577013		Coupeville	S7730-02-00078-0	Not Determined	1969
450	442	The Bungalow, Engle, Flora A.P., House	Coupeville	R13233-358-3900	Not Determined	1914
629809	577019		Coupeville	R13233-310-1640	Not Determined	1935
629810	577020		Coupeville	S6415-00-27008-0	Not Determined	1941
629811	577021		Coupeville	S6415-00-23006-0	Not Determined	1941
629812	577022		Coupeville	S6005-00-13002-0	Not Determined	1942
629813	577023		Coupeville	S6415-00-27001-0	Not Determined	1942
629814	577024		Coupeville	R13233-260-3800	Not Determined	1969
629856	577066		Coupeville	S8370-00-00002-0	Not Determined	1952
444	436	Gillespie, Carl, House, Sampler Bookstore, Rosie's Garden Restaurant	Coupeville	R13233-286-3810	Not Determined	1884
629988	577192		Coupeville	R13233-211-3980	Not Determined	1965
630009	577213		Coupeville	S8060-00-10001-0	Not Determined	1880
630073	577276		Coupeville	R13233-040-4160	Not Determined	1956
630074	577277		Coupeville	S6415-00-31004-0	Not Determined	1961

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
630189	577384		Coupeville	R13104-375-5250	Not Determined	1950
630192	577387		Coupeville	S8050-00-09001-0	Not Determined	1965
630232	577427		Coupeville	R13219-100-1950	Not Determined	1860
630233	577428		Coupeville	R13105-478-4660	Not Determined	1876
630234	577429		Coupeville	R13104-305-1970	Not Determined	1890
630235	577430		Coupeville	R13109-465-4760	Not Determined	1891
630236	577431		Coupeville	R13110-085-1980	Not Determined	1902
630237	577432		Coupeville	R13103-332-1790	Not Determined	1910
630238	577433		Coupeville	R13109-500-4220	Not Determined	1948
630240	577435		Coupeville	R13103-502-4800	Not Determined	1969
630252	577447		Coupeville	R13222-320-0550	Not Determined	1923
665755	612872	Reynolds House	Coupeville	231403	Determined Not Eligible	1928
666001	613111	Private	Coupeville		Determined Not Eligible	1951
165	157	Harmon - Pearson - Engle Farm	Coupeville		Not Determined, Washington Heritage Barn Register	1900
166	158	Cawsey House, Cawsey House, Perkins House	Coupeville		Not Determined	1890
168	160	Comstock, Al & Nellie, House, Sherman House	Coupeville		Not Determined	1890
174	166	Old Al Comstock Place	Coupeville		Determined Eligible	1935
176	168	Gallagher/Schreck/Sherman Farm, Sherman, A., House	Coupeville		Not Determined, Washington Heritage Barn Register	1917
177	169	Aloha Farms, Hancock, Samuel E., House	Coupeville		Not Determined, Washington Heritage Barn Register	1953
186	178	Gus Reuble Farm	Coupeville		Not Determined, Washington Heritage Barn Register	1930
380	372	Fullington, Maude, House, Fullington, Mary, House	Coupeville	S7070-00-11000-0	Not Determined	1859
382	374	Island County Bank, Vracin Office	Coupeville	R13233-375-4150	Not Determined	1890
384	376	Kinney, Captain Thomas, House, Davison House	Coupeville	S6415-00-08004-0	Not Determined	1871
385	377	Captain Clapp House, Vandyk House	Coupeville	S6415-00-07004-0	Not Determined	1890
388	380	Sedge Building, This 'n That Shop, Tartans and Tweeds	Coupeville		Not Determined	1871
389	381	Robertson, John, House, Tartans and Tweeds, Penn Cove Gallery, Ye Kitchen Shop	Coupeville		Not Determined	1864
392	384	John Robertson's Store, Seagull Restaurant, Captain's Galley	Coupeville		Not Determined	1886, 1912
393	385	Post Office, Laundromat, Fantasy Island	Coupeville		Not Determined	1938
394	386	Coupeville Cash Store, Butler Bell Antiques, Gift Gallery Antiques	Coupeville		Not Determined	1885, 1886
396	388	Elkhorn Saloon, Bishop Building, Coupeville Weaving Shop, Elkhorn Truck Antiques	Coupeville		Not Determined	1883
398	390	Judge Still Law Office, The Cove	Coupeville		Not Determined	1909
399	391	Island County Times Building, Lorna Doone's Attic, Jan McGregor Studio	Coupeville		Not Determined	1906, 1958

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
400	392	Island County Abstract Office, Kristen's Ice Cream and More	Coupeville		Not Determined	1890, 1958
401	393	Terry's Dryer, Trader's Wharf	Coupeville		Not Determined	1855, 1897
403	395	Gillespie Meat Market, Korner Kranny, Keeping Room Antiques	Coupeville		Not Determined	1887, 1890
436	428	Congregational Church, St. Mary's Catholic Church	Coupeville	R13233-184-4240	Determined Eligible, Not Determined	1889
437	429	Reverend Lindsey House	Coupeville	624827	Determined Eligible, Not Determined	1898
443	435	Highwarden House, Young House, Datum Pacific Inc.	Coupeville	R13233-282-3880	Not Determined	1888
451	443	Telephone Exchange Building	Coupeville	S6025-00-18001-0	Not Determined	1958
457	449	Nichols House, Bennett House	Coupeville	R13104-490-3930	Not Determined	1893
458	450	Sergeant Clark House, Madsen House	Coupeville	R13104-493-4210	Not Determined	1895
467	459	Wanamaker, James, House, Martin House	Coupeville	R13104-331-4200	Not Determined	1890
470	462	Spangler House, Franzen Rental House	Coupeville	R13104-310-3980	Not Determined	1962
471	463	Bearss House, Barrett House	Coupeville	R13104-280-4190	Not Determined	1890
475	467	Bergman House	Coupeville	R13234-479-3170	Not Determined	1938
39779	30277	Rock Wall	Coupeville		Not Determined	1928
114746	67477	Darst, Earle	Coupeville		Determined Not Eligible	1950
115087	67802	Runway 13-31, Facility 201715, Runway 14-32	Coupeville		Not Determined	1962
158714	106579		Coupeville		Not Determined	1941
159314	107163	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159315	107164		Coupeville		Not Determined	1941
159316	107165		Coupeville		Not Determined	1941
159317	107166		Coupeville		Not Determined	1941
159318	107167		Coupeville		Not Determined	1941
159319	107168	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159320	107169	Fort Casey Company Quarters	Coupeville		Not Determined	1940
159321	107170		Coupeville		Not Determined	1941
159322	107171	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159323	107172	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159324	107173	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159327	107174		Coupeville		Not Determined	1921
159328	107175	Fort Casey Quartermaster Workshop: Building 22	Coupeville		Not Determined	1921
159329	107176	Fort Casey Guard House: Building 8	Coupeville		Not Determined	1921
159330	107177	Fort Casey Administration Building: Building 1	Coupeville		Not Determined	1940
159331	107178	Fort Casey Bachelor Officers Quarters	Coupeville		Not Determined	1940

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
159332	107179		Coupeville		Not Determined	1904, 1906
159333	107180		Coupeville		Not Determined	1930
159334	107181		Coupeville		Not Determined	1900, 1962
159335	107182	Fort Casey Munitions Bunkers	Coupeville		Not Determined	1900
159336	107183	Fort Casey Chapel	Coupeville		Not Determined	1941
159337	107184	Fort Casey Quarter Master and Storehouse: Building 21	Coupeville		Not Determined	1921
159338	107185	Fort Casey Firehouse: Building 15	Coupeville		Not Determined	1904
159339	107186	Fort Casey Commanding Officer's Quarters	Coupeville		Not Determined	1904
159340	107187	Fort Casey Officer's Quarters	Coupeville		Not Determined	1904
159341	107188	Fort Casey Officer's Quarters: Building 3	Coupeville		Not Determined	1904
159342	107189		Coupeville		Not Determined	1904
159343	107190		Coupeville		Not Determined	1904
159344	107191		Coupeville		Not Determined	1904
159345	107192		Coupeville		Not Determined	1904
159346	107193	Fort Casey Batteries	Coupeville		Determined Eligible	1900
159347	107194		Coupeville		Not Determined	1941
159348	107195		Coupeville		Not Determined	1880
184804	132628				Not Determined	1941
184805	132629				Not Determined	1941
184807	132631				Not Determined	1941
184808	132632				Not Determined	1941
184809	132633				Not Determined	1941
184810	132634				Not Determined	1941
184811	132635				Not Determined	1941
184812	132636				Not Determined	1941
184813	132637				Not Determined	1941
184814	132638				Not Determined	1941
184816	132640				Not Determined	1941
184817	132641				Not Determined	1941
184818	132642				Not Determined	1941
184819	132643				Not Determined	1941
184820	132644				Not Determined	1941
184821	132645				Not Determined	1941
184822	132646				Not Determined	1921

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
184823	132647				Not Determined	1921
184824	132648				Not Determined	1921
184827	132651				Not Determined	1904
184831	132655				Not Determined	1941
184832	132656				Not Determined	1921
184833	132657				Not Determined	1904
184834	132658				Not Determined	1904
184835	132659				Not Determined	1904
184836	132660				Not Determined	1904
184837	132661				Not Determined	1904
184838	132662				Not Determined	1904
184839	132663				Not Determined	1904
184840	132664				Not Determined	1904
184841	132665				Not Determined	1900
184842	132666				Not Determined	1941
184843	132667				Not Determined	1880
184844	132668	San de Fuca School			Not Determined	1902
672587	619227	Whidbey Island Game Farm, Pacific Rim Institute for Environmental Stewardship	Coupeville		Determined Eligible	1946
126836	74751		WA		Not Determined	1941
674330	620873	Dean House, Patmore House, Zustiak House	Coupeville	264840/ S7070-00-10007-0	Not Determined	1918
623311	570567		Coupeville	S8050-02-19008-0	Not Determined	1900
623339	570595		Coupeville	S8050-00-10022-0	Not Determined	1961
623345	570601		Coupeville	S8050-00-09017-0	Not Determined	1967
623349	570605		Coupeville	S8050-02-18016-0	Not Determined	1968
623352	570608		Coupeville	S8050-00-04013-1	Not Determined	1968
424	416	Newcomb House	Coupeville	R13234-434-1330	Not Determined	1908
178	170	Jenne, Edward and Agnes, Farm	Coupeville	R13109-330-4240	Not Determined, Washington Heritage Barn Register	1908
625553	572777		Coupeville	R13114-120-5030	Not Determined	1910
625554	572778		Coupeville	R13115-273-1780	Not Determined	1910
625555	572779	Schulke House/Steadman House, Valentine House	Coupeville	S6370-00-61005-0	Determined Eligible, Not Determined	1910
625556	572780		Coupeville	R13232-173-0200	Not Determined	1910
625557	572781		Coupeville	R13103-126-3340	Not Determined	1910
625559	572782		Coupeville	S7070-00-06002-0	Not Determined	1910
420	412	Benson House, Dole House	Coupeville	S7215-00-01001-0	Not Determined	1910

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625561	572783		Coupeville	R13219-034-3750	Not Determined	1910
625562	572784		Coupeville	S7070-00-07001-2	Not Determined	1910
625563	572785		Coupeville	R13103-266-1530	Not Determined	1910
625564	572786		Coupeville	S7070-00-03007-0	Not Determined	1911
625565	572787	Frank Newberry House	Coupeville	R13104-471-4210	Not Determined	1912
625566	572788		Coupeville	S6005-00-05002-0	Not Determined	1912
625567	572789		Coupeville	R13110-338-3570	Not Determined	1912
625568	572790		Coupeville	R03225-330-4800	Not Determined	1913
625569	572791		Coupeville	R03225-297-4170	Not Determined	1913
625570	572792		Coupeville	R13232-058-1270	Not Determined	1913
625572	572794		Coupeville	S6415-00-17003-0	Not Determined	1915
625574	572795		Coupeville	R13232-189-0120	Not Determined	1916
409	401	Angel, Charles, House, Rojas House	Coupeville	S6425-00-04001-0	Not Determined	1917
625576	572796		Coupeville	R13102-500-0500	Not Determined	1918
625577	572797		Coupeville	S7070-00-10007-0	Not Determined	1918
625578	572798		Coupeville	R13232-140-5020	Not Determined	1918
625579	572799		Coupeville	S6425-00-02003-0	Not Determined	1920
625580	572800		Coupeville	R13232-128-4970	Not Determined	1920
625582	572801		Coupeville	R13103-410-2190	Not Determined	1920
625583	572802		Coupeville	R13233-096-1940	Not Determined	1923
625584	572803		Coupeville	S6415-00-26001-0	Not Determined	1923
625586	572805		Coupeville	R13232-190-4830	Not Determined	1925
625587	572806		Coupeville	S7215-00-02001-0	Not Determined	1925
625588	572807	Zylstra/Sherod House	Coupeville	R13219-478-3400	Not Determined	1925
625589	572808	Nathan Howard	Coupeville	R13103-290-2150	Determined Not Eligible, Not Determined	1924, 1925
625590	572809		Coupeville	S6025-00-04001-0	Not Determined	1925
625594	572812	Oly Allison House	Coupeville	R13219-430-3490	Not Determined	1925
410	402	Polly Harpole's Maternity Home	Coupeville	S6415-00-32006-0	Not Determined	1927
625597	572814		Coupeville	R13103-378-2330	Not Determined	1927
625600	572816		Coupeville	R13114-333-2200	Not Determined	1928
625602	572818		Coupeville	S6370-00-61010-0	Not Determined	1928
625603	572819		Coupeville	R13230-099-2780	Not Determined	1929
625604	572820		Coupeville	R13232-153-0280	Not Determined	1929
625606	572822		Coupeville	R13104-419-2260	Not Determined	1930

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625607	572823		Coupeville	R13230-038-3450	Not Determined	1930
625611	572827		Coupeville	R13234-476-2500	Not Determined	1932
625612	572828		Coupeville	R13230-215-2340	Not Determined	1932
625613	572829		Coupeville	R03225-355-2100	Not Determined	1932
625614	572830		Coupeville	R13230-251-0570	Not Determined	1932
625615	572831		Coupeville	R13103-357-0630	Not Determined	1932
625616	572832		Coupeville	S8060-00-09042-0	Not Determined	1932
625617	572833		Coupeville	R13103-157-2690	Not Determined	1932
625621	572837		Coupeville	R13114-410-1250	Not Determined	1933
326	318	Clark House	Coupeville	R13233-184-4510	Not Determined	1933
625623	572838		Coupeville	R13232-197-0060	Not Determined	1933
625631	572846		Coupeville	S7530-00-00006-3	Not Determined	1935
625632	572847		Coupeville	R13233-305-1520	Not Determined	1935
625633	572848		Coupeville	S8060-00-06016-0	Not Determined	1935
625634	572849		Coupeville	S7530-00-00003-1	Not Determined	1935
625635	572850		Coupeville	S8060-00-47001-0	Not Determined	1935
625637	572852		Coupeville	R13234-310-1560	Not Determined	1936
625639	572854		Coupeville	R13230-249-0750	Not Determined	1937
625643	572857		Coupeville	S7070-00-02000-1	Not Determined	1938
625739	572953		Coupeville	S7530-00-00006-2	Not Determined	1951
625741	572955		Coupeville	S6415-00-33001-0	Not Determined	1952
625742	572956		Coupeville	R13233-319-3870	Not Determined	1952
428	420	Boothe House	Coupeville	S6420-00-00005-2	Not Determined	1952
625744	572957		Coupeville	R13103-128-2840	Not Determined	1952
625745	572958		Coupeville	S8010-00-00093-0	Not Determined	1952
625746	572959	Private	Coupeville	R13219-317-3400	Determined Not Eligible, Not Determined	1952
625747	572960		Coupeville	R13230-003-3500	Not Determined	1952
625748	572961		Coupeville	R13103-045-1700	Not Determined	1952
625749	572962		Coupeville	R13233-170-0300	Not Determined	1952
625751	572964		Coupeville	S8010-00-00096-0	Not Determined	1952
625752	572965		Coupeville	S8010-00-00065-0	Not Determined	1952
625753	572966		Coupeville	R13111-060-0100	Not Determined	1953
625754	572967	Private	Coupeville	S7400-00-01026-0	Determined Not Eligible, Not Determined	1953
625755	572968		Coupeville	S6415-00-23001-0	Not Determined	1953

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625756	572969		Coupeville	S8010-00-00004-0	Not Determined	1953
625757	572970		Coupeville	S7215-00-02002-1	Not Determined	1953
625758	572971		Coupeville	S8010-00-00015-1	Not Determined	1953
625759	572972		Coupeville	R13234-322-0400	Not Determined	1953
625760	572973		Coupeville	S8010-00-00016-1	Not Determined	1953
625761	572974		Coupeville	R13103-274-1870	Not Determined	1953
625763	572976		Coupeville	R13115-345-4930	Not Determined	1954
625764	572977		Coupeville	S7400-00-04002-0	Not Determined	1954
625765	572978		Coupeville	S7400-00-03001-0	Not Determined	1954
625766	572979		Coupeville	S7400-00-01019-0	Not Determined	1954
625767	572980		Coupeville	S7530-00-0B009-0	Not Determined	1954
625768	572981		Coupeville	S8010-00-00019-0	Not Determined	1954
625769	572982		Coupeville	R13232-181-0160	Not Determined	1954
625770	572983		Coupeville	S7400-00-01022-0	Not Determined	1954
625771	572984		Coupeville	S7530-01-0000I-0	Not Determined	1954
625772	572985		Coupeville	S7530-01-0000E-0	Not Determined	1954
625773	572986		Coupeville	S7205-00-00006-0	Not Determined	1954
625774	572987		Coupeville	S6415-00-18006-0	Not Determined	1954
625775	572988		Coupeville	S6415-00-38008-0	Not Determined	1954
625777	572990		Coupeville	R13115-269-1350	Not Determined	1955
625778	572991		Coupeville	R13103-375-1830	Not Determined	1955
625779	572992		Coupeville	R13230-198-2660	Not Determined	1955
625780	572993		Coupeville	S6415-00-33005-0	Not Determined	1955
625782	572995		Coupeville	S7530-00-00011-0	Not Determined	1955
625783	572996		Coupeville	S7400-00-01008-0	Not Determined	1955
408	400	Heckenbury House, Masonic Rental House	Coupeville	R13233-344-3760	Not Determined	1955
625788	573000		Coupeville	S7400-00-01015-0	Not Determined	1956
625789	573001		Coupeville	S7400-00-01012-0	Not Determined	1956
625790	573002		Coupeville	S6415-00-18005-0	Not Determined	1956
625791	573003		Coupeville	R13233-194-2500	Not Determined	1956
625792	573004		Coupeville	S6025-00-02004-0	Not Determined	1956
625793	573005		Coupeville	S7530-00-0B010-0	Not Determined	1956
625794	573006		Coupeville	S7400-00-03007-0	Not Determined	1956
625795	573007		Coupeville	S8270-00-0F001-0	Not Determined	1956
625796	573008		Coupeville	S7400-00-01037-0	Not Determined	1956

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625797	573009		Coupeville	S7530-00-00001-0	Not Determined	1956
625798	573010		Coupeville	S8270-00-0F002-2	Not Determined	1956
625799	573011		Coupeville	S7400-00-01027-0	Not Determined	1956
625800	573012		Coupeville	R13232-174-4330	Not Determined	1956
625805	573017		Coupeville	S8060-00-48001-0	Not Determined	1957
625806	573018		Coupeville	S8270-00-0E004-0	Not Determined	1957
625807	573019		Coupeville	S8270-00-0E002-0	Not Determined	1957
625808	573020		Coupeville	S7400-00-05004-0	Not Determined	1957
625809	573021		Coupeville	S8270-00-0E003-0	Not Determined	1957
625810	573022		Coupeville	S7400-00-03025-0	Not Determined	1957
625811	573023		Coupeville	S7400-00-01031-0	Not Determined	1957
625812	573024		Coupeville	S7400-00-02003-0	Not Determined	1957
625813	573025		Coupeville	S8270-00-0F007-2	Not Determined	1957
625814	573026		Coupeville	S8270-00-0F004-2	Not Determined	1957
625815	573027		Coupeville	S8270-00-0E001-0	Not Determined	1957
625816	573028		Coupeville	S7400-00-03006-0	Not Determined	1957
625817	573029		Coupeville	R03225-245-5130	Not Determined	1957
625823	573035		Coupeville	S7400-00-02015-0	Not Determined	1958
625824	573036		Coupeville	S6415-00-06001-0	Not Determined	1958
625825	573037	Residence	Coupeville	S8270-00-0F007-1	Not Determined	1958
625826	573038		Coupeville	S7400-00-02004-0	Not Determined	1958
625828	573040		Coupeville	S8270-00-0F002-1	Not Determined	1958
625829	573041		Coupeville	R13233-190-1000	Not Determined	1958
625830	573042		Coupeville	S8270-00-0E005-0	Not Determined	1958
625831	573043		Coupeville	S7400-00-03008-0	Not Determined	1958
625934	573145	Private	Coupeville	R13233-188-2280	Determined Not Eligible, Not Determined	1963
625935	573146		Coupeville	R13233-182-4680	Not Determined	1963
625936	573147		Coupeville	S7400-00-05012-0	Not Determined	1963
625937	573148		Coupeville	R13103-049-5150	Not Determined	1963
625938	573149		Coupeville	R03225-413-4300	Not Determined	1963
625939	573150		Coupeville	S7530-00-0000A-1	Not Determined	1963
625940	573151		Coupeville	R13232-162-0230	Not Determined	1963
625941	573152		Coupeville	R13232-133-2400	Not Determined	1963
625958	573169		Coupeville	S6370-00-61008-0	Not Determined	1964

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
625964	573175		Coupeville	S8010-00-00082-0	Not Determined	1964
625965	573176		Coupeville	S6005-00-14001-2	Not Determined	1964
625967	573178		Coupeville	R13103-115-4620	Not Determined	1964
625968	573179		Coupeville	R13230-043-3150	Not Determined	1964
625970	573181		Coupeville	S7400-00-05001-1	Not Determined	1964
625981	573192		Coupeville	S7530-00-00009-0	Not Determined	1965
625982	573193		Coupeville	S7530-00-0000A-3	Not Determined	1965
625983	573194		Coupeville	S8010-00-00036-0	Not Determined	1965
625986	573197		Coupeville	R13104-496-3880	Not Determined	1965
625988	573199		Coupeville	R13103-270-2050	Not Determined	1965
625989	573200		Coupeville	S7450-00-00013-0	Not Determined	1965
625990	573201		Coupeville	R13234-381-4590	Not Determined	1965
625991	573202		Coupeville	S8010-00-00005-0	Not Determined	1965
626003	573214		Coupeville	R13114-116-3680	Not Determined	1966
626007	573218		Coupeville	S7450-00-00001-0	Not Determined	1966
626008	573219		Coupeville	R13234-317-5000	Not Determined	1966
626009	573220		Coupeville	S8010-00-00069-0	Not Determined	1966
626010	573221		Coupeville	R13103-407-4060	Not Determined	1966
626011	573222		Coupeville	S7400-00-01007-0	Not Determined	1966
626012	573223		Coupeville	R13103-105-2830	Not Determined	1966
626013	573224		Coupeville	S8010-00-00068-0	Not Determined	1966
626015	573226		Coupeville	S7530-00-00005-0	Not Determined	1966
627636	574847		Oak Harbor	R13221-046-1290	Not Determined	1912
627638	574849		Oak Harbor	R13222-114-3380	Not Determined	1912
627695	574906		Oak Harbor	R13222-114-3760	Not Determined	1922
627710	574921		Oak Harbor	R13223-378-0540	Not Determined	1924
627822	575033		Oak Harbor	S8060-00-73003-4	Not Determined	1939
627873	575084		Oak Harbor	S8050-00-12005-0	Not Determined	1943
628006	575217		Oak Harbor	S7730-00-00014-2	Not Determined	1949
628011	575222		Oak Harbor	S7730-00-00010-2	Not Determined	1949
628024	575235		Oak Harbor	S7730-00-00004-3	Not Determined	1949
628034	575245		Oak Harbor	S7730-00-00005-4	Not Determined	1950
628038	575249		Oak Harbor	S7730-00-00014-1	Not Determined	1950
628045	575256		Oak Harbor	S7730-00-00011-3	Not Determined	1950
628048	575259		Oak Harbor	S7730-00-00017-2	Not Determined	1950

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628053	575264		Oak Harbor	R13220-034-3440	Not Determined	1950
628059	575270		Oak Harbor	S7730-02-00059-0	Not Determined	1950
628061	575272		Oak Harbor	S7730-00-00010-1	Not Determined	1950
628063	575274		Oak Harbor	S7730-00-00013-5	Not Determined	1950
628075	575286		Oak Harbor	S7730-00-00020-3	Not Determined	1950
628080	575291		Oak Harbor	S8370-00-00001-0	Not Determined	1950
628184	575395		Oak Harbor	S7730-00-00019-1	Not Determined	1952
628187	575398		Oak Harbor	R13222-042-2320	Not Determined	1952
628188	575399		Oak Harbor	S7730-00-00015-1	Not Determined	1952
628200	575411		Oak Harbor	S7730-00-00005-1	Not Determined	1952
628210	575421		Oak Harbor	S7730-00-00009-1	Not Determined	1952
628211	575422		Oak Harbor	S8370-00-00004-0	Not Determined	1952
628229	575440		Oak Harbor	S8370-00-00005-0	Not Determined	1953
628237	575448		Oak Harbor	S7730-02-00025-0	Not Determined	1953
628250	575461		Oak Harbor	S7730-00-00008-3	Not Determined	1953
628252	575463		Oak Harbor	S7725-00-00001-0	Not Determined	1953
628257	575468		Oak Harbor	S7730-02-00063-0	Not Determined	1953
628275	575486		Oak Harbor	R13221-010-3550	Not Determined	1953
628372	575583		Oak Harbor	S7730-02-00048-0	Not Determined	1955
628375	575586		Oak Harbor	R13221-048-2090	Not Determined	1955
628381	575592		Oak Harbor	R13222-164-2540	Not Determined	1955
628385	575596		Oak Harbor	R13221-010-1970	Not Determined	1955
628387	575598		Oak Harbor	R13223-470-0630	Not Determined	1955
628389	575600		Oak Harbor	S7730-00-00012-2	Not Determined	1955
628399	575610		Oak Harbor	S7730-00-00003-1	Not Determined	1955
628411	575622		Oak Harbor	S7730-00-00003-2	Not Determined	1955
628439	575650		Oak Harbor	S7730-02-00029-0	Not Determined	1956
628445	575656		Oak Harbor	S7730-02-00051-0	Not Determined	1956
628450	575661		Oak Harbor	S7730-00-00006-3	Not Determined	1956
628451	575662		Oak Harbor	S7730-02-00053-0	Not Determined	1956
628463	575674		Oak Harbor	S7730-02-00057-0	Not Determined	1956
628608	575819		Oak Harbor	S7730-02-00035-2	Not Determined	1957
628616	575827		Oak Harbor	S7730-02-00075-0	Not Determined	1957
628624	575835		Oak Harbor	S7730-02-00023-0	Not Determined	1957
628630	575841		Oak Harbor	S7730-02-00070-2	Not Determined	1957

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
628631	575842		Oak Harbor	S7730-02-00066-0	Not Determined	1957
628637	575848		Oak Harbor	S7730-02-00068-0	Not Determined	1957
628652	575863		Oak Harbor	S7730-02-00073-0	Not Determined	1957
628814	576025		Oak Harbor	S7730-02-00019-0	Not Determined	1958
628975	576186		Oak Harbor	R13223-340-0720	Not Determined	1959
628990	576201		Oak Harbor	R13228-511-1960	Not Determined	1959
629129	576340		Oak Harbor	R13221-062-5200	Not Determined	1960
629142	576353		Oak Harbor	S8050-00-07026-0	Not Determined	1961
629161	576372		Oak Harbor	S8050-00-13008-0	Not Determined	1961
629165	576376		Oak Harbor	S8050-00-04001-0	Not Determined	1961
629177	576388		Oak Harbor	S7730-02-00001-0	Not Determined	1961
629182	576393		Oak Harbor	R13221-032-2250	Not Determined	1962
629195	576406		Oak Harbor	S8050-00-07007-0	Not Determined	1962
629202	576413		Oak Harbor	S8050-00-01002-0	Not Determined	1962
629203	576414		Oak Harbor	R13223-511-1120	Not Determined	1962
629212	576423		Oak Harbor	R13223-307-0450	Not Determined	1962
629312	576523		Oak Harbor	S7730-02-00028-0	Not Determined	1964
629319	576530		Oak Harbor	S7005-00-01009-1	Not Determined	1964
629327	576538		Oak Harbor	R13221-016-1760	Not Determined	1964
629334	576545		Oak Harbor	S7005-02-03008-0	Not Determined	1964
629356	576567		Oak Harbor	S8050-00-04022-0	Not Determined	1964
629376	576587		Oak Harbor	S7730-02-00015-0	Not Determined	1965
629402	576613		Oak Harbor	R13221-051-1540	Not Determined	1965
629403	576614		Oak Harbor	S8050-00-08044-0	Not Determined	1965
629511	576722		Oak Harbor	S7730-02-00074-0	Not Determined	1967
629515	576726		Oak Harbor	S7730-02-00065-0	Not Determined	1967
629519	576730		Oak Harbor	S8050-00-09029-0	Not Determined	1967
629521	576732		Oak Harbor	S7730-02-00041-1	Not Determined	1967
629524	576735		Oak Harbor	S7730-02-00049-0	Not Determined	1967
629528	576739		Oak Harbor	S7730-02-00054-0	Not Determined	1967
629533	576744		Oak Harbor	S7730-00-00013-1	Not Determined	1967
629535	576746		Oak Harbor	S7730-02-00046-0	Not Determined	1967
629536	576747		Oak Harbor	S7730-02-00040-0	Not Determined	1967
629538	576749		Oak Harbor	S7730-02-00024-0	Not Determined	1967
629540	576751		Oak Harbor	S7730-02-00038-0	Not Determined	1967

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629543	576754		Oak Harbor	R13221-169-5200	Not Determined	1967
629544	576755		Oak Harbor	S7730-00-00013-3	Not Determined	1967
629555	576766		Oak Harbor	S7730-02-00041-0	Not Determined	1967
629557	576768		Oak Harbor	S7730-02-00020-0	Not Determined	1967
629561	576772		Oak Harbor	S7730-00-00013-2	Not Determined	1967
629573	576784		Oak Harbor	S7730-02-00064-2	Not Determined	1968
629576	576787		Oak Harbor	S7730-02-00088-2	Not Determined	1968
629578	576789		Oak Harbor	S7730-02-00087-0	Not Determined	1968
629582	576793		Oak Harbor	S7730-02-00088-1	Not Determined	1968
629585	576796		Oak Harbor	S7730-02-00085-0	Not Determined	1968
629592	576803		Oak Harbor	S8050-02-18009-2	Not Determined	1968
629699	576910		Oak Harbor	S8050-00-06011-0	Not Determined	1968
629708	576919		Oak Harbor	S8050-00-10021-0	Not Determined	1969
629712	576923		Oak Harbor	S7730-02-00083-0	Not Determined	1969
629716	576927		Oak Harbor	S7730-02-00079-0	Not Determined	1969
629734	576945		Oak Harbor	S7730-02-00081-0	Not Determined	1969
629737	576948		Oak Harbor	S7730-02-00080-0	Not Determined	1969
629740	576951		Oak Harbor	S7730-02-00076-1	Not Determined	1969
629747	576958		Oak Harbor	S8050-00-01001-2	Not Determined	1969
629749	576960		Oak Harbor	R13221-164-3400	Not Determined	1969
629752	576963		Oak Harbor	S7730-02-00080-1	Not Determined	1969
629758	576969		Oak Harbor	S7730-02-00078-1	Not Determined	1969
629771	576982		Oak Harbor	S7730-00-00012-4	Not Determined	1969
629772	576983		Oak Harbor	S7725-00-00008-0	Not Determined	1969
629900	577110		Coupeville	R13230-187-0370	Not Determined	1959
629901	577111		Coupeville	R13233-249-3680	Not Determined	1968
629925	577135		Coupeville	S7246-00-00012-0	Not Determined	1890
441	433	Jenne, Jacob, House, Victorian Bed and Breakfast	Coupeville	R13233-279-3910	Not Determined	1889
629936	577145		Coupeville	R13102-427-4250	Not Determined	1955
439	431	Libbey, Joseph B., House	Coupeville	R13233-214-3740	Determined Eligible, Not Determined	1870
448	440	Leach House	Coupeville	R13233-344-3870	Not Determined	1878, 1883
328	320	Williams House	Coupeville	S6415-00-40001-0	Not Determined	1896
629956	577161		Coupeville	S6415-00-09003-0	Not Determined	1910
629957	577162		Coupeville	R13104-460-4100	Not Determined	1920

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
629958	577163		Coupeville	R13104-475-3900	Not Determined	1947
629960	577165		Coupeville	R13104-427-3800	Not Determined	1968
629969	577174		Coupeville	R13104-409-3940	Not Determined	1952
629979	577184		Coupeville	R13233-193-3970	Not Determined	1935
630081	577284	Chapman Rental House	Coupeville	R13104-436-3940	Not Determined	1918
159364	107200	Glenwood Hotel	Coupeville	R13233-380-3950	Not Determined	1890
440	432	Higgins House, Hecher and Donaldson Rental House, Dale Roundy Law Office	Coupeville	R13233-264-3900	Not Determined	1917
463	455	Dixon House, Partridge House, Community Alcohol Center, Penn Cove Veterinary Clinic	Coupeville	R13104-428-3940	Not Determined	1918
630099	577299		Coupeville	R13233-258-3970	Not Determined	1951
630100	577300		Coupeville	R13233-250-3850	Not Determined	1956
630101	577301		Coupeville	S6415-00-31007-0	Not Determined	1958
630102	577302		Coupeville	R13233-363-4140	Determined Not Eligible	1960
630103	577303		Coupeville	R13233-133-4550	Determined Not Eligible	1969
334	326	Coupeville City Hall	Coupeville	S6415-00-20005-0	Not Determined	1928
630124	577323	Island County Courthouse	Coupeville	S6415-00-21000-0	Not Determined	1948
630125	577324		Coupeville	R13233-240-3830	Not Determined	1968
630131	577330		Coupeville	R13122-410-0750	Not Determined	1940
630132	577331		Coupeville	R13116-271-4200	Not Determined	1940
630141	577340		Coupeville	R13233-380-3350	Not Determined	1874
630142	577341		Coupeville	R13233-230-3860	Not Determined	1959
445	437	Methodist Church, United Methodist Church	Coupeville	R13233-291-3850	Not Determined	1894
666911	613948	Kathleen Ryan	Coupeville		Determined Not Eligible	1960
278	270	Grennan and Cranney Store, Grennan and Cranney Store	Coupeville		Not Determined, Washington Heritage Register	1855
344	336	Griffith, Thomas, House, Brooks House	Coupeville	S6415-00-12001-0	Not Determined	1869
345	337	First Methodist Parsonage, Jefferds Rental House	Coupeville	S6415-00-09005-1	Not Determined	1890
347	339	Jefferds Rental House	Coupeville	S6415-00-13002-0	Not Determined	1920
363	355	Holbrook, Horace, House, Forrester, Alice, House	Coupeville	R13233-352-3600	Not Determined	1890
368	360	Howell House, Wright House	Coupeville	S6415-00-32004-0	Not Determined	1927
369	361	Clark, Ed, House, Bishop House	Coupeville	S6415-00-32003-0	Not Determined	1915
370	362	Morris House, Reynolds Rental House	Coupeville	S6415-00-32002-0	Not Determined	1910
374	366	Cushen House, Penn Cove Bed and Breakfast	Coupeville	R13233-363-3550	Not Determined	1925
376	368	Pontiac Dealership, Auto Barn	Coupeville	S6025-00-06001-3	Not Determined	1963
676408	622820	House	Coupeville	R13233-310-1640	Not Determined	1935
676414	622826	House	Coupeville	R13233-276-1160	Not Determined	1946

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
55501	44327	Mortar Battery Secondary Station, Fort Casey, None	Coupeville	Lot 1 of R13116-495-2950	Determined Eligible	1908
431	423	White, Dr., House	Coupeville	R13233-322-1850	Not Determined	1894
49281	39384	Rock Wall	Coupeville		Not Determined	1928
49283	39386	Fifth Street, Arnold Road	Coupeville	na	Not Determined	1890
49284	39387	Forest Street, Power Road	Coupeville	na	Not Determined	1890
49285	39388	Main Street, Holbrook Road	Coupeville	na	Not Determined	1890
49287	39390	Standard Oil Dock, Penn Cove Mussels, Inc. Dock	Coupeville		Not Determined	1915
88926	48429	Kineth, John Jr., Barn, Salmagundie Farms	Coupeville	R13101-287-1000	Not Determined, National Register, Not Determined, Washington Heritage Barn Register, Not Determined, Washington Heritage Register	1903
88927	48430	Crockett, Colonel Walter, Barn, Colonel Walter Crockett Farm	Coupeville	R13115-220-2200	Not Determined, National Register, Not Determined, Washington Heritage Barn Register, Not Determined, Washington Heritage Register	1895
88928	48431	Sherman Farm, Sherhill Vista Farms	Coupeville	R13109-086-1990	Not Determined	1942
88929	48432	Willow Wood Farm, Smith Farm	Coupeville	R13104-145-0170	Not Determined	1900
88930	48433	LeSourd Barn and Granary, Ebey Road Farm, Inc.	Coupeville	R13104-118-2490	Not Determined, National Register, Not Determined, Washington Heritage Barn Register, Not Determined, Washington Heritage Register	1923
626098	573309		Coupeville	S7400-00-01024-0	Not Determined	1969
626099	573310		Coupeville	S8160-00-03006-0	Not Determined	1969
626100	573311		Coupeville	S8160-00-13009-0	Not Determined	1969
626102	573313		Coupeville	S7760-00-03004-0	Not Determined	1969
626103	573314		Coupeville	S7400-00-04005-0	Not Determined	1969
201	193	Sherman Hog House	Coupeville		Not Determined, National Register, Not Determined, Washington Heritage Barn Register, Not Determined, Washington Heritage Register	1942
700399	662809	Willowood Barn, Willowood Farm; Smith Ranch	Coupeville		Determined Eligible, National Register, Determined Eligible, Washington Heritage Barn Register, Determined Eligible, Washington Heritage Register	1880
700400	662810	Barn, Tessaro Barn	Coupeville		Determined Eligible, National Register, Determined Eligible, Washington Heritage Barn Register, Determined Eligible, Washington Heritage Register	1905
700711	663121	Pratt Sheep Barn I, Pratt Farm	Coupeville		Determined Eligible, Washington Heritage Barn Register	1935

HISTORIC I	ResourceID	SiteNameHi	Loc FullAd	TaxParcel	RegisterTy	BuiltYear
700757	663167	Pratt Sheep Barn, Pratt Sheep Barn II	Coupeville		Determined Eligible, Washington Heritage Barn Register	1935
700759	663169	Crockett, Hugh, Barn, Boyer Farm	Coupeville		Determined Eligible, Washington Heritage Barn Register	1860

Note: Properties with resource ID 0 removed. Duplicate inventory records (by ResourceID) removed. Raw Data from DAHP GIS.

Historic Properties on DAHP GIS Data Summary Table

Historic Properties	Count
Determined Eligible for Local, State or National Register	14
Determined Not Eligible	22
Not Determined (Potentially Eligible)	876
Total	912

Washington Heritage Barn Register on DAHP GIS Data

SITE_ID	Comments	Elig_Name	STREET_ADD
IS00295	Jenne, Edward and Agnes, Farm	Washington Heritage Barn Register	Coupeville
IS00302	Calhoun, Thomas and Mary, Farm	Washington Heritage Barn Register	Coupeville
IS00313	Boyer, Freeman, Barn	Washington Heritage Barn Register	Coupeville
IS00314	Keith, Sam, Farm	Washington Heritage Barn Register	Coupeville
IS00338	Clark Sherman Farm	Washington Heritage Barn Register	Coupeville
IS00339	Rip, Lawrence and Joyce, Farm	Washington Heritage Barn Register	Coupeville
IS00340	Gus Reuble Farm	Washington Heritage Barn Register	Coupeville
IS00344	Pratt Sheep Barn I	Washington Heritage Barn Register	Coupeville
IS00345	Ernest Watson House	Washington Heritage Barn Register	Coupeville
IS00346	Harmon/Pearson/Engle Farm	Washington Heritage Barn Register	Coupeville
IS00347	Aloha Farms	Washington Heritage Barn Register	Coupeville
IS00352	Pratt Sheep Barn	Washington Heritage Barn Register	Coupeville
IS00354	Gallagher/Schreck/Sherman Farm	Washington Heritage Barn Register	Coupeville
IS00355	Crockett, Hugh, Barn	Washington Heritage Barn Register	Coupeville
IS00227	LeSourd Barn and Granary	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville
IS00229	Kineth, John Jr., Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville
IS00231	Sherman Hog House	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville
IS00232	Willowood Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville
IS00234	Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville

Washington Heritage Barn Register on DAHP GIS Data Summary Table

Washington Heritage Barn Register	Count
Listed	19

Historic Districts on DAHP GIS Data

SITE_ID	Comments	Elig_Name	STREET_ADD
DT00006	Central Whidbey Island Historic District	National Register, Washington Heritage Register	South of Oak Harbor, Roughly Six Miles Either Side of Coupeville, Coupeville, WA

Historic Districts on DAHP GIS Data Summary Table

Historic Districts	Count
Determined Eligible	1

Cemetery Sites on DAHP GIS Data

SITE_ID	Comments	Elig_Name
IS00049	PRE-CONTACT	Survey/Inventory
IS00050	PRE-CONTACT	Survey/Inventory
IS00300	PRE-CONTACT	Survey/Inventory
IS00052	PRE-CONTACT	Survey/Inventory
IS00054	PRE-CONTACT	Survey/Inventory
IS00061	PRE-CONTACT	Survey/Inventory
IS00331	PRE-CONTACT	Inventory
IS00075	PRE-CONTACT	Survey/Inventory
IS00077	PRE-CONTACT	Survey/Inventory
IS00088	PRE-CONTACT	Survey/Inventory
IS00217	PRE-CONTACT	Survey/Inventory
IS00218	PRE-CONTACT	Survey/Inventory
IS00235	PRE-CONTACT	Survey/Inventory
IS00263	PRE-CONTACT	Survey/Inventory
IS00271	CEMETERY	Inventory
IS00272	SNAKLIN MONUMENT	Inventory
IS00273	SUNNYSIDE CEMETERY	Inventory
IS00013	PRE-CONTACT	Survey/Inventory

Cemetery Sites on DAHP GIS Data Summary Table

Cemetery Sites	Count
Inventory	4
Survey/Inventory	14
Total	18

Washington Heritage Register Properties on DAHP GIS Data

SITE_ID	Comments	Elig_Name	STREET_ADD	Created_Da
IS00226	Crockett, Colonel Walter, Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register	Coupeville	01/01/09
IS00098	Grennan and Cranney Store	Washington Heritage Register	Coupeville	01/01/09

Washington Heritage Register Properties on DAHP GIS Data Summary Table

Washington Heritage Register	Count
Listed	2

Archaeological Sites on DAHP GIS Data Summary Table

Archaeological Sites	Count
Determined Eligible	6
Potentially Eligible	5
Unevaluated (Potentially Eligible)	84
Total	95

Enclosure (3)

Properties Listed for the National Register of Historic Places in Ebey's Landing National Historic Reserve and the Aggregate 65dB DNL

Reference Number	Name	Type	Location
73001869	Central Whidbey Island Historic District	District	Central Whidbey Island - Coupeville
77001334	Loers, Benjamin, House	Building	2046 Swantown Road - Oak Harbor
82004285	Deception Pass	Structure	Highway 20 - Anacortes

Properties Listed for the National Register of Historic Places in Ebey's Landing National Historic Reserve and the Aggregate 65dB DNL Summary Table

NRHP Listed Properties	Count
District	1
Building	1
Structure	1
Total	3

Context Bibliography

- Ames, K. and H.D.G. Maschner
1999 *Peoples of the Northwest Coast: Their Archaeology and Prehistory*. Thames and Hudson, New York.
- Bennett, L. A.
1972 *Effects of White Contact on the Lower Skagit Indians*. Washington Archaeological Society Occasional Paper No. 3. Washington Archaeological Society. Seattle
- Blukis Onat, A.
1987 *Resource Protection Planning Process Identification of Prehistoric Archaeological Resources in the Northern Puget Sound Study Unit*. Report prepared by Boas Inc., Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Cahail, A.K.
1901 *Sea Captains of Whidbey Island*. Island County Historical Society.

1939 *The Life of Dr. John Coe Kellogg*. Written by Alice Kellogg Cahail as told to her by her father Albert H. Kellogg, son of the Whidbey pioneer, Dr. John Coe Kellogg. Whidbey Island Farm Bureau News, published in installments from January 19 to February 23, 1939.
- Cardno TEC, Inc. (Cardno TEC)
2013 Final Naval Air Station Whidbey Island Cold War Historic Context. Prepared for NAVFAC Atlantic. July.
- Cole, D. and D. Darling
1990 History of the Early Period. In *Northwest Coast*. Ed. W. Suttles. Handbook of North American Indians, Vol. 7. W. C. Sturtevant, Gen Ed. Smithsonian Institution, Washington, D. C.
- Collins, J.M.
1974 *Valley of the Spirits: The Upper Skagit Indians of Western Washington*. University of Washington Press, Seattle.
- Cook, J.J.
1973 *A particular friend, Penn's Cove; a history of the settlers, claims, and buildings of central Whidbey Island*. Coupeville, Washington: Island County Historical Society.
- Dames and Moore
1994 Final Historic and Archaeological Resources Protection Plan, Naval Air Station Whidbey Island, Washington. Prepared for the U.S. Navy Engineering Field Activity, Northwest Naval Facilities Engineering Command.

- Darst, P.C.
 2005 *Spirit of the Island...A Photo History of Oak Harbor with Coupeville and San de Fuca on Beautiful Whidbey Isle*. Published by Author.
- 2014 *Oak Harbor* (Images of America). Charleston, South Carolina: Arcadia Publishing.
- Dickenson, R.E.
 1980 *Comprehensive Plan for Ebey's Landing National Historical Reserve*. National Park Service, Seattle, Washington.
- Duer, D.
 2009 *Ebey's Landing National Historical Reserve: An Ethnohistory of Traditionally Associated Contemporary Populations*. United States Department of the Interior, National Park Service. Pacific West Region Series in Social Science, Publication Number 2009-02.
- EDAW, Inc.
 1997 *Historic Resources Survey: Naval Air Station Whidbey Island*. EDAW, Inc., Seattle, Washington.
- Eells, M.
 1985 *The Indians of Puget Sound: The Notebooks of Myron Eells*. G.P. Castile, ed. Seattle, Washington. University of Washington Press.
- Evans-Hatch G. and M. Evans-Hatch
 2005 *Historic Resources Study: Ebey's Landing National Historical Reserve Whidbey Island, Washington*. National Park Service, Seattle, Washington.
- Goetz, L.N.
 1997 *Archaeological Resources Assessment and Protection Plan for the Naval Air Station Whidbey Island, Island County, Washington*. Prepared for Engineering Field Activity Northwest, Naval Facilities Engineering Command. Historical Research Associates, Inc.
- Governor's Office of Indian Affairs
 2013 *Treaty of Point Elliot*.
- Grossnick, R.A .
 1997 *United States Naval Aviation: 1910–1995*. Washington, D.C.: Naval Historical Center, Department of the Navy.
- Guss, E., J.C. O'Mahoney, and M. Richardson
 2014 *Whidbey Island Reflections on People and the Land*. The History Press, Charleston, South Carolina.

- Hampton, R. and M. Burkett
 2010 Final: Phase I Architecture Survey of Naval Air Station Whidbey Island. Island County, Washington. Vol. 1. Prepared by Hardlines Design Company for NAVFAC Atlantic. Norfolk, Virginia.
- Historical Research Associates, Inc. (HRA)
 1997 Archaeological Resources Assessment and Protection Plan for the Naval Air Station Whidbey Island, Island County Washington. Prepared for Engineering Field Activity Northwest, Poulsbo, Washington.
- Horr, D. A.
 1974 *American Indian Ethnohistory: Indians of the Northwest: Coast Salish and Western Washington Indians*. David Horr ed. Garland Publishing. New York.
- Historic Whidbey
 1993 *Sails, Steamships & Sea Captains: Settlement, Trade, and Transportation of Island County Between 1850–1900*. Coupeville, Washington.
- Kauhi, T.C. and J.L. Markert
 2009 Washington Statewide Archaeology Predictive Model Report. Prepared by GeoEngineers, Inc. Tacoma, Washington for the Washington Department of Archaeology and Historic Preservation, Olympia.
- Kellogg, G.A.
 1934 *A History of Whidbey's Island (Whidby Island), State of Washington*. Oak Harbor: George B. Astel Publishing Company
- Larson Anthropological Archeological Services Limited (LAAS)
 2000 Technical Report #2000-09. Victory Homes Demolition and Replacement, Seaplane Base Naval Air Station Whidbey Island County, Washington Archeological Resources and Traditional Cultural Places Overview. 5 May.
- Marino, C.
 1990 History of Western Washington Since 1846. In *Northwest Coast* Ed. By W. Suttles. Handbook of North American Indians, Vol. 7. W. C. Sturtevant, gen. ed.. Smithsonian Institution, Washington, D. C.
- McClary, D.
 2005 *Island County -- Thumbnail History*. HistoryLink.org Essay 7523.
- McRoberts, P.
 2003 North Coast Indians, likely members of the Kake tribe of Tlingits, behead Isaac Ebey on August 11, 1857. HistoryLink.org Essay 5302.

- National Cooperative Highways Research Program
 2012 A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing, Report 723. Transportation and Research Board, Washington D.C.
- National Park Service
 1983 Building and Landscape Inventory, Part B, Ebey's Landing National Historical Reserve. Seattle, Washington.
 2005 Ebey's Landing National Historical Reserve. Draft General Management Plan and Environmental Impact Statement. Seattle, Washington
- Navy Facilities Engineering Command (NAVFAC)
 2016 Naval Air Station Whidbey Island Integrated Cultural Resources Management Plan. United States Navy. United States Naval Facilities Engineering Command, Northwest.
- Neil, D. and L. Brainard
 1989 *By Canoe and Sailing Ship They Came: A History of Whidbey's Island*. Oak Harbor, Spindrift Publishing Co.
- Neil, D., and Island Images, Inc.
 1992 *Deja Views: Historical Pictorial of Whidbey Island: From the files of Dorothy Neil*. Oak Harbor, Washington (P.O. Box 808, Oak Harbor 98277): Island Images.
- Nelson, C.M.
 1990 Prehistory of the Puget Sound Region. In *Northwest Coast*, Edited by Wayne Suttles. pp. 481-484. Handbook of North American Indians, Vol. 7, W. C. Sturtevant general editor, Smithsonian Institution, Washington, D.C.
- Newberry, R.
 2014 *Kake return to Ebey's Landing after 157 years*. Wed Aug 27th, 2014. South Whidbey Record.
- Riddle, M.
 2010 *Coupeville -- Thumbnail History*. HistoryLink.org Essay 9587.
- Ruby, R.H., and J.A. Brown
 1992 *Guide to the Indian Tribes of the Pacific Northwest*. Revised Edition. University of Oklahoma Press, Norman, Oklahoma.
- Salmon, J.S.
 2011 *Protecting America: Cold War Defensive Sites, A National Historic Landmark Theme Study*. Washington, D.C.: U.S. Department of the Interior.

- Shefry, M.S. and W.R. Luce
1998 Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years (Revised). National Register Bulletin 22, U.S. Department of the Interior
- Smith, M.W.
1941 The Coast Salish of Puget Sound. *American Anthropologist* 43:197–211.
- Sno-Isle Genealogical Society
2002–2009 *Souvenir Edition, commemorating Whidbey Island's Centennial, 1848–1948; reviewing one hundred years of progress on Whidbey Island.* 1948. Langley, Wash.
- Steen, S. and A. Simpkins
2016 Ebey's Landing National Historical Reserve Historic buildings Inventory 2016 Update. National Park Service, Seattle, Washington.
- Stein, J.K.
2000 *Exploring Coast Salish Prehistory: The Archaeology of San Juan Island.* Burke Museum Monographs, Seattle, Washington.
- Stell Environmental Enterprises, Inc. (Stell)
2013 Final Archaeological Inventory of Naval Outlying Landing Field Coupeville and Select Lands of Ault Field, Naval Air Station Whidbey Island, Island County, Washington. Prepared by Jason Jones and Michael Chidley for NAVFAC Northwest. September.

2017 Early Euro-American Settlement Study and Context Report Naval Air Station Whidbey Island. Prepared for Naval Facilities Engineering Command, Atlantic.
- Stell Environmental Enterprises, Inc. (Stell) and Cardno TEC
2013 Final: Naval Air Station Whidbey Island Cold War Study Phase 2: Inventory and Evaluation. Prepared for Naval Facilities Engineering Command, Northwest.
- Sundberg, T.J.
1961 *Portrait of an island.* Whidbey Press: Oak Harbor, Washington.
- Suttles, W. and B. Lane
1990 Southern Coast Salish. In *Northwest Coast*, edited by W. Suttles, pp. 485-502. Handbook of North American Indians, vol. 7. W. C. Sturtvant, General Editor. Smithsonian Institution, Washington, D. C.
- Thompson, G.

- 1978 Prehistoric Settlement Changes in the Southern Northwest Coast: A Functional Approach. *University of Washington Reports in Archaeology* 5. Seattle, Washington.
- Trebon, T.
2000 Beyond Isaac Ebey: Tracing the Remnants of Native American Culture on Whidbey Island. *Columbia* (Fall 20000): 6-11.
- Upchurch, O.C. (as presented in Duer 2009)
1936 The Swinomish People and Their State. *Pacific Northwest Quarterly*. 27 (4)
- Wessen, G.C.
1988 *Prehistoric Cultural Resources of Island County*. A report prepared for the Washington State Department of Community Development, Office of Archaeology and Historic Preservations. July 1988.
- White, R.
1992 *Land Use, Environment, and Social Change: The Shaping of Island County, Washington*. University of Washington Press, Seattle, Washington.
- Wilma, D., and P. Long
2003 *Dutch colonists arrive at Oak Harbor, Whidbey Island, on March 17, 1894*. HistoryLink.org Essay 5432.
- Weyeneth, R.R.
1989 *Survey of Historic Resources in the NAS Whidbey Island Study Area*. Past Perfect Historical and Environmental Consulting, Bellingham, WA.



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2800
July, 19 2017

Dr. Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: CONTINUING SECTION 106 CONSULTATION ON
THE IDENTIFICATION EFFORT FOR THE PROPOSED INCREASE IN EA-
18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY
ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. The Navy thanks you for your comments on our identification methodology and appreciates your continued participation in the Section 106 consultation. The Navy will carefully take your comments and recommendations into consideration. This letter is to provide you an update on our identification effort.

We are currently in the process of gathering information on historic properties in the APE. The Navy is working with your staff to schedule a meeting to discuss this effort in greater detail. To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation (DAHP) Geographic Information System (GIS) data, the National Register of Historic Places (NRHP), NAS Whidbey Island records, and the 2016 Ebey's Landing National Historical Reserve (ELNHR) Historic Building Inventory Update (Enclosures 1-4). The summary tables comprise data gathered from existing information and provided by consulting parties. The summary tables include:

Enclosure 1. Historic properties identified in the 65 dB DNL contour line.

Enclosure 2. Historic buildings identified in the ELNHR derived from the ELNHR's 2016 Inventory Update.

Enclosure 3. Historic properties identified in the ELNHR.

Enclosure 4. All listed historic properties in the NRHP.

5090
Ser N44/2800
July 19, 2017

Data provided in enclosures (2) and (3) may be duplicate in some instances for buildings and structures.

In addition, the Navy invites you to comment on our preliminary context bibliography (Enclosure 5). The unique juxtaposition of federal properties and the ELNHR, with a community that celebrates the local and national historic setting provides a wealth of contextual information to expand upon. The enclosed bibliography draws upon existing information and provides a foundation to elaborate upon the broad description and patterns of historical development within the APE. Please note that the bibliography includes the Cold War Historic Context Study for NAS Whidbey Island and a number of guidance documents on identifying and evaluating Post World War II historic properties.

Finally, per 36 CFR 800.4(a)(4) the Navy is consulting with Indian Tribes to identify properties of religious and cultural significance within the area of potential effect.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with SHPO and our other consulting parties. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

- Enclosures:
1. Historic properties in the 65 dB DNL contour line
 2. Historic buildings in the ELNHR derived from the ELNHR's 2016 Inventory
 3. Historic properties identified in the ELHNR
 4. All listed historic properties in the NRHP
 5. Historic Context Bibliography



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2791
July 19, 2017

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE IDENTIFICATION EFFORT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. This letter is to provide you an update on our effort to identify historic properties within the area of potential effect (APE). The Navy welcomes your comments or any further information about historic properties in the area.

We are currently in the process of gathering information on historic properties in the APE. To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation (DAHP) Geographic Information System (GIS) data, the National Register of Historic Places (NRHP), NAS Whidbey Island records, and the 2016 Ebey's Landing National Historical Reserve (ELNHR) Historic Building Inventory Update (Enclosures 1-4). The summary tables comprise data gathered from existing information and provided by consulting parties. The summary tables include:

Enclosure 1. Historic properties identified in the 65 dB DNL contour line.

Enclosure 2. Historic buildings identified in the ELNHR derived from the ELNHR's 2016 Inventory Update.

Enclosure 3. Historic properties identified in the ELNHR.

Enclosure 4. All listed historic properties in the NRHP.

Data provided in enclosures (2) and (3) may be duplicate in some instances for buildings and structures.

5090
Ser N44/2791
July 19, 2017

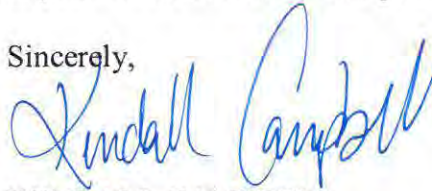
In addition, the Navy invites you to comment on our preliminary context bibliography (Enclosure 5). The unique juxtaposition of federal properties and the ELNHR, with a community that celebrates the local and national historic setting provides a wealth of contextual information to expand upon. The enclosed bibliography draws upon existing information and provides a foundation to elaborate upon the broad description and patterns of historical development within the APE.

The Navy understands that the project area and its surrounding location may have cultural importance and significance to your tribe. Section 106 of the NHPA requires federal agencies to seek information from tribes likely to have knowledge of, or concerns with, historic resources within the project's APE. We are specifically seeking your comments on our proposed APE and any knowledge or concerns about properties that may have religious or cultural significance and may be eligible for listing in the National Register of Historic Places, including Traditional Cultural Properties.

We appreciate any assistance you could provide us in our efforts to comply with Section 106 of the NHPA. Please be assured that the Navy will treat any information you share with us with the degree of confidentiality that is required in Section 800.11(c) of the NHPA, or with any other special restrictions you may require.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with SHPO and our other consulting parties. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

- Enclosures:
1. Historic properties in the 65 dB DNL contour line
 2. Historic buildings in the ELNHR derived from the ELNHR's 2016 Inventory
 3. Historic properties identified in the ELHNR
 4. All listed historic properties in the NRHP
 5. Historic Context Bibliography



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2787
July 19, 2017

Mr. Ken Pickard
President
Citizens of Ebey's Reserve
P.O. Box 202
Coupeville, WA 98239-0202

Dear Mr. Pickard:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE IDENTIFICATION EFFORT FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. This letter is to provide you an update on our effort to identify historic properties within the area of potential effect (APE). The Navy welcomes your comments or any further information about historic properties in the area.

We are currently in the process of gathering information on historic properties in the APE. To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation (DAHP) Geographic Information System (GIS) data, the National Register of Historic Places (NRHP), NAS Whidbey Island records, and the 2016 Ebey's Landing National Historical Reserve (ELNHR) Historic Building Inventory Update (Enclosures 1-4). The summary tables comprise data gathered from existing information and provided by consulting parties. The summary tables include:

Enclosure 1. Historic properties identified in the 65 dB DNL contour line.

Enclosure 2. Historic buildings identified in the ELNHR derived from the ELNHR's 2016 Inventory Update.

Enclosure 3. Historic properties identified in the ELNHR.

Enclosure 4. All listed historic properties in the NRHP.

Data provided in enclosures (2) and (3) may be duplicate in some instances for buildings and structures.

5090
Ser N44/2787
July 19, 2017

In addition, the Navy invites you to comment on our preliminary context bibliography (Enclosure 5). The unique juxtaposition of federal properties and the ELNHR, with a community that celebrates the local and national historic setting provides a wealth of contextual information to expand upon. The enclosed bibliography draws upon existing information and provides a foundation to elaborate upon the broad description and patterns of historical development within the APE.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with SHPO and our other consulting parties. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,



KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer

- Enclosures:
1. Historic properties in the 65 dB DNL contour line
 2. Historic buildings in the ELNHR derived from the ELNHR's 2016 Inventory
 3. Historic properties identified in the ELHNR
 4. All listed historic properties in the NRHP
 5. Historic Context Bibliography



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/3313
October 2, 2017

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: CONTINUING SECTION 106 CONSULTATION FOR THE PROPOSED
INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION
WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. The Navy appreciates your continued participation in the Section 106 consultation.

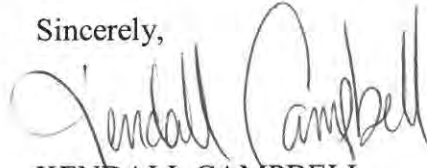
This letter is to inform you that completion of the section 106 analysis for the EA-18G Growler Operations EIS will be extended, as the Navy has decided to extend the timeline for completion of the Final EIS. During this additional time, the Navy will conduct additional analysis to incorporate changes to Navy training requirements that may reduce impacts to local communities. These changes are based on the introduction of new landing technologies that would reduce the Navy's requirement for Field Carrier Landing Practice (FCLP) and result in fewer operations and personnel than previously projected. The Navy will also consider additional FCLP distribution options between Ault Field and OLF Coupeville that may further mitigate noise impacts.

The Navy recognizes that aircraft noise can adversely affect the setting of certain noise-sensitive historic properties and cannot complete the section 106 process until the noise models are revised to incorporate changes to the Navy's training requirements. Should the additional noise modeling result in a change to the proposed 65 dB DNL noise contour line, the Navy will adjust the Area of Potential Effects (APE) accordingly. While the new noise analysis is being performed, the Navy will continue to work on the section 106 identification effort. Specifically, we will continue to compile information about historic properties within the APE. However, we will wait for the new noise analysis to conduct a determination of effects analysis.

5090
Ser N44/3313
October 2, 2017

The Navy welcomes your comments and will continue to take any comments received into consideration as we continue our identification efforts. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink that reads "Kendall Campbell". The signature is written in a cursive style with a large, looping initial "K".

KENDALL CAMPBELL

NASWI Cultural Resources Program Manager and
Archaeologist

By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/3312
October 2, 2017

Dr. Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: CONTINUING SECTION 106 CONSULTATION FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. The Navy appreciates your continued participation in the Section 106 consultation.

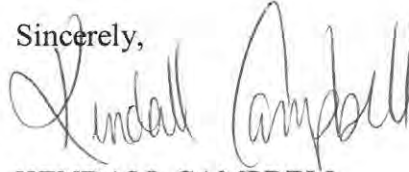
This letter is to inform you that completion of the section 106 analysis for the EA-18G Growler Operations EIS will be extended, as the Navy has decided to extend the timeline for completion of the Final EIS. During this additional time, the Navy will conduct additional analysis to incorporate changes to Navy training requirements that may reduce impacts to local communities. These changes are based on the introduction of new landing technologies that would reduce the Navy's requirement for Field Carrier Landing Practice (FCLP) and result in fewer operations and personnel than previously projected. The Navy will also consider additional FCLP distribution options between Ault Field and OLF Coupeville that may further mitigate noise impacts.

The Navy recognizes that aircraft noise can adversely affect the setting of certain noise-sensitive historic properties and cannot complete the section 106 process until the noise models are revised to incorporate changes to the Navy's training requirements. Should the additional noise modeling result in a change to the proposed 65 dB DNL noise contour line, the Navy will adjust the Area of Potential Effects (APE) accordingly. While the new noise analysis is being performed, the Navy will continue to work on the section 106 identification effort. Specifically, we will continue to compile information about historic properties within the APE. However, we will wait for the new noise analysis to conduct a determination of effects analysis.

5090
Ser N44/3312
October 2, 2017

The Navy welcomes your comments and will continue to take any comments received into consideration as we continue our identification efforts. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

A handwritten signature in cursive script that reads "Kendall Campbell".

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/3318
October 2, 2017

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: CONTINUING SECTION 106 CONSULTATION FOR THE PROPOSED
INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION
WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. The Navy appreciates your continued participation in the Section 106 consultation.

This letter is to inform you that completion of the section 106 analysis for the EA-18G Growler Operations EIS will be extended, as the Navy has decided to extend the timeline for completion of the Final EIS. During this additional time, the Navy will conduct additional analysis to incorporate changes to Navy training requirements that may reduce impacts to local communities. These changes are based on the introduction of new landing technologies that would reduce the Navy's requirement for Field Carrier Landing Practice (FCLP) and result in fewer operations and personnel than previously projected. The Navy will also consider additional FCLP distribution options between Ault Field and OLF Coupeville that may further mitigate noise impacts.

The Navy recognizes that aircraft noise can adversely affect the setting of certain noise-sensitive historic properties and cannot complete the section 106 process until the noise models are revised to incorporate changes to the Navy's training requirements. Should the additional noise modeling result in a change to the proposed 65 dB DNL noise contour line, the Navy will adjust the Area of Potential Effects (APE) accordingly. While the new noise analysis is being performed, the Navy will continue to work on the section 106 identification effort. Specifically, we will continue to compile information about historic properties within the APE. However, we will wait for the new noise analysis to conduct a determination of effects analysis.

The Navy understands that the project area and its surrounding location may have cultural importance and significance to your tribe. Section 106 of the NHPA requires federal agencies to seek information from tribes likely to have knowledge of, or concerns with, historic resources within the project's APE. We are specifically seeking your comments on our proposed APE and

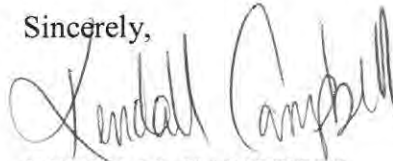
5090
Ser N44/3318
October 2, 2017

any knowledge or concerns about properties that may have religious or cultural significance and may be eligible for listing in the National Register of Historic Places, including Traditional Cultural Properties.

We appreciate any assistance you could provide us in our efforts to comply with section 106 of the NHPA. Please be assured that the Navy will treat any information you share with us with the degree of confidentiality that is required in Section 800.11(c) of the NHPA, or with any other special restrictions you may require.

The Navy welcomes your comments and will continue to take any comments received into consideration as we continue our identification efforts. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink that reads "Kendall Campbell". The signature is written in a cursive style with a large, looping initial "K".

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/3314
October 2, 2017

Mr. Ken Pickard
President
Citizens of Ebey's Reserve
P.O. Box 202
Coupeville, WA 98239-0202

Dear Mr. Pickard:

SUBJECT: CONTINUING SECTION 106 CONSULTATION FOR THE PROPOSED
INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION
WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 CFR section 800, Naval Air Station (NAS) Whidbey Island is continuing consultation for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington. The Navy appreciates your continued participation in the Section 106 consultation.

This letter is to inform you that completion of the section 106 analysis for the EA-18G Growler Operations EIS will be extended, as the Navy has decided to extend the timeline for completion of the Final EIS. During this additional time, the Navy will conduct additional analysis to incorporate changes to Navy training requirements that may reduce impacts to local communities. These changes are based on the introduction of new landing technologies that would reduce the Navy's requirement for Field Carrier Landing Practice (FCLP) and result in fewer operations and personnel than previously projected. The Navy will also consider additional FCLP distribution options between Ault Field and OLF Coupeville that may further mitigate noise impacts.

The Navy recognizes that aircraft noise can adversely affect the setting of certain noise-sensitive historic properties and cannot complete the section 106 process until the noise models are revised to incorporate changes to the Navy's training requirements. Should the additional noise modeling result in a change to the proposed 65 dB DNL noise contour line, the Navy will adjust the Area of Potential Effects (APE) accordingly. While the new noise analysis is being performed, the Navy will continue to work on the section 106 identification effort. Specifically, we will continue to compile information about historic properties within the APE. However, we will wait for the new noise analysis to conduct a determination of effects analysis.

5090
Ser N44/3314
October 2, 2017

The Navy welcomes your comments and will continue to take any comments received into consideration as we continue our identification efforts. If you require additional information, I can be reached at (360) 257-6780 or kendall.campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink that reads "Kendall Campbell". The signature is written in a cursive style with a large initial "K".

KENDALL CAMPBELL
NASWI Cultural Resources Program Manager and
Archaeologist
By Direction of the Commanding Officer



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2077
June 25, 2018

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1063 South Capital Way, Suite 106
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 102214-23-USN: REQUEST FOR SECTION 106 CONSULTATION ON THE FINDING OF ADVERSE EFFECT TO HISTORIC PROPERTIES FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR 800, Naval Air Station (NAS) Whidbey Island is continuing consultation, and asks for your concurrence on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington.

The Navy has determined that the proposed undertaking is a Historic Properties Adversely Affected for indirect adverse effects to the Central Whidbey Island Historic District as a result of more frequent aircraft operations affecting certain landscape components of the district, specifically the perceptual qualities on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington in five locations (Enclosure 1).

The Navy understands that the Area of Potential Effect and its surrounding location may have cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy is continuing consultation with the Swinomish Indian Tribal Community, the Samish Indian Nation, the Upper Skagit Indian Tribe, the Stillaguamish Tribe of Indians, Lummi Nation, Tulalip Tribe, Suquamish Tribe, and Jamestown S'Klallam Indian Tribe. Results of tribal consultation may be provided to your office.

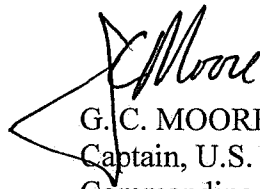
The Navy is also continuing consultation with the Advisory Council on Historic Preservation (ACHP), National Park Service, Trust Board of Ebey's Landing National Historical Reserve, Island County Commissioners, Washington State Parks, Seattle Pacific University, Citizens of Ebey's Reserve, David, Day, Port Townsend Historical Society, City of Port

5090
Ser N44/2077
June 25, 2018

Townsend, and Town of Coupeville. Results of this consultation may also be provided to your office.

The Navy requests your concurrence with the finding of Adverse Effects to Historic Properties for the proposed undertaking. If you require additional information, please contact Ms. Kendall Campbell, the NAS Whidbey Island Cultural Resources Program Manager and Archaeologist, at (360) 257-6780 or email at Kendall.Campbell1@navy.mil.

Sincerely,


G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. Finding of Effects Determination



June 27, 2018

Ms. Kendall Campbell
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

Re: Increase in EA-18G Growler Operations
Log No.: 102214-23-USN

Dear Ms. Campbell:

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Increase in EA-18G Growler Operations at Naval Air Station Whidbey Island, Whidbey Island, Island County, Washington.

We concur with your Determination of Adverse Effect. We look forward to further consultations and the development of a Memorandum of Agreement (MOA) to address the identified Adverse Effect.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

We look forward to further substantive consultations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Whitlam', with a long horizontal line extending to the right.

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: rob.whitlam@dahp.wa.gov





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2078
June 25, 2018

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Fowler:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE FINDING OF ADVERSE EFFECT TO HISTORIC PROPERTIES FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR 800, Naval Air Station (NAS) Whidbey Island is continuing consultation and asks for your concurrence on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington.

The Navy has determined that the proposed undertaking is a Historic Properties Adversely Affected for indirect adverse effects to the Central Whidbey Island Historic District as a result of more frequent aircraft operations affecting certain landscape components of the district, specifically the perceptual qualities on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington.in five locations (Enclosure 1).

The Navy understands that the Area of Potential Effect and its surrounding location may have cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy is continuing consultation with the Swinomish Indian Tribal Community, the Samish Indian Nation, the Upper Skagit Indian Tribe, the Stillaguamish Tribe of Indians, Lummi Nation, Tulalip Tribe, Suquamish Tribe, and Jamestown S'Klallam Indian Tribe. Results of tribal consultation may be provided to your office.

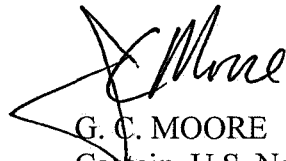
The Navy is also continuing consultation with the Washington State Historic Preservation Officer (SHPO), National Park Service, Trust Board of Ebey's Landing National Historical Reserve, Island County Commissioners, Washington State Parks, Seattle Pacific University, Citizens of Ebey's Reserve, David, Day, Port Townsend Historical Society, City of Port

5090
Ser N44/2078
June 25, 2018

Townsend, and Town of Coupeville. Results of this consultation may also be provided to your office.

The Navy requests your concurrence with the finding of Adverse Effects to Historic Properties for the proposed undertaking. If you require additional information, please contact Ms. Kendall Campbell, the NAS Whidbey Island Cultural Resources Program Manager and Archaeologist, at (360) 257-6780 or email at Kendall.Campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "G. C. Moore". The signature is written in a cursive style and is positioned above the printed name.

G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. Finding of Effects Determination



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090

Ser N44/2079

June 25, 2018

Mr. David Brownell
Cultural Resources Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Mr. Brownell:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE FINDING OF ADVERSE EFFECT TO HISTORIC PROPERTIES FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON.

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations 36 CFR 800, Naval Air Station (NAS) Whidbey Island is continuing consultation and asks for your comments on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington.

The Navy has determined that the proposed undertaking is a Historic Properties Adversely Affected for indirect adverse effects to the Central Whidbey Island Historic District as a result of more frequent aircraft operations affecting certain landscape components of the district, specifically the perceptual qualities on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington in five locations (Enclosure 1).

The Navy understands that the Area of Potential Effect (APE) and its surrounding location may have cultural importance and significance to your tribe. Section 106 of the NHPA requires federal agencies to seek information from tribes likely to have knowledge of, or concerns with, historic resources within the project's APE. We are specifically seeking your comments on our proposed determination of effects, and any knowledge or concerns about properties that may have religious or cultural significance and may be eligible for listing in the National Register of Historic Places, including Traditional Cultural Properties.

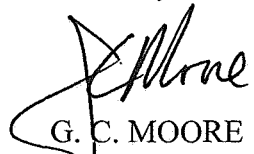
The Navy is also continuing consultation with the Advisory Council on Historic Preservation (ACHP), the Washington State Historic Preservation Officer (SHPO), National Park Service, Trust Board of Ebey's Landing National Historical Reserve, Island County Commissioners, Washington State Parks, Seattle Pacific University, Citizens of Ebey's Reserve, David, Day, Port Townsend Historical Society, City of Port Townsend, and Town of Coupeville. Results of this consultation may also be provided to your office.

5090
Ser N44/2079
June 25, 2018

We appreciate any assistance you could provide us in our efforts to comply with Section 106 of the NHPA. Please be assured that the Navy will treat any information you share with us with the degree of confidentiality that is required in Section 800.11(c) of the NHPA, or with any other special restrictions you may require.

The Navy requests your comments with the finding of Adverse Effects to Historic Properties for the proposed undertaking. If you require additional information, please contact Ms. Kendall Campbell, the NAS Whidbey Island Cultural Resources Program Manager and Archaeologist, at (360) 257-6780 or email at Kendall.Campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "G. C. Moore". The signature is stylized with a large, sweeping initial "G" and "M".

G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. Finding of Effects Determination



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2087
June 25, 2018

Ms. Maryon Attwood
President
Citizens of Ebey's Reserve
P.O. Box 202
Coupeville, WA 98239-0202

Dear Ms. Attwood:

SUBJECT: CONTINUING SECTION 106 CONSULTATION THE FINDING OF ADVERSE EFFECT TO HISTORIC PROPERTIES FOR THE PROPOSED INCREASE IN EA-18G GROWLER OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR 800, Naval Air Station (NAS) Whidbey Island is continuing consultation, and asks for your comments on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington.

The Navy has determined that the proposed undertaking is a Historic Properties Adversely Affected for indirect adverse effects to the Central Whidbey Island Historic District as a result of more frequent aircraft operations affecting certain landscape components of the district, specifically the perceptual qualities on our finding of Historic Properties Adversely Effected for the proposed increase of EA-18G Growler operations at NAS Whidbey Island, Island County, Washington.in five locations (Enclosure 1).

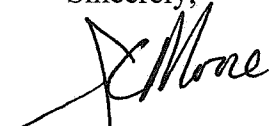
The Navy understands that the Area of Potential Effect and its surrounding location may have cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy is continuing consultation with the Swinomish Indian Tribal Community, the Samish Indian Nation, the Upper Skagit Indian Tribe, the Stillaguamish Tribe of Indians, Lummi Nation, Tulalip Tribe, Suquamish Tribe, and Jamestown S'Klallam Indian Tribe.

The Navy is also continuing consultation with the Advisory Council on Historic Preservation (ACHP), Washington State Historic Preservation Officer (SHPO), National Park Service, Trust Board of Ebey's Landing National Historical Reserve, Island County Commissioners, Washington State Parks, Seattle Pacific University, Citizens of Ebey's Reserve, David, Day, Port Townsend Historical Society, City of Port Townsend, and Town of Coupeville. Results of this consultation may also be provided to your office.

5090
Ser N44/2087
June 25, 2018

The Navy requests your comments on the finding of Adverse Effects to Historic Properties for the proposed undertaking. If you require additional information, please contact Ms. Kendall Campbell, the NAS Whidbey Island Cultural Resources Program Manager and Archaeologist, at (360) 257-6780 or email at Kendall.Campbell1@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "G. C. Moore". The signature is written in a cursive style and is positioned above the printed name.

G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. Finding of Effects Determination

Section 106 Determination of Effect for the EA-18G “Growler” Airfield Operations at the Naval Air Station Whidbey Island Complex

Executive Summary

The United States (U.S.) Department of the Navy (Navy) is continuing consultation and conducting an identification effort and determination of effect under Section 106 of the National Historic Preservation Act of 1966 (NHPA) for the increase in EA-18G “Growler” aircraft and airfield operations at Naval Air Station (NAS) Whidbey Island. The results of the Navy’s identification effort and determination of effects are reflected in the following document. In addition, this document summarizes consultation efforts for this undertaking under NHPA per 36 CFR 800 and presents information requested during previous consultations through correspondence and meetings conducted between October 2014 and October 2017.

The Navy has determined that the proposed undertaking is a “Historic Properties Adversely Affected”. The increased frequentness of noise exposure results in adverse indirect effects to characteristics of the Central Whidbey Island Historic District that currently make it eligible for the National Register of Historic Places (NRHP). Although the effects are intermittent, the proposed undertaking would result in an increased occurrence of noise exposure affecting certain cultural landscape components in the historic district—specifically, the perceptual qualities of five locations that contribute to the significance of the landscapes. The Navy finds no other adverse effects to historic properties from the proposed undertaking.

This documents describes how the Navy applied the criteria of adverse effect to historic properties within the area of potential effects (APE) and assessed whether the proposed undertaking may directly or indirectly alter the characteristics that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property. As defined in consultation, the APE comprises four components:

- On-installation Direct Effect Areas: Areas on the installation where historic properties could be directly affected (i.e., by ground disturbance, demolition, or alteration).
 - On-installation Indirect Effect Areas: Areas within the installation bounded by the 65 decibel (dB) day-night average sound level (DNL) noise contours where historic properties could remain physically undisturbed but potentially subject to effects from the introduction of visual, atmospheric, or audible elements that occur when aircraft are seen or heard flying in the vicinity.
- Off-installation Indirect Effect Areas: Areas off installation within operational areas bounded by the 65 dB DNL noise contours and potentially subject to effects from the introduction of visual, atmospheric, or audible elements to the setting that occur when aircraft are seen or heard flying in the vicinity.
- Ebey’s Landing National Historical Reserve (ELNHR)

To minimize the adverse indirect effects of the proposed undertaking, the Navy would continue to implement current policies that are in place to minimize auditory, visual, and atmospheric effects of flight operation on the surrounding community, including the following:

- Implementing flight path noise abatement patterns that direct inter-facility flights away from land and directing pilots to keep aircraft above minimum flight altitude standards set by the Federal Aviation Administration (FAA).
- Publishing flight operations on a weekly basis to assist the public in making informed decisions about their activities.
- Utilizing Landing Signal Officers (LSOs) during Field Carrier Landing Practice (FCLP) training to ensure flight pattern integrity and proper sequencing of aircraft is maintained.
- Restricting ground operations and aircraft maintenance.
- Restricting high-power jet aircraft turns prior to noon on Sundays and daily between the hours of 10:00 p.m. and 7:30 a.m.
- Working with local municipalities to adopt appropriate land use zoning through the Navy's Air Installations Compatible Use Zones (AICUZ) and Readiness and Environmental Protection Initiative (REPI) programs.
- Training pilots to familiarize them with rules and noise abatement procedures, and instill attitudes that support positive community relations.
- Continually reviewing operational procedures to identify potential operational changes that reduce noise while supporting safe, effective, and economical mission execution.
- Participating in bi-annual community leadership forums to discuss issues between the installation and the local community.
- Monitoring airfield operations and striving to mitigate potential operational impacts during academic testing periods and important community events such as the Penn Cover Mussel Fest.
- Continuing to work with the Whidbey Camano Land Trust to collaborate on the purchase of conservation easements that serve to preserve the historic and scenic integrity of the cultural landscapes by lessening changes that affect the integrity of the Central Whidbey Island Historic District.

In addition to the above-mentioned measures to avoid and minimize adverse effects on historic properties in the Central Whidbey Island Historic District, the Navy offers the following mitigation measures as a starting point to consultation on resolution of adverse effects on historic properties under 36 Code of Federal Regulations (CFR) 800.6:

- Installation of informational kiosks and/or panels at entry points to the ELNHR at locations where the undertaking has adverse indirect effects to perceptual qualities that contribute to the significance of the ELNHR's contributing landscapes.
- Increased support to the REPI and encroachment management programs at NAS Whidbey Island for continued partnership with the Whidbey Camano Land Trust in acquiring conservation easements.
- The Navy proposes to enter into a cooperative agreement with the ELNHR to collaborate on a project to improve the efficacy and efficiency of online ELNHR historic property inventories. This

agreement will ameliorate inconsistencies and update the ELNHR and Washington State historic property inventories and GIS databases for properties located within the ELNHR.

1 Introduction

The Navy proposes to continue and expand its existing Electronic Attack community at NAS Whidbey Island by operating additional Growler aircraft as appropriated by Congress. The Navy needs to effectively and efficiently increase electronic attack capabilities in order to counter increasingly sophisticated threats and provide more aircraft per squadron to give operational commanders more flexibility in addressing future threats and missions. The need for the proposed undertaking is to maintain and expand Growler operational readiness to support national defense requirements under Title 10, United States Code (U.S.C.) Section 5062.

Due to the complexity of the proposed undertaking, the Navy has conducted robust consultations with the Washington (WA) State Historic Preservation Officer (SHPO), the Advisory Council of Historic Preservation (ACHP), American Indian Tribes, representatives of local governments, and other interested parties. The Navy initiated consultation on October 14, 2014, and has continued consultation through correspondence and in-person meetings from June 2016 through October 2017. Key consultation steps have included correspondence and meetings to establish the proposed undertaking, to define the APE, to discuss the identification effort and methods, and to present an inventory of historic properties within the APE. In the fall of 2017, the Navy paused the identification and consultation effort in anticipation of changes to the scale and scope of the proposed undertaking that would potentially alter the APE and require revisions to the inventory.

Since the October 2017 consultation, the Navy has modified the proposed undertaking to account for changes to projected operational needs including a decrease in the projected number of pilots required in each squadron, a reduction in the total number of operations proposed, and the inclusion of additional operational scenarios under each alternative. These changes have resulted in revisions to the APE and revisions to the inventory.

2 Proposed Undertaking

The U.S. Navy proposes to expand existing EA-18G “Growler” (Growler) operations at NAS Whidbey Island’s Ault Field and Outlying Landing Field (OLF) Coupeville (Figure 1). The purpose of the proposed undertaking is to continue and expand the Navy’s existing Electronic Attack community at NAS Whidbey Island by operating additional Growler aircraft as appropriated by Congress. The Navy needs to effectively and efficiently increase electronic attack capabilities in order to counter increasingly sophisticated threats and provide more aircraft per squadron to give operational commanders more flexibility in addressing future threats and missions. The need for the proposed undertaking is to maintain and expand Growler operational readiness to support national defense requirements under Title 10, U.S.C. Section 5062.

The mission of the Navy’s Growler aircraft is to suppress enemy air defenses and communications systems. Additionally, Navy Growlers disrupt land-based threats in order to protect the lives of U.S. ground forces. The Secretary of Defense directed that the tactical Airborne Electronic Attack (AEA) mission is the exclusive responsibility of the Navy. As a result, the Navy is the only U.S. military service to maintain a tactical AEA capability and is required to preserve and cultivate the expertise and knowledge of the Growler community. NAS Whidbey Island has served as the home base location for the Navy’s tactical Electronic Warfare community for more than 45 years and is currently the sole home base for the Navy’s entire tactical AES community in the U.S.

The November 2016 Draft Environmental Impact Statement (DEIS) for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex evaluates the potential impacts of alternatives and operational scenarios based on the allocation of additional Growler aircraft between carrier and expeditionary squadrons and potential distribution of annual Growler FCLPs between Ault Field and OLF Coupeville. Since the Draft EIS was published, the Navy has modified the proposed undertaking to incorporate the following:

1. A reduced number of pilots to be assigned to Fleet Squadrons at NAS Whidbey Island (two fewer pilots per carrier squadron), which results in a decrease in overall projected flight operations.
2. The accelerated Fleet-wide introduction of new technology (e.g., Precision Landing Mode [PLM]) that will reduce the overall requirement for FCLP training at NAS Whidbey Island, and
3. Two additional FCLP distribution scenarios that may further mitigate noise impacts at Ault Field and OLF Coupeville.

The Navy announced these changes in a press release dated September 22, 2017. The information presented herein accounts for these changes. The changes are represented in the tables at the end of this section comparing the No Action Alternative to the three proposed alternatives and the various scenarios of flight operation including distribution of FCLPs between Ault Field and OLF Coupeville.

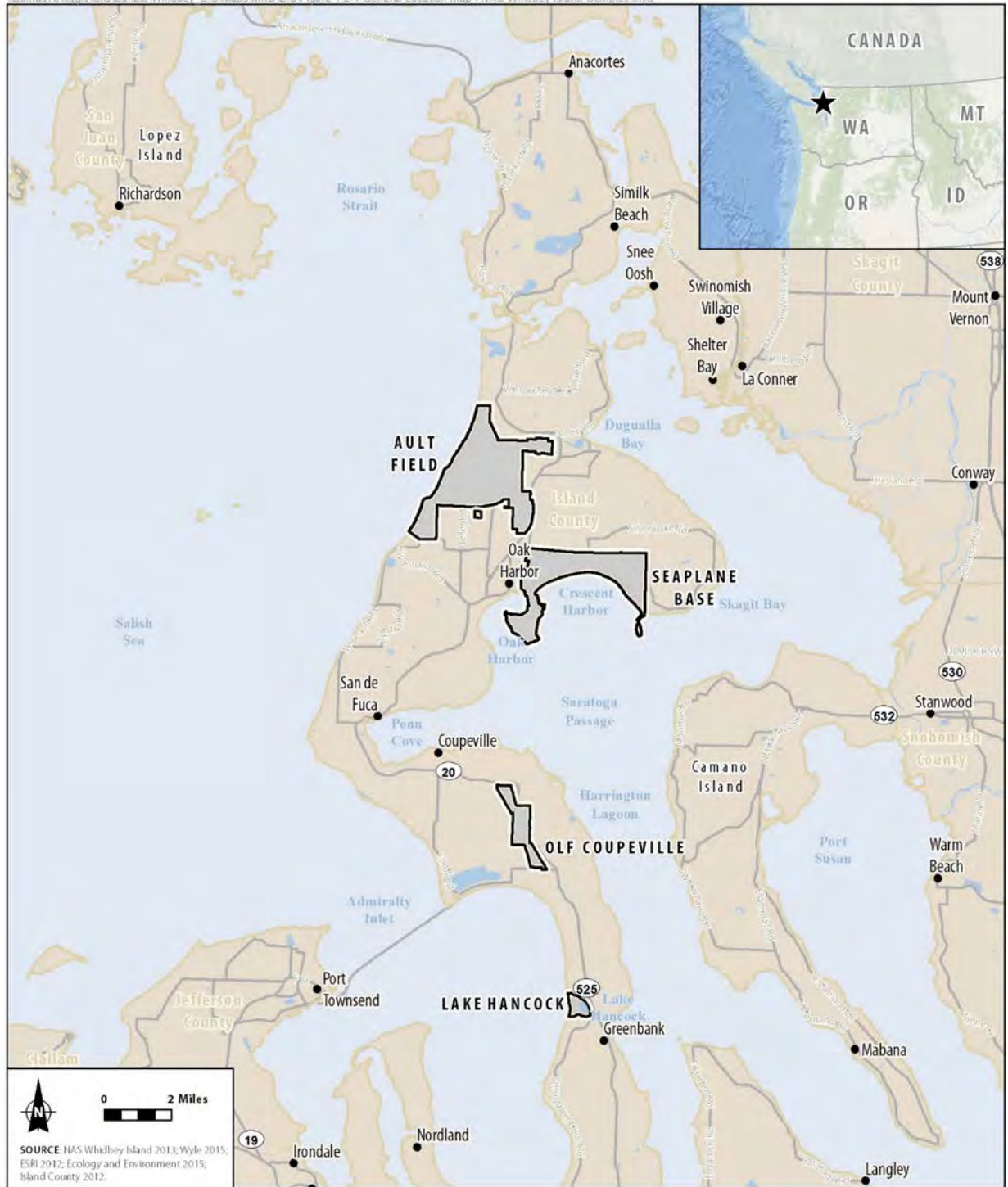


Figure 1 NAS Whidbey Island

The proposed undertaking continues to include an increase in the number of EA-18G aircraft operating at NAS Whidbey Island as well as expand the number of total annual airfield operations at NAS Whidbey Island's primary airport, Ault Field, and FCLP operations at OLF Coupeville. Airfield operations specific to this undertaking include Growler takeoffs and landings, inter-facility transit, and FCLP training at Ault Field and OLF Coupeville. Annual airfield operations at NAS Whidbey Island would increase by approximately 29 to 33 percent (depending on alternative and scenario selected) over the No Action Alternative to support the addition of 35 or 36 new aircraft assigned to Ault Field (Tables 1-3). See Sections 2.2 and 2.3 for more information on the proposed alternatives and scenarios.

The proposed increase in aircraft and personnel requires renovation and construction of facilities at Ault Field. No construction would be required at OLF Coupeville because it is capable of supporting increased operational requirements in its current state. Construction at Ault Field would take place in future years, and personnel and aircraft would arrive incrementally as aircraft are delivered by the manufacturer, personnel are trained, and families relocate.

Under any of the action alternatives, planned land disturbance for construction activities would be 10.1 acres. Once constructed, facilities and parking would add up to 2.3 acres of new impervious surface at the installation. Throughout construction, these alternatives would require temporary hangar facilities to support squadron functions until permanent facilities are completed. Once construction is complete, all temporary facilities would be removed. All three alternatives would require repairs to an inactive taxiway for aircraft parking in addition to expanded hangar space. All planned construction activities would occur on the north end of the flight line at Ault Field. New parking areas, maintenance facilities, and aircraft armament storage would be constructed along Enterprise Road at the north end of Charles Porter Road. Appendix A shows the locations of required facilities under each alternative, including:

- Temporary hangar facilities, which would be placed over existing impervious surface, that would be utilized throughout construction to support squadron functions until permanent facilities are completed. Upon completion of construction, all temporary facilities would be removed.
- Repairs would be made to an inactive taxiway for aircraft parking in addition to expanded hangar space.
- A two-squadron hangar would be constructed on the flight line adjacent to Hangar 5.
- Hangar 12 would be expanded to accommodate additional training squadron aircraft.
- Demolition of Building 115.

Table 1. Comparison of Modeled No Action Alternative and Alternative 1, under All Scenarios (Average Year), Aircraft Operations at the NAS Whidbey Island Complex^{1, 5, 7, 8, 9}

<i>Aircraft Type</i>	<i>FCLP²</i>	<i>Other Operations³</i>	<i>Total</i>	<i>Total Change from No Action⁶</i>
<i>Average Year Scenarios for Ault Field</i>				
No Action	11,300	66,900	78,200	
<i>Alternative 1, Scenario A (20% of FCLPs at Ault Field)</i>				
Growler	6,100	67,000	73,100	
All Other Aircraft ^{4, 6}	0	14,200	14,200	
Total Airfield Operations	6,100	81,200	87,300	+9,100
<i>Alternative 1, Scenario B (50% of FCLPs at Ault Field)</i>				
Growler	15,500	65,600	81,100	
All Other Aircraft ^{4, 6}	0	14,200	14,200	
Total Airfield Operations	15,500	79,800	95,300	+17,100
<i>Alternative 1, Scenario C (80% of FCLPs at Ault Field)</i>				
Growler	24,900	64,400	89,300	
All Other Aircraft ^{4, 6}	0	13,900	13,900	
Total Airfield Operations	24,900	78,300	103,200	+25,000
<i>Alternative 1, Scenario D (30% of FCLPs at Ault Field)</i>				
Growler	9,200	66,600	75,800	
All Other Aircraft ^{4, 6}	0	14,200	14,200	
Total Airfield Operations	9,200	80,800	90,000	+11,800
<i>Alternative 1, Scenario E (70% of FCLPs at Ault Field)</i>				
Growler	21,700	64,800	86,500	
All Other Aircraft ^{4, 6}	0	13,900	13,900	
Total Airfield Operations	21,700	78,700	100,400	+22,200
<i>Average Year Scenarios for OLF Coupeville</i>				
No Action	6,100	400	6,500	
<i>Alternative 1, Scenario A (80% of FCLPs at OLF Coupeville)</i>				
Growler	24,900	0	24,900	
All Other Aircraft ^{4, 6}	0	400	400	
Total Airfield Operations	24,900	400	25,300	+18,800
<i>Alternative 1, Scenario B (50% of FCLPs at OLF Coupeville)</i>				
Growler	15,500	0	15,500	
All Other Aircraft ^{4, 6}	0	400	400	
Total Airfield Operations	15,500	400	15,900	+9,400
<i>Alternative 1, Scenario C (20% of FCLPs at OLF Coupeville)</i>				
Growler	6,200	0	6,200	
All Other Aircraft ^{4, 6}	0	400	400	
Total Airfield Operations	6,200	400	6,600	+100
<i>Alternative 1, Scenario D (70% of FCLPs at OLF Coupeville)</i>				
Growler	21,800	0	21,800	
All Other Aircraft ^{4, 6}	0	400	400	
Total Airfield Operations	21,800	400	22,200	+15,700
<i>Alternative 1, Scenario E (30% of FCLPs at OLF Coupeville)</i>				
Growler	9,300	0	9,300	
All Other Aircraft ^{4, 6}	0	400	400	
Total Airfield Operations	9,300	400	9,700	+3,200

Table 1. Comparison of Modeled No Action Alternative and Alternative 1, under All Scenarios (Average Year), Aircraft Operations at the NAS Whidbey Island Complex^{1, 5, 7, 8, 9}

<i>Aircraft Type</i>	<i>FCLP²</i>	<i>Other Operations³</i>	<i>Total</i>	<i>Total Change from No Action⁶</i>
<i>Average Year Scenarios for the NAS Whidbey Island Complex</i>				
No Action Total	17,400	67,300	84,700	
<i>Alternative 1, Scenario A</i>				
Total Airfield Operations	31,000	81,600	112,600	+27,900
<i>Alternative 1, Scenario B</i>				
Total Airfield Operations	31,000	80,200	111,200	+26,500
<i>Alternative 1, Scenario C</i>				
Total Airfield Operations	31,100	78,700	109,800	+25,100
<i>Alternative 1, Scenario D</i>				
Total Airfield Operations	31,000	81,200	112,200	+27,500
<i>Alternative 1, Scenario E</i>				
Total Airfield Operations	31,000	79,100	110,100	+25,400

Source: Wyle, 2017

Notes:

- ¹ Three-digit numbers are rounded to nearest 100 if \geq to 100; two-digit numbers are rounded to the nearest 10 if \geq 10 or if between 1 and 9.
- ² Each FCLP pass = 2 operations (one arrival and one departure).
- ³ Other operations include Touch-and-Goes, Depart and Re-enter, and Ground Controlled Approaches.
- ⁴ All other aircraft include P-8A, H-60, C-40, and transient aircraft. The 400 other operations at OLF Coupeville are H-60 search and rescue helicopter operations.
- ⁵ An operation is defined as one arrival or one departure.
- ⁶ The number of operations fluctuates slightly between alternative and scenario due to randomness inherent in modeling.
- ⁷ The NAS Whidbey Island complex includes Ault Field and OLF Coupeville.
- ⁸ Scenario A: 20 percent of FCLPs conducted at Ault Field, and 80 percent conducted at OLF Coupeville; Scenario B: 50 percent of FCLPs conducted at Ault Field, and 50 percent conducted at OLF Coupeville; Scenario C: 80 percent of FCLPs conducted at Ault Field, and 20 percent conducted at OLF Coupeville; Scenario D: 30 percent of FCLPs conducted at Ault Field, and 70 percent conducted at OLF Coupeville; Scenario E: 70 percent of FCLPs conducted at Ault Field, and 30 percent conducted at OLF Coupeville.
- ⁹ Since the publication of the Draft EIS, two new operational scenarios for each action alternative have been added to the analysis. In addition, several updates were applied to the noise analysis, which included incorporation of Precision Landing Mode reducing overall airfield operations by approximately 20 percent across all scenarios and updating the number of pilots per squadron (reduction); see Section 1.13.

Key:

- FCLP = field carrier landing practice
- OLF = outlying landing field

Table 2. Comparison of Modeled No Action Alternative and Alternative 2, under All Scenarios (Average Year), Aircraft Operations at the NAS Whidbey Island Complex^{1, 5, 7, 8, 9}

<i>Aircraft Type</i>	<i>FCLP²</i>	<i>Other Operations³</i>	<i>Total</i>	<i>Total Change from No Action⁶</i>
<i>Average Year Scenarios for Ault Field</i>				
No Action	11,300	66,900	78,200	
<i>Alternative 2, Scenario A (20% of FCLPs at Ault Field)</i>				
Growler	5,900	67,900	73,800	
All Other Aircraft ^{3, 5}	0	14,200	14,200	
Total Airfield Operations	5,900	82,100	88,000	+9,800
<i>Alternative 2, Scenario B (50% of FCLPs at Ault Field)</i>				
Growler	14,800	66,500	81,300	
All Other Aircraft ^{3, 5}	0	14,200	14,200	
Total Airfield Operations	14,800	80,700	95,500	+17,300
<i>Alternative 2, Scenario C (80% of FCLPs at Ault Field)</i>				
Growler	23,700	65,400	89,100	
All Other Aircraft ^{3, 5}	0	14,100	14,100	
Total Airfield Operations	23,700	79,500	103,200	+25,000
<i>Alternative 2, Scenario D (30% of FCLPs at Ault Field)</i>				
Growler	8,900	67,500	76,400	
All Other Aircraft ^{3, 5}	0	14,200	14,200	
Total Airfield Operations	8,900	81,700	90,600	+12,400
<i>Alternative 2, Scenario E (70% of FCLPs at Ault Field)</i>				
Growler	20,800	65,800	86,600	
All Other Aircraft ^{3, 5}	0	14,100	14,100	
Total Airfield Operations	20,800	79,900	100,700	+22,500
<i>Average Year Scenarios for OLF Coupeville</i>				
No Action	6,100	400	6,500	
<i>Alternative 2, Scenario A (80% of FCLPs at OLF Coupeville)</i>				
Growler	23,700	0	23,700	
All Other Aircraft ³	0	400	400	
Total Airfield Operations	23,700	400	24,100	+17,600
<i>Alternative 2, Scenario B (50% of FCLPs at OLF Coupeville)</i>				
Growler	14,800	0	14,800	
All Other Aircraft ³	0	400	400	
Total Airfield Operations	14,800	400	15,200	+8,700
<i>Alternative 2, Scenario C (20% of FCLPs at OLF Coupeville)</i>				
Growler	5,900	0	5,900	
All Other Aircraft ³	0	400	400	
Total Airfield Operations	5,900	400	6,300	-200
<i>Alternative 2, Scenario D (70% of FCLPs at OLF Coupeville)</i>				
Growler	20,800	0	20,800	
All Other Aircraft ^{3, 5}	0	400	400	
Total Airfield Operations	20,800	400	21,200	+14,700
<i>Alternative 2, Scenario E (30% of FCLPs at OLF Coupeville)</i>				
Growler	8,900	0	8,900	
All Other Aircraft ^{3, 5}	0	400	400	
Total Airfield Operations	8,900	400	9,300	+2,800

Table 2. Comparison of Modeled No Action Alternative and Alternative 2, under All Scenarios (Average Year), Aircraft Operations at the NAS Whidbey Island Complex^{1, 5, 7, 8, 9}

<i>Aircraft Type</i>	<i>FCLP²</i>	<i>Other Operations³</i>	<i>Total</i>	<i>Total Change from No Action⁶</i>
Average Year Scenarios for the NAS Whidbey Island Complex				
No Action Total	17,400	67,300	84,700	
Alternative 2, Scenario A				
Total Airfield Operations	29,600	82,500	112,100	+27,400
Alternative 2, Scenario B				
Total Airfield Operations	29,600	81,100	110,700	+26,000
Alternative 2, Scenario C				
Total Airfield Operations	29,600	79,900	109,500	+24,800
Alternative 2, Scenario D				
Total Airfield Operations	29,700	82,100	111,800	+27,100
Alternative 2, Scenario E				
Total Airfield Operations	29,700	80,300	110,000	+25,300

Source: Wyle, 2017

Notes:

- ¹ Three-digit numbers are rounded to nearest 100 if \geq to 100; two-digit numbers are rounded to the nearest 10 if \geq 10 or if between 1 and 9.
- ² Each FCLP pass = 2 operations (one arrival and one departure).
- ³ Other operations include Touch-and-Goes, Depart and Re-enter, and Ground Controlled Approaches.
- ⁴ All other aircraft include P-8A, H-60, C-40, and transient aircraft. The 400 other operations at OLF Coupeville are H-60 search and rescue helicopter operations.
- ⁵ An operation is defined as one arrival or one departure.
- ⁶ The number of operations fluctuates slightly between alternative and scenario due to randomness inherent in modeling.
- ⁷ The NAS Whidbey Island complex includes Ault Field and OLF Coupeville.
- ⁸ Scenario A: 20 percent of FCLPs conducted at Ault Field, and 80 percent conducted at OLF Coupeville; Scenario B: 50 percent of FCLPs conducted at Ault Field, and 50 percent conducted at OLF Coupeville; Scenario C: 80 percent of FCLPs conducted at Ault Field, and 20 percent conducted at OLF Coupeville; Scenario D: 30 percent of FCLPs conducted at Ault Field, and 70 percent conducted at OLF Coupeville; Scenario E: 70 percent of FCLPs conducted at Ault Field, and 30 percent conducted at OLF Coupeville.
- ⁹ Since the publication of the Draft EIS, two new operational scenarios for each action alternative have been added to the analysis. In addition, several updates were applied to the noise analysis, which included incorporation of Precision Landing Mode reducing overall airfield operations by approximately 20 percent across all scenarios and updating the number of pilots per squadron (reduction); see Section 1.13.

Key:

FCLP = field carrier landing practice
 OLF = outlying landing field

Table 3. Comparison of Modeled No Action Alternative and Alternative 3, under All Scenarios (Average Year), Aircraft Operations at the NAS Whidbey Island Complex^{1, 5, 7, 8, 9}

<i>Aircraft Type</i>	<i>FCLP²</i>	<i>Other Operations³</i>	<i>Total</i>	<i>Total Change from No Action⁶</i>
Average Year Scenarios for Ault Field				
No Action	11,300	66,900	78,200	
Alternative 3, Scenario A (20% of FCLPs at Ault Field)				
Growler	5,900	67,700	73,600	
All Other Aircraft ^{3, 5}	0	14,100	14,100	
Total Airfield Operations	5,900	81,800	87,700	+9,500
Alternative 3, Scenario B (50% of FCLPs at Ault Field)				
Growler	14,800	66,600	81,400	
All Other Aircraft ^{3, 5}	0	13,900	13,900	
Total Airfield Operations	14,800	80,500	95,300	+17,100
Alternative 3, Scenario C (80% of FCLPs at Ault Field)				
Growler	23,700	65,200	88,900	
All Other Aircraft ^{3, 5}	0	14,000	14,000	
Total Airfield Operations	23,700	79,200	102,900	+24,700
Alternative 3, Scenario D (30% of FCLPs at Ault Field)				
Growler	8,900	67,300	76,200	
All Other Aircraft ^{3, 5}	0	14,100	14,100	
Total Airfield Operations	8,900	81,400	90,300	+12,100
Alternative 3, Scenario E (70% of FCLPs at Ault Field)				
Growler	20,700	65,600	86,300	
All Other Aircraft ^{3, 5}	0	14,000	14,000	
Total Airfield Operations	20,700	79,600	100,300	+22,100
Average Year Scenarios for OLF Coupeville				
No Action	6,100	400	6,500	
Alternative 3, Scenario A (80% of FCLPs at OLF Coupeville)				
Growler	23,700	0	23,700	
All Other Aircraft ³	0	400	400	
Total Airfield Operations	23,700	400	24,100	+17,600
Alternative 3, Scenario B (50% of FCLPs at OLF Coupeville)				
Growler	14,800	0	14,800	
All Other Aircraft ³	0	400	400	
Total Airfield Operations	14,800	400	15,200	+8,700
Alternative 3, Scenario C (20% of FCLPs at OLF Coupeville)				
Growler	5,900	0	5,900	
All Other Aircraft ³	0	400	400	
Total Airfield Operations	5,900	400	6,300	-200
Alternative 3, Scenario D (70% of FCLPs at OLF Coupeville)				
Growler	20,700	0	20,700	
All Other Aircraft ^{3, 5}	0	400	400	
Total Airfield Operations	20,700	400	21,100	+14,600
Alternative 3, Scenario E (30% of FCLPs at OLF Coupeville)				
Growler	8,900	0	8,900	
All Other Aircraft ^{3, 5}	0	400	400	
Total Airfield Operations	8,900	400	9,300	+2,800

Table 3. Comparison of Modeled No Action Alternative and Alternative 3, under All Scenarios (Average Year), Aircraft Operations at the NAS Whidbey Island Complex^{1, 5, 7, 8, 9}

<i>Aircraft Type</i>	<i>FCLP²</i>	<i>Other Operations³</i>	<i>Total</i>	<i>Total Change from No Action⁶</i>
<i>Average Year Scenarios for the NAS Whidbey Island Complex</i>				
No Action Total	17,400	67,300	84,700	
<i>Alternative 3, Scenario A</i>				
Total Airfield Operations	29,600	82,200	111,800	+27,100
<i>Alternative 3, Scenario B</i>				
Total Airfield Operations	29,600	80,900	110,500	+25,800
<i>Alternative 3, Scenario C</i>				
Total Airfield Operations	29,600	79,600	109,200	+24,500
<i>Alternative 3, Scenario D</i>				
Total Airfield Operations	29,600	81,800	111,400	+26,700
<i>Alternative 3, Scenario E</i>				
Total Airfield Operations	29,600	80,000	109,600	+24,900

Source: Wyle, 2017

Notes:

- ¹ Three-digit numbers are rounded to nearest 100 if \geq to 100; two-digit numbers are rounded to the nearest 10 if \geq 10 or if between 1 and 9.
- ² Each FCLP pass = two operations (one arrival and one departure).
- ³ Other operations include Touch-and-Goes, Depart and Re-enter, and Ground Controlled Approaches.
- ⁴ All other aircraft include P-8A, H-60, C-40, and transient aircraft. The 400 other operations at OLF Coupeville are H-60 search and rescue helicopter operations.
- ⁵ An operation is defined as one arrival or one departure.
- ⁶ The number of operations fluctuates slightly between alternative and scenario due to randomness inherent in modeling.
- ⁷ The NAS Whidbey Island complex includes Ault Field and OLF Coupeville.
- ⁸ Scenario A: 20 percent of FCLPs conducted at Ault Field, and 80 percent conducted at OLF Coupeville; Scenario B: 50 percent of FCLPs conducted at Ault Field, and 50 percent conducted at OLF Coupeville; Scenario C: 80 percent of FCLPs conducted at Ault Field, and 20 percent conducted at OLF Coupeville; Scenario D: 30 percent of FCLPs conducted at Ault Field, and 70 percent conducted at OLF Coupeville; Scenario E: 70 percent of FCLPs conducted at Ault Field, and 30 percent conducted at OLF Coupeville.
- ⁹ Since the publication of the Draft EIS, two new operational scenarios for each action alternative have been added to the analysis. In addition, several updates were applied to the noise analysis, which included incorporation of Precision Landing Mode reducing overall airfield operations by approximately 20 percent across all scenarios and updating the number of pilots per squadron (reduction); see Section 1.13.

Key:

- FCLP = field carrier landing practice
- OLF = outlying landing field

2.1 Proposed Alternatives

The Navy is evaluating potential effects to historic properties from continuing and increasing airfield operations, establishing facilities and functions at Ault Field to support an expanded Growler mission, and associated personnel changes. Three alternatives are being considered for implementation of the undertaking, as well as the No Action Alternative (Table 4). The alternatives include:

Table 4. Aircraft, Personnel, and Dependents by Alternative for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

<i>Alternative</i>	<i>Growler Aircraft Loading</i>	<i>Total Growler Aircraft</i>	<i>Growler Personnel Loading</i>	<i>Total Growler Personnel</i>	<i>Dependents</i>
No Action Alternative	9 carrier squadrons (45 aircraft) 3 expeditionary squadrons (15 aircraft) 1 Reserve Squadron (5 aircraft) 1 training squadron (17 aircraft)	82	517 Officer 3,587 Enlisted	4,104	5,627
Alternative 1	9 carrier squadrons (72 aircraft) 3 expeditionary squadrons (15 aircraft) 1 Reserve Squadron (5 aircraft) 1 training squadron (25 aircraft)	117 (+35)	597 Officer 3,842 Enlisted	4,439 (+335)	6,086 (+459)
Alternative 2	9 carrier squadrons (63 aircraft) 5 expeditionary squadrons (25 aircraft) 1 Reserve Squadron (5 aircraft) 1 training squadron (25 aircraft)	118 (+36)	619 Officer 4,113 Enlisted	4,732 (+628)	6,487 (+860)
Alternative 3	9 carrier squadrons (63 aircraft) 3 expeditionary squadrons (24 aircraft) 1 Reserve Squadron (5 aircraft) 1 training squadron (26 aircraft)	118 (+36)	597 Officer 3,848 Enlisted	4,445 (+341)	6,094 (+467)

No Action Alternative (Baseline for Comparison of the Action Alternatives)

The No Action Alternative represents the current existing and authorized conditions for Ault Field and OLF Coupeville. The No Action Alternative comprises factors such as aircraft loading, facility and infrastructure changes, changes in personnel levels, and the changes to the number of aircraft unrelated to the proposed undertaking that are expected to be fully implemented by 2021. The No Action Alternative takes into account platform changes and actions already consulted and currently being

implemented. The No Action Alternative does not meet the purpose and need of the Navy's Proposed Action (the proposed undertaking), but it does provide a benchmark of the existing and planned conditions against which to compare the potential effects to historic properties of the three action alternatives.

Alternative 1

Alternative 1 would expand carrier capabilities by adding three additional aircraft to each of the existing nine carrier squadrons and augmenting the Fleet Replacement Squadrons (FRS) with eight additional aircraft (a net increase of 35 aircraft). Alternative 1 would add an estimated 335 Navy personnel and 459 dependents to the region.

Alternative 2

Alternative 2 would expand expeditionary and carrier capabilities by establishing two new expeditionary squadrons, adding two additional aircraft to each of the nine existing carrier squadrons, and augmenting the FRS with eight additional aircraft (a net increase of 36 aircraft). Alternative 2 would add an estimated 628 Navy personnel and 860 dependents to the region.

Alternative 3

Alternative 3 would expand expeditionary and carrier capabilities by adding three additional aircraft to each of the three existing expeditionary squadrons, adding two additional aircraft to each of the nine existing carrier squadrons, and augmenting the FRS with nine additional aircraft (a net increase of 36 aircraft). Alternative 3 would add an estimated 341 Navy personnel and 467 dependents to the region.

2.2 Operational Scenarios and Field Carrier Landing Practice

The Navy introduced five sub-alternatives (referred to as "scenarios" A through E) in the Final EIS to analyze the potential effects from increased operations and the distribution of FCLP operations between Ault Field and OLF Coupeville. Each of the scenarios represents a varying distribution of Growler FCLP operations between Ault Field and OLF Coupeville, expressed as a percentage at each location. The percentages depicted are used for general description of the scenarios. See Table 5 for a summary of EA-18G Growler aircraft FCLP changes by alternative and scenario.

- **Scenario A** – Twenty percent of all FCLPs conducted at Ault Field and 80 percent of all FCLPs conducted at OLF Coupeville
- **Scenario B** – Fifty percent of all FCLPs conducted at Ault Field and 50 percent of all FCLPs conducted at OLF Coupeville
- **Scenario C** – Eighty percent of all FCLPs conducted at Ault Field and 20 percent of all FCLPs conducted at OLF Coupeville
- **Scenario D** – Thirty percent of all FCLPs conducted at Ault Field and 70 percent of all FCLPs conducted at OLF Coupeville
- **Scenario E** – Seventy percent of all FCLPs conducted at Ault Field and 30 percent of all FCLPs conducted at OLF Coupeville

Table 5. Comparison of FCLPs by Alternative at the NAS Whidbey Island Complex¹

<i>Alternative²</i>	<i>Ault Field</i>	<i>OLF Coupeville</i>	<i>Total FCLPs</i>
<i>Alternative 1</i>			
Scenario A (20/80 FCLP Split)	6,100	24,900	31,000
Scenario B (50/50 FCLP Split)	15,500	15,500	31,000
Scenario C (80/20 FCLP Split)	24,900	6,200	31,100
Scenario D (30/70 FCLP Split)	9,200	21,800	31,000
Scenario E (70/30 FCLP Split)	21,700	9,300	31,000
<i>Alternative 2</i>			
Scenario A (20/80 FCLP Split)	5,900	23,700	29,600
Scenario B (50/50 FCLP Split)	14,800	14,800	29,600
Scenario C (80/20 FCLP Split)	23,700	5,900	29,600
Scenario D (30/70 FCLP Split)	8,900	20,800	29,700
Scenario E (70/30 FCLP Split)	20,800	8,900	29,700
<i>Alternative 3</i>			
Scenario A (20/80 FCLP Split)	5,900	23,700	29,600
Scenario B (50/50 FCLP Split)	14,800	14,800	29,600
Scenario C (80/20 FCLP Split)	23,700	5,900	29,600
Scenario D (30/70 FCLP Split)	8,900	20,700	29,600
Scenario E (70/30 FCLP Split)	20,700	8,900	29,600
<i>No Action Alternative</i>	<i>11,300</i>	<i>6,100</i>	<i>17,400</i>

Notes:

- ¹ This table includes FCLP operations only. Total airfield operations include FCLPs as well as all other operations. Detailed airfield operations tabulated by airfield and alternative/scenario are provided in Sections 3.1 and 4.1.
- ² The FCLP percentages for each scenario that are expressed in this analysis are intended to analyze levels of operations at Ault Field and OLF Coupeville. The percentages are not intended to provide a firm division of FCLPs between airfields. Training requirements may require FCLPs that fall within a range of these operations.
- ³ FCLP operations may differ between alternative and scenario due to randomness inherent in modeling.

The FCLP percentages for each scenario that are expressed in this analysis are intended to analyze levels of total aircraft operations. The percentages are not intended to provide a firm division of FCLPs between airfields. From a purely operational perspective, the Navy would prefer to use OLF Coupeville for all FCLPs because it more closely replicates the carrier flight pattern and landing conditions at sea, and therefore provides superior training. However, because the Navy recognizes that noise impacts to the community are unavoidable, the Navy analyzed five operational scenarios at the expense of ideal training. For more information about the proposed alternatives and scenarios, see Section 2 of the EIS.

Currently, NAS Whidbey Island is home to nine carrier squadrons (45 aircraft), three expeditionary squadrons (15 aircraft), one expeditionary reserve squadron (five aircraft), one training squadron (17 aircraft), and an Electronic Attack Weapons School. The squadrons are defined as follows:

- **Carrier squadrons** deploy on aircraft carriers and conduct periodic FCLP to requalify pilots to land on aircraft carriers
- **Expeditionary squadrons** include the reserve squadron; because they deploy to overseas land-based locations, they do not normally require periodic FCLP prior to deployment
- **The training squadron**, also known as the Fleet Replacement Squadron, or FRS, is the training squadron responsible for “post-graduate” training of newly designated Navy pilots and Naval

Flight Officers, those returning to flight status after non-flying assignments, or those transitioning to a new aircraft for duty in the Fleet. The training squadron is the “schoolhouse” where pilots receive their initial FCLP, and it fosters professional standardization and a sense of community.

Although the proposed number of aircraft in each alternative is similar, the personnel required and the manner in which the aircrews would train using the additional aircraft differ, which in turn, changes operational requirements. For example, the squadron type determines the FCLP requirements and number of personnel stationed in the local area. An alternative that has an increased number of carrier squadrons would result in increased FCLP requirements, while an alternative that increases expeditionary squadrons would not result in increased FCLP requirements.

FCLP is a graded flight exercise that prepares pilots for landing on aircraft carriers. FCLP is generally flown in a left-hand, closed-loop, racetrack-shaped pattern, ending with a touch-and-go landing or a low approach with the LSO present and grading the proficiency of the pilot. The pattern simulates, as closely as practicable, the conditions aircrews would encounter during actual carrier landing operations at sea (see Figure 2). FCLPs are conducted on shore facilities to provide pilots the opportunity to simulate carrier landing operations in an environment where the risks associated with at-sea carrier operations can be safely managed. Landing on an aircraft carrier is one of the most dangerous tasks a pilot can perform and is a perishable skill that must be regularly reinforced.

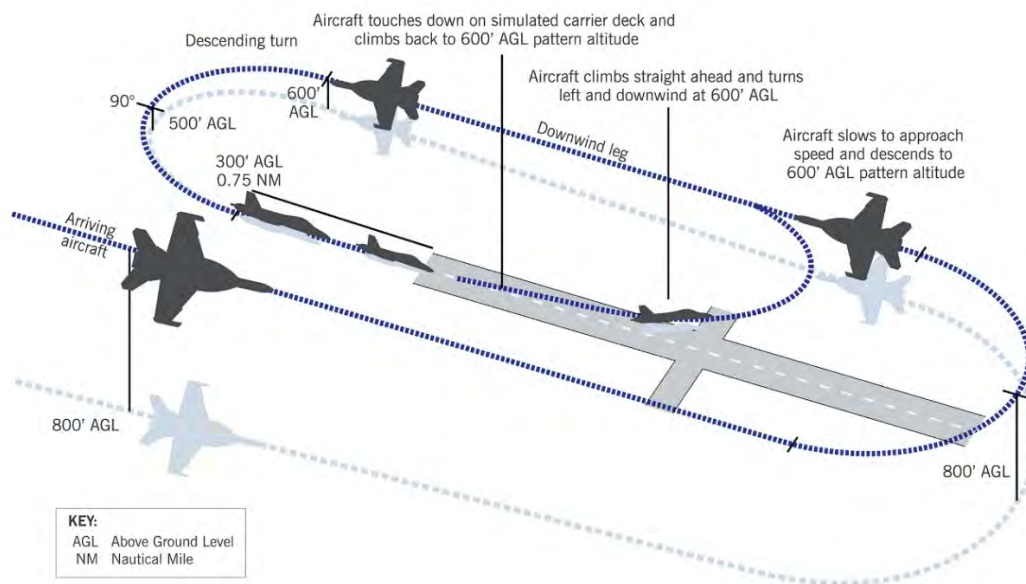


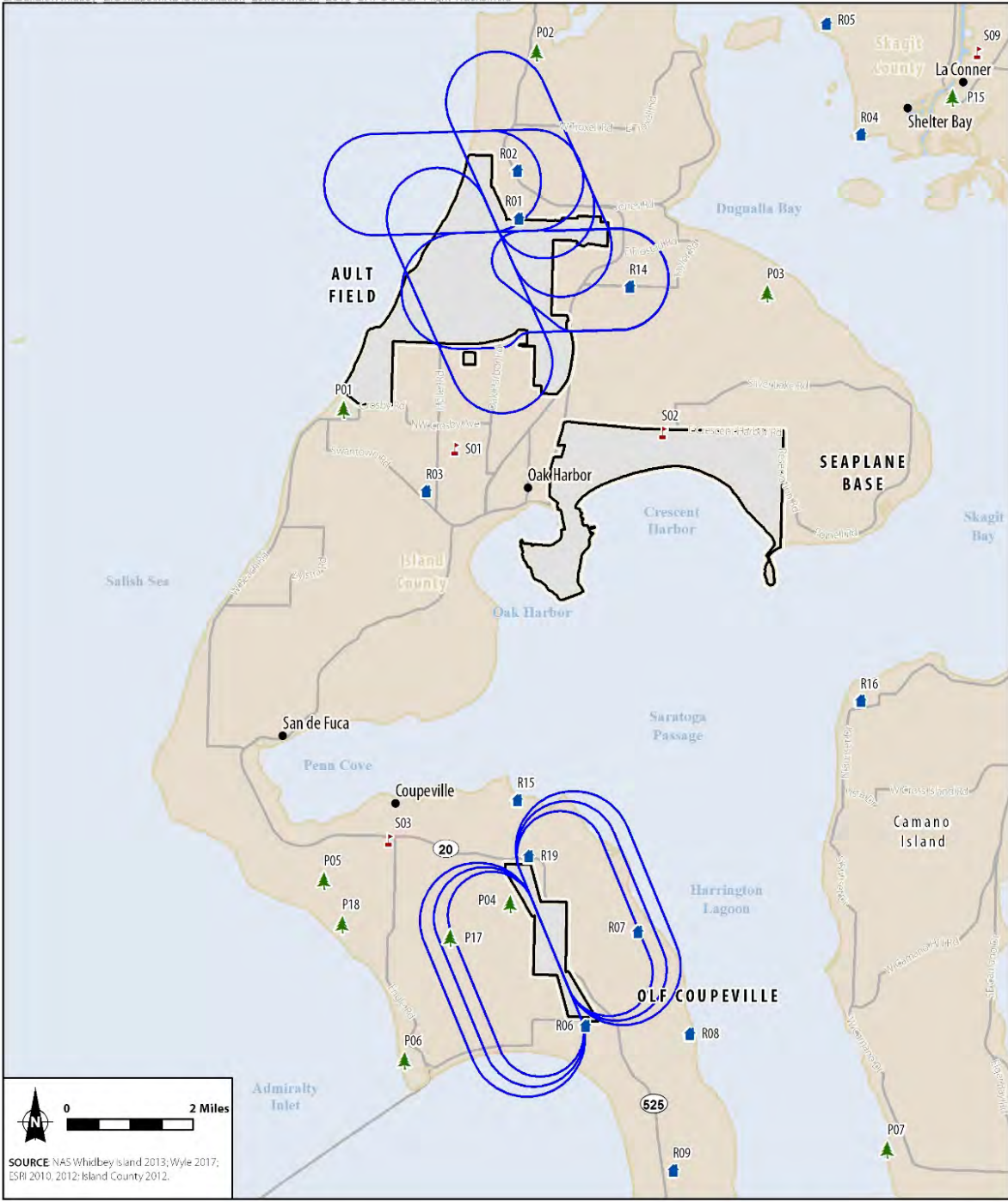
Figure 2 FCLP Pattern

A typical FCLP evolution lasts approximately 45 minutes, usually with three to five aircraft participating in the training. Each FCLP flight pattern is considered two operations: the landing or approach is counted as one operation, and the takeoff is counted as another. So, a single plane flying one FCLP loop is counted as two operations. FCLP schedules are dictated by training and deployment schedules, occur with concentrated periods of high-tempo operations, and are followed by periods of little to no activity. Per Navy guidelines, pilots must perform FCLP before initial carrier qualification (ship) landings or re-

qualification landings. The carrier qualification landings for each pilot need to occur within 10 days of operating from an aircraft carrier.

For several years, the Navy has been developing technology to make landing on a carrier easier and safer. This effort has resulted in the Navy's projected Fleet-wide implementation of PLM technology (also known as MAGIC CARPET, an acronym for Maritime Augmented Guidance with Integrated Controls for Carrier Approach and Recovery Precision Enabling Technologies). PLM is a flight control system that automates some controls to assist pilots with landing on aircraft carriers, resulting in a safer environment for Navy pilots. This technology will reduce the workload and training requirements for pilots to develop and maintain proficiency at shipboard landings. PLM holds great promise for making carrier landing safer through automation, which would reduce the amount of FCLP required. The potential training reduction for required FCLPs with the inclusion of PLM is estimated at 20 percent. This 20-percent reduction is reflected in the results of the updated noise analysis and incorporated into the current analysis of effects. The Navy is moving forward with an aggressive schedule to incorporate this technology into the Fleet, and the Navy expects that this will reduce FCLP training requirements in the next several years.

Finally, the FCLP pattern analyzed includes a change from a historical non-standard pattern to a standardized flight pattern. Runway utilization for FCLPs at Ault Field and OLF Coupeville depends primarily on prevailing winds and the performance characteristics of the Growler. In recent years, due to a non-standard flight pattern on OLF Coupeville Runway 14, the utilization of that runway has been significantly lower than Runway 32. The narrower non-standard flight pattern requires an unacceptably steep angle of bank for the Growler due to performance differences from the former Prowler flying the pattern. Consequently, the proposed undertaking includes the standardization of the training pattern at OLF Coupeville to allow the Growler to utilize both Runway 14 and Runway 32, depending on weather conditions (see Figure 3). For more information about runway utilization, see Section 3 of the EIS.



- City
- County Boundary
- Major Road
- Installation Area
- FCLP
- Points of Interest (POI)
- ▲ Park
- Residential
- ▲ School

**FCLP Flight Tracks at
NAS Whidbey Island Complex**
Whidbey Island, Island County, WA

Figure 3 Proposed FCLP Flight Tracks at Ault Field and OLF Coupeville

2.3 Historical FCLP Operations at Ault Field and OLF Coupeville

The level of operations proposed under each alternative and scenario combination for this undertaking represents a return to past levels of operations occurring in the 1970s, 1980s, and 1990s at the NAS Whidbey Island complex, which ranged between 98,259 (in 2002) and 188,420 (in 1990) (Appendix B).

Electronic warfare has played a key role in combat operations since its introduction during World War II, and its importance continues to grow as potential adversaries invest in modern threat systems. From early in the installation's history, Ault Field and the Seaplane Base were identified as ideal locations for the rearming and refueling of Navy patrol planes and other tactical aircraft operating in defense of Puget Sound. On September 21, 1942, NAS Whidbey Island was formally commissioned. In support of the new naval air operations on Whidbey Island, OLF Coupeville became operational in 1943 to support practice approach/landings and emergency landings.

At the end of World War II, NAS Whidbey Island was chosen as the main, multi-type aircraft, all-weather naval support station in the Pacific Northwest and in 1951 was designated a Master Jet Station, which expanded its mission to include jet aircraft training and operations of carrier-based squadrons. The U.S. involvement in Vietnam saw NAS Whidbey Island's evolution into the Navy's home for its electronic attack aircraft. This period also saw the end of the seaplane era, with the last of the seaplane squadrons transferred to NAS Moffett Field, California in 1965. At the same time, NAS Whidbey Island announced it would receive the new A-6A Intruder platform, the first all-weather attack bomber. Effects of the arrival of the A-6A to NAS Whidbey Island were almost immediate, as these squadrons trained for deployments in Southeast Asia. Air operations at Ault Field increased 31 percent from 1966 to 1967. In 1967, OLF Coupeville became critical in assisting to mission success, and by 1969 nearly 40,000 FCLP operations were being conducted at OLF Coupeville. As a Master Jet Station, in 1971, NAS Whidbey Island received a new high-performance aircraft, the EA-6B Prowler, and became the home base of the AEA mission for the Navy. With the introduction of the Prowler, the Navy consistently averaged over 20,000 FCLP operations annually at OLF Coupeville through the remainder of the Cold War. OLF Coupeville continues to be critical to the AEA mission and provides the most realistic training for FCLP.

Since the arrival of the Intruder aircraft in 1966, the Navy has continuously used OLF Coupeville for FCLP training (Figure 4). Like all NAS Whidbey Island operations, previous FCLP operations at OLF Coupeville indicate periods of higher and lower activity, depending on Navy mission requirements. Prior to 1996, FCLP operations at OLF Coupeville ranged between approximately 11,782 and 39,246, with more than 20,000 FCLP operations per year in the late 1960s and in the late 1980s to early 1990s. Since 1996 and the sunset of the Intruder aircraft, FCLP operations at OLF Coupeville have ranged between 2,548 and 9,736 per year. In that time, NAS Whidbey Island has also seen the transition of the AEA aircraft from the Prowler to the Growler. The Growler began operations at NAS Whidbey Island in 2007, and the full transition from the Prowler to the Growler aircraft was completed on June 27, 2015. See Figure 5 and Appendix C for previous FCLP operations data between 1967 and 2016.

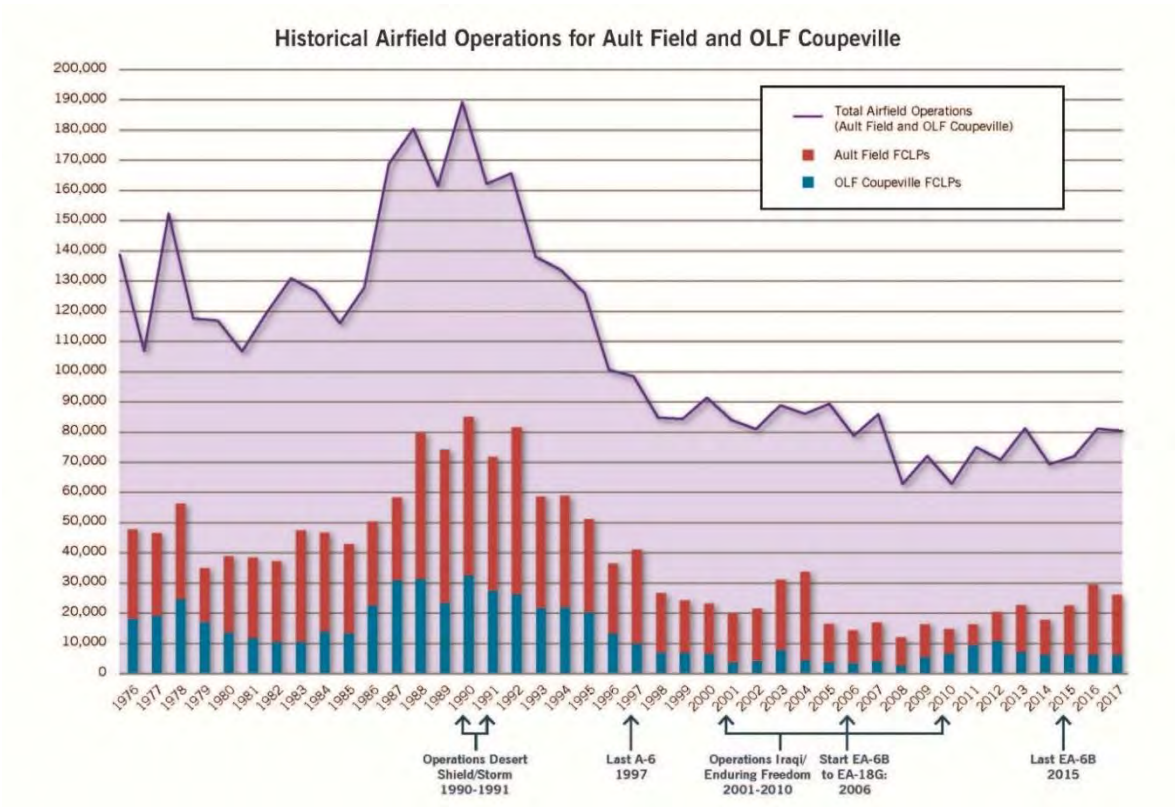


Figure 4 Previous Airfield Operations for Ault Field and OLF Coupeville

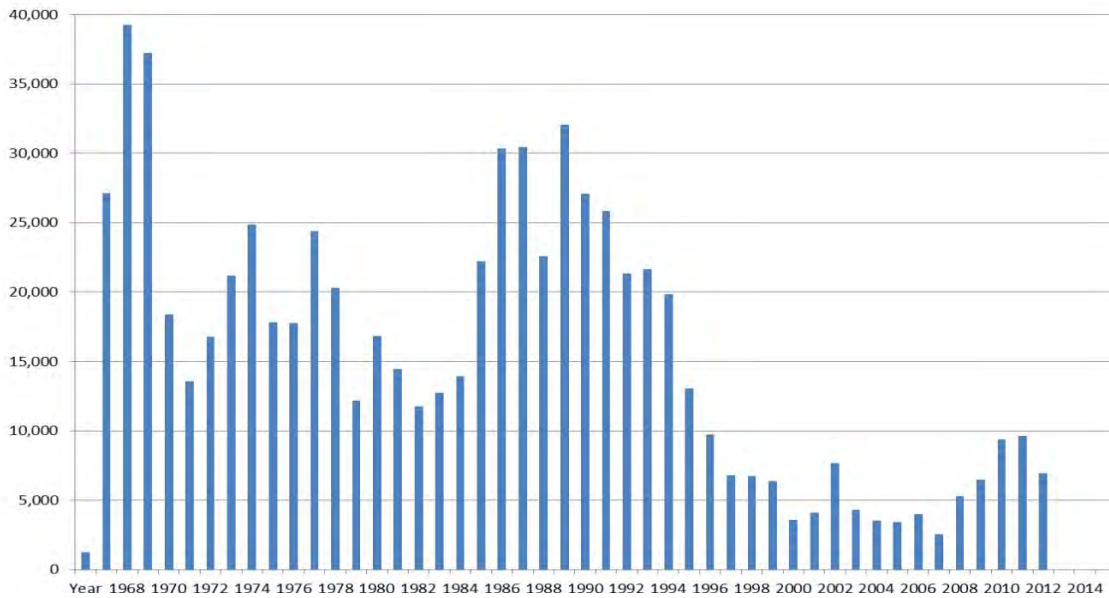


Figure 5 Previous FCLP Operations for OLF Coupeville

3 Definition of the Area of Potential Effects

The APE is defined as the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist (36 CFR 800.16[d]). It includes effects that will occur immediately as well as those effects that are reasonably foreseeable. The APE was defined in consultation with the ACHP, SHPO, consulting parties, and American Indian tribes. Due to the complexity of the project and the wealth of comments from consulting parties, APE consultations spanned a year beginning in June 2016 and concluding in July 2017. See Appendix D for a summary of Navy consultation efforts from October 2014 through October 2017. The following is a short synopsis of the APE consultation.

The Navy provided a proposed definition of the APE to the ACHP, SHPO, consulting parties, and American Indian tribes and nations (tribes) on June 30, 2016. The Navy proposed to define the direct effect components of the APE as those areas where construction would occur on the installation. The Navy further proposed to define the indirect effect components of the APE as those areas on and off the installation within the 65 dB DNL noise contours from air operations at NAS Whidbey Island. The Navy noted at the time that a noise modeling study was in process for this undertaking. Upon completion of the noise modeling study, the Navy would utilize the resulting modeled noise contours for the APE and continue consultation. The results of the noise study were released in November 2016, and, in cooperation with the Draft EIS public meetings, the Navy invited the public to provide input on the proposed undertaking's potential effects to historic properties and the APE. The most conspicuous concern of the undertaking expressed in the public meetings was the potential for adverse indirect effects to historic properties from noise.

In correspondence dated May 1, 2017, the Navy conducted additional consultation concerning the definition of the APE; the results of the noise contours from the noise modeling study, which utilized NOISEMAP Version 7.2, were provided to all consulting parties. To fully evaluate the potential direct and indirect effects of the undertaking on historic properties, the APE was proposed to include the following three components:

- **On-installation Direct Effect Areas:** Areas on the installation where historic properties could be directly affected (e.g., by ground disturbance, demolition, or alteration) (Figure 6).
- **On-installation Indirect Effect Area:** Areas within the installation bounded by the 65 dB DNL noise contours where historic properties could remain physically undisturbed but potentially subject to effects from the introduction of visual, atmospheric, or audible elements.
- **Off-installation Indirect Effect Area:** Areas off installation, within operational areas potentially bounded by the 65 dB DNL noise contours and potentially subject to effects from the introduction of visual, atmospheric, or audible elements to the setting.

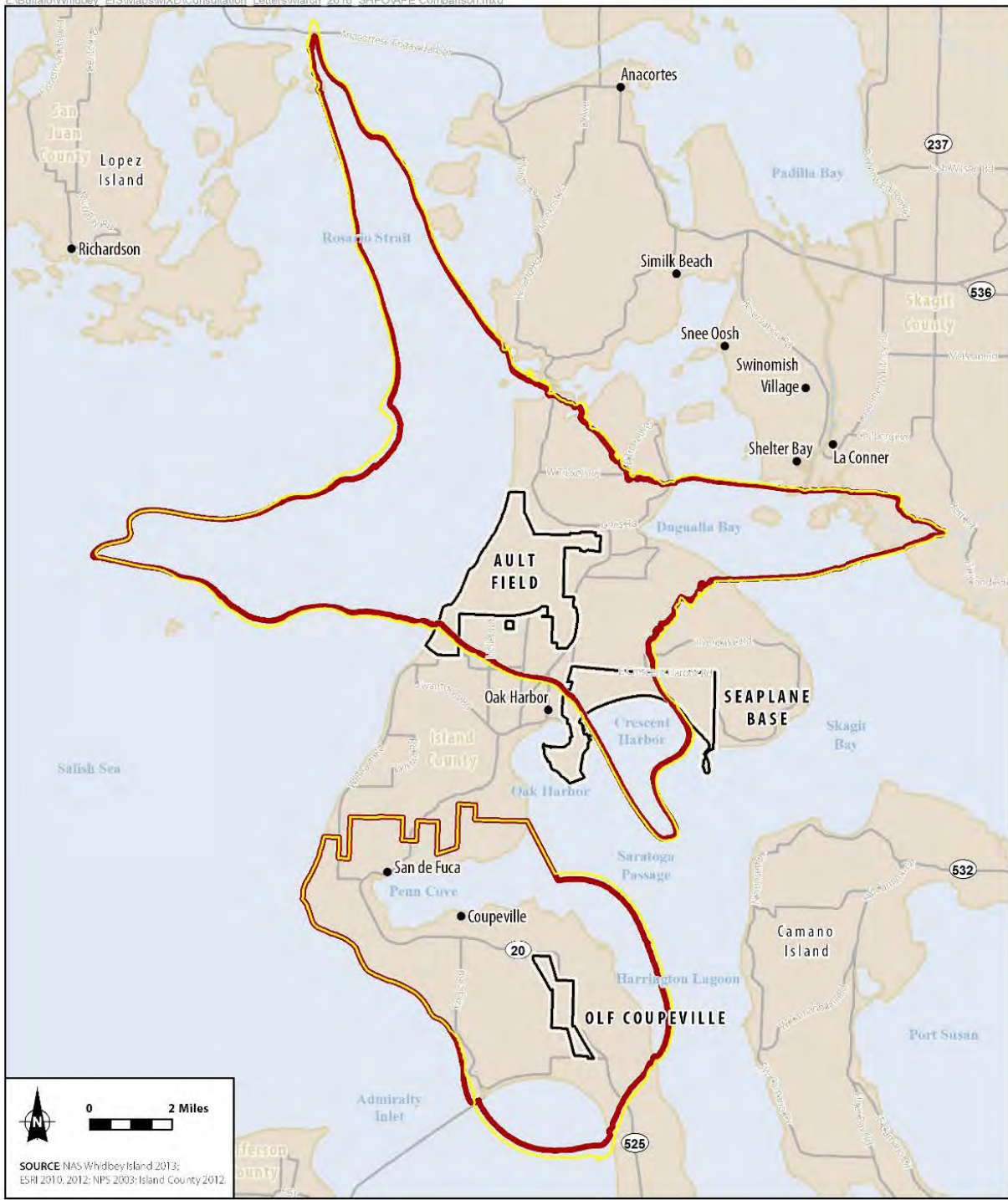


Figure 6 Direct Area of Potential Effects

Additional information was provided in July 2017 to address concerns that the APE fully encompasses any historic properties with a potential to be affected by the undertaking, specifically from indirect effects of airfield operational noise. The Navy recognized that aircraft noise may adversely affect the setting of certain noise-sensitive historic properties for short periods of time when the aircraft are operating in the vicinity and noted that the 65 dB DNL noise contour selected for the APE included the most expansive aggregate noise contour. The aggregate noise contour combined the land encompassed by the 65 dB DNL contour extending the largest distance from Ault Field and OLF Coupeville for each alternative. This thereby incorporated the largest overall area within the 65 dB DNL noise contours around Ault Field and OLF Coupeville. The May 1, 2017, letter also noted that the 65 dB DNL contour is generally accepted for the evaluation of potential effects to historic properties near airports, and its use to define the APE in Section 106 consultations is consistent with use by other federal agencies to evaluate potential impacts from change in noise, including the U.S. Environmental Protection Agency (USEPA), U.S. Department of Housing and Urban Development (HUD), the FAA, and the Department of Defense (DoD). Finally, the Navy also indicated its intention to include the whole of the ELNHR within the APE analysis.

The DNL metric is the current standard for assessing potential effects to historic properties because it factors the number, frequency, and energy (loudness) of noise events. The DNL metric is a cumulative measure and represents long-term noise exposure rather than a sound level heard at any given time, which makes it appropriate for assessing long-term direct and indirect auditory, visual, and atmospheric effects to historic properties. The DNL values are average quantities, mathematically representing the continuous sound level that would be present from all of the variations in sound level that occur over a 24-hour period. For more information about noise metrics and modeling, see Section 3.2.2 and Appendix A of the EIS.

On October 2, 2017, the Navy notified the ACHP, SHPO, consulting parties, and tribes that the Navy was revising the noise analysis and would consult on changes to the APE and inventory once the revision was complete. There were changes in the scale and scope of the undertaking due to a decrease in the number of pilots required in each squadron and squadron composition, the inclusion of two new scenarios (Scenarios D and E), and the new noise analysis. The inclusion of this information resulted in a change in the airfield DNL noise contours. Since the defined APE is based on the 65 dB DNL contour line (with inclusion of the ELNHR boundary), the Navy has revised the APE to reflect the new aggregate 65 dB DNL contour line consistent with the methodology used in prior consultations. This resulted in a concurrent change in the inventory. The APE change as a result of the new noise analysis is illustrated in Figure 7, and the change in inventory is discussed in Section 5.



- City
- County Boundary
- Major Road
- Installation Area
- ▭ June 2017 APE
- ▭ February 2018 APE

APE Comparison
Whidbey Island, Island County, WA

Figure 7 Amended Indirect Area of the APE

4 Cultural Context

Whidbey Island is located within the ethnographic territory of the Southern Coast Salish, a large native group consisting of speakers of two distinct Coast Salish languages: *Twana* or *Lushootseed*. Twana was spoken by the people of Hood Canal and its drainage. Lushootseed territory extended from Samish Bay in the north, south to the head of Puget Sound, and it was further divided into the Northern Lushootseed and Southern Lushootseed by differences in dialect. Before the treaties of 1854-1855, as many as 50 named groups were known to have lived in the Southern Coast Salish traditional cultural area (Suttles and Lane, 1990). Whidbey Island is located in the southwestern part of Northern Lushootseed territory and was home to several Southern Coast Salish tribes for numerous generations (Navy, 2016c).

The northern portion of the island is within the ethnographic territory of the Lower Skagit, speakers of a northern Lushootseed dialect. The Kikiallus and Squiamish, divisions of the Swinomish, also occupied the northern portion of Whidbey Island, including the area of Deception Pass (Snyder, 1974). Additionally, the K'lallam reportedly exploited resources along the west coast of Whidbey Island in the early historic period (Gibbs, 1855).

The waters of northern Puget Sound were used by the Coastal Salish people, and their subsistence practices centered on the exploitation of marine resources, although terrestrial resources were also heavily used. The most important food of the Southern Coast Salish was salmon; however, a number of shellfish species, including clams, cockles, oysters, saltwater snails, barnacles, crab, chitons, and mussels, also were gathered and eaten. Important terrestrial resources included blacktail deer and elk. Important plant resources collected during ethnographic times included camas, bracken, wapato, salmonberry, thimbleberry, trailing blackberry, blackcap, serviceberry, salal berry, red huckleberry, blueberry, and red and blue elderberry (Navy, 2016c; Suttles and Lane, 1990).

Forest resources also were used for wooden canoes, boxes, bowls, and spoons. Wood fibers were used to make basketry, cordage, mats, nets, blankets, and garments. Cattail and tule mats were made, along with robes of a variety of materials including woven mountain goat wool, deer hides, bear skins, and duck skins (Navy, 2016c). In the vicinity of Crescent Harbor and Oak Harbor, the Lower Skagit primarily fished for flounder and salmon, and harvested a variety of shellfish (Snyder, 1974). In general, resources on the island were exploited in the spring, summer, and fall, when groups would travel to various sites on the island where resources could be easily obtained as they became seasonally available.

By the 1790s, the first non-native groups entered Puget Sound. George Vancouver was one of the first to arrive, in 1792 (Suttles and Lane, 1990). At first, the settlers made little contact with the Southern Coast Salish due to the needs of the fur trade, which was their initial interest. However, by 1818, the U.S. and Great Britain opened up the territory, including lands within Puget Sound. Thirty years later, a treaty was signed between the U.S. and Great Britain to divide the territory, with the lands south of the boundary at the Strait of Juan de Fuca going to the U.S. (Navy, 2016c).

During the mid-1800s, the number of Euro-American settlements increased in the Washington Territory, which caused some conflict with the local tribes. As a result, Isaac Stevens, the first governor and superintendent of Indian Affairs of the Washington Territory, was authorized by the U.S. to negotiate with Washington tribes for the settlement of their traditional lands. Stevens negotiated eight treaties. As part of these treaties, the tribes reserved their rights to continue traditional activities on these lands.

Reservations also were established from the lands retained, after tribal lands were ceded to the U.S. Treaty rights, however, were reserved on lands beyond the reservations.

Industries such as timber and commercial fishing developed during the second half of the nineteenth century, as tribal members slowly moved onto reservations and white settlement grew. In 1850, the Donation Land Law was passed to give legal status to claims already made to promote settlement. Isaac N. Ebey was the first permanent white settler to file a claim as a result of this act. Settlement in the areas of Oak Harbor and Crescent Harbor also occurred at this time, with brothers Samuel and Thomas Maylor arriving in 1852, followed soon after by Edward Barrington (although none filed claims until the 1860s) (NPS, 1980). In addition, the military began acquiring land for defense as early as 1850. This land, with an additional 150 acres on and around Admiralty Head, became the construction site of Fort Casey beginning in 1897 (Gilbert and Luxenberg, 1997).

In 1883, the Town of Coupeville was platted on Captain Thomas Coupe's 320-acre claim. One year later, the town had stores, hotels, a school, a church, and numerous dwellings. Today's Front Street is representative of this late nineteenth century development. Coupeville is the second oldest city founded in the State of Washington (NPS, 2006a).

In addition to the Town of Coupeville, continued growth allowed for the construction of Fort Casey in the late 1890s; it served as part of a defense system to guard Puget Sound (NPS, 1980). Much of the infrastructure associated with Fort Casey has been in place since 1906 (NPS, 2006a). Fort Casey Military Reservation, along with Fort Flagler and Fort Worden, was part of a three-fort defense system designed to protect the entrance to Puget Sound (Gilbert and Luxenberg, 1997). Starting in 1895, Dutch homesteaders began to arrive and settle in the Oak Harbor area. By 1897, more than 200 Dutch had settled in north Whidbey, particularly in the area of Clover Valley, which is today Ault Field (Neil, 1989). This community of Dutch settlers began potato and dairy farms on Whidbey Island (Navy, 2016c). By the turn of the century, the Puget Sound basin was established as the urban center of the northwest, and Whidbey Island became a vacation spot for the mainlanders (Navy, 2016c).

During this time, Island County's population doubled between 1900 and 1910, and continued to increase during the 1920s; the number of farms in the county also tripled between 1900 and 1920. In addition, military activity increased at Fort Casey with the construction of map rooms and gun escarpments during World War I (Gilbert and Luxenberg, 1997).

Naval buildup in the U.S. during the late 1930s required expansion of existing facilities and construction of new facilities on the West Coast. Beginning in 1939, Fort Casey also became active as the U.S. began to increase its military strength in reaction to events occurring in Europe (Gilbert and Luxenberg, 1997).

After the enactment of the Two-Ocean Navy Act, of 1940, the Chief of Naval Operations requested a list of potential locations for a new Pacific Coast base that could accommodate seaplanes, allow for expansion into land-based planes, and provide the necessary support services for ammunition, fuel, and personnel. Clover Valley and Crescent Harbor were selected, due in large part to their weather, described as a "sunshine oasis in the fog belt of Puget Sound" (Command History, 1945). An appropriation of \$3.79 million was made for the construction of NAS Whidbey Island in August of 1941, and construction began following the attack on Pearl Harbor. The mission of the two new bases on Whidbey Island was to provide facilities to operate and maintain two off-shore patrol squadrons, one inshore patrol squadron, and facilities for operating four additional squadrons. NAS Whidbey Island was formally commissioned on September 21, 1942 (Navy, 2016c).

Prior to the Navy's acquisition of land for the Seaplane Base and Ault Field (originally Clover Valley Field) in 1941, and for OLF Coupeville in 1943, the lands on Whidbey Island were rural, with open pasture land, dirt roads, and second-growth forested areas. Farms and their accompanying structures dominated the landscape, as the community of Oak Harbor had a population of fewer than 400 people. Before the early 1940s, these rural areas were subdivided into numerous lots ranging in size from 10 to nearly 180 acres. Ault Field contained approximately 120 such lots as of 1941, and roughly 85 rural or farm lots were located at the Seaplane Base (Hampton and Burkett, 2010; Navy, 2016).

OLF Coupeville, located on the south side of Penn Cove, was split between 16 landowners in 1937, before its acquisition by the Navy in 1943; construction was completed in 1944 (Navy, 2016c). For instance, the Kineth and Smith families had obtained large homestead tracts through the Homestead Act in the 1850s. The homesteads around OLF Coupeville contained fertile prairie lands, and farmers like the Kineth and Smith families prospered growing some of the best wheat crops on the island (Navy, 2017a). In fact, the northern portions of OLF Coupeville are located within the ELNHR because of the properties' overlap with some of the original land claims on Whidbey Island.

The outbreak of World War II brought more activity to Whidbey Island. Patrol planes based at NAS Whidbey Island flew long-range navigation training missions over the north Pacific. Buildings continued to be added to the original complement throughout World War II (Hampton and Burkett, 2010). In 1949, NAS Whidbey Island became a major Fleet support station and the only major station north of San Francisco and west of Chicago. This decision to make it a major Fleet support station, and the rising tensions of the Cold War in connection with the outbreak of the Korean War, resulted in the development of additional facilities and rehabilitation of existing structures in the early 1950s (Dames and Moore, 1994). This development centered on Ault Field, with the Seaplane Base taking a supporting role.

The 1950s also were characterized by the first operations of modern jet aircraft. In 1951, NAS Whidbey Island was designated a Master Jet Station. In order to provide long-range, nuclear-capable, strategic bombers from forward-based Pacific Fleet aircraft carriers, the Navy assigned heavy attack squadrons to NAS Whidbey Island beginning in 1956. In the latter half of the 1950s, NAS Whidbey Island also became the center of anti-submarine warfare in the Pacific Northwest (Navy, 2016c).

During the same time, the Fort Casey military reservation fluctuated between being an active training post and being on caretaker status. The property was put up for sale in 1954; Washington State Parks and Recreation Commission took over ownership of Admiralty Head at this time (Gilbert and Luxenberg, 1997).

During the early 1960s, the Seaplane Base continued as an active facility, but it was placed on standby status by 1966. Between 1965 and 1969, NAS Whidbey Island received the A6 Intruder squadrons, which transformed it into the sole training and operation center for these squadrons for use in the Pacific. The A6A Intruder training program included celestial and other navigational training, radar navigation, special weapons employment, bombing, and day/night carrier qualifications. This action increased air operations at Ault Field. In 1967, OLF Coupeville was reactivated for FCLPs (Navy, 2016c). Since that year, the Navy has continuously used OLF Coupeville for FCLP, with a peak of use between 1967 and 1971 and another peak in the late 1980s and early 1990s (*Argent v. United States*, 124 F.3d 1277).

In 1970, the Seaplane Base patrol operations were ended. By 1971, NAS Whidbey Island became the home base of tactical electronic warfare squadrons for naval aviation forces, a role that continues today

(Navy, 2016c). Two years later, in 1973, NAS Whidbey Island was formally established as a Functional Specialty Center, responsible for the training and operations of all medium attack squadrons of the Pacific Fleet and all of the Navy's tactical electronic warfare squadrons.

The Central Whidbey Island Historic District was listed on the NRHP on December 12, 1973. The original nomination form noted its state significance, a period of significance for the nineteenth century, and areas of significance including aboriginal (historic), agriculture, architecture, commerce, and military. The ELNHR (Ebey's Reserve) boundaries are the same as the Central Whidbey Island Historic District. Established under Section 508 of the Parks and Recreation Act of 1978, the Ebey's Reserve was created "to preserve and protect a rural community which provides an unbroken historic record from...19th century exploration and settlement in Puget Sound to the present time." The reserve is the only "historical reserve" in the National Park System. The lands included in the historic district today include approximately 17,400 acres, including Penn Cove. The district consisted of original donation land claims, locations listed in a Historic American Building Survey (HABS), Fort Casey, and structures displaying a cross-section of early domestic architecture (Cook, 1972).

By 1980, aviation units based at NAS Whidbey Island included six medium attack squadrons, nine tactical electronic warfare squadrons, and three Naval Air Reserve squadrons (Navy, 2016c). In 1980, an addendum to the NRHP nomination form for the Central Whidbey Island Historic District was developed to include the Clark House in a new location (Vandermeer, 1980). During the 1980s, NAS Whidbey Island squadrons provided electronic warfare support to U.S. naval forces operating around the world. NAS Whidbey Island then functioned as the main homeport for the Pacific Fleet of Prowler squadrons, which began the transition to Growler aircraft in 2008. The Seaplane Base has continued as a support facility to Ault Field (Navy, 2016c).

In 1998, an amendment to the Central Whidbey Island Historic District was completed. This amendment notes the property as a district, with private and public ownership, containing 103 contributing buildings, six sites, 286 structures, and one object. It identifies 79 contributing resources previously listed in the NRHP. The NRHP form notes significance under criteria A, B, and C, a period of significance from 1300 to 1945, and areas of significance in agriculture, architecture, commerce, recreation/tourism, ethnic heritage, exploration/settlement, education, religion, military, and politics and government. The amendment also identifies key cultural landscape components and characteristics, such as land use patterns, circulation systems, landscape organization, vegetation, and farm complexes (Gilbert and Luxenberg, 1997).

Ten contributing landscape areas were included as part of the 1998 amendment in order to represent four primary landforms and the Town of Coupeville. The ten contributing landscape areas are defined in the amendment as Ebey's Prairie, Crockett Prairie, Smith Prairie, San de Fuca Uplands, Fort Casey Uplands, East Woodlands, West Woodlands, Penn Cove, Coastal Strip, and Coupeville. The contributing landscapes possess character-defining qualities including:

- Patterns of Spatial Organization
- Natural Vegetation
- Land Use Categories and Activities
- Vegetation Related to Land Use
- Circulation

- Structures
- Cluster Arrangement
- Views and Other Perceptual Qualities

Historic land use patterns are shown to retain a high degree of integrity and represent the dominant values of agricultural lands, recreation and natural resource values of the shorelines, and community stability for the Town of Coupeville. Fifteen character views are noted within the nomination form, including views to or within Crockett's Prairie, Ebey's Prairie, Coupeville, Grasser's Lagoon, Penn Cove, Smith Prairie, Monroe's Landing, Fort Casey, and the Uplands (Gilbert and Luxenberg, 1997). These resources are eligible under NRHP criterion A for their association with agriculture, architecture, commerce, recreation/tourism, ethnic heritage (native people), exploration and settlement, education, religion, military, and politics and government; under NRHP criterion B for their association with Captain George Vancouver and Master Joseph Whidbey, the Ebey family, Captain Thomas Coupe, Judge Lester Still, and other individuals who contributed to the settlement and development of central Whidbey Island; and under NRHP criterion C because they comprise a cohesive cultural landscape that embodies the distinctive characteristics of types, styles, and periods of construction dating from the mid-nineteenth century to the present, reflecting associations with agricultural, military, commercial, residential, governmental, and recreational types of land use. (Gilbert and Luxenberg, 1997).

5 Inventory of Properties listed on or eligible to be Listed in the NRHP within the APE

There is a wealth of information about historic and pre-contact cultural resources on Whidbey Island. The Navy compiled a historic context bibliography of pertinent studies and literature, presented in Appendix E, for consultation in its July 19, 2017, letter updating its efforts to identify historic properties in the APE. The Whidbey Island community celebrates its local and national historic setting and is home to many federal, state, and local resource managers, including the National Park Service, the Navy, the ELNHR, and Washington State Parks and Recreation. Consequently, numerous archeological and architectural studies have been performed that provide a robust foundation for understanding the prehistoric and historic-era development in the APE.

Due to the nature of the direct and indirect potential effects from the proposed activities in the undertaking, along with the large number of cultural resource surveys available, the Navy did not conduct a full survey of historic properties in the APE; instead, it incorporates the existing substantial data, obtained from background research as presented in the historic context bibliography, consultation, and previous field investigations. In addition, since the majority of the area of the APE surrounding OLF Coupeville is incorporated into the boundary for the ELNHR, the Navy elected to utilize the most recent historic building inventory update of 2016 in its assessment along with the 2003 analysis of land use change and cultural landscape integrity. See Appendix E for a bibliography of pertinent source material.

In most cases, the results of architectural, historical, and archaeological studies have been included in the Washington State Department of Archaeology and Historic Preservation (WA DAHP) Geographic Information System (GIS) data. This inventory presents information gathered primarily from the WA DAHP GIS data set, the NRHP, NAS Whidbey Island records, and the 2016 ELNHR Historic Building Inventory Update. See Appendix F for a complete list of cultural resources within the APE, including those listed in the NRHP, the Washington Heritage Register, and the Washington State Historic Barn Register.

This inventory includes all historic properties within the APE regardless of property type or eligibility status. The Navy's identification effort has taken into consideration comments made to the Draft EIS and in Section 106 consultations. In addition, the inventory has been changed since the July 19, 2017, identification effort update as a result of the outcome of the new noise modeling and amended APE. Specifically, some properties at the boundary of the 65 dB DNL no longer fall within it, so they were removed from the inventory. See Appendix G for a list of properties that are no longer within the APE.

A large number of properties were also added to the inventory to ensure all properties on file at WA DAHP and on file with the ELNHR are considered. While both data sets overlap, the 2016 ELNHR Historic Building Update includes only those properties that are within the boundary of the reserve and that have been formally evaluated to determine whether they contribute to the historic significance of the reserve. Those evaluated properties are a small subset of historic structures within the ELNHR boundary that have been recorded by other entities and are on file at WA DAHP. The ELNHR 2016 inventory has not been updated in the WA DAHP database. To ensure all potentially indirectly affected properties are considered in this analysis, the inventory has been revised to include all properties recorded in the WA DAHP GIS data within the boundaries of the ELNHR in addition to those listed in the 2016 ELNHR Historic Building Update. Consequently, the inventory is smaller than that reported on July 19, 2017, which

presented the WA DAHP GIS data separately from the ELNHR inventory. See Appendix F for a full inventory of the APE.

While the WA DAHP GIS data are the most comprehensive available for the APE, some inconsistencies were noted where the DAHP GIS data overlap with NAS Whidbey Island and ELNHR data. This inventory has been corrected to reconcile differences between the WA DAHP GIS data and NAS Whidbey records. However, it has not been corrected to reconcile differences between the WA DAHP GIS data and 2016 ELNHR inventory. Consequently, duplicate listings for NAS Whidbey Island properties have been removed from this inventory, and determinations of eligibility have been updated while inconsistencies between the ELNHR 2016 inventory and the WA DAHP GIS data have not been updated. To ensure all ELNHR properties are accurately considered, the ELNHR properties were analyzed separately.

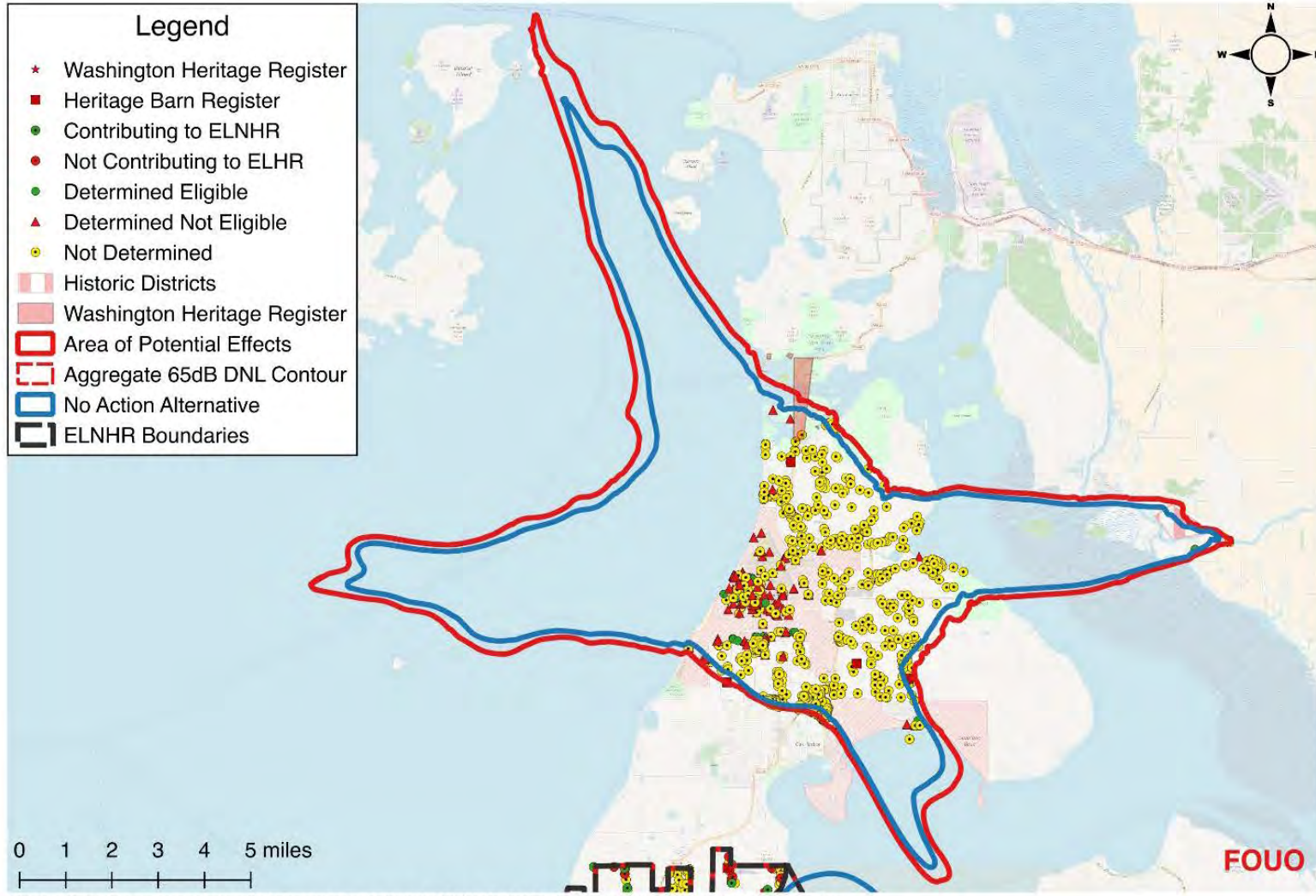
The rich history of Whidbey Island is reflected in the large number of recorded archaeological sites, cemetery sites, historic buildings and structures, and historic and archaeological districts within the APE (Table 6). See Figures 8 and 9 for locations of historic buildings, structures, and districts, and Appendix H for locations of archaeological districts and cemetery sites. There are a total of 2,487 inventoried historic properties within the APE. The majority of inventoried properties are historic structures and buildings, which include a total 1,989 buildings and structures on file at the WA DAHP, 288 listed in the ELNHR inventory, and 29 listed on the NRHP, WA Heritage Barn Register, or the Washington Heritage Register. There are also 151 recorded archaeological sites, which reflect Whidbey Island’s extensive indigenous history, and 27 historic era and pre-contact cemetery sites. Additionally, two historic and archaeological districts are within the APE: the ELNHR and Sqwikwikwab (Fish Town).

Table 6 Revised APE Inventory Overview

<i>Property Type</i>	<i>Eligible/ Listed</i>	<i>Not Eligible</i>	<i>Not Determined</i>	<i>Total Inventoried</i>
Buildings and Structures (50 Years and Older)	28	182	1,779	1,989
Washington Heritage Barn Register Listed	23	NA	NA	23
Historic Districts	2	0	0	2
Washington Heritage Register Listed	4	NA	NA	4
National Register of Historic Places	2	NA	NA	2
Cemetery Sites	1	0	26	27
Archaeological Sites	7	2	142	151
Archaeological Districts	1	0	0	1
ELNHR 2016 Inventory	203	85	NA	288
Total	271	269	1,947	2,487

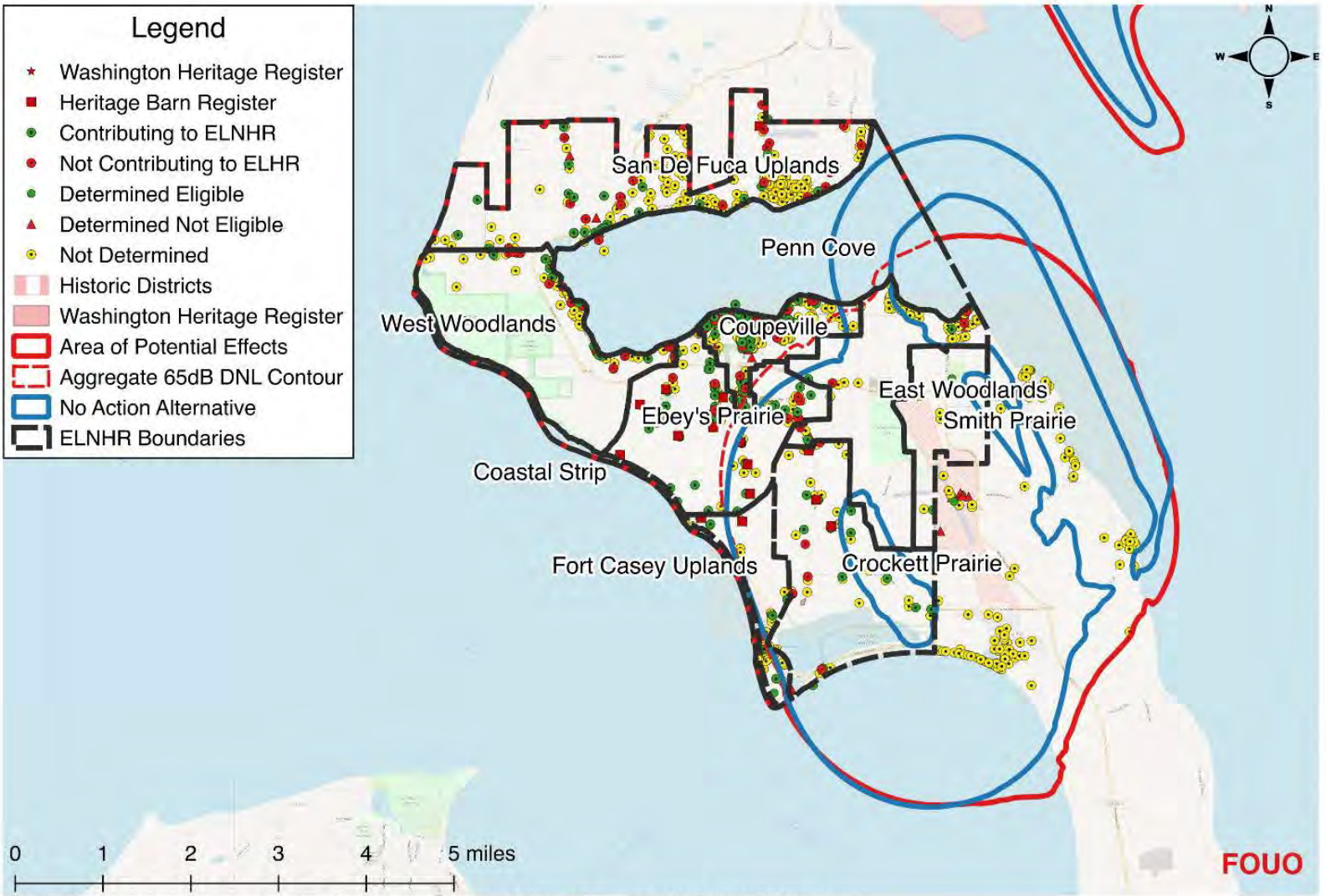
Note: Many of the ELNHR buildings and structures (where the 65 dB DNL overlaps with the ELNHR) are also included in the ELNHR 2016 Inventory.

Note: Properties listed on the Washington Heritage Register or Washington Heritage Barn Register are considered potentially eligible for listing in the NRHP.



Note: Displays property status as recorded in DAHP GIS data and ELNHR 2016 Update.

Figure 8 Map of Recorded Historic Buildings and Structures within the Ault Field Portion of the APE



Note: Displays property status as recorded in DAHP GIS data and ELNHR 2016 Update.

Figure 9 Map of Recorded Historic Buildings and Structures within the OLF Coupeville Portion of the APE

5.1 Buildings and Structures (50 Years and Older)

Like many developed areas, there are a large number of recorded historic structures and buildings within the APE. However, the majority of recorded buildings have either been determined not eligible for listing in the NRHP or have yet to be evaluated (see Table 7). Approximately one percent of recorded properties within the APE have been determined eligible for listing but are not listed in local, state, or national historic registers. Nine percent have been determined not eligible for listing, and 89 percent are properties greater than 50 years of age that have yet to be formally evaluated for eligibility for listing in the NRHP. These unevaluated properties primarily consist of records imported into the WA DAHP GIS database from the real estate tax assessor’s records to help historic researchers identify areas where properties of historic importance may be present. For purposes of this study, all Washington State Heritage Register and non-determined properties are considered potentially eligible for listing in the NRHP.

Table 7 Buildings and Structures (50 Years and Older) within the APE

<i>Buildings and Structures (50 Years and Older)</i>	<i>Count</i>
Determined Eligible for Local, State, or National Register	28
Determined Not Eligible	182
Not Determined (Potentially Eligible)	1,779
Total	1,989

5.2 Washington Heritage Barn Register, NRHP, and Washington Heritage Register Listed Properties

There are 29 properties within the APE that are listed on the NRHP, Washington Heritage Barn Register, or Washington Heritage Register (Table 8). Twenty-three properties are listed in the Washington Heritage Barn Register, four are listed in the Washington Heritage Register, and two are listed in the NRHP. Properties listed on the Washington Heritage Register or Washington Heritage Barn Register have not necessarily been evaluated for listing in the NRHP but are considered potentially eligible for listing in the NRHP.

Table 8 Washington Heritage Barn Register, NRHP, and Washington Heritage Register Listed Properties within the APE

<i>Listed Properties</i>	<i>Count</i>
Washington Heritage Barn Register	23
Washington Heritage Register	4
NRHP Listed	2
Total	29

Note: Properties listed on the Washington Heritage Register or Washington Heritage Barn Register are considered potentially eligible for listing in the NRHP.

5.3 Historic Districts

There are two historic districts within the APE: Central Whidbey Island Historic District, which was originally recorded as part of the Central Whidbey Island Historic District, and Squikwikwab (also known as Fish Town) Historic/Archaeological District. Both districts have been determined eligible for listing in the NRHP.

5.3.1 Central Whidbey Island Historic District

The Central Whidbey Island Historic District’s inventory has evolved significantly since its inception in 1973. The original 1973 Central Whidbey Island Historic District NRHP form listed 78 nineteenth century historic structures; this number was amended to 79 in 1980. In 1998, the NRHP form was amended again to include a total of 396 historic properties spanning the time period between 1300 and 1945. Approximately 92 structures were determined to be contributing to the eligibility of the district, along with a collection of contributing features including 21 roads, 15 views, and a variety of small-scale features (e.g. old lamp posts, historic gates and fences, and remnant orchards). In 2010, the NRHP form was amended again to include an additional structure. Today, the inventory includes 203 eligible or contributing buildings and a collection of other contributing features that span the time period from 1300 to 1945 (Table 9), See Appendix I for a complete list of contributing structures, roads, and views.

Table 9 ELNHR Inventory

<i>Recorded Buildings and Structures</i>	<i>Non-Contributing Structures</i>	<i>Contributing Buildings and Structures</i>	<i>Contributing Roads</i>	<i>Contributing Views</i>	<i>Contributing Landscapes</i>
288	85	203	21	15	10

The ELNHR was established by Congress in 1978 to “preserve and protect a rural community which provides an unbroken historic record from Nineteenth Century exploration and settlement of Puget Sound up to the present time....” (Public Law 95-625). The reserve comprises 17,400 acres of private, state, and federally owned land in central Whidbey Island and incorporates the Central Whidbey Island Historic District. The district and ELNHR have evolved substantially over the past 45 years.

The district possesses both historic and architectural significance and is significant for its retention of a number of important historic events, including early settlement, rural community development tied to farmland, a strong tie with wartime activities, and architectural styles representative of much of the Puget Sound region in the late 1800s.

The 1998 NRHP amendment to the historic district added 217 buildings, sites, and structures to the district, as well as 10 contributing landscapes. The intent of the amendment was to supplement the original nomination to “fully reflect the range of landscape and architectural features that contribute to the special character of the Reserve which Congress has sought to preserve.” The amendment identified eight defining landscape characteristics: Patterns of Spatial Organization, Response to the Natural Environment, Land Use Categories and Activities, Vegetation, Circulation, Buildings and Structures, Cluster Arrangements, and Views and Other Perceptual Qualities.

In addition, the 1998 NRHP amendment notes:

“...changes are evident within the historic district. Some properties deemed eligible for the National Register lack individual distinction but are eligible as components of a district. The

grouping of buildings, structures and sites within the Reserve identified for listing in conjunction with the district's cultural landscape features and components, represent the various historic periods and areas of significance identified in this amended nomination form in an exemplary way. The district, comprised of various and diverse pieces, as a whole possesses great significance and integrity. The non-contributing buildings and structures do not detract from the sense of time and place that the historic features provide this area. The unity that this historic district/national historical reserve exhibits and its rich and assorted natural and cultural resources provide a laboratory for learning about Pacific Northwest history and how this history fits into our nation's history.”

The nomination package considers that the district represents pieces of history from different historic periods and that non-contributing elements do not detract from the integrity of the district but instead offer an understanding of how history within the district is ever changing and that this district is continuing to evolve to its present time and place.

In 2003, the ELNHR prepared an analysis of land use change and cultural landscape integrity. The eight established landscape characteristics were evaluated for integrity since their listing in the NRHP. The study found that all 10 of the Central Whidbey Island Historic District’s contributing landscapes retained integrity but were at risk from incremental residential growth. The study recommended that for the agricultural tradition to persist, a combination of controls such as zoning, designation of agricultural protection, and purchase of conservation easements should be implemented.

In 2016, the ELNHR inventory was updated. The update included reevaluation of contributing structures. The updated inventory is on file with the ELNHR; however, it has yet to be included into the WA DAHP Washington Information System for Architectural and Archaeological Records Data (WISAARD) database or incorporated into the NRHP listing. Associated contributing landscape and elements were not included in the update.

5.3.2 Sqwikwikwab (Fish Town)

Sqwikwikwab, also known as Fish Town, is an eligible historic and archaeological district in the vicinity of La Connor, near the mouth of the north fork of the Skagit River. It is within an area known ethnographically to have been occupied by the Lower Skagit Indians. Today, the Lower Skagit Indians (sometimes called Whidbey Island Skagits) are enrolled in the Swinomish Indian Tribal Community. The name Sqwikwikwab was derived historically from a series of fishing cabins that were erected in the early twentieth century, when gill-netting of salmon in the river became illegal. In the middle 1960s, many of the cabins were restored and occupied by an artist colony.

5.4 Cemeteries

Twenty-seven cemeteries are within the APE (Table 10). Five are historic-era cemeteries or monuments, and 22 are prehistoric archaeological sites that contained multiple burials. Individual and collective burial places can reflect and represent in important ways the cultural values and practices of the past that help instruct us about who we are as a people. Yet for profoundly personal reasons, familial and cultural descendants of the interred often view graves and cemeteries with a sense of reverence and devout sentiment that can overshadow objective evaluation. Therefore, cemeteries and graves are among those properties that ordinarily are not considered eligible for inclusion in the NRHP unless they meet special requirements. One prehistoric cemetery site in the APE, 45IS00082, is also an

archaeological site that is eligible for listing in the NRHP and subject to protection under the Native American Graves Protection and Repatriation Act (NAGPRA).

Table 10 Cemeteries within the APE

<i>Cemeteries</i>	<i>Count</i>
Historic-era Cemetery	4
Historic-era Monument	1
Prehistoric Burial Places	22
Total	27

5.5 Archaeological Sites

There are a total of 151 archaeological sites within the APE (Table 11). Seven have been determined eligible for listing in the NRHP, and two have been determined ineligible for listing in the NRHP. Fifteen are considered potentially eligible for listing, and 127 have not been evaluated for eligibility for listing in the NRHP. Unevaluated sites are considered potentially eligible.

Table 11 Archaeological Sites within the APE

<i>Archaeological Sites</i>	<i>Count</i>
Determined Eligible	7
Determined Not Eligible	2
Potentially Eligible	15
Unevaluated (Potentially Eligible)	127
Total	151

5.6 Archaeological Districts

There is one archaeological district, Sqwikwikwab, within the APE. It is also listed in the WA DAHP data as a historic district.

5.6.1 Sqwikwikwab (Fish Town)

Sqwikwikwab, also known as Fish Town, is an eligible historic and archaeological district in the vicinity of La Connor, near the mouth of the north fork of the Skagit River. The district consists of four prehistoric archaeological sites: 45SK33A, 45SK33B, 45SK99, and a nearby burial site. The archaeological sites have been excavated by the Washington Archaeological Society, the Seattle Central Community College, and Washington State University. The burials were removed by the local American Indian tribes for reburial around 1900. Radiocarbon dating places occupation of 45SK99 to 1220 ± 70.

6 Methodology for Determination of Adverse Effects

The NHPA Section 106 directs federal agencies to make a reasonable and good faith effort to identify historic properties, taking into account the magnitude and nature of the proposed undertaking, the nature and extent of the potential effects on historic properties, and the likely nature and location of the historic properties within the APE (36 CFR 800.4(b)(1)). If historic properties are present and the federal agency determines those properties may be affected by the proposed undertaking, federal agencies take into account the nature and extent of the potential effects on those historic properties by applying the criteria of adverse effects. Per Section 106 regulations, an adverse effect is found when an undertaking may alter, directly or indirectly, any of the “characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” (36 CFR 800.5[a][1]).

To determine the potential adverse effects of the undertaking, this analysis applies an appropriate methodology to identify direct and indirect effects to historic properties. Direct effects are primarily the result of construction and demolition activities that may cause direct physical damage to significant features of a historic property. Indirect effects are primarily the result of change to “visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features” (36 CFR 800.5[a][1]).

To identify historic properties potentially subject to direct and indirect adverse effects in the APE, the Navy analyzed a variety of data, including:

1. Results of an environmental and cultural literature review,
2. Cultural resource survey and reports of properties within 100 meters of the area of indirect effects,
3. Review of historic property inventories including those conducted by NAS Whidbey Island, WA DAHP, Washington Heritage Barn Register, Washington Heritage Register, and the ELNHR 2016 Inventory,
4. Noise studies related to effects on structures and historic properties
5. Noise studies performed on Whidbey Island
6. Geological formation information,
7. Soils classification,
8. Historic land use and land ownership information, and
9. History of Navy activity in area.

6.1 Direct Effects

For this analysis, consideration of potential direct adverse effects includes whether the proposed undertaking involves direct physical damage to a historic property, including historic buildings, structures, districts, or archaeological sites. In addition, the analysis considered whether the undertaking proposed any construction, renovation, or demolition activities that would alter the use or setting of existing historic properties. Since additional facilities or renovation to existing facilities would not be required at OLF Coupeville, the proposed undertaking includes construction and demolition

activities only at Ault Field. Accordingly, the Navy analyzes potential direct adverse effects to historic properties from physical destruction, damage, alteration, or change in the character of a property's use that could arise from proposed construction, renovation, and demolition of buildings and structures at Ault Field.

Proposed ground-disturbing, construction, demolition, and renovation activities are limited to Ault Field. No ground disturbance is anticipated to occur in other locations of the APE during construction (i.e., off station); no direct effects would be anticipated to occur to archaeological resources outside the direct effects area of the APE.

The proposed undertaking includes ground disturbance primarily in the north end of the flight line at Ault Field, within the APE for the area of potential direct effects as identified on July 14, 2017. Construction of a new armament storage facility would occur west of Building 386 (Hangar 5), and the current armament storage building (Building 115) would be demolished. New hangar facilities include expansion of Building 2737 (Hangar 12) and construction of a two-squadron hangar just north of Hangar 5.

All ground-disturbing activities for construction and demolition will occur in areas where sediments have been extensively disturbed by past construction of Ault Field facilities and utilities. During building and runway construction, excavation is not planned to exceed a depth of 10 feet below the ground surface, which is the current maximum depth expected for construction of foundation footings. Utilities are expected to be installed to a depth of 24 to 36 inches below the ground surface and then connected into existing utility lines where feasible. Landscaping and parking construction will disturb the upper 8 to 12 inches of topsoil. Airfield repairs are proposed for Taxiway Juliet, requiring excavation of existing fill estimated at no greater than 21 inches below the ground surface.

6.2 Indirect Effects

Analysis of potential indirect effects includes consideration of whether the undertaking would introduce or change "visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features," consistent with 36 CFR 800.5(a)(1). The proposed changes in airfield operations at Ault Field and OLF Coupeville have the potential to introduce auditory, visual, and atmospheric characteristics that could cause indirect effects to historic properties. Specifically, although the Navy would not be introducing a new noise level through the proposed undertaking, the proposed changes in aircraft operations and flight patterns have the potential to change the frequentness of noise exposure in the community. Based on comments received during consultation on the APE and the proposed undertaking's potential to alter noise exposure due to increased operations and flight pattern changes, the Navy focused its analysis of potential indirect effects upon whether the undertaking results in a substantive change in noise exposure measured in dB DNL. As discussed in Section 3, DNL illustrates where high levels of noise exposure are being experienced. Application of an average sound level, such as the DNL metric, to analyze substantive change in noise exposure when comparing existing conditions and proposed changes is consistent with analysis conducted by other federal and state agencies, including the FAA (FAA Order 1050.1F) and the Department of Transportation (DOT) (WA State Department of Transportation Traffic Noise Policy and Procedures, 2012).

The Navy analyzed substantive change in noise exposure in two ways:

1. Analyzing the change in exposure to the 65 dB DNL contour, and

2. Analyzing the degree of change in dB DNL, also called delta DNL, in the APE.

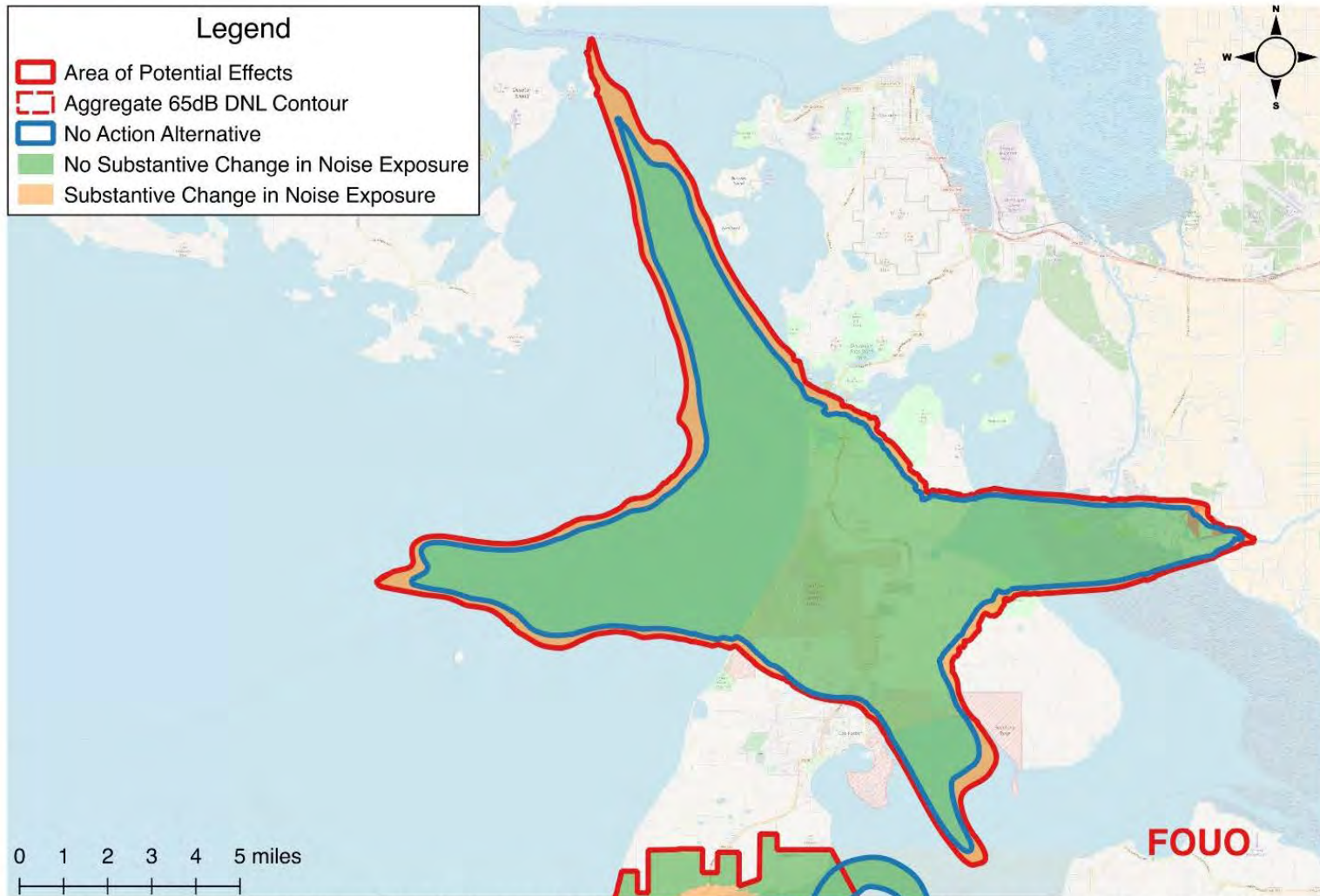
Change in exposure to the area within the 65 dB DNL contour is represented as change in the 65 dB DBL contour between the No Action Alternative and the proposed aggregate 65 dB DNL contour. For this undertaking, the area within the proposed aggregate 65 dB DNL contour is larger in most instances than that of the 65 dB DNL contour of the No Action Alternative. Thus, the analysis focuses on those historic properties located within the proposed aggregate 65 dB DNL that are not located within the No Action Alternative's 65 dB DNL contour. Primarily, these historic properties are located at the edge of the APE, where the proposed aggregate 65 dB DNL expands beyond the No Action Alternative 65 dB DNL contour. This area is represented as orange in Figures 10 and 11.

The degree of change in dB DNL is measured by the difference between the dB DNL for the proposed action, represented as an aggregate of all proposed alternatives, and the dB DNL modeled under the No Action Alternative. This difference, also called delta DNL, was calculated across the entire APE in 1 dB increments. The highest degree of change in delta DNL occurs primarily near OLF Coupeville, where the Growler would fly a standardized training pattern that utilizes both Runway 14 and Runway 32.

To determine the degree of change in delta DNL that could result in a potential for indirect adverse effects on historic properties, the Navy looked to other federal agencies' standards. Consistently, other federal agencies applied a methodology for addressing potential adverse effects to historic properties from an increase in noise exposure through reference to land use compatibility standards within a 65 dB DNL contour as a proxy.

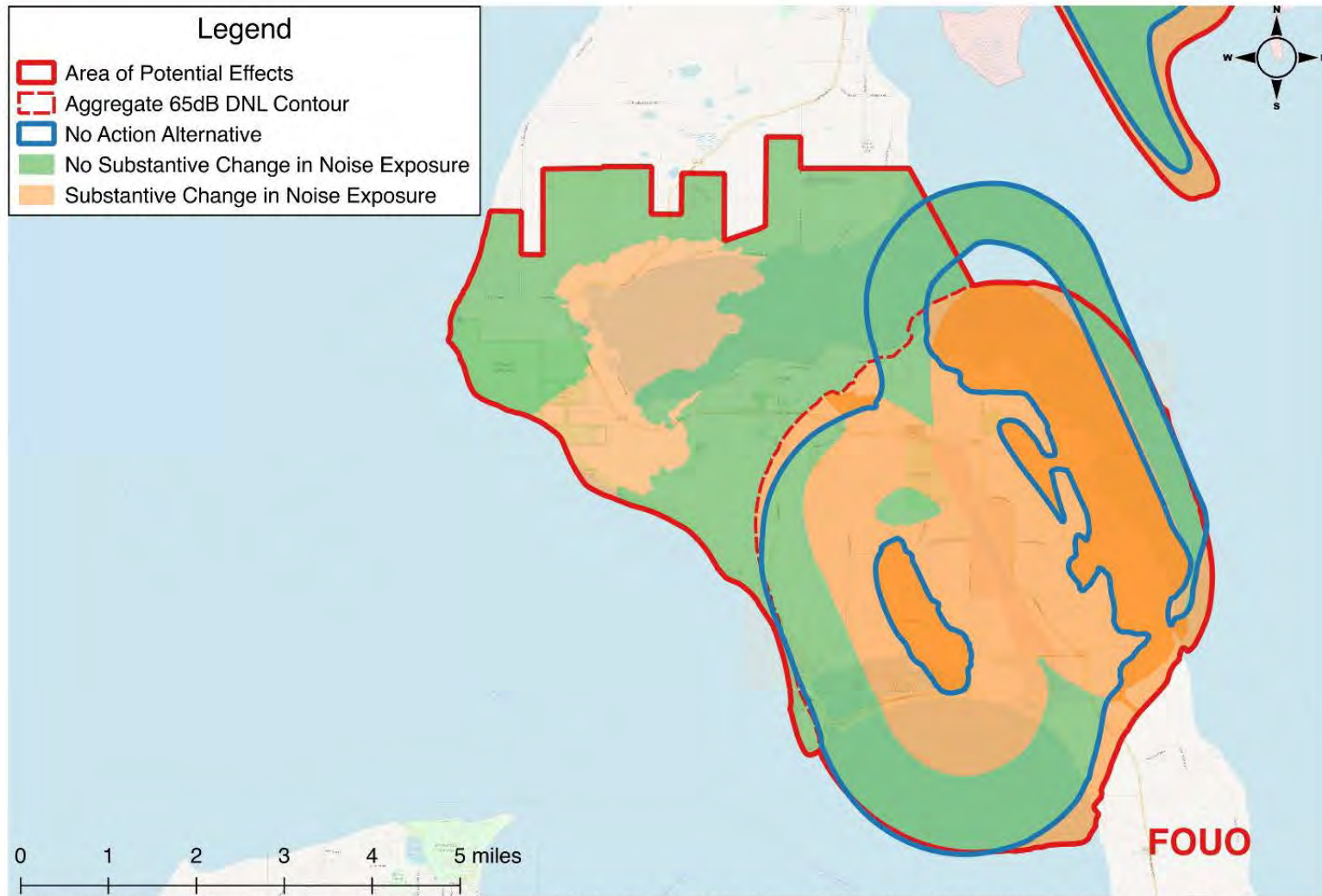
The Navy conducts Air Installations Compatible Use Zones (AICUZ) studies and provides recommendations to local governing bodies promoting compatible land use surrounding Navy airfields based, in part, on noise exposure depicted as a DNL contour. An AICUZ study recommends compatible land use based on noise exposure levels in increments of 5 dB DNL. The foundation of the 5 dB DNL standard is based on federal policy and the characteristics of sound.

Use of the 5 dB DNL increment is in keeping with the 1977 Standard Land Use Coding Manual (SLUCM) from the U.S. DOT, Federal Highway Administration, as well as the findings of two other Federal Interagency Committees on noise, one published in 1980 and another in 1992. In alignment with the SLUCM, practices by other federal agencies, and Navy policy, the Navy identifies noise zones in 5 dB bands within the 65 dB DNL contour and AICUZ noise zones. Accordingly, the Navy assesses change in delta DNL based on changes in noise exposure of 5 dB DNL or greater to identify a substantive change in noise exposure that could have potential adverse indirect effects to historic properties.



Note: Darker orange indicates overlap between shift in 65 dB DNL (from No Action Alternative to Aggregate 65 dB DNL) and area where increase in dB DNL is substantive.

Figure 10 Ault Field Areas of Substantive Change in Noise Exposure



Note: Darker orange indicates overlap between shift in 65 dB DNL (from No Action Alternative to Aggregate 65 dB DNL) and area where increase in dB DNL is substantive.

Figure 11 OLF Coupeville Areas of Substantive Change in Noise Exposure

Historic properties are currently not considered by federal agencies for land use compatibility recommendations. Since historic properties are not currently included in the SLUCM, the Navy is following the recommendations in the *Aircraft Noise Study for Naval Air Station Whidbey Island and Outlying Landing Field Coupeville, Washington* (2005), and uses “conventional structures” as the standard to assess noise exposure levels for normally compatible land uses. For conventional structures, land use compatibility recommendations begin at Noise Zone 2, which begins at 65 dB DNL. As such, the Navy applies the methodology for assessing potential indirect adverse effects to historic properties within the 65 dB DNL contour that result in substantive change in noise exposure using a change in 5 dB DNL. However, due to the unique historic characteristics of the ELNHR, the Navy agreed to include the entirety of the ELNHR in its APE, and it will analyze all historic properties included in the ELNHR inventory that experience a change of 5 dB DNL or greater regardless of what noise contour the historic property falls within.

While change in DNL is commonly applied to analyze potential adverse effects to historic properties, there is no established standard threshold. Thresholds lower than 5 DNL have been used by other agencies at commercial airports where the noise events are relatively steady from day to day. However, Navy airfield operations are more episodic and depend on operational and training needs driven by deployment schedules. Even with a substantial increase in activity at OLF Coupeville, noise would still be more sporadic, temporary sound exposure in comparison to the sound resulting from an active commercial airport. For all these reasons, the Navy has chosen to use 5dB as the increment for this analysis.

In summary, this analysis assesses a substantive change in noise exposure using delta DNL in comparison to the existing, or No Action Alternative, noise levels of:

- +5 dB DNL or more in areas with an existing DNL of greater than or equal to 65 dB, and
- +5 dB DNL or more in areas within the ELNHR, regardless of existing noise contour range.

In Figures 10 and 11, the areas depicted in orange within the APE are those where the model shows substantive changes to noise exposure that could cause indirect adverse effects to historic properties. The dark orange area depicts areas where there is an overlap in the change in exposure to the 65 dB contour line and a change in 5 dB or more in delta DNL. The analysis finds that 31 historic properties listed as eligible or contributing to the ELNHR would experience a change in 5 dB DNL or more under the proposed undertaking in areas within the ELNHR that are located outside the aggregate 65 dB DNL contour. Within the aggregate 65 dB DNL contour, the only area that experiences a substantive change in noise exposure occurs at OLF Coupeville. No areas surrounding Ault Field experience a change of 5 dB DNL or greater within the 65 dB DNL contour.

6.3 Additional Considerations for Determining Effects

In addition to changes in noise exposure and noise experience, the Navy also took into consideration the following factors to assess indirect adverse effects to historic properties:

1. **The maximum potential level of usage proposed at both airfields.** None of the action alternatives proposes using both airfields to the maximum level.
2. **Intermittent airfield use.** Unlike commercial airfields, operations at military airfields are intermittent, with long periods of time between airfield operations when there is no use or no noise occurring.

3. **History of use at Ault Field and OLF Coupeville.** Ault Field is the primary airfield for NAS Whidbey Island and has historically higher numbers of operations than OLF Coupeville. The aggregate 65 dB DNL contour line represents the noise environment predicted with the maximum possible number of operations at OLF Coupeville. The alternative with the greatest proposed number of operations would generate noise levels similar to the historical levels generated by the average number of operations conducted between 1968 and 1989.
 - a. The Navy follows governing FAA rules and regulations when establishing procedures for flying arrivals and departures. Procedures for arrival and departure into and out of Ault Field and OLF Coupeville have been developed in conjunction with the FAA over decades, with an emphasis on de-conflicting military, commercial, and general aircraft while avoiding more densely populated areas where feasible.
 - b. Seasonal changes, such as wind direction and hours of darkness, will influence noise-abatement protocols used throughout the year. For example, wind direction will determine which runway is used at the airfield. Nighttime training is accomplished earlier in the winter, when it gets dark around 5:00 p.m., then during the summer, when it gets dark around 10:00 p.m.
4. **The Navy strives to be a good steward of the environment as well as a good neighbor.** NAS Whidbey Island is implementing measures to minimize impacts from aircraft operations or training noise impacts on its surrounding communities. Policies currently implemented to minimize noise impacts at Ault Field and OLF Coupeville include the following:
 - a. Flight paths are designed to mitigate the effects of aircraft noise on the communities surrounding the NAS Whidbey Island airfields. In addition to adopting local flight noise abatement patterns that direct interfacility flights away from land as much as possible, the NAS Whidbey Island Operations Manual standards for interfacility transit are above minimum flight altitude standards set by the FAA.
 - b. The Navy publishes a schedule of FCLP flight operations weekly for both Ault Field and OLF Coupeville to assist the public in making informed decisions about their activities.
 - c. During FCLPs, a LSO is present to monitor approaches to the airfield, maintain two-way communication with air traffic control and all participating pilots, and ensure pattern integrity and proper sequencing of aircraft in order to efficiently accomplish FCLP training.
 - d. Airfield ground operations and aircraft maintenance are restricted to reduce noise disturbance. High-power turns should not be conducted prior to 12:00 noon on Sundays or between the hours of 10:00 p.m. and 7:30 a.m. for jet aircraft.
 - e. The Navy has been actively working to minimize effects of noise on the community through its AICUZ and REPI programs. Specifically, the Navy works with local municipalities to adopt appropriate land use zoning to curb high-density development around the airfields and partners with the Whidbey Camano Land Trust and Island County to establish numerous conservation easements in order to preserve the historic and scenic integrity of the cultural landscapes. This initiative of establishing conservation easements is designed to reduce the number of changes that threaten the integrity of the Central Whidbey Island Historic District, specifically

at Smith Prairie and Crockett Prairie landscapes (two landscape areas with the highest proportion of effect). To date, NAS Whidbey Island has partnered with the Whidbey Camano Land Trust to secure conservation easements on 961 acres of land in the Central Whidbey Island Historic District at a cost of \$7.8 million. See Figure 12 for the encroachment protection map that depicts current conservation units.

- f. The NAS Whidbey Island Air Operations Department is responsible for conducting periodic pilot training to provide familiarization with course rules, appropriate noise abatement procedures, and the importance of good community relations.
- g. The NAS Whidbey Island Air Operations Officer continually reviews operational procedures to identify operational changes intended to reduce noise within the constraints of safety, mission effectiveness, and cost savings.
- h. The NAS Whidbey Island Commanding Officer and Air Operations Officer participate in bi-annual community leadership forums to discuss issues of mutual importance between the installation and the local community.
- i. The NAS Whidbey Island Air Operations Officer monitors airfield operational schedules and attempts to mitigate potential operational impacts during key academic testing periods in schools and during large-scale community events such as the Penn Cove Mussel Fest.

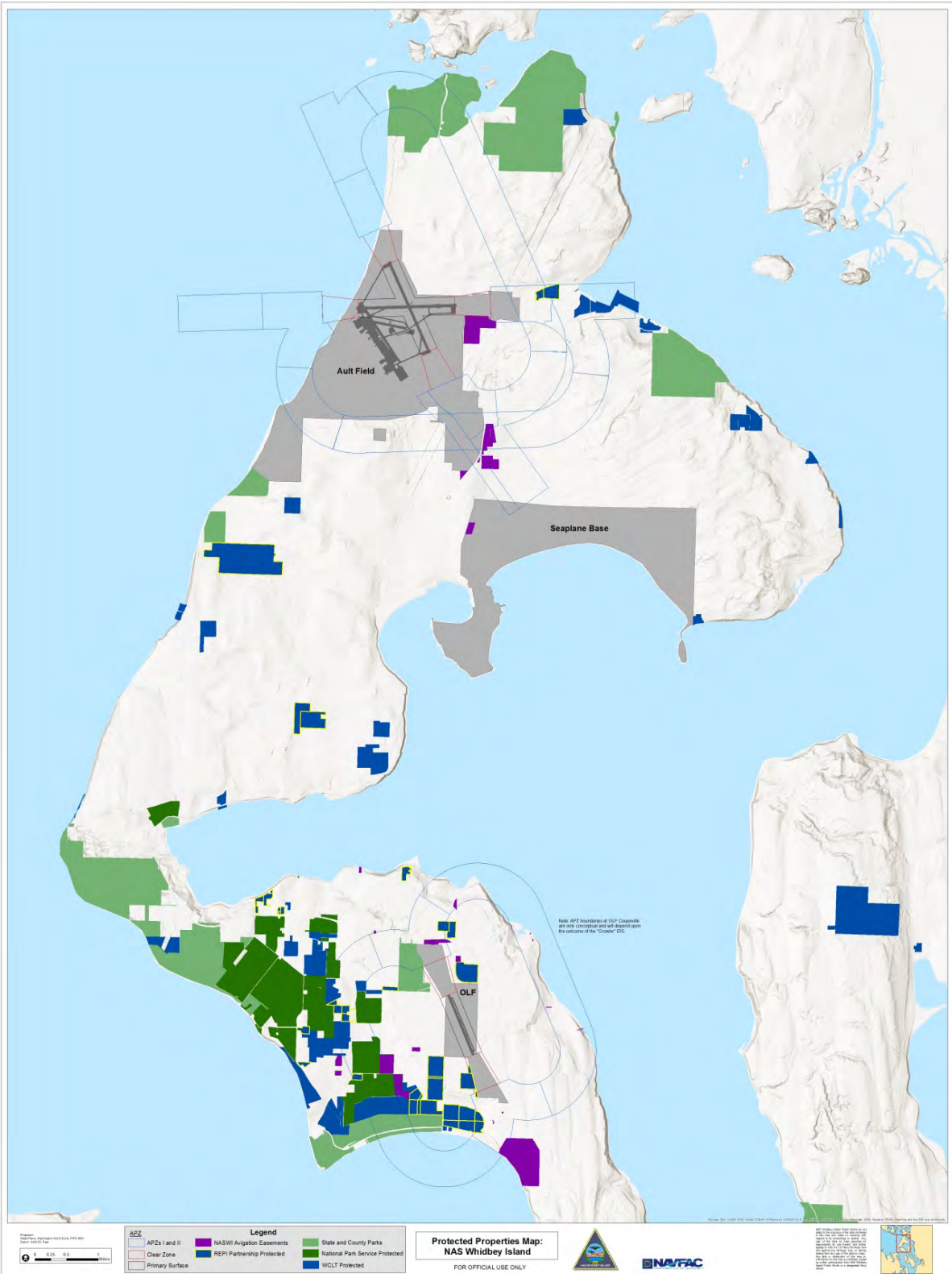


Figure 12 NAS Whidbey Island Encroachment Protection Map

7 Determination of Adverse Effects to Historical, Archaeological and Cultural Resources

In this section, the Navy applies the methodology for assessing effects described in Section 6. For the direct effects analysis, the Navy focuses only on those areas where ground-disturbing activities, construction, and demolition are proposed. For the indirect effects analysis, the Navy applies the methodology to the entirety of the APE. See Section 6 for more information about methods.

7.1 Analysis of Potential Direct Effects

To support additional Growler aircraft and personnel, new construction would occur at Ault Field, including expansion and construction of hangar space, construction of new armament storage, demolition of the old armament storage facility, construction of a separate mobile maintenance storage facility, and expansion of parking areas.

To identify historic properties within the APE, the Navy has reviewed available environmental and cultural resource literature addressing properties within 100 meters of the project area. The review determined one archaeological survey, four architectural surveys, and one context report have been conducted within the search area (Table 13).

Table 13 Environmental and Cultural Resources Studies Conducted in the Area of the Proposed Undertaking

<i>Author</i>	<i>Report Title</i>	<i>Comments</i>
EDAW, Inc. 1997	<i>Historic Resources Survey Naval Air Station Whidbey Island, U.S. Department of the Navy, Island County, WA</i>	A survey of NAS Whidbey Island historic buildings; Ault Field Buildings 112, 118, and 180/220 dating to the 1940s identified as eligible
Rudolph et al. 2009	<i>Historic Properties Assessment and National Register Eligibility Recommendations for P-236 ARRA Waterline Replacement NAVFAC Northwest AOR: NAS Whidbey Island.</i>	Archaeological pedestrian survey with 18 shovel tests; 1 historic site recorded beyond the APE; 3 previously recorded sites were evaluated.
Hampton and Burkette 2010	<i>Phase I Architecture Survey of Naval Air Station Whidbey Island</i>	NAS Whidbey Island building overview and evaluation including Ault Field.
Thursby et al. 2013	<i>Final Naval Air Station Whidbey Island Cold War Historic Context</i>	A literature overview to establish Cold War historic context of NAS Whidbey Island, including Ault Field
Chidley et al. 2013	<i>Naval Air Station Whidbey Island Cold War Study Phase 2: Inventory and Evaluation</i>	Inventory and evaluation of Cold War era resources at NAS Whidbey Island including Ault Field
Chidley et al. 2017	<i>Early Euro-American Settlement Study and Context Report: Naval Air Station Whidbey Island</i>	Report addressing the pre-Navy history of all Navy property on Whidbey Island
Stevenson et al. 2018	<i>Archaeological Inventory for the Naval Health Clinic, Oak Harbor Naval Air Station Whidbey Island, Island County, Washington</i>	Archaeological pedestrian survey with 84 shovel tests; no historic properties recorded

Two archaeological surveys have occurred of areas of the APE and within 100 meters of the APE. The 2009 archaeological survey examined the linear alignment of a large water pipeline project. Several sections of the water pipeline intersect or run near the APE. The pipeline survey included a pedestrian

survey of the entire route, with limited shovel testing where the alignment deviated from existing roadways and where there appeared to be little previous disturbance. The study also included delineation and evaluation of previously recorded archaeological sites at Ault Field. Because the portion of the surveyed alignment that runs near the APE was extensively disturbed, no shovel testing was required.

The 2018 archaeological survey examined areas southwest of Ault Field and conducted 84 shovel tests up to 1 meter in depth. This subsurface survey was limited to some degree by some combination of modern paved streets, paved parking lots, buried marked and unmarked utilities, fencing with locked gates, buildings, and recently demolished buildings impeding shovel testing. No archaeological resources were observed during the pedestrian or subsurface survey.

The architectural surveys focused on NAS Whidbey Island buildings that were built before 1964 and during the Cold War Era (1947–1989) at Ault Field and other NAS Whidbey Island properties. Two historic structures have been recorded within the APE, but neither will be adversely affected by the work. The context report focused on early Euro-American settlement at NAS Whidbey Island to provide information on settlement, ownership, and use of Clover Valley and other NAS Whidbey Island properties.

Two buildings associated with the activities defined in the direct effects analysis have been determined eligible for listing in the NRHP, with SHPO concurrence. Building 386 (Hangar 5) was determined eligible as a historic structure and an example of the Miramar-type hangar on January 26, 2010 (SHPO Log: 012610-05-USN), and under the Cold War era context on April 4, 2014 (SHPO Log:020714-01-USN). Building 112 (Hangar 1) was determined eligible for its architectural merit as a Birchwood-type hangar in 2010 (SHPO Log:012610-05-USN). Three buildings and structures associated with the proposed undertaking have been determined not eligible for listing in the NRHP, and the SHPO concurred. Building 115 was determined not eligible on January 26, 2010 (SHPO Log: 012610-05-USN). Building 2737 (Hangar 12) and Taxiway Juliet were determined not eligible on April 4, 2014 (SHPO Log: 020714-01-USN).

The Navy's literature review also revealed the following regarding the APE:

- The underlying geology of the APE consists primarily of artificial fill, modified land, and Pleistocene glacial deposits including Everson Interstade Glaciomarine Drift and Vashon Stade Till. The privately owned parking expansion footprint is depicted within or very near Holocene nearshore deposits on the geologic map of the Oak Harbor, Crescent Harbor, and Part of the Smith Island 7.5-minute Quadrangles, Island County, Washington (Dragovich et al, 2005) however archaeological shovel testing performed along Charles Porter Boulevard for a waterline replacement project in 2008 did not encounter any intact soils (Rudolph et al, 2009).
- The soils are classified as Urban Land-Coupeville-Coveland Complex, Coveland Loam, and Everett-Alderwood Complex. Urban Land is land that is mostly covered by streets, parking lots, buildings, and other structures of urban areas. Coupeville-Coveland Complex, Coveland Loam, and Everett-Alderwood Complex soils are formed in glacial drift and outwash overlying dense glaciomarine deposits. These soils are used for forage crop production, livestock grazing, timber production, wildlife habitat, hay and pasture, urban development, a source of sand and gravel, woodland, field crops, orchards, vineyards, and watersheds. Potential natural vegetation includes Sitka spruce, red alder, western red cedar, Douglas fir, grand fir, lodgepole pine, bigleaf

maple, clustered rose, salmonberry, blackberry, red elderberry, common snowberry, stinging nettle, swordfern, slough sedge, field horsetail, scouring-rush horsetail, stinging nettle, salal, bracken fern, Pacific rhododendron, western hemlock, red huckleberry, Nootka rose, ocean-spray, and Cascade Oregon grape, orange honeysuckle, and evergreen huckleberry.

- No prehistoric or historic archaeological sites have been recorded within the APE or within 200 meters of it. Two historic archaeological sites are located within 1 kilometer of the APE. Site 45IS243 is located about 800 kilometers east of the APE. The site consists of historic logging materials, cut tree stumps, and a dugout area of 39 by 30 meters. Site 45IS283 is located about 900 kilometers southwest of the APE. The site includes a historic period concrete foundation and debris. Both historic archaeological sites are recommended ineligible for listing in the NRHP, but the Navy has yet to formally evaluate them.
- Building 386 (Hangar 5), which is eligible for the NRHP, is proximate to the planned location of the construction activities and would be adjacent to the two-squadron hangar. This building is eligible for the NRHP due to its unique architectural qualities as an example of a Miramar-type hangar (i.e., Criterion C). The physical structure of the building would not be altered during the proposed construction; however, increased dust, personnel, and machinery may temporarily impact the setting. The new hangar facility design would be required to comply with the NAS Whidbey Island Installation Appearance Plan (IAP). The IAP was developed to maintain consistency of appearance of all structural design throughout the installation. The Navy has determined that no adverse effect to Hangar 5's viewshed would be anticipated.
- Building 112 (Hangar 1), which is eligible for the NRHP, is also proximate to the planned location of expansion and construction of hangars. Hangar 1 was determined eligible during the cultural resources review for the Environmental Assessment (EA) for the Demolition of Underutilized, Excess, and Obsolete Buildings at NAS Whidbey Island (Demo EA) in 2010. The Demo EA proposed demolition of up to 80 structures at NAS Whidbey Island, including Hangar 1. A Memorandum of Agreement (MOA) to mitigate the adverse effects of demolition on Hangar 1 and several other eligible buildings was signed with the SHPO in May 2010. The Navy has met the mitigation measures stipulated in the MOA, and Hangar 1 is scheduled for demolition in the fall of 2018.
- Building 115 was built in 1942 and was determined ineligible for listing in the NRHP (SHPO Log: 012610-05-USN). Building 115 is located on Midway Street, just west of Langley Boulevard. The building was originally built as an ordnance shop and continues its function as an aviation armament shop today. A new ordnance shop is required in closer proximity to the flight line and will replace Building 115. Geotechnical borings within one-eighth mile of Building 115 encountered five soil types: fill, glacial marine drift, glacial till, glacial outwash, and undifferentiated glacially consolidated soils. The fill varied from 2.5 to 6 feet deep, and no Holocene deposits were encountered between it and the Pleistocene sediments. It is unlikely that any intact Holocene sediments exist beneath the building. Therefore, the Navy has determined that archaeological monitoring of the building's demolition is not warranted.
- Taxiway Juliet was constructed in the early 1950s. While the taxiways (in conjunction with the runway) represent the post-World War II conversion of Ault Field to a Master Jet Station, they were determined not eligible for inclusion in the NRHP (DAHP Log: 041814-01-USN). Therefore, the Navy has determined no historic properties would be affected during taxiway repairs.

- In case of an inadvertent discovery of Native American human remains and/or archaeological resources during construction, the Navy would follow the current inadvertent discovery plan by notifying the appropriate tribal governments and the state Department of Archaeology and Historic Preservation regarding the treatment of the remains and/or archaeological resources per applicable laws.

The Navy has determined that the proposed undertaking in the area of direct effects in the APE will result in no adverse effects to historic properties because no archaeological sites are known to exist in the APE, no NRHP-eligible buildings will be adversely affected by the proposed undertaking, and little likelihood exists for intact archaeological deposits to be present in the APE. Given the results of geotechnical borings and documented disturbance from airfield and flight line construction and maintenance since 1942, the Navy does not find archaeological monitoring of construction or demolition necessary. Although it is unlikely that intact archaeological resources will be found, the Navy recognizes the potential for post-review discoveries of archaeological resources. Therefore, a copy of the inadvertent discovery plan will be provided to the contractor, alerting them to cease work and notify the NAS Whidbey Island Cultural Resource Program Manager if a discovery is made.

7.2 Analysis of Indirect Effects

Indirect effects resulting from change to visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features include change in visual elements or alteration to views and vistas, modification of atmospheric elements from aircraft operations, or change in noise exposure.

For this undertaking, the proposed activities would not introduce new visual, atmospheric, or audible elements. Rather, the existing elements would be increased.

The increase in operations relative to the No Action Alternative does not alter the visual experience, atmospheric elements, or setting in ways that diminish the district's ability to convey its historic significance. The character-defining features of the historic district and its contributing properties are not predicated on a setting that is absent of modern technology or non-contributing elements, particularly those that enter the visual setting temporarily, such as modern ships, vehicles, trucks, and aircraft. The 1998 amendment to the Central Whidbey Island Historic District NRHP nomination makes clear that the diversity of buildings, structures, and sites, along with the contributing landscape features, represent a variety of historic periods. In addition, non-contributing buildings and structure do not substantially detract from the sense of time and place that the historic features, when experienced as a whole, provide the area. As such, temporary introduction of a visual and atmospheric elements in the sky does not indirectly alter the characteristics of the district that make it eligible for listing in the NRHP.

To reiterate from Section 6, potential adverse indirect effects from change in noise exposure on historic properties were measured in two ways: 1, a change in exposure to the 65 dB DNL contour and 2, a substantive change in dB DNL.

Change in exposure to the 65 dB DNL contour is represented as change in the area of the 65 dB DNL contour between the No Action Alternative and the proposed aggregate 65 dB DNL contour. This includes any historic properties that are located within the proposed aggregate 65 dB DNL contour but are not located within the No Action Alternative's 65 dB DNL contour. Primarily, these properties are

located at the edge of the APE, where the proposed 65 dB DNL contour expands beyond the No Action Alternative 65 dB DNL contour.

Substantive change in dB DNL is measured as the difference between the dB DNL for the proposed action, represented as an aggregate of all proposed alternatives, and the dB DNL modeled under the No Action Alternative. This difference, also called delta DNL, was modeled across the entire APE, and areas where there is a substantive increase in dB DNL were outlined. See Section 6 for more information on substantive increases in dB DNL. These areas are primarily near OLF Coupeville, where the Growler would fly a standardized training pattern that utilizes both Runway 14 and Runway 32.

The noise modeling indicates that changes to noise exposure are minimal within the majority of the APE. However, areas at the boundary between the proposed aggregate 65 dB DNL contour and the No Action Alternative 65 dB DNL contour at OLF Coupeville and Ault Field would fall within the 65 dB DNL contour, and there would be a substantive change in delta DNL near OLF Coupeville and in the northern portion of the Central Whidbey Island Historic District (Figures 10 and 11).

To analyze potential adverse indirect effects of modeled noise changes, the property type and eligibility status for all identified historic properties listed in the NRHP were compiled, as well as those listed in the Washington Heritage Barn Register and the Washington Heritage Register, recorded as eligible on the WA DAHP GIS data, and recognized as contributing to ELNHR in the ELNHR 2016 Inventory (Appendix J) within the substantive change in dB DNL area and within the area between the proposed aggregate 65 dB DNL contour and No Action Alternative 65 dB DNL contour. In addition, because of the unique and important historic characteristics of the Central Whidbey Island Historic District, the Navy has also included all eligible and contributing historic properties listed in the ELNHR Inventory that experience a delta DNL change of 5 dB or more. Table 14 presents a summary of all determined-eligible properties listed in the Washington DAHP WISAARD database, the 2016 update to the ELNHR, and properties listed in the NRHP, the Washington Heritage Barn Register, or the Washington Heritage Register. See Figures 13 and 14 for locations of historic buildings, structures, and districts, and see Appendix K for locations of archaeological districts and cemetery sites. Sections 7.2.1 – 7.2.6 assess effects to determined eligible or listed properties that are within the potential adverse effects area.

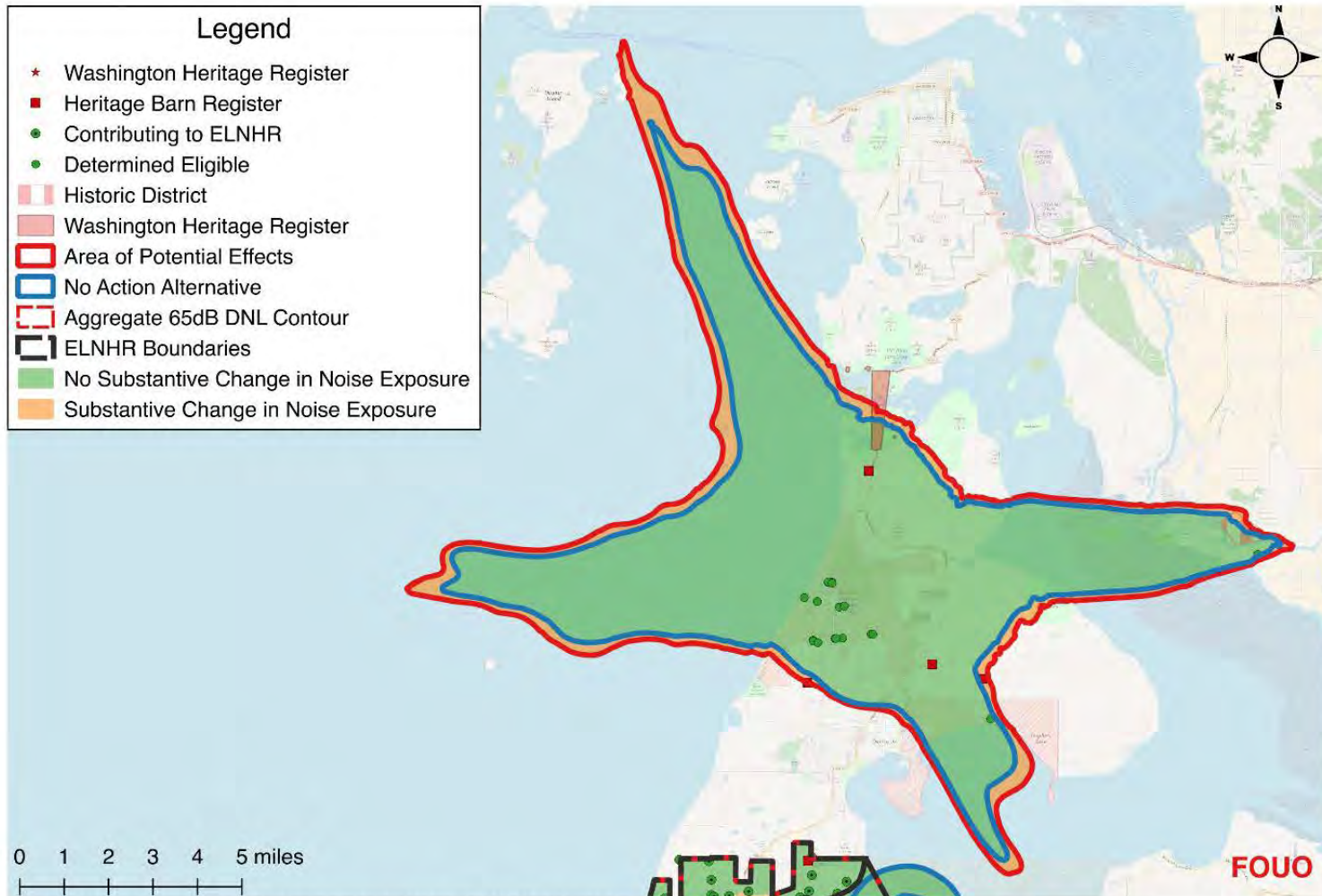
The proposed undertaking would result in no substantive change in noise exposure to a majority of the eligible and listed properties. Of the 67 eligible or listed historic properties within the APE, approximately 87 percent (58 properties) would not experience any substantive change in noise exposure, and 13 percent (nine properties) are located in the area of the APE where substantive changes in noise exposure have been identified.

Table 14 Summary of Potential Indirect Effects to all Eligible and Listed Properties

<i>Property Type</i>	<i>Potential Indirect Effects</i>		
	<i>No Substantive Change in Noise Exposure</i>	<i>Substantive Change in Noise Exposure</i>	<i>Total</i>
Buildings and Structures (50 years and older)	26	2	28
Listed in Washington Heritage Barn Register	17	6	23
Listed in Washington Heritage Register	4	0	4
Listed in NRHP	2	0	2
Historic Districts*	1	1	2
Archaeological Sites	7	0	7
Cemetery Sites	1	0	1
Traditional Cultural Places	0	0	0
Archaeological Districts	1	0	1
Total	58	9	67

Note: Many of the ELNHR buildings and structures (where the 65 dB DNL overlaps with ELNHR) are also included in the ELNHR 2016 Inventory).

* For the purposes of this study, ELNHR is analyzed as an NRHP-listed historic district.



Note 1: Displays property status as recorded in ELNHR 2016 Update and DAHP GIS data.
 Note 2: Darker orange indicates overlap between shift in 65 dB DNL (from No Action Alternative to Aggregate 65 dB DNL) and area where increase in dB DNL is substantive,

Figure 13 Map of all Eligible and Listed Historic Buildings and Structures within the Ault Field portion of the APE

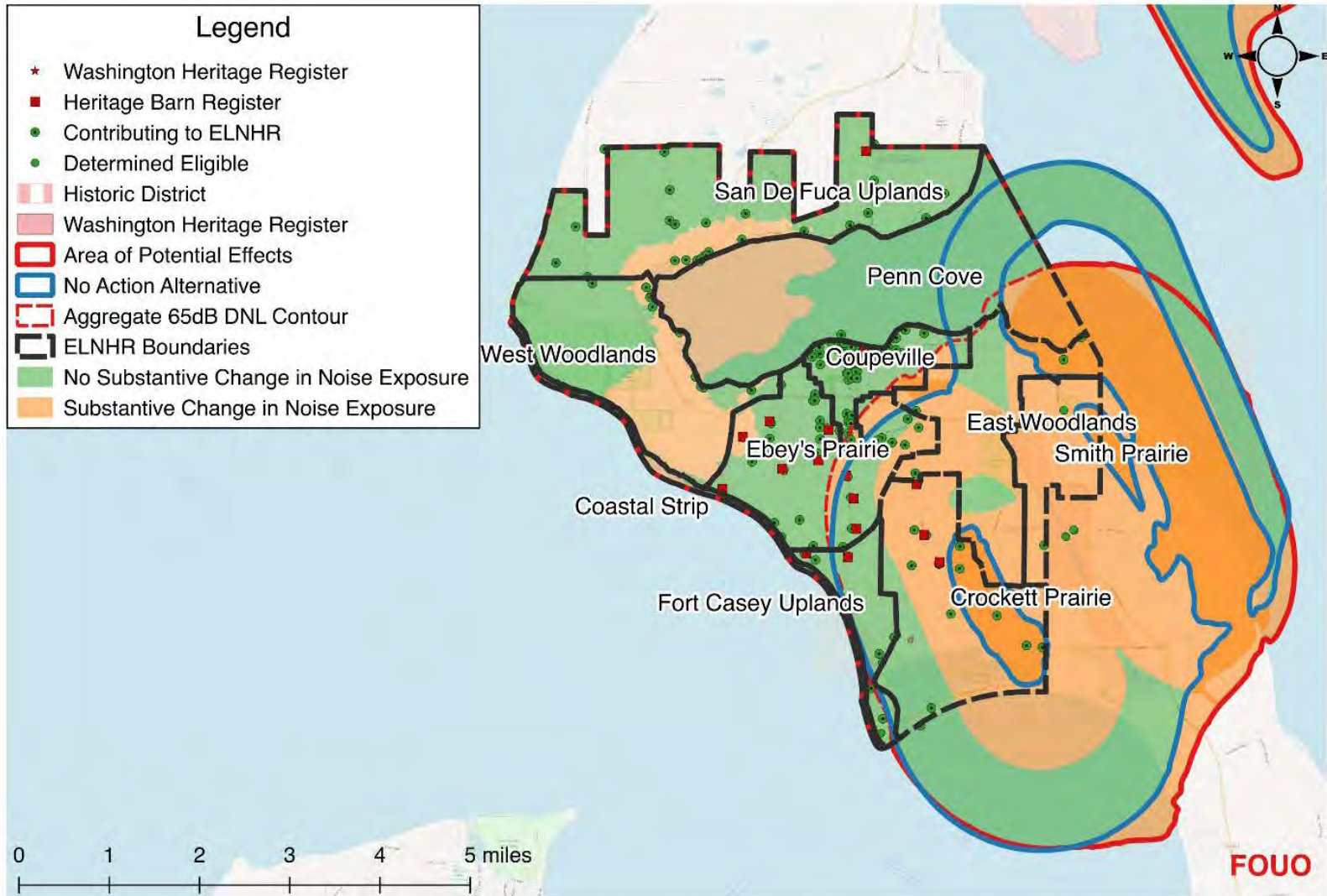


Figure 14 Map of all Eligible and Listed Historic Buildings and Structures within the OLF Coupeville portion of the APE

7.2.1 Historic Buildings and Structures

Two eligible buildings and structures would experience substantive change in noise exposure (Table 15). However, the proposed undertaking will have no adverse effect to the structural integrity of the historic structures in the indirect effects area of the APE or diminish the integrity of their design or workmanship.

Table 15 Eligibility Criteria of Historic Buildings and Structures in the Potential Adverse Effects Area

<i>Historic ID</i>	<i>Name</i>	<i>Year Built</i>	<i>Eligibility Criteria</i>
672587	Whidbey Island Game Farm, Pacific Rim Institute for Environmental Stewardship	1946	Criterion A
700759	Crockett, Hugh, Barn, Boyer Farm	1860	Criterion A

To analyze potential adverse effects to structures and buildings, the Navy looked to previous studies within the APE, as well as to outside research on the effects of noise on historic properties. Specifically, the Navy looked at the original criteria and amendments to the NRHP nomination form for the Central Whidbey Island Historic District. In addition, the Navy looked to the ELNHR's management documents, studies, and inventories. Finally, the Navy sought out available research and studies on the effects of aircraft noise on historic properties.

There is limited research available that documents studies on the effects of aircraft noise on historic properties. This analysis focuses on noise effects on structures in general (Guidelines for preparing Environmental Impact Statements on Noise, 1977) and on noise effects on historic structures. Pertinent studies include an analysis of proposed Concorde flight operations on historic structures at several East Coast airports, including Dulles and Kennedy Airports (Hershey, Kevala, and Burns 1975, and Wessler 1977) and portions of the 2012 noise study prepared in support of the 2012 EA for the proposed transition of expeditionary EA-6B Prowler squadrons to EA-18G Growler aircraft. To date, no study supports a finding that aircraft operations at Ault Field or OLF Coupeville have or will cause diminished integrity of location, setting, materials, design, workmanship, feeling, or association to historic buildings and structures.

The Navy reviewed the original nomination package of the Central Whidbey Island Historic District and subsequent amendments made in 1983, 1998, and 2010, as well as ELNHR's management plans and inventory updates of 1980, 2003, 2005, and 2016. The inventories and evaluations studied various property types and character-defining features of the district and the ELNHR. Although the ELNHR inventories have added and subtracted properties from contributing status, no properties have been determined to no longer retain the characteristics that qualify them for inclusion in the NRHP because of adverse effects from Navy actions, specifically aircraft operations or aircraft noise effects on buildings and structures.

In 1977, the National Research Council developed guidelines for evaluating potential impacts of noise for EIS studies on noise. These guidelines are consistently cited in subsequent studies as the basis for evaluating Section 106 impacts to historic properties. Per the guidelines, sounds lasting more than 1 second and with a peak unweighted sound level greater than or equal to 130 dB (in the 1 hertz (Hz) to 1,000 Hz frequency range) are considered potentially damaging to structural components (NRC and NAS, 1977). This is a conservative standard for assessing all sound (NRC and NAS, 1977).

With respect to the potential for aircraft noise and vibration effects on the structural components of historic structures, only a few studies have been published. Two studies were conducted in the 1970s in connection with the EIS on proposed Concorde operations in the U.S. In 1975, Hershey, Kevala, and Burns (1975) examined the potential for structural feature breakage at five historic sites within the Concorde flightpath, including the St. George's Church near Kennedy Airport, and four historic sites near Dulles Airport (Sully Plantation, Dranesville Tavern, Broad Run Bridge and Tollhouse, and Manassas Battlefield Park). The historic sites chosen for study were all located within a few miles of the proposed Concorde flight paths. The authors evaluated the impact on structural features, including windows, brick chimneys, a stone bridge, and plaster ceilings. They determined that the potential for breakage was generally less than 0.001 percent for a year of overflights at all five historic sites.

In 1977, Wesler reevaluated the noise analysis at the Sully Plantation and concluded that no damage was found to the 1795 plantation house from routine departures of the Concorde aircraft 1,500 feet from the runway centerline of Dulles Airport (Wesler, 1977). Wesler found that the structural vibration levels from the Concorde takeoff and landings were actually less than those caused by touring groups and vacuum cleaning. Of note, both Concorde studies also concluded that "noise exposure levels for compatible land use also were protective of conventional historic and archaeological sites."

The Navy's 2012 noise study included an assessment of noise and vibration impacts from Navy airfield operations to historic buildings and structures. Because of a wide range of variations in building code and aircraft types, the U.S. has yet to develop a precise threshold for adverse effects to the integrity of buildings and structures. Therefore, this study applies the same standards used in the 2012 noise study for the assessment of noise and vibration from Navy airfield operations to historic properties within the APE.

The 2012 study at NAS Whidbey Island suggested that sounds lasting more than 1 second above a sound level of 130 C-weighted decibels (dBC) are potentially damaging to structural components (Kester and Czech, 2012). The study evaluated Prowlers and Growlers at NAS Whidbey Island and noted that none of the conditions evaluated for the study caused C-weighted sound levels to exceed 130 dBC (i.e., the stated threshold) and that structural damage would not be expected. The authors, however, did note that takeoff conditions had C-weighted sound levels greater than 110 dBC for both types of aircraft, creating an environment conducive to noise-induced vibration (Kester and Czech, 2012).

In order to reach these conclusions, the authors of the 2012 study included a brief examination of low-frequency noise associated with Growler overflights at 1,000 feet AGL in takeoff, cruise, and approach configuration/power conditions (Kester and Czech, 2012). The study found that the takeoff condition has the highest potential for damage, with unweighted sound levels of approximately 105 dB and an overall C-weighted sound level of 115 dBC. The Growler would exhibit C-weighted sound levels up to 101 dBC when cruising and 109 dBC (gear down) at approach. As these levels are much less than the 130 dB criterion, damage would not be expected for structures in the vicinity of the NAS Whidbey Island airfields.

In 2016, the National Park Service (NPS) conducted an acoustical study utilizing two acoustic monitoring systems for 31 days on NPS property in the ELNHR. The locations consisted of the Reuble Farmstead and

the Ferry House. At the Reuble Farmstead (located approximately 0.5 mile from Crockett Barn), the highest recorded sound pressure level was 113 dBA during FCLP by Growlers. At the Ferry House, 85 dBA was the loudest recorded military aircraft sound level (NPS, 2016). While these studies concerned two locations known for their historic qualities, the study did not evaluate the potential damage that could be caused to these structures by noise or vibration. However, when comparing the highest recorded sound pressures of 113 dBA and 85 dBA at the two points of interest (POIs), it is unlikely that sound pressures would approach a peak unweighted sound level greater than or equal to 130 dBC, which is the level that would be considered potentially damaging to structures at those locations.

Although studies are limited, the available data indicate that noise within the APE is unlikely to alter the characteristics that qualify historic buildings and structures for inclusion in the NRHP.

7.2.2 Heritage-Listed Historic Properties

Six buildings listed in the Washington Heritage Barn Register would experience substantial changes in noise exposure (Table 16). The same analysis described in Section 7.2.1 applies to heritage-listed historic properties. Accordingly, the undertaking will have no adverse effect to the structural integrity of the listed buildings and structures and does not alter the qualities of significance that make these historic properties eligible. The proposed undertaking does not alter characteristics of architectural expression, method of construction, or physical features of the property’s setting.

Table 16 Eligibility Criteria of Buildings Listed in the Washington Heritage Barn Register in the Potential Adverse Effects Area

<i>ID</i>	<i>Name</i>	<i>Register</i>	<i>Built Year</i>	<i>Eligibility Criteria</i>
IS00343	James, William and Florence, Farm	Heritage Barn	c. 1914	None Listed
IS00314	Keith, Sam, Farm	Heritage Barn	1895	Criterion A
IS00340	Gus Reuble Farm	Heritage Barn	1912	Criterion A
IS00355	Crockett, Hugh, Barn	Heritage Barn	c. 1860	Criterion A
IS00356	Hookstra, Lambert, Farm	Heritage Barn	c. 1910	None Listed
IS00229	Kineth, John, Barn	Heritage Barn		

7.2.3 Archaeological Sites

No determined-eligible archaeological sites would experience a substantive change in noise exposure.

7.2.4 Cemeteries

No determined-eligible area cemeteries would experience a substantive change in noise exposure.

7.2.5 Traditional Cultural Places

There are no known traditional cultural places or properties of traditional religious importance recorded in the APE. Consultations with Tribes and the SHPO have resulted in no new traditional cultural places or properties of traditional religious importance identified within the APE. See Appendix D for a summary of Navy consultations.

7.2.6 Historic and Archaeological Districts

One historic district, the Central Whidbey Island Historic District, would experience substantive changes to noise exposure that would cause adverse effects to the perceptual quality of views that contribute to its significance.

Central Whidbey Island Historic District Buildings and Structures

Of the 288 individually eligible or contributing buildings and structures in the Central Whidbey Island Historic District (the district), 44 would experience substantive changes in noise exposure (Table 17 and Figure 15). However, the undertaking will have no adverse effect on the structural integrity of the listed buildings and structures and does not alter the qualities of significance that make these historic properties eligible per the analysis in Section 7.2.1. The proposed undertaking does not alter characteristics of architectural expression or method of construction, and it does not introduce alterations in land use patterns inconsistent with the agricultural land use patterns first established during the period of significance of early settlement in the 1850s within the boundary of the district.

Table 17 Contributing Buildings to the ELNHR within the Potential Adverse Effects Area

<i>Name</i>	<i>Landscape Area</i>	<i>Built Year</i>	<i>Significance</i>
Bearss/Barrett House	Coupeville	1893	Criterion C
James Wanamaker House	Coupeville	1892	Criterion C
A.B. Coates House	Coupeville	1892	Criterion C
Morrow/Franzen House (Spangler/Franzen Rental House)	Coupeville	c. 1900	Criterion C
Reuble Squash Barn	Coupeville	c. 1940	Criterion C
Mulder House	East Woodlands	c. 1900	Criterion C
Thomas/Sullivan House	East Woodlands	1910	Criterion C
Harp Place	Smith Prairie	c. 1900	Criterion C
Wiley Barn	Fort Casey Uplands	c. 1930s	Criterion A
John Kineth, Jr. Farmhouse	Smith Prairie	c. 1910	Criteria A and C
Keith House	Fort Casey Uplands	1895	Criterion A
Old Anderson Place	Fort Casey Uplands	1902	Criterion A
Hapton/Gould House (John Gould/Miller House)	Crockett Prairie	1910	Criterion C
Reuble Farm	Fort Casey Uplands	1895	Criterion A
Fort Casey Pump House	Crockett Prairie	1906	Criterion A
Gillespie House/Reuble Farm	Fort Casey Uplands	1912	Criterion A
Myers Property	East Woodlands	c. 1928	Criterion A
Clarence Wanamaker Farm	Crockett Prairie	1928	Criteria A and C
Crockett/Boyer Barn (Hugh Crockett House)	Crockett Prairie	c. 1860	Criterion A
Col. Walter Crockett Farmhouse and Blockhouse	Crockett Prairie	c. 1860	Criterion A
Calhoun House (Sam Crockett House)	Crockett Prairie	1890	Criterion C
Gilbert Place/Eggerman Farm	Crockett Prairie	Unknown	Criterion A
Walton Aubert House – Fiddler’s Green	Penn Cove	1907	Criteria A and C
O’Leary Cottage/Snakelum House	Penn Cove	1940	Criteria A and C
Melvin Grasser House	Penn Cove	1932	Criterion C
Old County Courthouse/Grennan & Cranney Store	Penn Cove	1855	Criteria A and C
George Libbey House	Penn Cove	1904	Criterion C
Fisher Place	Penn Cove	1928	Criteria A and C
Whid-Isle Inn/Captain Whidbey Inn	Penn Cove	c. 1905	Criteria A and C
Smith Cottage	Penn Cove	1933	Criteria A and C
A. Kineth House	Penn Cove	1916	Criteria A and C
Still Log Cabin	Penn Cove	c. 1938	Criteria A and C
San de Fuca School	San de Fuca Uplands	1903	Criterion C
Capt. R.B. Holbrook House	San de Fuca Uplands	1874	Criterion C
Liberal League Hall/San de Fuca Community Chapel	San de Fuca Uplands	1906	Criterion C
Hingston House	San de Fuca Uplands	1880	Criterion C
Tuft Cottage/Mrs. J. Arnold House	San de Fuca Uplands	Pre-1935	Criterion C
Armstrong/Trumball House	San de Fuca Uplands	c. 1905	Criterion C
Fisher/Hingston/Trumball General StoreL	San de Fuca Uplands	c. 1903	Criterion A
Hingston/Trumball Store	San de Fuca Uplands	1880	Criterion C
Armstrong/Scoby House	San de Fuca Uplands	1895	Criterion C
Henry Arnold/Grasser House	San de Fuca Uplands	1923	Criteria A and C
Robart Cottage	San de Fuca Uplands	1912	Criterion C
NPS Sheep Barn	Ebey’s Prairie	1930	Criterion C

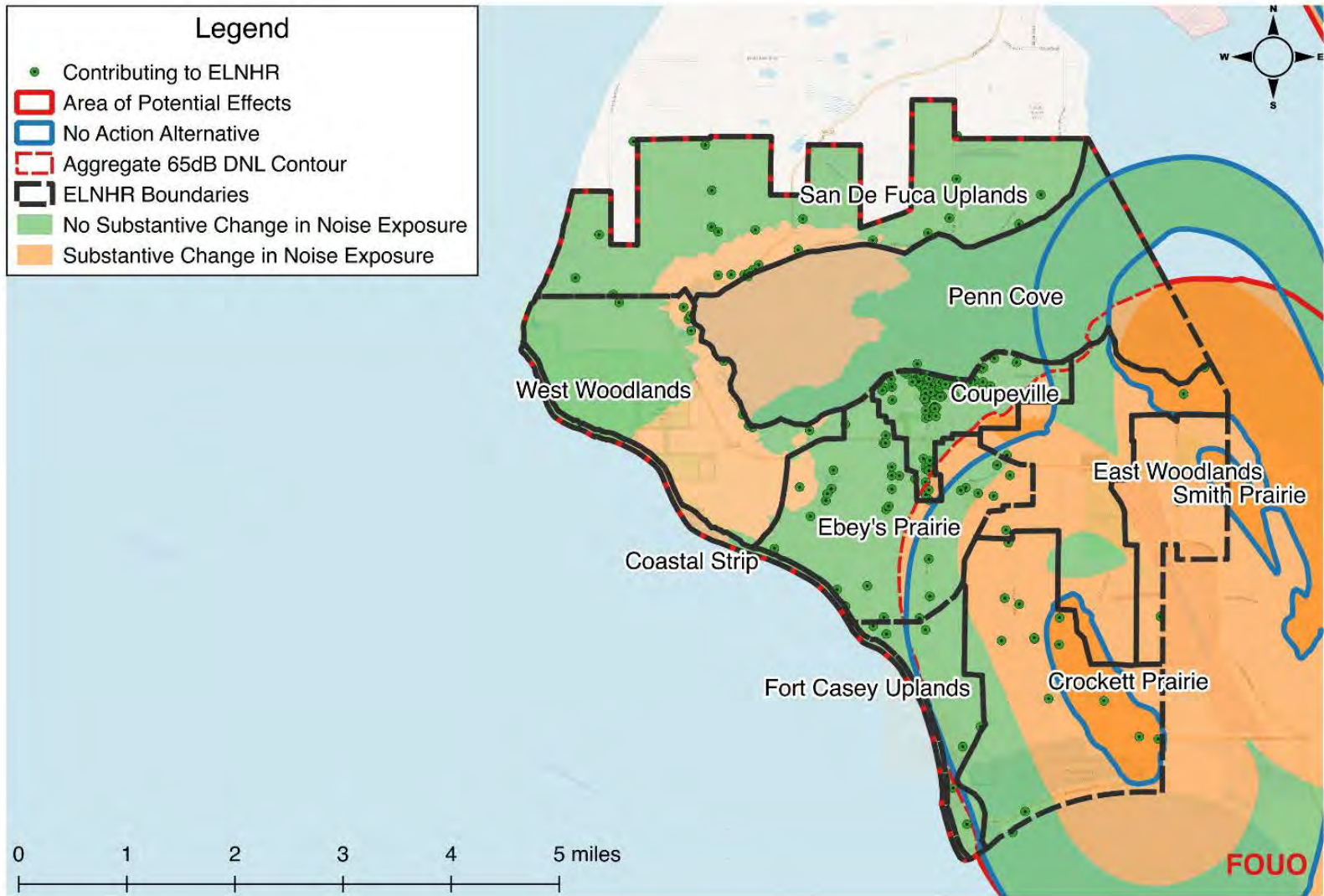


Figure 15 Map of Potential Adverse Effects to Contributing Properties and Landscapes in ELNHR

Central Whidbey Island Historic District Contributing Features and Elements

A number of landscape and architectural features contribute to the special character of the Central Whidbey Island Historic District and were identified in the 1983 building and landscape inventory conducted by the NPS. The district's inventory was expanded, and a number of landscapes were introduced into its NRHP nomination form in the 1998 amendment. This amendment and its inclusion of contributing landscape features to the historic character of the district sought to reflect and formalize those special historic qualities of Central Whidbey Island that Congress sought to preserve in the creation of the ELNHR in 1978. The 1998 amendment documents the landscape component of the inventory into both natural and cultural elements of ELNHR and identifies 10 distinct landscape areas, including Ebey's Prairie, Crockett Prairie, Smith Prairie, San de Fuca Uplands, Fort Casey Uplands, East Woodlands, West Woodlands, Penn Cove, Coastal Strip, and Coupeville. The landscape areas were identified as character-defining features representing the continuum of early patterns of settlement, agriculture, and commercial uses in the district as evidenced by historic land use patterns, circulation systems, spatial organization as a response to the natural environment, vegetation, structures, farm cluster, and views and other perceptual qualities.

In 2003, the NPS performed an analysis of land use change and cultural landscape integrity to assess tangible loss of the character-defining qualities of landscape. The NPS did not identify Navy aircraft operations at OLF Coupeville as a threat to change the overall character of the district from the period of 1983 to 2000.

The proposed undertaking will not affect the character-defining qualities related to land use patterns, circulation systems, spatial organization as a response to the natural environment, vegetation, structures, or farm clusters. The 2003 NPS analysis covered a time period when Navy aircraft operations at OLF Coupeville exceeded the proposed increase in, and overall numbers of, operations contained in the current Proposed Action. The 2003 study primarily focused on patterns of land use change, circulation patterns, vegetation, boundaries, and cluster arrangements. The study concluded that the greatest risk to integrity of landscape features in the district was the "relentless pressures of residential growth" and recommended land use control strategies such as zoning and conservation easements. The current proposed undertaking does not change circulation, patterns of land use, vegetation, structures, or cluster arrangements and will have no adverse effect to these landscape characteristics.

The proposed undertaking has the potential for indirect adverse effects to the perceptual qualities that contribute to cultural landscapes of the Central Whidbey Island Historic District, specifically the significant perceptual qualities of landscapes from nine distinct points in the district. The Navy identified a substantive change in noise exposure in nine areas where perceptual qualities contribute to the significance of the landscape. Potentially affected landscapes include all of the identified contributing landscapes except for the Fort Casey Uplands. The substantive change in noise exposure has the potential to indirectly alter the perceptual experience of the contributing cultural landscapes because these nine areas are identified as tangible resources and character-defining features of the cultural landscapes. The 1998 amendment defines these areas as contributing views following the NPS's published guidance for nominating rural historic districts in 1984. Guidance for analysis and evaluation of views and vistas includes analysis of significant perceptual qualities, such as smells and sounds, from the viewpoint (NPS Cultural Landscapes Inventory Professional Procedures Guide, 2001). The Central Whidbey Island Historic District NRHP nomination describes the contributing landscape views and the perceptual qualities as tangible resources that were identified using the historic record and are based on

character-defining features of the cultural landscape. The nine landscape areas located within the defined area of substantive change in noise exposure include:

1. Entry to Coupeville from Ebey’s Prairie into the prairie and along Main Street
2. View to Crockett Prairie and Camp Casey from Wanamaker Road
3. View to Crockett Prairie and uplands from the top of Patmore Road
4. View to Crockett Prairie and uplands from Keystone Spit
5. View to Grasser’s Lagoon from Highway 20
6. Views to and across Penn Cove along Madrona Way
7. Views from the bluff trail to Ebey’s Prairie and Coastal Strip
8. View from Smith Prairie from Highway 20, entering the ELNHR
9. Views to Grasser’s Hill from Madrona Way

Of these nine landscape areas, one is located within the area newly exposed to the aggregate 65 dB DNL contour, four are located within the aggregate 65 dB DNL contour and are exposed to a change of 5 dB or greater delta DNL, and four are located outside the aggregate 65 dB DNL contour but within the boundary of the ELNHR and experience a change in 5 dB or greater delta DNL (see Table 18).

Table 18 Change in Noise Exposure within Aggregate 65 dB DNL Noise Contour

<i>Change in Exposure to Aggregate 65 dB DNL Contour</i>	<i>Change in delta DNL of 5 dB or Greater within the Aggregate 65 dB DNL Contour</i>	<i>Change in delta DNL of 5 dB or Greater Outside the Aggregate 65 dB DNL Contour within ELNHR</i>
Entry to Coupeville (from Ebey’s Prairie into prairie center and along Main Street) and Front Street in Coupeville	View to Crockett Prairie and Camp Casey from Wanamaker Road	View to Grasser’s Lagoon from Highway 20
	View to Crockett Prairie and uplands from the top of Patmore Road	Views to and across Penn Cove along Madrona Way
	Views to Crockett Prairie and uplands from Keystone Spit	Views from the bluff trail to Ebey’s Prairie and Coastal Strip
	View of Smith Prairie from Highway 20, entering the ELNHR	Views to Grasser’s hill from Madrona Way

Of the nine landscape areas, the Navy has determined that five are adversely affected as a result of a substantive change in noise exposure. Although all of these landscape points either experience a change in exposure to the 65 dB DNL contour or a change of delta DNL of 5 dB or more, only five experience a change that has the potential to result in a change in recommended land use. Of the four landscape points outside the aggregate 65 dB DNL contour within the ELNHR that experience a change in 5 dB or greater delta DNL, the level of change in noise exposure, although quite noticeable, does not result in an adverse effect. The landscapes are located well outside the 65 dB DNL contour and a quiet soundscape is not a defining characteristic of the landscapes. In addition, no land use restrictions are recommended per SLUCM standards as a result of the change in noise exposure, and the area is considered compatible with all land uses.

The remaining five landscape points are located within areas where change in noise exposure would result in potential changes in land use recommendations and/or land use restrictions. In addition, the five landscape points are located at gateway points into the ELNHR where the rural character of the landscape contributes not only to the scenic quality of ELNHR but also to those characteristics of the landscape that have shaped human settlement and use of the landscape that make the landscapes character defining elements of the historic district. All of these entrance points are within three landscape areas: Crockett Prairie, Smith Prairie, and Ebey's Prairie. These three prairies make up approximately 42 percent of the ELNHR and are key landscape characteristics to many of the historic themes, events, people, and activities important in the ELNHR's history, including the Salish occupation and use, early Euro-American settlement, and agricultural land use patterns established during early settlement in the 1850s. The change in noise exposure indirectly alters the perceptual qualities of the five contributing views identified and the character-defining features of these key cultural landscape components.

8 Finding of Effect

The Navy has determined that the proposed undertaking is a Historic Properties Adversely Affected for adverse indirect effects to cultural landscapes in the Central Whidbey Island Historic District—specifically, the perceptual qualities of the following five locations that contribute to the significance of the landscape:

1. Entry to Coupeville from Ebey’s Prairie into prairie and along Main Street
2. View to Crockett Prairie and Camp Casey from Wanamaker Road
3. View to Crockett Prairie and uplands from the top of Patmore Road
4. View to Crockett Prairie and uplands from Keystone Spit
5. View from Smith Prairie from Highway 20, entering the ELNHR

In order to minimize the adverse effect to the perceptual experience of these cultural landscapes, the Navy proposes to continue to support policies in place to minimize noise effects of flight operation in the community (see Section 6). In addition, the Navy will continue to work with the Whidbey Camano Land Trust to collaborate on the purchase of conservation easements, which, per the recommendations of the 2003 landscape study, serves to preserve the historic and scenic integrity of the cultural landscape and to diminish landscape change that threatens the integrity of the landscape features on the ELNHR.

In addition to continuing existing policies that minimize adverse effects to historic properties, the Navy offers the following as a starting point for consultation on resolution of the adverse effect to perceptual experience of these cultural landscapes:

- Informational kiosks at locations where the undertaking has adverse indirect effects to perceptual qualities that contribute to the significance of ELNHR contributing landscapes, which coincide with entry points to the ELNHR.
 - Although the Navy determined that the four landscapes points within the ELNHR that experience a delta DNL change of 5 dB or more but are located outside the 65 dB DNL contour are not adversely effected by the change in noise exposure, these areas are also located at or near entrance points to the reserve. The Navy is willing to consider locating information kiosks in these location as well.
- Increase support to the REPI and encroachment management programs at NAS Whidbey Island for continued partnership with the Whidbey Camano Land Trust in acquiring conservation easements.
- Support of a project to improve efficacy and efficiency of online ELNHR historic property inventories to ameliorate inconsistencies and update the ELNHR and Washington State historic properties inventories and GIS databases for properties located within the ELNHR. The Navy proposes to enter into a cooperative agreement with the ELNHR to provide support equivalent to one year of labor at pay grade GS 9.

Appendix A Location of Required Facilities



Appendix B

Previous Operations for Ault Field and the Seaplane Base from 1976 to 2013

Year	Ault Field			OLF Coupeville	Total	
	FCLP (a)	Other (b)	Total (a+b)	FCLP (d)	FCLP (a+d)	Operations (a+b+d)
1976	29,245	90,948	120,193	17,810	47,055	138,003
1977	27,064	61,449	88,513	17,748	44,812	106,261
1978	31,308	95,896	127,204	24,378	55,686	151,582
1979	17,720	78,963	96,683	20,282	38,002	116,965
1980	25,102	79,000	104,102	12,190	27,292	116,292
1981	26,443	62,805	89,248	16,848	43,291	160,096
1982	26,696	77,639	104,335	14,472	41,168	118,807
1983	36,418	82,019	118,437	11,782	48,200	130,219
1984	32,400	80,842	113,242	12,726	45,126	125,968
1985	29,185	72,267	101,452	13,934	43,119	115,386
1986	27,475	77,529	105,004	22,232	49,707	127,236
1987	27,202	110,480	137,682	30,350	57,552	168,032
1988	47,734	101,396	149,130	30,442	78,176	179,527
1989	50,186	87,850	138,036	22,596	72,782	160,632
1990	51,758	104,582	156,340	32,080	83,838	188,420
1991	43,662	90,632	134,294	27,088	70,750	161,382
1992	54,516	84,515	139,031	25,844	80,360	164,875
1993	36,422	79,551	115,973	21,324	57,746	137,297
1994	36,472	74,990	111,462	21,628	58,100	133,090
1995	30,494	74,936	105,430	19,854	50,348	125,284
1996	22,832	86,895	109,727	13,066	35,898	122,793
1997	30,740	88,093	118,833	9,736	40,476	128,569
1998	19,516	77,433	96,949	6,808	26,324	103,757
1999	17,194	77,014	94,208	6,752	23,946	100,960
2000	16,536	84,424	100,960	6,378	22,914	107,338
2001	16,132	79,857	95,989	3,568	19,700	99,557
2002	17,090	77,069	94,159	4,100	21,190	98,259

Source: Wyle Laboratories, Inc. 2004

Appendix C
Previous FCLP Operations Data for OLF Coupeville from 1967 to 2013

<i>Year</i>	<i>Operations</i>
1967	1,236
1968	27,130
1969	39,246
1970	37,218
1971	18,392
1972	13,572
1973	16,764
1974	21,180
1975	24,844
1976	17,810
1977	17,748
1978	24,378
1979	20,282
1980	12,190
1981	16,848
1982	14,472
1983	11,782
1984	12,726
1985	13,934
1986	22,232
1987	30,350
1988	30,442
1989	22,596
1990	32,080
1991	27,088
1992	25,844
1993	21,324
1994	21,628
1995	19,854
1996	13,066
1997	9,736
1998	6,808
1999	6,752
2000	6,378
2001	3,568
2002	4,100
2003	7,684
2004	4,314
2005	3,529
2006	3,413
2007	3,976
2008	2,548
2009	5,292

<i>Year</i>	<i>Operations</i>
2010	6,476
2011	9,378
2012	9,668
2013	6,972
2014	6,120
2015	6,120
2016	6,120
2017	5,804

Appendix D

Summary of Section 106 Consultation from October 2014 to November 2017

<i>NHPA Section 106 Process for Growler Increase at NAS Whidbey Island</i>	<i>Consultation Effort to date</i>
Navy Established Undertaking	October 2014
Identification of Historic Properties Defining the Area of Potential Effects (APE)	June 2016 - Letter proposing APE methodology Aug 2016 - Letter clarifying Section 106 process Nov 2016 - Release of DEIS and contour lines Dec 2016 - Public meetings presenting proposed APE April 2017 - Letter defining APE May 2017 - Meeting to discuss APE rationale July 2017 - Letter defining final APE
Identification of Historic Properties Inventory and Eligibility	June 2017 – Letter proposing inventory methodology July 2017 – Letter with final inventory Aug 2017 – Meeting providing rationale for using existing inventories and eligibility status w/o additional survey Oct 2017- Notification of delay in consultation to incorporate changes in scale and scope of undertaking

Appendix E

Context Bibliography

- Ames, K. and H.D.G. Maschner. 1999. *Peoples of the Northwest Coast: Their Archaeology and Prehistory*. Thames and Hudson, New York.
- Bennett, L. A. 1972. *Effects of White Contact on the Lower Skagit Indians*. Washington Archaeological Society Occasional Paper No. 3. Washington Archaeological Society. Seattle
- Blukis Onat, A. 1987. *Resource Protection Planning Process Identification of Prehistoric Archaeological Resources in the Northern Puget Sound Study Unit*. Report prepared by Boas Inc., Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Cahail, A.K. 1901. *Sea Captains of Whidbey Island*. Island County Historical Society.
- _____. 1939. *The Life of Dr. John Coe Kellogg*. Written by Alice Kellogg Cahail as told to her by her father Albert H. Kellogg, son of the Whidbey pioneer, Dr. John Coe Kellogg. Whidbey Island Farm Bureau News, published in installments from January 19 to February 23, 1939.
- Cardno TEC, Inc. (Cardno TEC). 2013. Final Naval Air Station Whidbey Island Cold War Historic Context. Prepared for NAVFAC Atlantic. July.
- Cole, D. and D. Darling. 1990. History of the Early Period. In *Northwest Coast*. Ed. W. Suttles. Handbook of North American Indians, Vol. 7. W. C. Sturtevant, Gen Ed. Smithsonian Institution, Washington, D. C.
- Collins, J.M. 1974. *Valley of the Spirits: The Upper Skagit Indians of Western Washington*. University of Washington Press, Seattle.
- Cook, J.J. 1973. *A particular friend, Penn's Cove; a history of the settlers, claims, and buildings of central Whidbey Island*. Coupeville, Washington: Island County Historical Society.
- Dames and Moore. 1994. Final Historic and Archaeological Resources Protection Plan, Naval Air Station Whidbey Island, Washington. Prepared for the U.S. Navy Engineering Field Activity, Northwest Naval Facilities Engineering Command.
- Darst, P.C. 2005. *Spirit of the Island...A Photo History of Oak Harbor with Coupeville and San de Fuca on Beautiful Whidbey Isle*. Published by Author.
- _____. 2014. *Oak Harbor* (Images of America). Charleston, South Carolina: Arcadia Publishing.
- Dickenson, R.E. 1980. *Comprehensive Plan for Ebey's Landing National Historical Reserve*. National Park Service, Seattle, Washington.
- Duer, D. 2009. Ebey's Landing National Historical Reserve: An Ethnohistory of Traditionally Associated Contemporary Populations. United States Department of the Interior, National Park Service. Pacific West Region Series in Social Science, Publication Number 2009-02.
- EDAW, Inc. 1997. Historic Resources Survey: Naval Air Station Whidbey Island. EDAW, Inc., Seattle, Washington.
- Eells, M. 1985. *The Indians of Puget Sound: The Notebooks of Myron Eells*. G.P. Castile, ed. Seattle, Washington. University of Washington Press.

Evans-Hatch G. and M. Evans-Hatch. 2005. *Historic Resources Study: Ebey's Landing National Historical Reserve Whidbey Island, Washington*. National Park Service, Seattle, Washington.

Goetz, L.N. 1997. *Archaeological Resources Assessment and Protection Plan for the Naval Air Station Whidbey Island, Island County, Washington*. Prepared for Engineering Field Activity Northwest, Naval Facilities Engineering Command. Historical Research Associates, Inc.

Governor's Office of Indian Affairs. 2013. *Treaty of Point Elliot*.

Grossnick, R.A. 1997. *United States Naval Aviation: 1910–1995*. Washington, D.C.: Naval Historical Center, Department of the Navy.

Guss, E., J.C. O'Mahoney, and M. Richardson. 2014. *Whidbey Island Reflections on People and the Land*. The History Press, Charleston, South Carolina.

Hampton, R. and M. Burkett. 2010. Final: Phase I Architecture Survey of Naval Air Station Whidbey Island. Island County, Washington. Vol. 1. Prepared by Hardlines Design Company for NAVFAC Atlantic. Norfolk, Virginia.

Historical Research Associates, Inc. (HRA). 1997. *Archaeological Resources Assessment and Protection Plan for the Naval Air Station Whidbey Island, Island County Washington*. Prepared for Engineering Field Activity Northwest, Poulsbo, Washington.

Horr, D. A. 1974. *American Indian Ethnohistory: Indians of the Northwest: Coast Salish and Western Washington Indians*. David Horr ed. Garland Publishing. New York.

Historic Whidbey. 1993. *Sails, Steamships & Sea Captains: Settlement, Trade, and Transportation of Island County Between 1850–1900*. Coupeville, Washington.

Kauhi, T.C. and J.L. Markert. 2009. Washington Statewide Archaeology Predictive Model Report. Prepared by GeoEngineers, Inc. Tacoma, Washington for the Washington Department of Archaeology and Historic Preservation, Olympia.

Kellogg, G.A. 1934. *A History of Whidbey's Island (Whidbey Island), State of Washington*. Oak Harbor: George B. Astel Publishing Company

Larson Anthropological Archeological Services Limited (LAAS). 2000. Technical Report #2000-09. Victory Homes Demolition and Replacement, Seaplane Base Naval Air Station Whidbey Island County, Washington Archeological Resources and Traditional Cultural Places Overview. 5 May.

Marino, C. 1990. History of Western Washington Since 1846. In *Northwest Coast* Ed. By W. Suttles. Handbook of North American Indians, Vol. 7. W. C. Sturtevant, gen. ed.. Smithsonian Institution, Washington, D. C.

McClary, D. 2005. *Island County -- Thumbnail History*. HistoryLink.org Essay 7523.

McRoberts, P. 2003. North Coast Indians, likely members of the Kake tribe of Tlingits, behead Isaac Ebey on August 11, 1857. HistoryLink.org Essay 5302.

National Cooperative Highways Research Program. 2012. A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing, Report 723. Transportation and Research Board, Washington D.C.

National Park Service. 1983. Building and Landscape Inventory, Part B, Ebey's Landing National Historical Reserve. Seattle, Washington.

_____. 2005. Ebey's Landing National Historical Reserve. Draft General Management Plan and Environmental Impact Statement. Seattle, Washington

Navy Facilities Engineering Command (NAVFAC). 2016. Naval Air Station Whidbey Island Integrated Cultural Resources Management Plan. United States Navy. United States Naval Facilities Engineering Command, Northwest.

Neil, D. and L. Brainard. 1989. *By Canoe and Sailing Ship They Came: A History of Whidbey's Island*. Oak Harbor, Spindrift Publishing Co.

Neil, D., and Island Images, Inc. 1992. *Deja Views: Historical Pictorial of Whidbey Island: From the files of Dorothy Neil*. Oak Harbor, Washington (P.O. Box 808, Oak Harbor 98277): Island Images.

Nelson, C.M. 1990. Prehistory of the Puget Sound Region. In *Northwest Coast*, Edited by Wayne Suttles. pp. 481-484. Handbook of North American Indians, Vol. 7, W. C. Sturtevant general editor, Smithsonian Institution, Washington, D.C.

Newberry, R. 2014. *Kake return to Ebey's Landing after 157 years*. Wed Aug 27th, 2014. South Whidbey Record.

Riddle, M. 2010. *Coupeville -- Thumbnail History*. HistoryLink.org Essay 9587.

Rottle, Nancy. 2003. Ebey's Landing National Historical Reserve: An Analysis of Land Use Change and Cultural Landscape Integrity. National Park Service, Seattle, Washington.

Ruby, R.H., and J.A. Brown. 1992. *Guide to the Indian Tribes of the Pacific Northwest*. Revised Edition. University of Oklahoma Press, Norman, Oklahoma.

Salmon, J.S. 2011. Protecting America: Cold War Defensive Sites, A National Historic Landmark Theme Study. Washington, D.C.: U.S. Department of the Interior.

Shefry, M.S. and W.R. Luce. 1998. Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years (Revised). National Register Bulletin 22, U.S. Department of the Interior.

Smith, M.W. 1941. The Coast Salish of Puget Sound. *American Anthropologist* 43:197-211.

Sno-Isle Genealogical Society. 2002-2009. *Souvenir Edition, commemorating Whidbey Island's Centennial, 1848-1948; reviewing one hundred years of progress on Whidbey Island*. 1948. Langley, Wash.

Steen, S. and A. Simpkins. 2016. Ebey's Landing National Historical Reserve Historic Buildings Inventory 2016 Update. National Park Service, Seattle, Washington.

Stein, J.K. 2000. *Exploring Coast Salish Prehistory: The Archaeology of San Juan Island*. Burke Museum Monographs, Seattle, Washington.

Stell Environmental Enterprises, Inc. (Stell). 2013. Final Archaeological Inventory of Naval Outlying Landing Field Coupeville and Select Lands of Ault Field, Naval Air Station Whidbey Island, Island County, Washington. Prepared by Jason Jones and Michael Chidley for NAVFAC Northwest. September.

_____. 2017. Early Euro-American Settlement Study and Context Report Naval Air Station Whidbey Island. Prepared for Naval Facilities Engineering Command, Atlantic.

Stell Environmental Enterprises, Inc. (Stell) and Cardno TEC. 2013. Final: Naval Air Station Whidbey Island Cold War Study Phase 2: Inventory and Evaluation. Prepared for Naval Facilities Engineering Command, Northwest.

Sundberg, T.J. 1961. *Portrait of an island*. Whidbey Press: Oak Harbor, Washington.

Suttles, W. and B. Lane. 1990. Southern Coast Salish. In *Northwest Coast*, edited by W. Suttles, pp. 485-502. Handbook of North American Indians, vol. 7. W. C. Sturtevant, General Editor. Smithsonian Institution, Washington, D. C.

Thompson, G. 1978. Prehistoric Settlement Changes in the Southern Northwest Coast: A Functional Approach. *University of Washington Reports in Archaeology* 5. Seattle, Washington.

Trebon, T. 2000. Beyond Isaac Ebey: Tracing the Remnants of Native American Culture on Whidbey Island. *Columbia* (Fall 20000): 6-11.

Upchurch, O.C. (as presented in Duer 2009). 1936. The Swinomish People and Their State. *Pacific Northwest Quarterly*. 27 (4)

Wessen, G.C. 1988. *Prehistoric Cultural Resources of Island County*. A report prepared for the Washington State Department of Community Development, Office of Archaeology and Historic Preservations. July 1988.

White, R. 1992. *Land Use, Environment, and Social Change: The Shaping of Island County, Washington*. University of Washington Press, Seattle, Washington.

Wilma, D., and P. Long. 2003. *Dutch colonists arrive at Oak Harbor, Whidbey Island, on March 17, 1894*. HistoryLink.org Essay 5432.

Weyeneth, R.R. 1989. *Survey of Historic Resources in the NAS Whidbey Island Study Area*. Past Perfect Historical and Environmental Consulting, Bellingham, WA.

Appendix F

Inventory of Cultural Resources within the Area of Potential Effects

WA DAHP GIS Data

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
26	Naval Air Station Whidbey Island - Outlying Field, Coupeville, NAS Building 1 & 2	NAS Whidbey Island		Determined Not Eligible	1944
42	NAS Whidbey Island - Building 410, Hangar 6, Building 410, Hangar 6	NAS Whidbey Island		Determined Eligible	1942, 1955, 1957
165	Harmon - Pearson - Engle Farm	Coupeville		Not Determined	1900
166	Cawsey House, Cawsey House, Perkins House	Coupeville		Not Determined	1890
168	Comstock, Al & Nellie, House, Sherman House	Coupeville		Not Determined	1890
174	Old Al Comstock Place	Coupeville		Determined Eligible	1935
176	Gallagher/Schreck/Sherman Farm, Sherman, A., House	Coupeville		Not Determined	1917
177	Aloha Farms, Hancock, Samuel E., House	Coupeville		Not Determined	1953
178	Jenne, Edward and Agnes, Farm	Coupeville	R13109-330-4240	Not Determined	1908
186	Gus Reuble Farm	Coupeville		Not Determined	1930
201	Sherman Hog House	Coupeville		Not Determined	1942
278	Grennan and Cranney Store, Grennan and Cranney Store	Coupeville		Not Determined	1855
326	Clark House	Coupeville	R13233-184-4510	Not Determined	1933
328	Williams House	Coupeville	S6415-00-40001-0	Not Determined	1896
334	Coupeville City Hall	Coupeville	S6415-00-20005-0	Not Determined	1928

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
335	Zylstra, James, House	Coupeville	S6415-00-22001-0	Not Determined	1890
343	Methodist Parsonage	Coupeville	S6415-00-11007-0	Not Determined	1889
344	Griffith, Thomas, House, Brooks House	Coupeville	S6415-00-12001-0	Not Determined	1869
345	First Methodist Parsonage, Jefferds Rental House	Coupeville	S6415-00-09005-1	Not Determined	1890
346	Straub, Jacob, House, Warder House	Coupeville	S6415-00-08008-0	Not Determined	1890
347	Jefferds Rental House	Coupeville	S6415-00-13002-0	Not Determined	1920
348	Hesselgrave Rental House, Bagby Rental House	Coupeville	S6415-00-13003-0	Not Determined	1890
352	Clapp House, Ghormley House	Coupeville	S6415-00-14002-0	Not Determined	1890
354	Ervin Rental House	Coupeville	S6415-00-15001-0	Not Determined	1890
355	Gould, John, House, Canty House	Coupeville	S6425-00-02001-0	Not Determined	1890
356	Coupe, Thomas, House	Coupeville	R13234-370-0150	Not Determined	1852
359	Solid, Chris, House	Coupeville	R13234-334-0450	Not Determined	1906
360	Chromy House	Coupeville	S6005-00-04002-0	Not Determined	1904
363	Holbrook, Horace, House, Forrester, Alice, House	Coupeville	R13233-352-3600	Not Determined	1890
368	Howell House, Wright House	Coupeville	S6415-00-32004-0	Not Determined	1927
369	Clark, Ed, House, Bishop House	Coupeville	S6415-00-32003-0	Not Determined	1915
370	Morris House, Reynolds Rental House	Coupeville	S6415-00-32002-0	Not Determined	1910
374	Cushen House, Penn Cove Bed and Breakfast	Coupeville	R13233-363-3550	Not Determined	1925
376	Pontiac Dealership, Auto Barn	Coupeville	S6025-00-06001-3	Not Determined	1963
380	Fullington, Maude, House, Fullington, Mary, House	Coupeville	S7070-00-11000-0	Not Determined	1859
382	Island County Bank, Vracin Office	Coupeville	R13233-375-4150	Not Determined	1890

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
384	Kinney, Captain Thomas, House, Davison House	Coupeville	S6415-00-08004-0	Not Determined	1871
385	Captain Clapp House, Vandyk House	Coupeville	S6415-00-07004-0	Not Determined	1890
388	Sedge Building, This 'n That Shop, Tartans and Tweeds	Coupeville		Not Determined	1871
389	Robertson, John, House, Tartans and Tweeds, Penn Cove Gallery, Ye Kitchen Shop	Coupeville		Not Determined	1864
391	Whidbey Mercantile Company, Toby's Tavern	Coupeville		Not Determined	1875, 1895
392	John Robertson's Store, Seagull Restaurant, Captain's Galley	Coupeville		Not Determined	1886, 1912
393	Post Office, Laundromat, Fantasy Island	Coupeville		Not Determined	1938
394	Coupeville Cash Store, Butler Bell Antiques, Gift Gallery Antiques	Coupeville		Not Determined	1885, 1886
396	Elkhorn Saloon, Bishop Building, Coupeville Weaving Shop, Elkhorn Truck Antiques	Coupeville		Not Determined	1883
398	Judge Still Law Office, The Cove	Coupeville		Not Determined	1909
399	Island County Times Building, Lorna Doone's Attic, Jan McGregor Studio	Coupeville		Not Determined	1906, 1958
400	Island County Abstract Office, Kristen's Ice Cream and More	Coupeville		Not Determined	1890, 1958
401	Terry's Dryer, Trader's Wharf	Coupeville		Not Determined	1855, 1897
403	Gillespie Meat Market, Korner Kranny, Keeping Room Antiques	Coupeville		Not Determined	1887, 1890
404	Wharf Warehouse and Dock	Coupeville		Not Determined	1905

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
408	Heckenbury House, Masonic Rental House	Coupeville	R13233-344-3760	Not Determined	1955
409	Angel, Charles, House, Rojas House	Coupeville	S6425-00-04001-0	Not Determined	1917
410	Polly Harpole's Maternity Home	Coupeville	S6415-00-32006-0	Not Determined	1927
414	Stark House, Jefferds Rental House	Coupeville	S6415-00-13007-1	Not Determined	1890
419	Mock House	Coupeville	S7215-00-01004-0	Not Determined	1904
420	Benson House, Dole House	Coupeville	S7215-00-01001-0	Not Determined	1910
424	Newcomb House	Coupeville	R13234-434-1330	Not Determined	1908
426	Lovejoy, E.O., House, Yorioka House	Coupeville	S6310-00-00011-0	Not Determined	1890
428	Boothe House	Coupeville	S6420-00-00005-2	Not Determined	1952
431	White, Dr., House	Coupeville	R13233-322-1850	Not Determined	1894
432	Black House, Lindsey House	Coupeville	R13233-323-1720	Not Determined	1894
436	Congregational Church, St. Mary's Catholic Church	Coupeville	R13233-184-4240	Determined Eligible	1889
437	Reverend Lindsey House	Coupeville	624827	Determined Eligible	1898
439	Libbey, Joseph B., House	Coupeville	R13233-214-3740	Determined Eligible	1870
440	Higgins House, Hecher and Donaldson Rental House, Dale Roundy Law Office	Coupeville	R13233-264-3900	Not Determined	1917
441	Jenne, Jacob, House, Victorian Bed and Breakfast	Coupeville	R13233-279-3910	Not Determined	1889
443	Highwarden House, Young House, Datum Pacific Inc.	Coupeville	R13233-282-3880	Not Determined	1888
444	Gillespie, Carl, House, Sampler Bookstore, Rosie's Garden Restaurant	Coupeville	R13233-286-3810	Not Determined	1884

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
445	Methodist Church, United Methodist Church	Coupeville	R13233-291-3850	Not Determined	1894
448	Leach House	Coupeville	R13233-344-3870	Not Determined	1878, 1883
450	The Bungalow, Engle, Flora A.P., House	Coupeville	R13233-358-3900	Not Determined	1914
451	Telephone Exchange Building	Coupeville	S6025-00-18001-0	Not Determined	1958
457	Nichols House, Bennett House	Coupeville	R13104-490-3930	Not Determined	1893
458	Sergeant Clark House, Madsen House	Coupeville	R13104-493-4210	Not Determined	1895
463	Dixon House, Partridge House, Community Alcohol Center, Penn Cove Veterinary Clinic	Coupeville	R13104-428-3940	Not Determined	1918
467	Wanamaker, James, House, Martin House	Coupeville	R13104-331-4200	Not Determined	1890
470	Private	Coupeville	R13104-310-3980	Not Determined	1962
471	Bearss House, Barrett House	Coupeville	R13104-280-4190	Not Determined	1890
475	Bergman House	Coupeville	R13234-479-3170	Not Determined	1938
39779	Rock Wall		27188 SR 20, Oak Harbor, WA 98277	Not Determined	1928
49281	Rock Wall		27188 SR 20, Coupeville, WA 98277	Not Determined	1928
49283	Fifth Street, Arnold Road	Coupeville	na	Not Determined	1890
49284	Forest Street, Power Road	Coupeville	na	Not Determined	1890
49285	Main Street, Holbrook Road	Coupeville	na	Not Determined	1890
49287	Standard Oil Dock, Penn Cove Mussels, Inc. Dock		State Route (SR) 20, vicinity of Coupeville, WA 98239	Not Determined	1915
51578	Naval Air Station Whidbey Island - Building 386, Hangar 5	NAS Whidbey Island	Federal - NA	Determined Eligible	1953, 1955

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
55501	Mortar Battery Secondary Station, Fort Casey, None	Coupeville	Lot 1 of R13116-495-2950	Determined Eligible	1908
88926	Kineth, John Jr., Barn, Salmagundie Farms	Coupeville	R13101-287-1000	Not Determined	1903
88927	Crockett, Colonel Walter, Barn, Colonel Walter Crockett Farm	Coupeville	R13115-220-2200	Not Determined	1895
88928	Sherman Farm, Sherhill Vista Farms	Coupeville	R13109-086-1990	Not Determined	1942
88929	Willow Wood Farm, Smith Farm	Coupeville	R13104-145-0170	Not Determined	1900
88930	LeSourd Barn and Granary, Ebey Road Farm, Inc.	Coupeville	R13104-118-2490	Not Determined	1923
102219	Ault Field - Buildings 360-363, Fuel Storage	NAS Whidbey Island		Determined Not Eligible	1952
102220	Ault Field - Fuel Tanks, Fuel Tanks Building 235-236	NAS Whidbey Island		Determined Not Eligible	1942
102222	Building 368, Electrical Utility Vault, Building 368, Taxiway Lighting Vault	NAS Whidbey Island		Determined Not Eligible	1954, 1955
102223	Ault Field - Building 369, Warehouse, Warehouse	NAS Whidbey Island		Determined Not Eligible	1954
102224	Ault Field - Building 371, BOSC Maintenance Shops	NAS Whidbey Island		Determined Not Eligible	1954
102225	Ault Field - Buildings 373, 374, 375, 376, 377, 378, 379, Barracks/Olympic Hall	NAS Whidbey Island		Determined Not Eligible	1954
102226	Ault Field - Building 382, Admiral Nimitz Hall	NAS Whidbey Island		Determined Not Eligible	1954
102227	Ault Field - Building 384, Central Heating Plant	NAS Whidbey Island		Determined Not Eligible	1954
102228	Building 385 - Operations Building, Building 385 - Operations Building	NAS Whidbey Island		Determined Not Eligible	1954

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
102229	Ault Field - Building 411, Contractor Storage	NAS Whidbey Island		Determined Not Eligible	1956
102230	Ault Field - Building 414, Utility Vault	NAS Whidbey Island		Determined Not Eligible	1956
102231	Ault Field - Building 415, Utility Vault, Storage	NAS Whidbey Island		Determined Not Eligible	1956
102232	Ault Field - Building 420, Sewage Treatment, Classified Shredder Facility	NAS Whidbey Island		Determined Not Eligible	1958
102233	Ault Field - Building 421, Sewage Pumping Station	NAS Whidbey Island		Determined Not Eligible	1958
102234	Air to Ground Communication Building , Building 856 - Ault Field Air to Ground Communication Building	NAS Whidbey Island		Determined Not Eligible	1959
102235	Ault Field - Building 860, Storage	NAS Whidbey Island		Determined Not Eligible	1959
102236	Rocky Point Rec Area - Building 873 Can Do Inn	NAS Whidbey Island		Determined Not Eligible	1961
102237	Radio Transmitter Building , Building 874 - Ault Field Radio Transmitter Building	NAS Whidbey Island		Determined Not Eligible	1961
102238	Precision Approach Radar (PAR) Generator Building, Building 894 - Ault Field PAR Generator Building	NAS Whidbey Island		Determined Not Eligible	1963
102239	Ault Field - Building 895, Smoking Shelter	NAS Whidbey Island		Determined Not Eligible	1948
102240	Ault Field - Building 889, Vault	NAS Whidbey Island		Determined Not Eligible	1962

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
102241	Ault Field - Building 962, Officer's Mess Hall, Ault Field - Building 962, Officer's Mess Hall, Officers' Mess Hall	NAS Whidbey Island		Determined Not Eligible	1963
102242	Ault Field - Building 960, Chapel, Ault Field - Building 960, Chapel, Chapel, Ault Field - Building 960, Chapel, NAS Whidbey Island: Chapel (Building 960)	NAS Whidbey Island		Determined Eligible	1963
102243	Ault Field - Building 2593, Electronic Attack Simulator	NAS Whidbey Island		Determined Not Eligible	1976
102245	Building 994, Calibration Lab, Building 994, Security	NAS Whidbey Island		Determined Not Eligible	1966, 1969
102247	Ault Field - Building 2643, Shop Building/Office	NAS Whidbey Island		Determined Not Eligible	1960
102248	Ault Field - Building 2738, Wing Simulator Center	NAS Whidbey Island		Determined Not Eligible	1989
102249	Building 2544, Hangar 7, Building 2544, Hangar 7	NAS Whidbey Island		Determined Not Eligible	1973
102250	Building 2642, Hangar 8, Building 2642, Hangar 8	NAS Whidbey Island		Determined Not Eligible	1980
102252	Ault Field - Building 2699, Hangar 10	NAS Whidbey Island		Determined Not Eligible	1986
102253	Ault Field - Building 2733, Hangar 11	NAS Whidbey Island		Determined Not Eligible	1988
102258	Sea Plane Base - Building 201705, Seawall	NAS Whidbey Island		Determined Not Eligible	1942
102259	Racon Hill - Building 858, Building 858 Medium Range Radar Building	NAS Whidbey Island		Determined Not Eligible	1959

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
102260	Racon Hill - Building 390	NAS Whidbey Island		Determined Not Eligible	1954
102261	Racon Hill - Building 853, Alarm Control Center	NAS Whidbey Island		Determined Not Eligible	1958
102262	Building 423, Ordnance Operations Building, Building 423, Ordnance Operations Building	NAS Whidbey Island		Determined Not Eligible	1958
102263	Ault Field - Building 424 and 425, Magazines	NAS Whidbey Island		Determined Not Eligible	1958
102264	Ault Field - Building 430, Generator Building	NAS Whidbey Island		Determined Not Eligible	1958
102265	Ault Field - Building 487, Pressure Washing Facility	NAS Whidbey Island		Determined Not Eligible	1943
102268	Ault Field - Building 340, Public Toilet/Shower, Rocky Point Recreation Area	NAS Whidbey Island		Determined Not Eligible	1949
102269	Ault Field - Building 198, Water Treatment Plant	NAS Whidbey Island		Determined Not Eligible	1959
102271	Ault Field - Building 946	NAS Whidbey Island		Determined Not Eligible	1952
102274	Racon Hill - Building 388, Water Reservoir	NAS Whidbey Island		Determined Not Eligible	1954
102275	Ault Field - Garage, Building R-38	NAS Whidbey Island		Determined Not Eligible	1945
102276	Ault Field Airfield , Ault Field Airfield Facilities (Facilities 201247, 201715, 201436, 201935, 201685, 201703)	NAS Whidbey Island		Determined Not Eligible	1952, 1956, 1961, 1962, 1968
102277	OLF Coupeville - Runway 13-31, Facility 201715, Runway 14-32	NAS Whidbey Island		Determined Not Eligible	1962

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
102278	Building 2547 - Avionics Facility; Aircraft Intermediate Maintenance Dept., Building 2547, Building 2547 - Avionics Facility; Aircraft Intermediate Maintenance Dept., Building 2547 - Fleet Readiness Center Northwest	NAS Whidbey Island		Determined Not Eligible	1974
102279	Ault Field - Storage Building, Building 285	NAS Whidbey Island		Determined Not Eligible	1948
102280	Ault Field - Building 353, Ordnance Storage	NAS Whidbey Island		Determined Not Eligible	1949
102282	Ault Field - Ault Theater, Skywarrior Theater, Building 118	NAS Whidbey Island		Determined Eligible	1942
102296	Sea Plane Base - Ready Lockers, Buildings 446, 447, 448, 449, 451, Storehouses	NAS Whidbey Island		Determined Eligible	1942
102298	Building 100, Barracks #8, Building 100, Post Office/Training/Weapons	NAS Whidbey Island		Determined Not Eligible	1942
102299	Ault Field - Barracks # 11, Building 103, Public Works/ROICC	NAS Whidbey Island		Determined Not Eligible	1942
102300	Ault Field - Barracks #16, Building 108, Marine Aviation Training Support Group/Poa	NAS Whidbey Island		Determined Not Eligible	1942
102301	Ault Field - Hangar 1, Ready Lockers, Building 112 and Support Buildings 457 and 458, Hangar 1 and Ready Lockers	NAS Whidbey Island		Determined Eligible	1942
102302	Ault Field - Recreation Building, Building 117, Recreation Building	NAS Whidbey Island		Determined Not Eligible	1942
102307	Ault Field - Boiler House, Building 209, Boiler House	NAS Whidbey Island		Determined Not Eligible	1944

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
102309	Ault Field - Dispensary and Dental Clinic, Building 243, Legal	NAS Whidbey Island		Determined Not Eligible	1945
102310	OLF Coupeville - Aircraft Control Tower, Building 1, Aircraft Operations Control Tower	NAS Whidbey Island		Determined Not Eligible	1944
102321	Sea Plane Base - Igloo Magazines, Buildings 35, 432-445, Inert Storehouses	NAS Whidbey Island		Determined Not Eligible	1942
102342	Ault Field - Maintenance Shop, Building 115, Weapons/AIMD/Supply	NAS Whidbey Island		Determined Not Eligible	1942
102343	Ault Field - Garage, Building 124, CDC Vehicle Maintenance HW Storage	NAS Whidbey Island		Determined Not Eligible	1942
102344	Ault Field - Free Gunnery Range Gate House, Building 128, Ladies Golf Clubhouse	NAS Whidbey Island		Determined Not Eligible	1942
102345	Ault Field - Ordnance Building, Building 130, Duffer's Cove / Golf Clubhouse	NAS Whidbey Island		Determined Not Eligible	1942
102347	Ault Field - High Explosive Magazine, Building 137, High Explosive Magazine	NAS Whidbey Island		Determined Not Eligible	1943
102348	Ault Field - Chief Petty Officer's Club (CPO), Building 138, Chief Petty Officer's Club (CPO)	NAS Whidbey Island		Determined Not Eligible	1943
102349	Ault Field - Skeet and Trap Shooting Office, Building 170, Rod and Gun Club Office, Bowman's Club	NAS Whidbey Island		Determined Not Eligible	1943

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
102350	Ault Field - Skeet and Trap Range, Facility 171, Vacant/Not in Use	NAS Whidbey Island		Determined Not Eligible	1943
102352	Ault Field - Agricultural Barn, Building 189, MVR Warehouse	NAS Whidbey Island		Determined Not Eligible	1920
102353	Ault Field - Granary, Building 206, Skookum Storage/ Maintenance Building	NAS Whidbey Island		Determined Not Eligible	1930
102354	Ault Field - VAQ Storage, Building 219, VAQ Storage/NADEP ISR Depot RPR	NAS Whidbey Island		Determined Not Eligible	1944
102355	Ault Field - Agricultural Barn, Building 262, NMCI Computer Warehouse	NAS Whidbey Island		Determined Not Eligible	1935
102356	Ault Field - Building 278,, A/C Refueler Contract Building	NAS Whidbey Island		Determined Not Eligible	1945
102357	Ault Field - Electrical Utility Building, Building 281, Electric Support at FF3	NAS Whidbey Island		Determined Not Eligible	1942
102358	Ault Field - Water Pump House, Building 284, Water Pump House	NAS Whidbey Island		Determined Not Eligible	1942
102360	Ault Field - Ready Locker Magazines, Building 353, 462-466, 469-471 Ready Locker Magazines	NAS Whidbey Island		Determined Not Eligible	1949
102364	Ault Field - CPO Club Utility Building, Building 492, CPO Club Storage	NAS Whidbey Island		Determined Not Eligible	1943
112737	Jay Palmer	Oak Harbor		Determined Not Eligible	1964
112741	Donna Ransdell	Coupeville		Determined Not Eligible	1950

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
112742	Private	Oak Harbor		Determined Not Eligible	1954
114746	Darst, Earle	Oak Harbor		Determined Not Eligible	1950
115064	Building 2737, Hangar 12, Building 2737, Hangar 12	NAS Whidbey Island		Determined Not Eligible	1989
115082	Building 2700 - Naval Facility Whidbey Island, Building 2700, Building 2700 - Naval Facility Whidbey Island, Building 2700 - Naval Ocean Processing Facility	NAS Whidbey Island		Determined Eligible	1986
115130	Magazines, Buildings 35, 432-445, Inert Storehouses	NAS Whidbey Island		Determined Not Eligible	1942
115167	Ready Locker Magazines, Building 353, 462-466, 469-471 Ready Locker Magazines	NAS Whidbey Island		Determined Not Eligible	1949
126836		WA		Not Determined	1941
126904		WA		Not Determined	1941
126905		WA		Not Determined	1941
126906		WA		Not Determined	1941
126907		WA		Not Determined	1941
126909		WA		Not Determined	1941
126910		WA		Not Determined	1941
126911		WA		Not Determined	1941
126912		WA		Not Determined	1941
126913		WA		Not Determined	1941
126914		WA		Not Determined	1941
126915		WA		Not Determined	1921
126916		WA		Not Determined	1921
126917		WA		Not Determined	1921

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
126920		WA		Not Determined	1904
126924		WA		Not Determined	1941
126925		WA		Not Determined	1921
126926		WA		Not Determined	1904
126927		WA		Not Determined	1904
126928		WA		Not Determined	1904
126929		WA		Not Determined	1904
126930		WA		Not Determined	1904
126931		WA		Not Determined	1904
126932		WA		Not Determined	1904
126933		WA		Not Determined	1904
126934		WA		Not Determined	1900
126935		WA		Not Determined	1941
126936		WA		Not Determined	1880
126937	San de Fuca School	WA		Not Determined	1902
126957	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
158714				Not Determined	1941
158782				Not Determined	1941
158783				Not Determined	1941
158784				Not Determined	1941
158785				Not Determined	1941
158787				Not Determined	1941
158788				Not Determined	1941
158789				Not Determined	1941
158790				Not Determined	1941
158791				Not Determined	1941
158792				Not Determined	1941
158793				Not Determined	1921
158794				Not Determined	1921

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
158795				Not Determined	1921
158798				Not Determined	1904
158802				Not Determined	1941
158803				Not Determined	1921
158804				Not Determined	1904
158805				Not Determined	1904
158806				Not Determined	1904
158807				Not Determined	1904
158808				Not Determined	1904
158809				Not Determined	1904
158810				Not Determined	1904
158811				Not Determined	1904
158812				Not Determined	1900
158813				Not Determined	1941
158814				Not Determined	1880
158815	San de Fuca School			Not Determined	1902
158835	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
159241	Fort Casey Barracks	Coupeville		Not Determined	1940, 1941
159242	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159244	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159245		Coupeville		Not Determined	1941
159247	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159248	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159314	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159315		Coupeville		Not Determined	1941
159316		Coupeville		Not Determined	1941
159317		Coupeville		Not Determined	1941
159318		Coupeville		Not Determined	1941
159319	Fort Casey Company Quarters	Coupeville		Not Determined	1941

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
159320	Fort Casey Company Quarters	Coupeville		Not Determined	1940
159321		Coupeville		Not Determined	1941
159322	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159323	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159324	Fort Casey Company Quarters	Coupeville		Not Determined	1941
159327		Coupeville		Not Determined	1921
159328	Fort Casey Quartermaster Workshop: Building 22	Coupeville		Not Determined	1921
159329	Fort Casey Guard House: Building 8	Coupeville		Not Determined	1921
159330	Fort Casey Administration Building: Building 1	Coupeville		Not Determined	1940
159331	Fort Casey Bachelor Officers Quarters	Coupeville		Not Determined	1940
159332		Coupeville		Not Determined	1904, 1906
159333		Coupeville		Not Determined	1930
159334		Coupeville		Not Determined	1900, 1962
159335	Fort Casey Munitions Bunkers	Coupeville		Not Determined	1900
159336	Fort Casey Chapel	Coupeville		Not Determined	1941
159337	Fort Casey Quarter Master and Storehouse: Building 21	Coupeville		Not Determined	1921
159338	Fort Casey Firehouse: Building 15	Coupeville		Not Determined	1904
159339	Fort Casey Commanding Officer's Quarters	Coupeville		Not Determined	1904
159340	Fort Casey Officer's Quarters	Coupeville		Not Determined	1904
159341	Fort Casey Officer's Quarters: Building 3	Coupeville		Not Determined	1904
159342		Coupeville		Not Determined	1904
159343		Coupeville		Not Determined	1904
159344		Coupeville		Not Determined	1904
159345		Coupeville		Not Determined	1904

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
159346	Fort Casey Batteries	Coupeville		Determined Eligible	1900
159347		Coupeville		Not Determined	1941
159348		Coupeville		Not Determined	1880
159352	Benson Confectionery	Coupeville		Not Determined	1916
159361	Puget Race Drug Store	Coupeville		Not Determined	1890
159363	Haller, Colonel Granville House	Coupeville	R13233-379-4060	Not Determined	1866, 1875
159364	Glenwood Hotel	Coupeville	R13233-380-3950	Not Determined	1890
159365	Tom Howell's Barbershop	Coupeville		Not Determined	1936
159368	Admiralty Head Lighthouse	Coupeville		Not Determined	1861
159369	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
184801				Not Determined	1941
184802				Not Determined	1941
184804				Not Determined	1941
184805				Not Determined	1941
184807				Not Determined	1941
184808				Not Determined	1941
184809				Not Determined	1941
184810				Not Determined	1941
184811				Not Determined	1941
184812				Not Determined	1941
184813				Not Determined	1941
184814				Not Determined	1941
184816				Not Determined	1941
184817				Not Determined	1941
184818				Not Determined	1941
184819				Not Determined	1941
184820				Not Determined	1941

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
184821				Not Determined	1941
184822				Not Determined	1921
184823				Not Determined	1921
184824				Not Determined	1921
184827				Not Determined	1904
184831				Not Determined	1941
184832				Not Determined	1921
184833				Not Determined	1904
184834				Not Determined	1904
184835				Not Determined	1904
184836				Not Determined	1904
184837				Not Determined	1904
184838				Not Determined	1904
184839				Not Determined	1904
184840				Not Determined	1904
184841				Not Determined	1900
184842				Not Determined	1941
184843				Not Determined	1880
184844	San de Fuca School			Not Determined	1902
184864	Wid-Isle Inn, Captain Whidbey Inn	Coupeville		Not Determined	1901
209249				Not Determined	1941
209250				Not Determined	1941
209252				Not Determined	1941
209253				Not Determined	1941
209255				Not Determined	1941
209256				Not Determined	1941
209257				Not Determined	1941
209258				Not Determined	1941
209259				Not Determined	1941

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
209260				Not Determined	1941
209261				Not Determined	1941
209262				Not Determined	1941
209264				Not Determined	1941
209265				Not Determined	1941
209266				Not Determined	1941
209267				Not Determined	1941
209268				Not Determined	1941
209269				Not Determined	1941
209270				Not Determined	1921
209271				Not Determined	1921
209272				Not Determined	1921
209275				Not Determined	1904
209279				Not Determined	1941
209280				Not Determined	1921
209281				Not Determined	1904
209282				Not Determined	1904
209283				Not Determined	1904
209284				Not Determined	1904
209285				Not Determined	1904
209286				Not Determined	1904
209287				Not Determined	1904
209288				Not Determined	1904
209289				Not Determined	1900
209290				Not Determined	1941
209291				Not Determined	1880
209292	San de Fuca School			Not Determined	1902
209312	Wid-Isle Inn, Captain Whidbey Inn			Not Determined	1901
623311		Oak Harbor	S8050-02-19008-0	Not Determined	1900

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
623312		Oak Harbor	R23330-102-1130	Not Determined	1900
623319		Oak Harbor	S6430-00-00013-0	Not Determined	1900
623330		Oak Harbor	R23330-037-1130	Not Determined	1900
623332		Oak Harbor	R13326-092-0250	Not Determined	1912
623333		Oak Harbor	R23330-095-2210	Not Determined	1920
623336		Oak Harbor	R13326-272-3510	Not Determined	1943
623337		Oak Harbor	R13312-167-2960	Not Determined	1952
623338		Oak Harbor	R13312-146-2130	Not Determined	1959
623339		Oak Harbor	S8050-00-10022-0	Not Determined	1961
623340		Oak Harbor	R13312-235-4300	Not Determined	1962
623342		Oak Harbor	R23320-096-0500	Not Determined	1963
623343		Oak Harbor	R13312-450-0650	Not Determined	1966
623344		Oak Harbor	R13323-074-2810	Not Determined	1966
623345		Oak Harbor	S8050-00-09017-0	Not Determined	1967
623346		Oak Harbor	R23330-484-0180	Not Determined	1967
623347		Oak Harbor	R23308-369-1170	Not Determined	1967
623349		Oak Harbor	S8050-02-18016-0	Not Determined	1968
623350		Oak Harbor	S8265-00-01001-2	Not Determined	1968
623351		Oak Harbor	R23319-386-2750	Not Determined	1968
623352		Oak Harbor	S8050-00-04013-1	Not Determined	1968
623353		Oak Harbor	S8265-02-03003-1	Not Determined	1969
623354		Oak Harbor	R23307-419-0980	Not Determined	1969
623355		Oak Harbor	R13328-363-4120	Not Determined	1969
623356		Oak Harbor	R23319-302-3820	Not Determined	1969
625481	Grennan and Cranney's General Store, Island County Courthouse	Coupeville	R13230-167-2640	Not Determined	1851
625482	Fairhaven	Coupeville	R13233-405-3070	Not Determined	1852
625486	Duvall House	Coupeville	R13233-409-2860	Not Determined	1860

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625487		Coupeville	R13108-364-4680	Not Determined	1860
625488		Coupeville	R13103-361-0370	Not Determined	1863
625490		Coupeville	R13109-149-1990	Not Determined	1870
625492		Coupeville	S8060-00-19004-1	Not Determined	1872
625494		Coupeville	S8060-00-09001-0	Not Determined	1880
625495		Coupeville	R13233-330-3880	Not Determined	1885
625496		Coupeville	S6415-00-19000-0	Not Determined	1886
625497		Coupeville	R13104-267-2240	Not Determined	1888
625498		Coupeville	R13233-054-1920	Not Determined	1888
625499		Coupeville	S6005-00-06005-0	Not Determined	1888
625503		Coupeville	R13233-008-3820	Not Determined	1890
625504		Coupeville	S8270-00-0E011-0	Not Determined	1890
625506		Coupeville	R13232-136-1940	Not Determined	1890
625507		Coupeville	R13104-487-2140	Not Determined	1890
625508		Coupeville	S6415-00-13004-0	Not Determined	1890
625514		Coupeville	R13104-098-3880	Not Determined	1890
625517		Coupeville	S6415-00-14001-0	Not Determined	1890
625525		Coupeville	S8060-00-10010-0	Not Determined	1890
625526		Coupeville	R13104-246-2030	Not Determined	1892
625527	Frain House/Burton-Engle House	Coupeville	R13104-373-3330	Not Determined	1892
625529		Coupeville	R13104-323-3820	Not Determined	1893
625532		Coupeville	S8060-00-17002-0	Not Determined	1895
625533		Coupeville	S6415-00-24007-0	Not Determined	1895
625535	Keith, Sam, Farm	Coupeville	R13103-078-2490	Not Determined	1898
625536		Coupeville	R13219-061-4150	Not Determined	1898
625537		Coupeville	R13111-248-4630	Not Determined	1900

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625538		Coupeville	S8150-00-01008-0	Not Determined	1900
625540		Coupeville	S8060-00-70002-0	Not Determined	1903
625541		Coupeville	R13104-328-2240	Not Determined	1903
625543		Coupeville	S6415-00-18007-1	Not Determined	1904
625545	Libbey, George and Annie House	Coupeville	R13230-154-2610	Not Determined	1904
625546		Coupeville	R13232-004-4950	Not Determined	1905
625547		Coupeville	S8060-00-10006-0	Not Determined	1905
625548		Coupeville	S6420-00-00006-1	Not Determined	1905
625550		Coupeville	R03225-234-4480	Not Determined	1906
625553		Coupeville	R13114-120-5030	Not Determined	1910
625554		Coupeville	R13115-273-1780	Not Determined	1910
625555	Schulke House/Steadman House, Valentine House	Coupeville	S6370-00-61005-0	Determined Eligible	1910
625556		Coupeville	R13232-173-0200	Not Determined	1910
625557		Coupeville	R13103-126-3340	Not Determined	1910
625559		Coupeville	S7070-00-06002-0	Not Determined	1910
625561		Coupeville	R13219-034-3750	Not Determined	1910
625562		Coupeville	S7070-00-07001-2	Not Determined	1910
625563		Coupeville	R13103-266-1530	Not Determined	1910
625564		Coupeville	S7070-00-03007-0	Not Determined	1911
625565	Frank Newberry House	Coupeville	R13104-471-4210	Not Determined	1912
625566		804 NE 9TH ST, COUPEVILLE, WA 98239	S6005-00-05002-0	Not Determined	1912
625567		Coupeville	R13110-338-3570	Not Determined	1912

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625568		2440 LIBBEY RD, COUPEVILLE, WA 98239	R03225-330-4800	Not Determined	1913
625569		2494 LIBBEY RD, COUPEVILLE, WA 98239	R03225-297-4170	Not Determined	1913
625570		50 SEA HOLLY LN, COUPEVILLE, WA 98239	R13232-058-1270	Not Determined	1913
625571		Coupeville	R13101-343-4020	Not Determined	1915
625572		307 NE 8TH ST, COUPEVILLE, WA 98239	S6415-00-17003-0	Not Determined	1915
625574		1996 MADRONA WAY, COUPEVILLE, WA 98239	R13232-189-0120	Not Determined	1916
625576		Coupeville	R13102-500-0500	Not Determined	1918
625577		502 NW MADRONA WAY, COUPEVILLE, WA 98239	S7070-00-10007-0	Not Determined	1918
625578		109 N SHERMAN RD, COUPEVILLE, WA 98239	R13232-140-5020	Not Determined	1918
625579		505 NE 9TH ST, COUPEVILLE, WA 98239	S6425-00-02003-0	Not Determined	1920
625580		97 N SHERMAN RD, COUPEVILLE, WA 98239	R13232-128-4970	Not Determined	1920
625582		Coupeville	R13103-410-2190	Not Determined	1920
625583		1456 BLACK RD, COUPEVILLE, WA 98239	R13233-096-1940	Not Determined	1923
625584		401 NE 6TH ST, COUPEVILLE, WA 98239	S6415-00-26001-0	Not Determined	1923
625585		Coupeville	R23107-391-0270	Not Determined	1925
625586		1637 MADRONA WAY, COUPEVILLE, WA 98239	R13232-190-4830	Not Determined	1925

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625587		901 NE 8TH ST, COUPEVILLE, WA 98239	S7215-00-02001-0	Not Determined	1925
625588	Zylstra/Sherod House	1173 ZYLSTRA RD, COUPEVILLE, WA 98239	R13219-478-3400	Not Determined	1925
625589	Private	Coupeville	R13103-290-2150	Determined Not Eligible	1924, 1925
625590		305 NW COVELAND ST, COUPEVILLE, WA 98239	S6025-00-04001-0	Not Determined	1925
625591		Coupeville	S8440-00-00025-0	Not Determined	1925
625594	Oly Allison House	1129 ZYLSTRA Rd, COUPEVILLE, WA 98239	R13219-430-3490	Not Determined	1925
625597		Coupeville	R13103-378-2330	Not Determined	1927
625600		Coupeville	R13114-333-2200	Not Determined	1928
625602		Coupeville	S6370-00-61010-0	Not Determined	1928
625603		2185 MADRONA WAY, COUPEVILLE, WA 98239	R13230-099-2780	Not Determined	1929
625604		1986 MADRONA WAY, COUPEVILLE, WA 98239	R13232-153-0280	Not Determined	1929
625606		82 S EBAY RD, COUPEVILLE, WA 98239	R13104-419-2260	Not Determined	1930
625607		2136 MADRONA WAY, COUPEVILLE, WA 98239	R13230-038-3450	Not Determined	1930
625608		Coupeville	R13113-363-4620	Not Determined	1932
625611		1108 NE LOVEJOY ST, COUPEVILLE, WA 98239	R13234-476-2500	Not Determined	1932
625612		25428 SR 20, COUPEVILLE, WA 98239	R13230-215-2340	Not Determined	1932
625613		2648 EL SOL PL, COUPEVILLE, WA 98239	R03225-355-2100	Not Determined	1932

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625614		2357 LIBBEY RD, COUPEVILLE, WA 98239	R13230-251-0570	Not Determined	1932
625615		Coupeville	R13103-357-0630	Not Determined	1932
625616		735 HOLBROOK RD, COUPEVILLE, WA 98239	S8060-00-09042-0	Not Determined	1932
625617		Coupeville	R13103-157-2690	Not Determined	1932
625620		Coupeville	S8150-00-01006-0	Not Determined	1933
625621		Coupeville	R13114-410-1250	Not Determined	1933
625623		1998 MADRONA WAY, COUPEVILLE, WA 98239	R13232-197-0060	Not Determined	1933
625624		Coupeville	R23106-508-1720	Not Determined	1933
625625		Coupeville	R23106-501-1840	Not Determined	1934
625626		Coupeville	S8150-00-01015-0	Not Determined	1935
625629		Coupeville	S8150-02-03001-2	Not Determined	1935
625631		2040 CAPTAIN WHIDBEY INN RD, COUPEVILLE, WA 98239	S7530-00-00006-3	Not Determined	1935
625632		709 NW MADRONA WAY, COUPEVILLE, WA 98239	R13233-305-1520	Not Determined	1935
625633		783 HOLBROOK RD, COUPEVILLE, WA 98239	S8060-00-06016-0	Not Determined	1935
625634		2100 MADRONA WAY, COUPEVILLE, WA 98239	S7530-00-00003-1	Not Determined	1935
625635		26611 SR 20, COUPEVILLE, WA 98239	S8060-00-47001-0	Not Determined	1935
625636		Coupeville	R23106-076-3100	Not Determined	1936
625637		903 NE 7TH ST, COUPEVILLE, WA 98239	R13234-310-1560	Not Determined	1936

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625639		2341 LIBBEY RD, COUPEVILLE, WA 98239	R13230-249-0750	Not Determined	1937
625643		507 NW SNOMONT ST, COUPEVILLE, WA 98239	S7070-00-02000-1	Not Determined	1938
625644		Coupeville	R23106-082-3080	Not Determined	1938
625645		1956 PENN COVE RD, COUPEVILLE, WA 98239	S8060-00-10013-0	Not Determined	1939
625647		1302 NE PARKER RD, COUPEVILLE, WA 98239	R13234-486-2900	Not Determined	1940
625648		403 NW COVELAND ST, COUPEVILLE, WA 98239	S6025-00-02003-0	Not Determined	1940
625649		Coupeville	S8010-00-00070-0	Not Determined	1940
625650		767 DUNBAR ST, COUPEVILLE, WA 98239	S8060-00-23010-0	Not Determined	1940
625651		1304 NE PARKER RD, COUPEVILLE, WA 98239	R13234-444-2960	Not Determined	1940
625652		Coupeville	R13234-382-4130	Not Determined	1940
625653	Private	Coupeville	S8010-00-00061-0	Determined Not Eligible	1941, 1953
625654		1940 GOOD BEACH LN, COUPEVILLE, WA 98239	R13232-118-0840	Not Determined	1941
625655		Coupeville	R13103-485-4710	Not Determined	1941
625656		1305 NE PARKER RD, COUPEVILLE, WA 98239	R13234-390-2850	Not Determined	1941
625657		Coupeville	R13115-333-2810	Not Determined	1942
625658		806 NE 8TH ST, COUPEVILLE, WA 98239	S6005-00-13001-0	Not Determined	1942
625659		807 NE LASALLE ST, COUPEVILLE, WA 98239	S6005-00-13005-0	Not Determined	1942

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625660		401 NE 4TH ST, COUPEVILLE, WA 98239	S6415-00-36001-0	Not Determined	1942
625661		205 NE 7TH ST, COUPEVILLE, WA 98239	S6415-00-23003-0	Not Determined	1942
625662		2210 KENNEDY LAGOON CT, COUPEVILLE, WA 98239	R13230-060-2580	Not Determined	1942
625663		2370 LIBBEY RD, COUPEVILLE, WA 98239	R13230-280-0400	Not Determined	1942
625664		306 NE 6TH ST, COUPEVILLE, WA 98239	S6415-00-24005-2	Not Determined	1942
625665		805 NE LASALLE ST, COUPEVILLE, WA 98239	S6005-00-13003-0	Not Determined	1942
625666		Coupeville	S8010-00-00089-0	Not Determined	1943
625667		Coupeville	S7095-01-00009-0	Not Determined	1943
625668		Coupeville	S8010-00-00022-0	Not Determined	1943
625669		164 CEMETERY RD, COUPEVILLE, WA 98239	R13105-282-4130	Not Determined	1943
625670		Coupeville	S8010-00-00006-0	Not Determined	1943
625671		2097 TWIN LAGOON LN, COUPEVILLE, WA 98239	S7530-01-0000B-0	Not Determined	1943
625672		1101 NE PARKER RD, COUPEVILLE, WA 98239	S6420-00-00004-2	Not Determined	1945
625673		407 NW COVELAND ST, COUPEVILLE, WA 98239	S6025-00-02001-0	Not Determined	1945
625674		1307 NE PARKER RD, COUPEVILLE, WA 98239	R13234-375-3030	Not Determined	1945
625675		2066 MADRONA WAY, COUPEVILLE, WA 98239	S7530-01-0000M-0	Not Determined	1945

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625676		702 NE GOULD ST, COUPEVILLE, WA 98239	S6415-00-16005-0	Not Determined	1945
625677		301 NE FRONT ST, COUPEVILLE, WA 98239	S6415-00-07001-0	Not Determined	1945
625678		201 NE 4TH ST, COUPEVILLE, WA 98239	S6415-00-38001-0	Not Determined	1945
625679		Coupeville	S8010-00-00084-0	Not Determined	1945
625680		905 NE KINNEY ST, COUPEVILLE, WA 98239	S6415-00-07008-1	Not Determined	1945
625681		437 HILL VALLEY DR, COUPEVILLE, WA 98239	S7150-00-00011-0	Not Determined	1945
625682		302 NE 4TH ST, COUPEVILLE, WA 98239	S6415-00-34005-2	Not Determined	1946
625683		404 NE CLAPP ST, COUPEVILLE, WA 98239	S6415-00-34003-0	Not Determined	1946
625684		Coupeville	S8010-00-00064-0	Not Determined	1946
625685		Coupeville	S7365-00-00004-0	Not Determined	1946
625686		508 VINE ST, COUPEVILLE, WA 98239	R13233-276-1160	Not Determined	1946
625687		402 NE CLAPP ST, COUPEVILLE, WA 98239	S6415-00-34005-1	Not Determined	1946
625688		Coupeville	S8150-00-01009-0	Not Determined	1947
625689		Coupeville	S8150-00-01010-0	Not Determined	1947
625690		Coupeville	S8010-00-00018-0	Not Determined	1947
625691		201 NE 9TH ST, COUPEVILLE, WA 98239	S6415-00-13001-0	Not Determined	1947
625692		802 NE LEACH ST, COUPEVILLE, WA 98239	S6005-00-13004-0	Not Determined	1947
625693		1207 NE PARKER RD, COUPEVILLE, WA 98239	R13234-390-2760	Not Determined	1947

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625694		Coupeville	R13103-251-2330	Not Determined	1947
625695		205 NE 4TH ST, COUPEVILLE, WA 98239	S6415-00-38004-0	Not Determined	1947
625696		2396 LIBBEY RD, COUPEVILLE, WA 98239	R13230-280-0050	Not Determined	1947
625697		606 NE GOULD ST, COUPEVILLE, WA 98239	S6415-00-25002-0	Not Determined	1947
625698		Coupeville	S8010-00-00039-0	Not Determined	1947
625699		301 NE 4TH ST, COUPEVILLE, WA 98239	S6415-00-37001-0	Not Determined	1947
625702		804 NW BROADWAY ST, COUPEVILLE, WA 98239	S7070-00-10004-0	Not Determined	1948
625703		108 NW BROADWAY ST, COUPEVILLE, WA 98239	R13233-156-2300	Not Determined	1948
625704		Coupeville	S8010-00-00085-0	Not Determined	1948
625705		Coupeville	S8010-00-00001-2	Not Determined	1948
625706		Coupeville	R13103-231-2300	Not Determined	1948
625707		305 NE 6TH ST, COUPEVILLE, WA 98239	S6415-00-27003-0	Not Determined	1948
625708		Coupeville	R13110-175-4500	Not Determined	1949
625709		Coupeville	R23117-442-0700	Not Determined	1949
625710		Coupeville	S8010-00-00015-2	Not Determined	1949
625711		2126 MADRONA WAY, COUPEVILLE, WA 98239	R13230-015-3660	Not Determined	1949
625712		26581 SR 20, COUPEVILLE, WA 98239	S8060-00-48002-0	Not Determined	1949
625713		2229 MADRONA WAY, COUPEVILLE, WA 98239	R13230-098-2310	Not Determined	1949
625714		1630 WIND DANCER PL, COUPEVILLE, WA 98239	R13232-101-4900	Not Determined	1949

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625715		Coupeville	S8150-00-01014-0	Not Determined	1950
625716		Coupeville	S7095-01-00015-0	Not Determined	1950
625717		25990 SR 20, COUPEVILLE, WA 98277	R13230-320-4740	Not Determined	1950
625718	Private	Coupeville	S8010-00-00062-0	Determined Not Eligible	1941, 1950
625719		Coupeville	R23106-090-3040	Not Determined	1950
625720		811 NE 9TH ST, COUPEVILLE, WA 98239	S6005-00-13008-0	Not Determined	1950
625721		66 SEA HOLLY LN, COUPEVILLE, WA 98239	R13232-091-1340	Not Determined	1950
625722		Coupeville	S8010-00-00063-0	Not Determined	1950
625723		Coupeville	R13103-200-2670	Not Determined	1950
625724		724 WALL ST, COUPEVILLE, WA 98239	S8060-00-09032-0	Not Determined	1950
625725		Coupeville	S7490-00-00003-0	Not Determined	1950
625726		301 NE 8TH ST, COUPEVILLE, WA 98239	S6415-00-17001-0	Not Determined	1950
625727		Coupeville	S8440-00-00014-0	Not Determined	1950
625728		162 CEMETERY RD, COUPEVILLE, WA 98239	R13105-322-4370	Not Determined	1950
625729		1008 NE LEACH ST, COUPEVILLE, WA 98239	R13234-420-1300	Not Determined	1950
625730	Private	Coupeville	R13103-270-2450	Determined Not Eligible	1950
625731		Coupeville	R23107-459-3200	Not Determined	1950
625732		2107 MADRONA WAY, COUPEVILLE, WA 98239	R13231-459-3340	Not Determined	1950
625733		Coupeville	R13103-245-1530	Not Determined	1950
625734		Coupeville	R13113-212-0210	Not Determined	1951

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625735		Coupeville	R13114-204-3780	Not Determined	1951
625736		701 NE HALLER ST, COUPEVILLE, WA 98239	S6415-00-18007-2	Not Determined	1951
625737		Coupeville	S7365-00-00006-0	Not Determined	1951
625738		Coupeville	S7365-00-00005-0	Not Determined	1951
625739		2046 CAPTAIN WHIDBEY INN RD, COUPEVILLE, WA 98239	S7530-00-00006-2	Not Determined	1951
625740		Coupeville	S8150-02-03001-1	Not Determined	1952
625741		407 NE HALLER ST, COUPEVILLE, WA 98239	S6415-00-33001-0	Not Determined	1952
625742		708 N MAIN ST, COUPEVILLE, WA 98239	R13233-319-3870	Not Determined	1952
625744		Coupeville	R13103-128-2840	Not Determined	1952
625745		Coupeville	S8010-00-00093-0	Not Determined	1952
625746	Terry Menges	1041 ZYLSTRA, COUPEVILLE, WA 98239	R13219-317-3400	Determined Not Eligible	1952
625747		2123 MADRONA WAY, COUPEVILLE, WA 98239	R13230-003-3500	Not Determined	1952
625748		Coupeville	R13103-045-1700	Not Determined	1952
625749		106 N SHERMAN RD, COUPEVILLE, WA 98239	R13233-170-0300	Not Determined	1952
625750		Coupeville	S7095-01-00010-0	Not Determined	1952
625751		Coupeville	S8010-00-00096-0	Not Determined	1952
625752		Coupeville	S8010-00-00065-0	Not Determined	1952
625753		Coupeville	R13111-060-0100	Not Determined	1953
625754	Private	Coupeville	S7400-00-01026-0	Determined Not Eligible	1953
625755		201 NE 7TH ST, COUPEVILLE, WA 98239	S6415-00-23001-0	Not Determined	1953

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625756		Coupeville	S8010-00-00004-0	Not Determined	1953
625757		705 NE LEACH ST, COUPEVILLE, WA 98239	S7215-00-02002-1	Not Determined	1953
625758		Coupeville	S8010-00-00015-1	Not Determined	1953
625759		704 NE OTIS ST, COUPEVILLE, WA 98239	R13234-322-0400	Not Determined	1953
625760		Coupeville	S8010-00-00016-1	Not Determined	1953
625761		Coupeville	R13103-274-1870	Not Determined	1953
625763		Coupeville	R13115-345-4930	Not Determined	1954
625764		Coupeville	S7400-00-04002-0	Not Determined	1954
625765		Coupeville	S7400-00-03001-0	Not Determined	1954
625766		Coupeville	S7400-00-01019-0	Not Determined	1954
625767		2076 TWIN LAGOON LN, COUPEVILLE, WA 98239	S7530-00-0B009-0	Not Determined	1954
625768		Coupeville	S8010-00-00019-0	Not Determined	1954
625769		1994 MADRONA WAY, COUPEVILLE, WA 98239	R13232-181-0160	Not Determined	1954
625770		Coupeville	S7400-00-01022-0	Not Determined	1954
625771		2065 TWIN LAGOON LN, COUPEVILLE, WA 98239	S7530-01-0000I-0	Not Determined	1954
625772		2079 TWIN LAGOON LN, COUPEVILLE, WA 98239	S7530-01-0000E-0	Not Determined	1954
625773		1105 NE MOORE PL, COUPEVILLE, WA 98239	S7205-00-00006-0	Not Determined	1954
625774		206 NE 7TH ST, COUPEVILLE, WA 98239	S6415-00-18006-0	Not Determined	1954
625775		301 NE HALLER ST, COUPEVILLE, WA 98239	S6415-00-38008-0	Not Determined	1954
625777		Coupeville	R13115-269-1350	Not Determined	1955
625778		Coupeville	R13103-375-1830	Not Determined	1955

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625779		2273 MADRONA WAY, COUPEVILLE, WA 98239	R13230-198-2660	Not Determined	1955
625780		206 NE 4TH ST, COUPEVILLE, WA 98239	S6415-00-33005-0	Not Determined	1955
625781		Coupeville	S7490-00-00025-0	Not Determined	1955
625782		2050 MADRONA WAY, COUPEVILLE, WA 98239	S7530-00-00011-0	Not Determined	1955
625783		Coupeville	S7400-00-01008-0	Not Determined	1955
625787		Coupeville	R23117-435-1680	Not Determined	1956
625788		Coupeville	S7400-00-01015-0	Not Determined	1956
625789		Coupeville	S7400-00-01012-0	Not Determined	1956
625790		702 NE KINNEY ST, COUPEVILLE, WA 98239	S6415-00-18005-0	Not Determined	1956
625791		207 NW BROADWAY ST, COUPEVILLE, WA 98239	R13233-194-2500	Not Determined	1956
625792		401 NW COVELAND ST, COUPEVILLE, WA 98239	S6025-00-02004-0	Not Determined	1956
625793		2072 TWIN LAGOON LN, COUPEVILLE, WA 98239	S7530-00-0B010-0	Not Determined	1956
625794		Coupeville	S7400-00-03007-0	Not Determined	1956
625795		801 NE OTIS ST, COUPEVILLE, WA 98239	S8270-00-0F001-0	Not Determined	1956
625796		Coupeville	S7400-00-01037-0	Not Determined	1956
625797		2108 MADRONA WAY, COUPEVILLE, WA 98239	S7530-00-00001-0	Not Determined	1956
625798		704 NE PERKINS ST, COUPEVILLE, WA 98239	S8270-00-0F002-2	Not Determined	1956
625799		Coupeville	S7400-00-01027-0	Not Determined	1956
625800		1673 MADRONA WAY, COUPEVILLE, WA 98239	R13232-174-4330	Not Determined	1956

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625801		Coupeville	R13113-422-4920	Not Determined	1957
625803		Coupeville	R23106-029-3200	Not Determined	1957
625804		Coupeville	R23107-450-3210	Not Determined	1957
625805		26535 SR 20, COUPEVILLE, WA 98239	S8060-00-48001-0	Not Determined	1957
625806		707 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0E004-0	Not Determined	1957
625807		703 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0E002-0	Not Determined	1957
625808		Coupeville	S7400-00-05004-0	Not Determined	1957
625809		705 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0E003-0	Not Determined	1957
625810		Coupeville	S7400-00-03025-0	Not Determined	1957
625811		Coupeville	S7400-00-01031-0	Not Determined	1957
625812		Coupeville	S7400-00-02003-0	Not Determined	1957
625813		704 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0F007-2	Not Determined	1957
625814		639 NE OTIS ST, COUPEVILLE, WA 98239	S8270-00-0F004-2	Not Determined	1957
625815		701 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0E001-0	Not Determined	1957
625816		Coupeville	S7400-00-03006-0	Not Determined	1957
625817		2411 LIBBEY RD, COUPEVILLE, WA 98239	R03225-245-5130	Not Determined	1957
625822		Coupeville	S8300-00-01024-0	Not Determined	1958
625823		Coupeville	S7400-00-02015-0	Not Determined	1958
625824		401 NE FRONT ST, COUPEVILLE, WA 98239	S6415-00-06001-0	Not Determined	1958
625825	Residence	706 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0F007-1	Not Determined	1958

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625826		Coupeville	S7400-00-02004-0	Not Determined	1958
625827		Coupeville	S7490-00-00026-0	Not Determined	1958
625828		703 NE OTIS ST, COUPEVILLE, WA 98239	S8270-00-0F002-1	Not Determined	1958
625829		121 VINE ST, COUPEVILLE, WA 98239	R13233-190-1000	Not Determined	1958
625830		801 NE 6TH ST, COUPEVILLE, WA 98239	S8270-00-0E005-0	Not Determined	1958
625831		Coupeville	S7400-00-03008-0	Not Determined	1958
625832		Coupeville	R13103-120-2950	Not Determined	1958
625833		404 NE KINNEY ST, COUPEVILLE, WA 98239	S6415-00-33003-1	Not Determined	1958
625834		Coupeville	S7400-00-03003-0	Not Determined	1958
625835		Coupeville	S7400-00-02014-0	Not Determined	1958
625836		1977 PENN COVE RD, COUPEVILLE, WA 98239	S8060-00-0E016-0	Not Determined	1958
625837		Coupeville	R13235-326-0200	Not Determined	1958
625838		Coupeville	R23107-523-3320	Not Determined	1958
625839		Coupeville	S7400-00-01005-0	Not Determined	1958
625840		Coupeville	S8270-00-0F005-2	Not Determined	1958
625841		Coupeville	S7400-00-01011-0	Not Determined	1958
625842		Coupeville	R13233-182-4600	Not Determined	1958
625843		Coupeville	R13230-345-0440	Not Determined	1958
625844		Coupeville	S8270-00-0F004-1	Not Determined	1958
625845		Coupeville	S7400-00-03002-0	Not Determined	1958
625846		Coupeville	S8270-00-0F003-0	Not Determined	1958
625847		Coupeville	S8270-00-0F005-1	Not Determined	1958
625848		Coupeville	R13233-094-1050	Not Determined	1958
625849		Coupeville	R13104-109-4100	Not Determined	1958

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625850		Coupeville	R13110-222-4560	Not Determined	1959
625851		Coupeville	S8300-00-01007-0	Not Determined	1959
625854		Coupeville	S8270-00-0E007-0	Not Determined	1959
625855		Coupeville	S8270-00-0A010-0	Not Determined	1959
625856		Coupeville	R13103-110-3240	Not Determined	1959
625857		Coupeville	S8270-00-0G006-0	Not Determined	1959
625858		Coupeville	S8270-00-0G007-0	Not Determined	1959
625859	Coupeville Courier Printing Office	Coupeville	S6415-00-07006-0	Not Determined	1959
625860		Coupeville	R03225-246-3560	Not Determined	1959
625861		Coupeville	S8270-00-0G005-0	Not Determined	1959
625862		Coupeville	R13104-481-2280	Not Determined	1959
625863		Coupeville	S8270-00-0A009-0	Not Determined	1959
625864		Coupeville	S8270-00-0E006-0	Not Determined	1959
625865	Private	Coupeville	R13103-150-3420	Determined Not Eligible	1959
625866		Coupeville	S6415-00-07003-0	Not Determined	1959
625867		Coupeville	S7350-00-0A006-0	Not Determined	1959
625868		Coupeville	S8270-00-0A008-2	Not Determined	1959
625869		Coupeville	S7530-00-0B002-0	Not Determined	1959
625870		Coupeville	S6415-00-06008-0	Not Determined	1959
625871		Coupeville	S6415-00-06007-0	Not Determined	1959
625872		Coupeville	S8300-00-02021-0	Not Determined	1960
625874		Coupeville	R13109-005-3830	Not Determined	1960
625875		Coupeville	R23107-080-5240	Not Determined	1960
625876		Coupeville	S8300-00-01027-0	Not Determined	1960

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625877		Coupeville	R13116-507-3830	Not Determined	1960
625878		Coupeville	S8010-00-00037-0	Not Determined	1960
625879		Coupeville	R13105-454-5070	Not Determined	1960
625880		Coupeville	S8270-00-0A013-1	Not Determined	1960
625881		Coupeville	S8270-00-0A007-0	Not Determined	1960
625882		Coupeville	S6415-00-16001-0	Not Determined	1960
625883		Coupeville	R13105-493-4950	Not Determined	1960
625884		Coupeville	S8270-00-0E009-1	Not Determined	1960
625885		Coupeville	S8270-00-0A012-0	Not Determined	1960
625886		Coupeville	R13234-442-4120	Not Determined	1960
625887		Coupeville	S8270-00-0A011-0	Not Determined	1960
625888		Coupeville	R13105-251-3790	Not Determined	1960
625889		Coupeville	S8010-00-00066-0	Not Determined	1960
625890		Coupeville	S8270-00-0A008-1	Not Determined	1960
625891		Coupeville	S6415-00-39001-0	Not Determined	1960
625892		Coupeville	S6415-00-33003-2	Not Determined	1960
625893		Coupeville	S8010-00-00083-0	Not Determined	1960
625894		Coupeville	S7400-00-01010-0	Not Determined	1960
625895		Coupeville	S8270-00-0E008-0	Not Determined	1960
625896		Coupeville	S7400-00-02008-0	Not Determined	1960
625897	Private	Coupeville	R13103-183-3330	Determined Not Eligible	1960
625898		Coupeville	R13232-126-2790	Not Determined	1960

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625899		Coupeville	R13232-191-5020	Not Determined	1960
625900		Coupeville	S8300-00-01017-0	Not Determined	1961
625904		Coupeville	S8300-00-01037-0	Not Determined	1961
625905		Coupeville	S8300-00-01021-0	Not Determined	1961
625909		Coupeville	S7490-00-00027-0	Not Determined	1961
625910		Coupeville	S7095-01-00008-0	Not Determined	1961
625911		Coupeville	S7400-00-01043-0	Not Determined	1961
625912		Coupeville	S7400-00-01045-0	Not Determined	1961
625913		Coupeville	S8010-00-00001-1	Not Determined	1961
625916		Coupeville	S8300-00-01026-0	Not Determined	1962
625917		Coupeville	S6370-00-58010-0	Not Determined	1962
625919		Coupeville	S8150-00-01004-0	Not Determined	1962
625920		Coupeville	S7400-00-02002-0	Not Determined	1962
625921		Coupeville	S7400-00-01016-0	Not Determined	1962
625923		Coupeville	S7095-01-00006-0	Not Determined	1962
625924		Coupeville	S7350-00-0A022-0	Not Determined	1962
625925		Coupeville	S8150-00-01003-0	Not Determined	1963
625928		Coupeville	S8150-02-03021-0	Not Determined	1963
625931		Coupeville	S8150-00-01005-0	Not Determined	1963
625933		Coupeville	S8440-00-00017-0	Not Determined	1963
625934	Patricia Powell	Coupeville	R13233-188-2280	Determined Not Eligible	1963
625935		Coupeville	R13233-182-4680	Not Determined	1963
625936		Coupeville	S7400-00-05012-0	Not Determined	1963
625937		Coupeville	R13103-049-5150	Not Determined	1963
625938		Coupeville	R03225-413-4300	Not Determined	1963
625939		Coupeville	S7530-00-0000A-1	Not Determined	1963
625940		Coupeville	R13232-162-0230	Not Determined	1963

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625941		Coupeville	R13232-133-2400	Not Determined	1963
625942		Coupeville	S8440-00-00028-0	Not Determined	1963
625945		Coupeville	S6010-00-01016-0	Not Determined	1964
625946		Coupeville	S6010-00-04028-0	Not Determined	1964
625947		Coupeville	S6010-00-01028-0	Not Determined	1964
625948		Coupeville	S8150-00-02005-0	Not Determined	1964
625949		Coupeville	S6010-00-04019-0	Not Determined	1964
625950		Coupeville	S6010-00-01025-0	Not Determined	1964
625951		Coupeville	S8150-02-03011-0	Not Determined	1964
625952		Coupeville	S8150-00-02004-0	Not Determined	1964
625953		Coupeville	S6010-00-03029-0	Not Determined	1964
625954		Coupeville	S6010-00-02025-0	Not Determined	1964
625956		Coupeville	S6010-00-05016-0	Not Determined	1964
625957		Coupeville	S8150-02-03008-0	Not Determined	1964
625958		Coupeville	S6370-00-61008-0	Not Determined	1964
625959		Coupeville	S6010-00-01010-0	Not Determined	1964
625960		Coupeville	S6010-00-01015-0	Not Determined	1964
625961		Coupeville	S8150-00-01012-0	Not Determined	1964
625962		Coupeville	S8440-00-00032-0	Not Determined	1964
625963		Coupeville	S8440-00-00016-0	Not Determined	1964
625964		Coupeville	S8010-00-00082-0	Not Determined	1964
625965		Coupeville	S6005-00-14001-2	Not Determined	1964
625966		Coupeville	S7490-00-00010-0	Not Determined	1964
625967		Coupeville	R13103-115-4620	Not Determined	1964
625968		Coupeville	R13230-043-3150	Not Determined	1964
625969		Coupeville	S7350-00-0A023-0	Not Determined	1964
625970		Coupeville	S7400-00-05001-1	Not Determined	1964
625973		Coupeville	S8150-02-04002-0	Not Determined	1965
625978		Coupeville	S8300-00-01004-0	Not Determined	1965

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
625979		Coupeville	S8150-02-03002-0	Not Determined	1965
625980		Coupeville	S6010-00-02005-0	Not Determined	1965
625981		Coupeville	S7530-00-00009-0	Not Determined	1965
625982		Coupeville	S7530-00-0000A-3	Not Determined	1965
625983		Coupeville	S8010-00-00036-0	Not Determined	1965
625984		Coupeville	S8440-00-00007-0	Not Determined	1965
625985		Coupeville	S7365-00-00007-0	Not Determined	1965
625986		Coupeville	R13104-496-3880	Not Determined	1965
625987		Coupeville	S8440-00-00030-0	Not Determined	1965
625988		Coupeville	R13103-270-2050	Not Determined	1965
625989		Coupeville	S7450-00-00013-0	Not Determined	1965
625990		Coupeville	R13234-381-4590	Not Determined	1965
625991		Coupeville	S8010-00-00005-0	Not Determined	1965
625992		Coupeville	R23106-022-3980	Not Determined	1965
625993		Coupeville	S6010-02-01004-0	Not Determined	1966
625999		Coupeville	S8150-02-03013-0	Not Determined	1966
626001		Coupeville	S8300-00-01003-0	Not Determined	1966
626003		Coupeville	R13114-116-3680	Not Determined	1966
626004		Coupeville	S8150-00-02007-0	Not Determined	1966
626005		Coupeville	S6010-00-04017-0	Not Determined	1966
626007		Coupeville	S7450-00-00001-0	Not Determined	1966
626008		Coupeville	R13234-317-5000	Not Determined	1966
626009		Coupeville	S8010-00-00069-0	Not Determined	1966
626010		Coupeville	R13103-407-4060	Not Determined	1966
626011		Coupeville	S7400-00-01007-0	Not Determined	1966
626012		Coupeville	R13103-105-2830	Not Determined	1966
626013		Coupeville	S8010-00-00068-0	Not Determined	1966
626014		Coupeville	R23106-010-3450	Not Determined	1966

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
626015		Coupeville	S7530-00-00005-0	Not Determined	1966
626016		Coupeville	S6010-03-0000D-2	Not Determined	1967
626018		Coupeville	S6010-06-00065-0	Not Determined	1967
626020		Coupeville	S6010-00-01005-0	Not Determined	1967
626024		Coupeville	S6010-00-01021-0	Not Determined	1967
626026		Coupeville	S7400-00-01006-0	Not Determined	1967
626027		Coupeville	S7530-00-0B011-0	Not Determined	1967
626028		Coupeville	R13234-333-4800	Not Determined	1967
626029		Coupeville	R13219-237-3790	Not Determined	1967
626030		Coupeville	R13234-460-2740	Not Determined	1967
626031		Coupeville	S7350-00-0A016-0	Not Determined	1967
626032		Coupeville	R13233-354-1910	Not Determined	1967
626033		Coupeville	S7400-00-01001-0	Not Determined	1967
626034		Coupeville	S7070-00-08001-0	Not Determined	1967
626035		Coupeville	S6010-00-01042-0	Not Determined	1968
626036		Coupeville	S6010-03-00171-0	Not Determined	1968
626037		Coupeville	S6010-00-02024-0	Not Determined	1968
626038		Coupeville	S6010-00-04033-0	Not Determined	1968
626039		Coupeville	S8300-00-01006-0	Not Determined	1968
626040		Coupeville	S6010-00-01023-0	Not Determined	1968
626042		Coupeville	S6010-06-00073-0	Not Determined	1968
626043		Coupeville	S6010-05-00092-0	Not Determined	1968
626044		Coupeville	S6010-00-01004-0	Not Determined	1968
626045		Coupeville	S6010-00-01041-0	Not Determined	1968
626046		Coupeville	S8300-00-01029-0	Not Determined	1968
626047		Coupeville	S6010-03-00027-0	Not Determined	1968
626050		Coupeville	S6010-03-00147-0	Not Determined	1968

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
626051		Coupeville	S8300-00-01009-0	Not Determined	1968
626053		Coupeville	S8150-02-03020-0	Not Determined	1968
626054		Coupeville	S6010-00-03013-0	Not Determined	1968
626055		Coupeville	S6010-00-02030-0	Not Determined	1968
626056		Coupeville	S6010-02-04009-0	Not Determined	1968
626057		Coupeville	S6010-00-03021-0	Not Determined	1968
626059		Coupeville	S6010-00-04039-0	Not Determined	1968
626060		Coupeville	S8150-00-02011-0	Not Determined	1968
626061		Coupeville	R13109-162-0730	Not Determined	1968
626062		Coupeville	S7450-00-00002-0	Not Determined	1968
626063		Coupeville	S7760-00-01003-0	Not Determined	1968
626064		Coupeville	R13101-315-0190	Not Determined	1968
626065		Coupeville	S7150-00-00004-0	Not Determined	1968
626066		Coupeville	S6310-00-00009-0	Not Determined	1968
626067		Coupeville	R13103-457-1910	Not Determined	1968
626068		Coupeville	S8010-00-00091-0	Not Determined	1968
626069		Coupeville	S8160-00-19002-0	Not Determined	1968
626070		Coupeville	S8010-00-00023-0	Not Determined	1968
626071		Coupeville	R13235-440-0630	Not Determined	1968
626072		Coupeville	R13219-363-3640	Not Determined	1968
626073		Coupeville	R13233-320-1350	Not Determined	1968
626074		Coupeville	S7365-00-00003-0	Not Determined	1968
626075		Coupeville	R13110-403-2890	Not Determined	1968
626076		Coupeville	S6415-00-33007-0	Not Determined	1968
626077		Coupeville	S7490-00-00029-0	Not Determined	1968
626078		Coupeville	S7365-00-00002-0	Not Determined	1968

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
626079		Coupeville	S6010-04-00019-0	Not Determined	1969
626080		Coupeville	R13109-141-0860	Not Determined	1969
626081		Coupeville	S6010-03-00038-0	Not Determined	1969
626082		Coupeville	S8300-00-01032-0	Not Determined	1969
626085		Coupeville	S6010-00-01013-0	Not Determined	1969
626087		Coupeville	S6010-00-01035-0	Not Determined	1969
626088		Coupeville	S6010-00-03019-0	Not Determined	1969
626090		Coupeville	S6010-00-04004-0	Not Determined	1969
626091		Coupeville	S6010-00-03015-0	Not Determined	1969
626092		Coupeville	S6010-06-00087-0	Not Determined	1969
626093		Coupeville	S6010-00-02031-0	Not Determined	1969
626095		Coupeville	S6010-05-00016-0	Not Determined	1969
626097		Coupeville	S6010-00-02041-0	Not Determined	1969
626098		Coupeville	S7400-00-01024-0	Not Determined	1969
626099		Coupeville	S8160-00-03006-0	Not Determined	1969
626100		Coupeville	S8160-00-13009-0	Not Determined	1969
626101		Coupeville	S8440-00-00004-0	Not Determined	1969
626102		Coupeville	S7760-00-03004-0	Not Determined	1969
626103		Coupeville	S7400-00-04005-0	Not Determined	1969
627599		Oak Harbor	R13302-247-5150	Not Determined	1895
627600		Oak Harbor	R13336-465-2400	Not Determined	1899
627601		Oak Harbor	R13221-061-3980	Not Determined	1899
627603		Oak Harbor	S7650-00-00001-0	Not Determined	1900
627604		Oak Harbor	R23330-157-1110	Not Determined	1900
627608	Private	Oak Harbor	R13436-479-1170	Not Determined	1910, 1913
627613		Oak Harbor	R13301-230-1710	Not Determined	1906
627616		Oak Harbor	R23330-375-4690	Not Determined	1907

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
627618		Oak Harbor	R23306-269-2380	Not Determined	1908
627620		Oak Harbor	R13327-497-1820	Not Determined	1908
627621		Oak Harbor	S8420-00-00001-2	Not Determined	1909
627626		Oak Harbor	R23331-420-4160	Not Determined	1910
627627		Oak Harbor	R13312-099-3180	Not Determined	1910
627628		Oak Harbor	R13435-083-4650	Not Determined	1910
627632		Oak Harbor	R13327-521-3910	Not Determined	1912
627634		Oak Harbor	R13312-168-1600	Not Determined	1912
627635		Oak Harbor	R13303-121-4290	Not Determined	1912
627636		Oak Harbor	R13221-046-1290	Not Determined	1912
627638		Oak Harbor	R13222-114-3380	Not Determined	1912
627640		Oak Harbor	S7740-00-00032-0	Not Determined	1913
627643		Oak Harbor	R13436-463-0820	Not Determined	1913
627645		Oak Harbor	R13336-443-1500	Not Determined	1913
627646		Oak Harbor	R23320-295-0400	Not Determined	1913
627650		Oak Harbor	R23330-049-5120	Not Determined	1914
627660		Oak Harbor	S7295-00-00025-0	Not Determined	1915
627661		Oak Harbor	R23319-445-5110	Not Determined	1915
627662		Oak Harbor	R13311-034-5090	Not Determined	1915
627665		Oak Harbor	R23330-239-4990	Not Determined	1917
627670		Oak Harbor	R13326-039-0630	Not Determined	1918
627674		Oak Harbor	R23329-484-0390	Not Determined	1918
627675		Oak Harbor	R23318-329-2390	Not Determined	1918
627682		Oak Harbor	R13312-175-4400	Not Determined	1920
627689		Oak Harbor	R13311-503-1120	Not Determined	1922
627691		Oak Harbor	R13303-141-5200	Not Determined	1922
627695		Oak Harbor	R13222-114-3760	Not Determined	1922
627698		Oak Harbor	R13311-067-4290	Not Determined	1923

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
627699		Oak Harbor	R23318-298-1470	Not Determined	1923
627707		Oak Harbor	R23317-431-3670	Not Determined	1923
627708		Oak Harbor	R13436-480-1340	Not Determined	1923
627709		Oak Harbor	R13435-150-3530	Not Determined	1924
627710		Oak Harbor	R13223-378-0540	Not Determined	1924
627711		Oak Harbor	R23306-462-0260	Not Determined	1924
627712		Oak Harbor	R23307-191-3230	Not Determined	1925
627714		Oak Harbor	R13335-487-0700	Not Determined	1925
627716		Oak Harbor	R13436-106-0110	Not Determined	1925
627720		Oak Harbor	R13312-146-1110	Not Determined	1925
627721		Oak Harbor	R13312-345-5100	Not Determined	1925
627723		Oak Harbor	R13221-015-2700	Not Determined	1925
627734		Oak Harbor	R23318-350-4160	Not Determined	1925
627736		Oak Harbor	R23318-402-5080	Not Determined	1927
627742		Oak Harbor	R13324-242-2140	Not Determined	1928
627743		Oak Harbor	R13324-069-2030	Not Determined	1928
627745		Oak Harbor	R23318-186-0260	Not Determined	1928
627748		Oak Harbor	R13301-282-3520	Not Determined	1928
627751		Oak Harbor	R23308-268-0780	Not Determined	1928
627756		Oak Harbor	R13313-299-0810	Not Determined	1928
627758		Oak Harbor	R13312-243-0490	Not Determined	1929
627759		Oak Harbor	R23330-324-4240	Not Determined	1929
627760		Oak Harbor	R13311-028-1950	Not Determined	1929
627762		Oak Harbor	R13311-495-4600	Not Determined	1930
627763		Oak Harbor	R13221-471-5100	Not Determined	1930
627765		Oak Harbor	R13327-293-1200	Not Determined	1930
627771	Private	Oak Harbor	R13303-210-4850	Determined Not Eligible	1931

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
627773		Oak Harbor	R23308-429-0900	Not Determined	1932
627778		Oak Harbor	R23318-162-0360	Not Determined	1933
627779		Oak Harbor	R13323-046-2810	Not Determined	1933
627780		Oak Harbor	R13324-020-3510	Not Determined	1933
627784		Oak Harbor	R13302-040-4840	Not Determined	1933
627788		Oak Harbor	R13436-440-1590	Not Determined	1935
627789		Oak Harbor	R23320-266-0390	Not Determined	1935
627791		Oak Harbor	R13311-288-3200	Not Determined	1935
627796		Oak Harbor	R13311-305-2050	Not Determined	1936
627800		Oak Harbor	R13222-490-4950	Not Determined	1936
627802		Oak Harbor	R13311-309-2840	Not Determined	1936
627804		Oak Harbor	S8050-00-02012-0	Not Determined	1937
627805		Oak Harbor	R13222-060-2620	Not Determined	1937
627806		Oak Harbor	R13220-188-3000	Not Determined	1937
627807		Oak Harbor	R23330-314-4920	Not Determined	1937
627808		Oak Harbor	R23320-469-3160	Not Determined	1937
627813		Oak Harbor	R23330-350-4900	Not Determined	1938
627814		Oak Harbor	S8420-00-00001-1	Not Determined	1938
627820		Oak Harbor	R13312-064-0060	Not Determined	1939
627822		Oak Harbor	S8060-00-73003-4	Not Determined	1939
627832		Oak Harbor	S7575-00-03016-0	Not Determined	1940
627836		Oak Harbor	R13302-429-4610	Not Determined	1940
627840		Oak Harbor	R13313-190-2060	Not Determined	1940
627849		Oak Harbor	R23317-450-2020	Not Determined	1941
627853		Oak Harbor	R13301-033-1640	Not Determined	1941
627854		Oak Harbor	R23306-182-0340	Not Determined	1942
627864		Oak Harbor	R13303-331-4980	Not Determined	1942
627867		Oak Harbor	R13326-371-0880	Not Determined	1942

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
627869		Oak Harbor	R23318-304-2250	Not Determined	1943
627870		Oak Harbor	R13302-282-1150	Not Determined	1943
627871		Oak Harbor	S6525-00-0300B-0	Not Determined	1943
627872		Oak Harbor	S7740-00-00033-0	Not Determined	1943
627873		Oak Harbor	S8050-00-12005-0	Not Determined	1943
627874		Oak Harbor	S6525-00-0300C-0	Not Determined	1943
627878		Oak Harbor	R13326-086-0670	Not Determined	1943
627879		Oak Harbor	S6525-00-02004-0	Not Determined	1943
627880		Oak Harbor	R23318-304-2370	Not Determined	1943
627881		Oak Harbor	R13326-120-0040	Not Determined	1943
627882		Oak Harbor	R23318-300-1820	Not Determined	1943
627883		Oak Harbor	S6525-00-02002-0	Not Determined	1943
627885		Oak Harbor	R23318-255-2570	Not Determined	1943
627886		Oak Harbor	R13301-298-0460	Not Determined	1943
627887		Oak Harbor	R13303-092-3820	Not Determined	1943
627888		Oak Harbor	R13312-496-0340	Not Determined	1943
627889		Oak Harbor	R23318-305-2500	Not Determined	1943
627890		Oak Harbor	S6525-00-02003-0	Not Determined	1943
627892		Oak Harbor	S6525-00-02001-0	Not Determined	1943
627893		Oak Harbor	S7055-00-00009-0	Not Determined	1943
627899		Oak Harbor	R23330-302-4720	Not Determined	1944
627902		Oak Harbor	S8060-00-35002-0	Not Determined	1945
627908		Oak Harbor	R23320-517-0300	Not Determined	1945
627911		Oak Harbor	R13302-121-4750	Not Determined	1945
627923		Oak Harbor	R23329-246-0260	Not Determined	1946
627925		Oak Harbor	R23319-154-3290	Not Determined	1946
627927		Oak Harbor	R13312-062-2900	Not Determined	1946
627931		Oak Harbor	R23330-290-4390	Not Determined	1946
627932		Oak Harbor	R23319-070-4950	Not Determined	1946

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
627942		Oak Harbor	R13303-181-3890	Not Determined	1947
627950		Oak Harbor	R23307-161-4440	Not Determined	1948
627952		Oak Harbor	R23307-505-1000	Not Determined	1948
627961		Oak Harbor	S7730-00-00003-4	Not Determined	1948
627964		Oak Harbor	R13223-415-0580	Not Determined	1948
627965		Oak Harbor	S7730-00-00014-3	Not Determined	1948
627972		Oak Harbor	R13323-081-2520	Not Determined	1948
627977		Oak Harbor	S7740-00-00041-0	Not Determined	1948
627981		Oak Harbor	S7730-00-00016-1	Not Determined	1948
627982		Oak Harbor	R23318-033-4910	Not Determined	1948
627986		Oak Harbor	R13216-026-5110	Not Determined	1949
627992		Oak Harbor	R13311-141-1940	Not Determined	1949
628002		Oak Harbor	R13311-158-1590	Not Determined	1949
628006		Oak Harbor	S7730-00-00014-2	Not Determined	1949
628009		Oak Harbor	R23307-331-4800	Not Determined	1949
628011		Oak Harbor	S7730-00-00010-2	Not Determined	1949
628024		Oak Harbor	S7730-00-00004-3	Not Determined	1949
628031		Oak Harbor	R13313-348-0320	Not Determined	1950
628033		Oak Harbor	R23307-191-2840	Not Determined	1950
628034		Oak Harbor	S7730-00-00005-4	Not Determined	1950
628038		Oak Harbor	S7730-00-00014-1	Not Determined	1950
628039		Oak Harbor	R13324-495-0500	Not Determined	1950
628043		Oak Harbor	R13311-128-2550	Not Determined	1950
628045		Oak Harbor	S7730-00-00011-3	Not Determined	1950

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628048		Oak Harbor	S7730-00-00017-2	Not Determined	1950
628049		Oak Harbor	R23318-333-3000	Not Determined	1950
628053		Oak Harbor	R13220-034-3440	Not Determined	1950
628055		Oak Harbor	R13303-147-3780	Not Determined	1950
628056		Oak Harbor	S7575-00-01027-0	Not Determined	1950
628058	John & Connie Hudgins	Oak Harbor	R13303-165-3850	Determined Not Eligible	1950
628059		Oak Harbor	S7730-02-00059-0	Not Determined	1950
628060		Oak Harbor	R23330-202-5010	Not Determined	1950
628061		Oak Harbor	S7730-00-00010-1	Not Determined	1950
628062		Oak Harbor	R23307-103-1050	Not Determined	1950
628063		Oak Harbor	S7730-00-00013-5	Not Determined	1950
628072		Oak Harbor	R13312-280-0330	Not Determined	1950
628075		Oak Harbor	S7730-00-00020-3	Not Determined	1950
628076		Oak Harbor	S7575-00-01026-0	Not Determined	1950
628077		Oak Harbor	R13312-084-1130	Not Determined	1950
628080		Oak Harbor	S8370-00-00001-0	Not Determined	1950
628084		Oak Harbor	R13301-456-0630	Not Determined	1950
628085		Oak Harbor	R13303-158-3780	Not Determined	1950
628093		Oak Harbor	R23307-303-4470	Not Determined	1950
628094		Oak Harbor	R13313-313-0150	Not Determined	1950
628096		Oak Harbor	R23330-385-4220	Not Determined	1950
628098		Oak Harbor	S7575-00-01024-0	Not Determined	1950
628101		Oak Harbor	R23330-385-4920	Not Determined	1950
628104		Oak Harbor	R13313-030-2320	Not Determined	1951
628108		Oak Harbor	R13228-519-1480	Not Determined	1951

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628111		Oak Harbor	R13302-198-0680	Not Determined	1951
628123		Oak Harbor	S7575-00-01028-0	Not Determined	1951
628130		Oak Harbor	S7730-00-00004-2	Not Determined	1951
628132		Oak Harbor	R13312-200-2450	Not Determined	1951
628133		Oak Harbor	S7740-00-00043-0	Not Determined	1951
628140		Oak Harbor	S7020-00-00001-1	Not Determined	1951
628146		Oak Harbor	R13335-427-3400	Not Determined	1951
628147		Oak Harbor	S7730-00-00005-2	Not Determined	1951
628148		Oak Harbor	S7730-00-00006-1	Not Determined	1951
628154		Oak Harbor	R13222-361-0130	Not Determined	1951
628159		Oak Harbor	S7730-00-00022-1	Not Determined	1951
628161		Oak Harbor	R13221-152-5230	Not Determined	1952
628163		Oak Harbor	S7730-00-00008-4	Not Determined	1952
628164		Oak Harbor	R13312-146-2380	Not Determined	1952
628166		Oak Harbor	S7730-00-00008-2	Not Determined	1952
628167		Oak Harbor	S7730-00-00003-3	Not Determined	1952
628168		Oak Harbor	S7730-00-00008-1	Not Determined	1952
628171		Oak Harbor	S7285-30-03008-0	Not Determined	1952
628172		Oak Harbor	S7730-02-00006-0	Not Determined	1952
628173		Oak Harbor	R13313-152-0130	Not Determined	1952
628176		Oak Harbor	R13223-329-0620	Not Determined	1952
628178		Oak Harbor	S7730-00-00006-2	Not Determined	1952
628179		Oak Harbor	S7730-00-00007-1	Not Determined	1952

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628181		Oak Harbor	R13313-030-1990	Not Determined	1952
628182		Oak Harbor	R13435-081-1760	Not Determined	1952
628184		Oak Harbor	S7730-00-00019-1	Not Determined	1952
628187		Oak Harbor	R13222-042-2320	Not Determined	1952
628188		Oak Harbor	S7730-00-00015-1	Not Determined	1952
628193		Oak Harbor	S6335-00-00007-0	Not Determined	1952
628195		Oak Harbor	R13335-394-3230	Not Determined	1952
628199		Oak Harbor	S7740-00-00018-0	Not Determined	1952
628200		Oak Harbor	S7730-00-00005-1	Not Determined	1952
628210		Oak Harbor	S7730-00-00009-1	Not Determined	1952
628211		Oak Harbor	S8370-00-00004-0	Not Determined	1952
628213		Oak Harbor	R13436-407-1940	Not Determined	1952
628214		Oak Harbor	S7740-00-00044-0	Not Determined	1952
628216		Oak Harbor	R13302-110-1160	Not Determined	1952
628218		Oak Harbor	R23319-055-3650	Not Determined	1952
628222		Oak Harbor	R13303-139-3950	Not Determined	1952
628225		Oak Harbor	R13312-099-2070	Not Determined	1952
628229		Oak Harbor	S8370-00-00005-0	Not Determined	1953
628231		Oak Harbor	R13328-483-4730	Not Determined	1953
628237		Oak Harbor	S7730-02-00025-0	Not Determined	1953
628247		Oak Harbor	R23318-306-2630	Not Determined	1953
628250		Oak Harbor	S7730-00-00008-3	Not Determined	1953
628252		Oak Harbor	S7725-00-00001-0	Not Determined	1953
628255		Oak Harbor	R13326-313-3310	Not Determined	1953

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628257		Oak Harbor	S7730-02-00063-0	Not Determined	1953
628263		Oak Harbor	S7020-00-00002-0	Not Determined	1953
628275		Oak Harbor	R13221-010-3550	Not Determined	1953
628278		Oak Harbor	S7730-00-00009-3	Not Determined	1953
628283		Oak Harbor	R23330-282-0700	Not Determined	1953
628288		Oak Harbor	S7730-02-00007-0	Not Determined	1953
628290		Oak Harbor	S7575-00-01029-0	Not Determined	1953
628291		Oak Harbor	S7730-00-00016-2	Not Determined	1953
628296		Oak Harbor	S7730-00-00021-0	Not Determined	1953
628297		Oak Harbor	S7730-00-00017-1	Not Determined	1953
628299		Oak Harbor	R23307-135-1920	Not Determined	1953
628300		Oak Harbor	S6335-00-00013-0	Not Determined	1953
628302		Oak Harbor	S7730-02-00060-0	Not Determined	1953
628305		Oak Harbor	S7730-00-00012-1	Not Determined	1954
628306		Oak Harbor	R13436-450-1370	Not Determined	1954
628307		Oak Harbor	S7730-02-00031-0	Not Determined	1954
628308		Oak Harbor	S6055-00-02007-0	Not Determined	1954
628310		Oak Harbor	S7730-00-00022-2	Not Determined	1954
628314		Oak Harbor	S8055-00-00003-0	Not Determined	1954
628318		Oak Harbor	R13313-233-2820	Not Determined	1954
628320		Oak Harbor	S7730-00-00009-2	Not Determined	1954
628327		Oak Harbor	R23307-129-1430	Not Determined	1954
628329		Oak Harbor	R13302-297-5120	Not Determined	1954
628331		Oak Harbor	R13436-462-1370	Not Determined	1954

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628332		Oak Harbor	S8055-00-00009-0	Not Determined	1954
628334		Oak Harbor	S7295-00-00029-0	Not Determined	1954
628337		Oak Harbor	R13221-087-3580	Not Determined	1954
628340		Oak Harbor	R13436-414-1760	Not Determined	1954
628341		Oak Harbor	S7725-00-00005-0	Not Determined	1954
628345		Oak Harbor	S7730-00-00012-3	Not Determined	1954
628350		Oak Harbor	R13323-063-2810	Not Determined	1954
628351		Oak Harbor	R13335-427-3300	Not Determined	1954
628354		Oak Harbor	S7730-02-00044-0	Not Determined	1954
628356		Oak Harbor	R13436-017-0190	Not Determined	1954
628359		Oak Harbor	S7295-00-00005-0	Not Determined	1955
628360		Oak Harbor	S7295-00-00023-0	Not Determined	1955
628362		Oak Harbor	S7295-00-00017-0	Not Determined	1955
628366		Oak Harbor	R13302-313-0330	Not Determined	1955
628370		Oak Harbor	S6055-00-02010-0	Not Determined	1955
628371		Oak Harbor	S7295-00-00016-0	Not Determined	1955
628372		Oak Harbor	S7730-02-00048-0	Not Determined	1955
628373		Oak Harbor	S6055-00-02006-0	Not Determined	1955
628374		Oak Harbor	R23305-154-2920	Not Determined	1955
628375		Oak Harbor	R13221-048-2090	Not Determined	1955
628377		Oak Harbor	R13335-422-3530	Not Determined	1955
628381		Oak Harbor	R13222-164-2540	Not Determined	1955
628382		Oak Harbor	S7295-00-00015-0	Not Determined	1955
628385		Oak Harbor	R13221-010-1970	Not Determined	1955
628387		Oak Harbor	R13223-470-0630	Not Determined	1955

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628388		Oak Harbor	R13312-115-0720	Not Determined	1955
628389		Oak Harbor	S7730-00-00012-2	Not Determined	1955
628397		Oak Harbor	S7295-00-00013-0	Not Determined	1955
628399		Oak Harbor	S7730-00-00003-1	Not Determined	1955
628401		Oak Harbor	R13436-469-0930	Not Determined	1955
628402		Oak Harbor	S6055-00-03007-0	Not Determined	1955
628404		Oak Harbor	R13313-299-0480	Not Determined	1955
628405		Oak Harbor	S7575-00-01019-0	Not Determined	1955
628409		Oak Harbor	R13313-281-0170	Not Determined	1955
628411		Oak Harbor	S7730-00-00003-2	Not Determined	1955
628413		Oak Harbor	R23330-324-4920	Not Determined	1955
628416		Oak Harbor	R13328-241-4830	Not Determined	1955
628418		Oak Harbor	S6055-00-02011-0	Not Determined	1955
628420		Oak Harbor	S7575-00-11015-0	Not Determined	1955
628421		Oak Harbor	S7295-00-00002-0	Not Determined	1956
628424		Oak Harbor	S7295-00-00022-0	Not Determined	1956
628425		Oak Harbor	S7295-00-00014-0	Not Determined	1956
628428		Oak Harbor	S7295-00-00003-0	Not Determined	1956
628430	Barn, Maurer Barn	Oak Harbor	R13435-015-1720	Not Determined	1956
628436		Oak Harbor	S7295-00-00021-0	Not Determined	1956
628439		Oak Harbor	S7730-02-00029-0	Not Determined	1956
628445		Oak Harbor	S7730-02-00051-0	Not Determined	1956
628449		Oak Harbor	R13312-146-2280	Not Determined	1956
628450		Oak Harbor	S7730-00-00006-3	Not Determined	1956
628451		Oak Harbor	S7730-02-00053-0	Not Determined	1956
628455		Oak Harbor	R13325-122-1680	Not Determined	1956

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628458		Oak Harbor	S7295-00-00018-0	Not Determined	1956
628461		Oak Harbor	S7295-00-00001-0	Not Determined	1956
628463		Oak Harbor	S7730-02-00057-0	Not Determined	1956
628469		Oak Harbor	R23307-250-0200	Not Determined	1956
628473		Oak Harbor	R13313-106-2430	Not Determined	1956
628476		Oak Harbor	S6055-00-02009-0	Not Determined	1956
628477		Oak Harbor	S7295-00-00008-0	Not Determined	1956
628478		Oak Harbor	S7295-00-00011-0	Not Determined	1956
628481		Oak Harbor	S7730-02-00061-0	Not Determined	1956
628488		Oak Harbor	S6055-00-03009-0	Not Determined	1956
628489		Oak Harbor	S7295-00-00024-0	Not Determined	1956
628490		Oak Harbor	R13336-210-0620	Not Determined	1956
628510		Oak Harbor	R13311-166-3870	Not Determined	1957
628511		Oak Harbor	S7730-02-00037-1	Not Determined	1957
628513		Oak Harbor	R13336-218-0190	Not Determined	1957
628516		Oak Harbor	S7730-02-00082-0	Not Determined	1957
628527		Oak Harbor	S7730-02-00069-0	Not Determined	1957
628531		Oak Harbor	R23329-102-0060	Not Determined	1957
628534		Oak Harbor	S7730-02-00067-0	Not Determined	1957
628554		Oak Harbor	S7730-00-00001-0	Not Determined	1957
628556		Oak Harbor	R13313-253-0590	Not Determined	1957
628558		Oak Harbor	R23319-415-4900	Not Determined	1957
628565		Oak Harbor	R13335-390-0580	Not Determined	1957
628568		Oak Harbor	R23331-427-1900	Not Determined	1957
628577		Oak Harbor	R13311-455-1770	Not Determined	1957
628578		Oak Harbor	R13436-478-1060	Not Determined	1957

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628586		Oak Harbor	R23308-345-0950	Not Determined	1957
628587		Oak Harbor	S7520-00-01001-0	Not Determined	1957
628592		Oak Harbor	S6055-00-03008-0	Not Determined	1957
628598		Oak Harbor	R13301-319-0100	Not Determined	1957
628599		Oak Harbor	R23331-415-2680	Not Determined	1957
628608		Oak Harbor	S7730-02-00035-2	Not Determined	1957
628616		Oak Harbor	S7730-02-00075-0	Not Determined	1957
628622		Oak Harbor	R13301-303-0100	Not Determined	1957
628624		Oak Harbor	S7730-02-00023-0	Not Determined	1957
628626		Oak Harbor	S6055-00-03010-0	Not Determined	1957
628630		Oak Harbor	S7730-02-00070-2	Not Determined	1957
628631		Oak Harbor	S7730-02-00066-0	Not Determined	1957
628636		Oak Harbor	R13326-185-0350	Not Determined	1957
628637		Oak Harbor	S7730-02-00068-0	Not Determined	1957
628638		Oak Harbor	R13324-091-2150	Not Determined	1957
628643		Oak Harbor	R23318-379-4850	Not Determined	1957
628652		Oak Harbor	S7730-02-00073-0	Not Determined	1957
628658		Oak Harbor	S7730-02-00021-0	Not Determined	1957
628663		Oak Harbor	R23307-115-0260	Not Determined	1957
628668		Oak Harbor	S7730-02-00034-0	Not Determined	1957
628669		Oak Harbor	S7730-02-00036-2	Determined Not Eligible	1957
628671		Oak Harbor	S7730-02-00035-1	Not Determined	1957
628674		Oak Harbor	R13303-173-3900	Not Determined	1958
628676		Oak Harbor	S7520-00-02016-0	Not Determined	1958

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628678		Oak Harbor	S7285-30-05006-0	Not Determined	1958
628680		Oak Harbor	S7285-30-09005-0	Not Determined	1958
628681		Oak Harbor	S7285-30-09008-0	Not Determined	1958
628684		Oak Harbor	S7065-00-00008-0	Not Determined	1958
628685		Oak Harbor	R23318-186-0510	Not Determined	1958
628688		Oak Harbor	S7065-00-00002-0	Not Determined	1958
628690		Oak Harbor	S7285-30-03009-0	Not Determined	1958
628691		Oak Harbor	S7285-30-08005-0	Not Determined	1958
628692		Oak Harbor	R13336-235-0190	Not Determined	1958
628693		Oak Harbor	S7065-00-00016-0	Not Determined	1958
628695		Oak Harbor	S7285-30-05003-0	Not Determined	1958
628696		Oak Harbor	S7285-30-09002-0	Not Determined	1958
628699		Oak Harbor	S7065-00-00006-0	Not Determined	1958
628700		Oak Harbor	S7285-40-00002-0	Not Determined	1958
628701		Oak Harbor	S7285-30-10002-0	Not Determined	1958
628702		Oak Harbor	S7285-30-05002-0	Not Determined	1958
628703		Oak Harbor	S7065-00-00011-0	Not Determined	1958
628704		Oak Harbor	R13325-019-1000	Not Determined	1958
628707		Oak Harbor	S8050-02-19004-0	Not Determined	1958
628708		Oak Harbor	S7520-00-03004-0	Not Determined	1958
628712		Oak Harbor	S7740-00-00026-0	Not Determined	1958
628713		Oak Harbor	S7285-30-05001-0	Not Determined	1958
628716		Oak Harbor	R13336-235-0080	Not Determined	1958
628722		Oak Harbor	S7065-00-00007-0	Not Determined	1958
628723		Oak Harbor	S7285-40-00008-0	Not Determined	1958
628725		Oak Harbor	R13221-187-5200	Not Determined	1958
628726		Oak Harbor	S7285-30-09007-0	Not Determined	1958
628728		Oak Harbor	S7520-00-02014-0	Not Determined	1958
628730		Oak Harbor	S7285-40-00004-0	Not Determined	1958

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628732		Oak Harbor	S7065-00-00014-0	Not Determined	1958
628738		Oak Harbor	R13313-055-0680	Not Determined	1958
628740		Oak Harbor	S7285-30-03016-0	Not Determined	1958
628741		Oak Harbor	S7295-00-00009-0	Not Determined	1958
628745		Oak Harbor	R13436-445-0590	Not Determined	1958
628747		Oak Harbor	S7065-00-00001-3	Not Determined	1958
628749		Oak Harbor	S7285-30-03010-0	Not Determined	1958
628751		Oak Harbor	S7285-30-11002-0	Not Determined	1958
628752		Oak Harbor	R23307-140-2510	Not Determined	1958
628753		Oak Harbor	S7285-30-04016-0	Not Determined	1958
628754		Oak Harbor	S7285-30-09003-0	Not Determined	1958
628756		Oak Harbor	S7520-00-02015-0	Not Determined	1958
628757		Oak Harbor	S7285-30-09001-0	Not Determined	1958
628762		Oak Harbor	S7520-00-02012-0	Not Determined	1958
628764		Oak Harbor	S7285-30-09006-0	Not Determined	1958
628765		Oak Harbor	S7285-30-04015-0	Not Determined	1958
628769		Oak Harbor	S7285-30-04003-0	Not Determined	1958
628771		Oak Harbor	S7285-40-00007-0	Not Determined	1958
628783		Oak Harbor	S7520-00-03002-0	Not Determined	1958
628787		Oak Harbor	S7285-30-10001-0	Not Determined	1958
628788		Oak Harbor	S7285-30-11001-0	Not Determined	1958
628793		Oak Harbor	S7520-00-02013-0	Not Determined	1958
628797		Oak Harbor	S7285-30-08006-0	Not Determined	1958
628799		Oak Harbor	S6515-00-01010-0	Not Determined	1958
628805		Oak Harbor	S7285-30-04013-0	Not Determined	1958
628807		Oak Harbor	S7285-30-05005-0	Not Determined	1958
628809		Oak Harbor	R23329-502-1030	Not Determined	1958
628814		Oak Harbor	S7730-02-00019-0	Not Determined	1958
628816		Oak Harbor	S7285-30-04001-0	Not Determined	1958

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628817		Oak Harbor	R13335-433-3520	Not Determined	1958
628822		Oak Harbor	R23317-425-0400	Not Determined	1958
628824		Oak Harbor	S7285-30-04006-0	Not Determined	1958
628825		Oak Harbor	S7285-30-04014-0	Not Determined	1958
628826		Oak Harbor	S7065-00-00015-0	Not Determined	1958
628827		Oak Harbor	S7520-00-02017-0	Not Determined	1958
628829		Oak Harbor	R13328-206-4900	Not Determined	1958
628832		Oak Harbor	S7065-00-00003-0	Not Determined	1958
628840		Oak Harbor	S7285-30-05004-0	Not Determined	1958
628842		Oak Harbor	R13336-218-0080	Not Determined	1958
628843		Oak Harbor	S7065-00-00012-0	Not Determined	1958
628848		Oak Harbor	S7655-00-01006-0	Not Determined	1958
628849		Oak Harbor	S7285-30-04008-0	Not Determined	1958
628850		Oak Harbor	S7285-30-08004-0	Not Determined	1958
628861		Oak Harbor	S7065-00-00005-0	Not Determined	1958
628862		Oak Harbor	S7285-30-04004-0	Not Determined	1958
628865		Oak Harbor	R13221-050-1970	Not Determined	1958
628868		Oak Harbor	S7065-00-00013-0	Not Determined	1958
628875		Oak Harbor	S7285-30-04005-0	Not Determined	1958
628876		Oak Harbor	S7285-30-06001-0	Not Determined	1958
628877		Oak Harbor	S7285-30-03012-0	Not Determined	1958
628880		Oak Harbor	S7295-00-00012-2	Not Determined	1958
628884		Oak Harbor	S7655-00-01007-0	Not Determined	1958
628885		Oak Harbor	S7285-30-10003-0	Not Determined	1958
628887		Oak Harbor	S7285-40-00003-0	Not Determined	1958
628888		Oak Harbor	R23319-039-2810	Not Determined	1958
628889		Oak Harbor	S8055-00-00005-0	Not Determined	1958
628891		Oak Harbor	R13336-461-4370	Not Determined	1958
628892		Oak Harbor	S7065-00-00004-0	Not Determined	1958

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628893		Oak Harbor	S7655-00-01008-0	Not Determined	1958
628897		Oak Harbor	S7285-30-04011-0	Not Determined	1958
628902		Oak Harbor	S7285-30-03011-0	Not Determined	1958
628903		Oak Harbor	S7520-00-03003-0	Not Determined	1958
628904		Oak Harbor	S7285-30-06002-0	Not Determined	1958
628907		Oak Harbor	S8297-00-00009-0	Not Determined	1958
628908		Oak Harbor	S7285-30-08002-0	Not Determined	1959
628920		Oak Harbor	S7285-30-04012-0	Not Determined	1959
628925		Oak Harbor	S7285-30-07001-0	Not Determined	1959
628926		Oak Harbor	S6535-00-00012-0	Not Determined	1959
628927		Oak Harbor	S7285-30-07004-0	Not Determined	1959
628929		Oak Harbor	S7655-00-01010-0	Not Determined	1959
628930		Oak Harbor	S7655-00-01009-0	Not Determined	1959
628935		Oak Harbor	S6600-00-01011-0	Not Determined	1959
628938		Oak Harbor	S7285-30-03013-0	Not Determined	1959
628940		Oak Harbor	S7285-30-09004-0	Not Determined	1959
628941		Oak Harbor	S6535-00-00010-0	Not Determined	1959
628951		Oak Harbor	R23331-419-2500	Not Determined	1959
628961		Oak Harbor	S6600-00-01010-0	Not Determined	1959
628964		Oak Harbor	S7285-30-07003-0	Not Determined	1959
628965		Oak Harbor	S7285-30-02016-0	Not Determined	1959
628972		Oak Harbor	S7285-30-03015-0	Not Determined	1959
628975		Oak Harbor	R13223-340-0720	Not Determined	1959
628976		Oak Harbor	S7520-00-03005-0	Not Determined	1959
628981		Oak Harbor	S7655-00-01014-0	Not Determined	1959
628987		Oak Harbor	S7285-30-04007-0	Not Determined	1959
628990		Oak Harbor	R13228-511-1960	Not Determined	1959
628991		Oak Harbor	S6535-00-00011-0	Not Determined	1959
628993		Oak Harbor	S7285-40-00009-0	Not Determined	1959

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
628996		Oak Harbor	S7295-00-00010-0	Not Determined	1959
628999		Oak Harbor	S6515-00-01008-0	Not Determined	1959
629001		Oak Harbor	S6535-00-00014-0	Not Determined	1959
629005		Oak Harbor	S7285-30-02015-0	Not Determined	1959
629008		Oak Harbor	S6600-00-01012-0	Not Determined	1959
629009		Oak Harbor	S7285-30-05007-0	Not Determined	1959
629013		Oak Harbor	S7285-30-08001-0	Not Determined	1959
629014		Oak Harbor	S7285-40-00001-0	Not Determined	1959
629015		Oak Harbor	S7285-30-07002-0	Not Determined	1959
629016		Oak Harbor	S7285-30-11004-0	Not Determined	1959
629019		Oak Harbor	R23330-418-0700	Not Determined	1959
629024		Oak Harbor	S7285-30-06003-0	Not Determined	1959
629026		Oak Harbor	S7285-30-03001-0	Not Determined	1959
629029		Oak Harbor	R13302-151-1520	Not Determined	1959
629030		Oak Harbor	S6535-00-00015-0	Not Determined	1959
629032		Oak Harbor	S7285-30-03014-0	Not Determined	1959
629035		Oak Harbor	R13301-292-0100	Not Determined	1959
629037		Oak Harbor	R13302-067-0530	Not Determined	1960
629041		Oak Harbor	R23308-318-1000	Not Determined	1960
629045		Oak Harbor	S7295-00-00019-0	Not Determined	1960
629046		Oak Harbor	R13311-391-1770	Not Determined	1960
629047		Oak Harbor	S8050-00-04007-0	Not Determined	1960
629052		Oak Harbor	R23319-342-5150	Not Determined	1960
629053		Oak Harbor	S7285-30-05010-0	Not Determined	1960
629054		Oak Harbor	S7730-02-00084-0	Not Determined	1960
629055		Oak Harbor	R23331-484-1370	Not Determined	1960
629056		Oak Harbor	S7520-00-02018-0	Not Determined	1960
629057		Oak Harbor	S7285-30-03002-0	Not Determined	1960
629058		Oak Harbor	S6535-00-00006-0	Not Determined	1960

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629059		Oak Harbor	S8055-00-00007-0	Not Determined	1960
629061		Oak Harbor	S8050-00-08042-0	Not Determined	1960
629068		Oak Harbor	S7730-02-00096-0	Not Determined	1960
629069		Oak Harbor	S7520-00-02019-0	Not Determined	1960
629070		Oak Harbor	R13301-196-2760	Not Determined	1960
629072		Oak Harbor	S7005-00-02015-0	Not Determined	1960
629073	Private	Oak Harbor	S7655-02-03007-0	Determined Not Eligible	1960
629074		Oak Harbor	S8050-00-09012-0	Not Determined	1960
629077		Oak Harbor	R13436-408-1490	Not Determined	1960
629079		Oak Harbor	S6515-00-03007-0	Not Determined	1960
629080		Oak Harbor	S7730-02-00003-0	Not Determined	1960
629081		Oak Harbor	S8050-00-13003-0	Not Determined	1960
629082		Oak Harbor	R13303-122-4920	Not Determined	1960
629083		Oak Harbor	R23317-236-3500	Not Determined	1960
629084		Oak Harbor	S6535-00-00008-0	Not Determined	1960
629086		Oak Harbor	S7295-00-00004-0	Not Determined	1960
629088		Oak Harbor	S7285-40-00006-0	Not Determined	1960
629089		Oak Harbor	R13326-185-0060	Not Determined	1960
629091		Oak Harbor	S7285-30-05012-0	Not Determined	1960
629093		Oak Harbor	R13302-013-1210	Not Determined	1960
629094		Oak Harbor	S6515-00-03002-0	Not Determined	1960
629095		Oak Harbor	R13335-429-3050	Not Determined	1960
629096		Oak Harbor	R23317-434-3570	Not Determined	1960
629097		Oak Harbor	S6515-00-02004-0	Not Determined	1960
629098		Oak Harbor	S7730-02-00030-0	Not Determined	1960

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629100		Oak Harbor	S6535-00-00001-0	Not Determined	1960
629102		Oak Harbor	R13223-445-0580	Not Determined	1960
629103		Oak Harbor	S8050-00-09022-0	Not Determined	1960
629105		Oak Harbor	S7285-30-02014-0	Not Determined	1960
629107		Oak Harbor	S7285-30-04002-0	Not Determined	1960
629108		Oak Harbor	S6535-00-00007-0	Not Determined	1960
629109		Oak Harbor	S7655-02-03006-0	Not Determined	1960
629110		Oak Harbor	R13301-411-0100	Not Determined	1960
629112		Oak Harbor	S6535-00-00005-0	Not Determined	1960
629113		Oak Harbor	S8050-00-07031-0	Not Determined	1960
629114		Oak Harbor	R13325-011-1850	Not Determined	1960
629115		Oak Harbor	R13436-460-1660	Not Determined	1960
629116		Oak Harbor	S6535-00-00017-2	Not Determined	1960
629117		Oak Harbor	R23318-296-1240	Not Determined	1960
629118		Oak Harbor	R13328-191-4110	Not Determined	1960
629119		Oak Harbor	S7520-00-02020-0	Not Determined	1960
629120		Oak Harbor	R13311-198-2970	Not Determined	1960
629123		Oak Harbor	S7655-00-01012-0	Not Determined	1960
629124		Oak Harbor	S6535-00-00004-0	Not Determined	1960
629125		Oak Harbor	S7285-30-05015-0	Not Determined	1960
629129		Oak Harbor	R13221-062-5200	Not Determined	1960
629130		Oak Harbor	R23318-196-0140	Not Determined	1960
629136		Oak Harbor	R13435-165-4310	Not Determined	1961
629138		Oak Harbor	S7285-30-05016-0	Not Determined	1961
629142		Oak Harbor	S8050-00-07026-0	Not Determined	1961
629145		Oak Harbor	S7285-30-02006-0	Not Determined	1961
629147		Oak Harbor	S7285-30-02005-0	Not Determined	1961

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629150		Oak Harbor	R13336-236-0710	Not Determined	1961
629153		Oak Harbor	S7285-30-05009-0	Not Determined	1961
629156		Oak Harbor	S6525-00-01008-0	Not Determined	1961
629159		Oak Harbor	S7285-30-01003-0	Not Determined	1961
629161		Oak Harbor	S8050-00-13008-0	Not Determined	1961
629163		Oak Harbor	R13312-280-4040	Not Determined	1961
629164		Oak Harbor	R23307-282-0080	Not Determined	1961
629165		Oak Harbor	S8050-00-04001-0	Not Determined	1961
629166		Oak Harbor	S7285-30-01006-0	Not Determined	1961
629168		Oak Harbor	S7285-30-01002-0	Not Determined	1961
629169		Oak Harbor	S6515-00-04002-0	Not Determined	1961
629170		Oak Harbor	S7285-30-02013-0	Not Determined	1961
629172		Oak Harbor	S7655-02-03003-0	Not Determined	1961
629173		Oak Harbor	R13303-141-4400	Not Determined	1961
629174		Oak Harbor	S7655-02-04007-0	Not Determined	1961
629175		Oak Harbor	S7285-30-05014-0	Not Determined	1961
629177		Oak Harbor	S7730-02-00001-0	Not Determined	1961
629178		Oak Harbor	S6515-00-01001-0	Not Determined	1961
629181		Oak Harbor	S7520-00-03010-0	Not Determined	1962
629182		Oak Harbor	R13221-032-2250	Not Determined	1962
629185		Oak Harbor	S6515-02-10005-0	Not Determined	1962
629186		Oak Harbor	S7520-00-03009-0	Not Determined	1962
629187		Oak Harbor	S7285-30-02007-0	Not Determined	1962
629189		Oak Harbor	S6535-00-00009-0	Not Determined	1962
629195		Oak Harbor	S8050-00-07007-0	Not Determined	1962
629196		Oak Harbor	S7740-00-00009-0	Not Determined	1962
629197		Oak Harbor	R13324-495-1150	Not Determined	1962

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629199		Oak Harbor	S8468-00-00021-0	Not Determined	1962
629202		Oak Harbor	S8050-00-01002-0	Not Determined	1962
629203		Oak Harbor	R13223-511-1120	Not Determined	1962
629204		Oak Harbor	S7285-30-01008-0	Not Determined	1962
629207		Oak Harbor	R13324-247-4930	Not Determined	1962
629208		Oak Harbor	S7655-02-04009-0	Not Determined	1962
629209		Oak Harbor	R23318-208-1700	Not Determined	1962
629212		Oak Harbor	R13223-307-0450	Not Determined	1962
629213		Oak Harbor	S7285-30-01005-0	Not Determined	1962
629215		Oak Harbor	R13326-071-0230	Not Determined	1962
629216		Oak Harbor	S7285-30-01004-0	Not Determined	1962
629218		Oak Harbor	S7655-02-02000-0	Not Determined	1962
629219		Oak Harbor	S7285-30-01007-0	Not Determined	1962
629223		Oak Harbor	R13221-025-3670	Not Determined	1962
629225		Oak Harbor	S7285-30-03005-0	Not Determined	1962
629227		Oak Harbor	S7285-30-03004-0	Not Determined	1962
629230		Oak Harbor	S6535-00-00016-0	Not Determined	1962
629232		Oak Harbor	S7285-30-05013-0	Not Determined	1962
629234		Oak Harbor	S7285-30-02010-0	Not Determined	1962
629235		Oak Harbor	R13325-010-2500	Not Determined	1962
629236		Oak Harbor	S7285-30-02009-0	Not Determined	1962
629238		Oak Harbor	S7655-02-03004-0	Not Determined	1962
629240		Oak Harbor	S7285-30-02004-0	Not Determined	1962
629241		Oak Harbor	S6515-00-01004-0	Not Determined	1962
629242		Oak Harbor	S7285-30-03003-0	Not Determined	1962
629243		Oak Harbor	S6515-00-04011-0	Not Determined	1962
629246		Oak Harbor	S7285-30-04010-0	Not Determined	1962
629251		Oak Harbor	R23318-306-0300	Not Determined	1962

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629252		Oak Harbor	R13335-454-3221	Not Determined	1963
629253		Oak Harbor	R13302-317-1150	Not Determined	1963
629255		Oak Harbor	S6515-02-08003-0	Not Determined	1963
629256		Oak Harbor	R13327-265-1490	Not Determined	1963
629259		Oak Harbor	S7520-00-03008-0	Not Determined	1963
629260		Oak Harbor	R23320-062-0660	Not Determined	1963
629261		Oak Harbor	S7730-02-00008-0	Not Determined	1963
629262		Oak Harbor	S8140-00-01006-0	Not Determined	1963
629265		Oak Harbor	S8050-00-07010-0	Not Determined	1963
629267		Oak Harbor	S7730-02-00090-0	Not Determined	1963
629269		Oak Harbor	R13436-148-0330	Not Determined	1963
629270		Oak Harbor	R23306-016-2470	Not Determined	1963
629275		Oak Harbor	S7655-02-03005-0	Not Determined	1963
629276		Oak Harbor	S6535-00-00018-0	Not Determined	1963
629281		Oak Harbor	R13301-232-0670	Not Determined	1963
629285		Oak Harbor	S7520-00-02003-0	Not Determined	1963
629291		Oak Harbor	S6535-00-00021-0	Not Determined	1963
629294		Oak Harbor	S7520-00-02001-0	Not Determined	1963
629295		Oak Harbor	S6535-00-00002-0	Not Determined	1963
629296		Oak Harbor	S7655-02-04001-0	Not Determined	1963
629299		Oak Harbor	R23319-384-5210	Not Determined	1963
629301		Oak Harbor	S7295-00-00027-0	Not Determined	1963
629303		Oak Harbor	S7285-30-05011-0	Not Determined	1963
629304		Oak Harbor	R13336-238-0530	Not Determined	1963
629306		Oak Harbor	R23318-036-4270	Not Determined	1963
629307		Oak Harbor	R13336-238-0620	Not Determined	1963
629308		Oak Harbor	S7520-00-03007-0	Not Determined	1963
629309		Oak Harbor	S6525-00-03019-0	Not Determined	1963

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629310		Oak Harbor	S7285-30-02003-0	Not Determined	1963
629311		Oak Harbor	R13221-044-4240	Not Determined	1963
629312		Oak Harbor	S7730-02-00028-0	Not Determined	1964
629313		Oak Harbor	S7655-02-03002-0	Not Determined	1964
629315		Oak Harbor	S7285-30-02011-0	Not Determined	1964
629318		Oak Harbor	S6515-02-08004-0	Not Determined	1964
629319		Oak Harbor	S7005-00-01009-1	Not Determined	1964
629320		Oak Harbor	S6515-00-05005-0	Not Determined	1964
629321		Oak Harbor	S8415-00-00004-0	Not Determined	1964
629325		Oak Harbor	R13327-147-1120	Not Determined	1964
629326		Oak Harbor	S7415-00-00003-0	Not Determined	1964
629327		Oak Harbor	R13221-016-1760	Not Determined	1964
629328		Oak Harbor	S7285-30-08003-0	Not Determined	1964
629329		Oak Harbor	S8415-00-00010-0	Not Determined	1964
629334		Oak Harbor	S7005-02-03008-0	Not Determined	1964
629337		Oak Harbor	S7655-02-04005-0	Not Determined	1964
629338		Oak Harbor	S7520-00-02002-0	Not Determined	1964
629341		Oak Harbor	S7655-02-04002-0	Not Determined	1964
629342		Oak Harbor	S7520-00-02009-0	Not Determined	1964
629344		Oak Harbor	S7285-30-02008-0	Not Determined	1964
629346		Oak Harbor	S7655-02-04006-0	Not Determined	1964
629347		Oak Harbor	S7285-30-04009-0	Not Determined	1964
629350		Oak Harbor	R13301-237-0140	Not Determined	1964
629351		Oak Harbor	R23319-227-0300	Not Determined	1964
629355		Oak Harbor	S7520-00-02010-0	Not Determined	1964
629356		Oak Harbor	S8050-00-04022-0	Not Determined	1964
629357		Oak Harbor	S7520-00-02004-0	Not Determined	1964

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629359		Oak Harbor	S7520-00-02008-0	Not Determined	1964
629361		Oak Harbor	S8255-00-00016-0	Not Determined	1964
629363		Oak Harbor	R13436-084-1780	Not Determined	1964
629368		Oak Harbor	R13434-100-4030	Not Determined	1965
629370		Oak Harbor	S8015-00-00001-0	Not Determined	1965
629371		Oak Harbor	S6535-00-00020-0	Not Determined	1965
629372		Oak Harbor	S7655-02-03010-0	Not Determined	1965
629374		Oak Harbor	R13326-444-2810	Not Determined	1965
629376		Oak Harbor	S7730-02-00015-0	Not Determined	1965
629379		Oak Harbor	S6055-00-02012-0	Not Determined	1965
629380		Oak Harbor	S7520-00-03006-0	Not Determined	1965
629391		Oak Harbor	R13312-167-3620	Not Determined	1965
629394		Oak Harbor	S6535-00-00003-0	Not Determined	1965
629398		Oak Harbor	S7655-02-04008-0	Not Determined	1965
629402		Oak Harbor	R13221-051-1540	Not Determined	1965
629403		Oak Harbor	S8050-00-08044-0	Not Determined	1965
629405		Oak Harbor	S8050-00-04008-0	Not Determined	1965
629406		Oak Harbor	S6515-03-12010-0	Not Determined	1965
629414		Oak Harbor	S8015-00-00007-0	Not Determined	1965
629415		Oak Harbor	S8050-00-10041-0	Not Determined	1965
629417		Oak Harbor	S7740-00-00002-0	Not Determined	1965
629418		Oak Harbor	R13327-302-1500	Not Determined	1965
629419		Oak Harbor	S7005-00-01003-0	Not Determined	1965
629420		Oak Harbor	S7730-02-00092-0	Not Determined	1966
629423		Oak Harbor	S6600-00-05003-0	Not Determined	1966
629427		Oak Harbor	R23330-382-1480	Not Determined	1966

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629429		Oak Harbor	R23305-165-1200	Not Determined	1966
629433		Oak Harbor	S7655-02-04004-0	Not Determined	1966
629436		Oak Harbor	S6515-00-01007-0	Not Determined	1966
629438		Oak Harbor	S6535-00-00019-0	Not Determined	1966
629439		Oak Harbor	S7740-00-00006-0	Not Determined	1966
629442		Oak Harbor	R23330-252-4280	Not Determined	1966
629443		Oak Harbor	S6515-03-11004-0	Not Determined	1966
629444		Oak Harbor	S7285-30-05008-0	Not Determined	1966
629445		Oak Harbor	S8050-00-05007-0	Not Determined	1966
629446		Oak Harbor	S7415-00-00002-0	Not Determined	1966
629448		Oak Harbor	S7730-00-00018-1	Not Determined	1966
629450		Oak Harbor	R13434-229-4010	Not Determined	1966
629451		Oak Harbor	S7415-00-00004-0	Not Determined	1966
629453		Oak Harbor	R23320-495-1180	Not Determined	1966
629454		Oak Harbor	S8050-00-05018-0	Not Determined	1966
629455		Oak Harbor	R13326-144-0680	Not Determined	1966
629456		Oak Harbor	R23319-156-2230	Not Determined	1966
629457		Oak Harbor	S8015-00-00006-0	Not Determined	1966
629459		Oak Harbor	S6515-03-11003-0	Not Determined	1966
629461		Oak Harbor	S7655-02-03008-0	Not Determined	1966
629464		Oak Harbor	S7520-00-02011-0	Not Determined	1966
629467		Oak Harbor	R13313-055-0970	Not Determined	1966
629470		Oak Harbor	S7655-00-01002-0	Not Determined	1967
629471		Oak Harbor	S7730-02-00052-0	Not Determined	1967
629472		Oak Harbor	S7730-00-00013-4	Not Determined	1967
629473		Oak Harbor	S7655-00-01004-0	Not Determined	1967
629476		Oak Harbor	S7730-02-00038-1	Not Determined	1967

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629478		Oak Harbor	S7730-02-00045-0	Not Determined	1967
629482		Oak Harbor	S6515-04-00020-0	Not Determined	1967
629484		Oak Harbor	S8015-00-00011-0	Not Determined	1967
629486		Oak Harbor	S7730-02-00039-0	Not Determined	1967
629487		Oak Harbor	S7730-02-00022-0	Not Determined	1967
629488		Oak Harbor	S7730-02-00064-1	Not Determined	1967
629492		Oak Harbor	S8015-00-00005-0	Not Determined	1967
629498		Oak Harbor	R13312-072-4180	Not Determined	1967
629505		Oak Harbor	S7520-00-02007-0	Not Determined	1967
629506		Oak Harbor	R23330-495-2340	Not Determined	1967
629507		Oak Harbor	R13324-151-4860	Not Determined	1967
629508		Oak Harbor	R13326-014-0230	Not Determined	1967
629510		Oak Harbor	S7295-00-00028-0	Not Determined	1967
629511		Oak Harbor	S7730-02-00074-0	Not Determined	1967
629515		Oak Harbor	S7730-02-00065-0	Not Determined	1967
629516		Oak Harbor	S7295-00-00026-0	Not Determined	1967
629517		Oak Harbor	S6515-05-15003-0	Not Determined	1967
629519		Oak Harbor	S8050-00-09029-0	Not Determined	1967
629520		Oak Harbor	R13303-106-3830	Not Determined	1967
629521		Oak Harbor	S7730-02-00041-1	Not Determined	1967
629524		Oak Harbor	S7730-02-00049-0	Not Determined	1967
629527		Oak Harbor	R23319-178-0820	Not Determined	1967
629528		Oak Harbor	S7730-02-00054-0	Not Determined	1967
629530		Oak Harbor	S7285-30-03006-0	Not Determined	1967

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629533		Oak Harbor	S7730-00-00013-1	Not Determined	1967
629535		Oak Harbor	S7730-02-00046-0	Not Determined	1967
629536		Oak Harbor	S7730-02-00040-0	Not Determined	1967
629537		Oak Harbor	S8015-02-00024-0	Not Determined	1967
629538		Oak Harbor	S7730-02-00024-0	Not Determined	1967
629540		Oak Harbor	S7730-02-00038-0	Not Determined	1967
629541		Oak Harbor	S7415-00-00005-0	Not Determined	1967
629543		Oak Harbor	R13221-169-5200	Not Determined	1967
629544		Oak Harbor	S7730-00-00013-3	Not Determined	1967
629550		Oak Harbor	R13326-288-3170	Not Determined	1967
629551		Oak Harbor	R23330-133-1720	Not Determined	1967
629552		Oak Harbor	S8015-00-00010-0	Not Determined	1967
629553		Oak Harbor	R13325-513-3740	Not Determined	1967
629554		Oak Harbor	S7285-30-03007-0	Not Determined	1967
629555		Oak Harbor	S7730-02-00041-0	Not Determined	1967
629556		Oak Harbor	R13313-231-1530	Not Determined	1967
629557		Oak Harbor	S7730-02-00020-0	Not Determined	1967
629560		Oak Harbor	S8015-00-00004-0	Not Determined	1967
629561		Oak Harbor	S7730-00-00013-2	Not Determined	1967
629563		Oak Harbor	S8265-00-01010-0	Not Determined	1967
629566		Oak Harbor	S8140-00-02025-0	Not Determined	1968
629568		Oak Harbor	S8140-00-05010-0	Not Determined	1968
629570		Oak Harbor	S7575-00-11028-0	Not Determined	1968
629571		Oak Harbor	R13325-249-3660	Not Determined	1968
629572		Oak Harbor	S8140-00-05002-0	Not Determined	1968

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629573		Oak Harbor	S7730-02-00064-2	Not Determined	1968
629574		Oak Harbor	S8140-00-05014-0	Not Determined	1968
629576		Oak Harbor	S7730-02-00088-2	Not Determined	1968
629578		Oak Harbor	S7730-02-00087-0	Not Determined	1968
629580		Oak Harbor	S8140-00-05003-0	Not Determined	1968
629582		Oak Harbor	S7730-02-00088-1	Not Determined	1968
629583		Oak Harbor	S8140-00-02023-0	Not Determined	1968
629584		Oak Harbor	S6515-03-12015-0	Not Determined	1968
629585		Oak Harbor	S7730-02-00085-0	Not Determined	1968
629586		Oak Harbor	S6515-07-00049-0	Not Determined	1968
629588		Oak Harbor	S6455-00-00003-0	Not Determined	1968
629590		Oak Harbor	S8055-00-00010-0	Not Determined	1968
629591		Oak Harbor	S8140-00-05011-0	Not Determined	1968
629592		Oak Harbor	S8050-02-18009-2	Not Determined	1968
629593		Oak Harbor	R13327-302-1820	Not Determined	1968
629594		Oak Harbor	R13311-099-1880	Not Determined	1968
629600		Oak Harbor	R13221-510-5130	Not Determined	1968
629601		Oak Harbor	S8140-00-02021-0	Not Determined	1968
629605		Oak Harbor	S8140-00-01003-0	Not Determined	1968
629607		Oak Harbor	R13434-200-4000	Not Determined	1968
629609		Oak Harbor	S8140-00-02013-0	Not Determined	1968
629610		Oak Harbor	S7575-00-01002-0	Not Determined	1968
629613		Oak Harbor	S8015-02-00013-0	Not Determined	1968
629614		Oak Harbor	S8015-02-00020-0	Not Determined	1968
629615		Oak Harbor	S8050-02-18005-0	Not Determined	1968
629616		Oak Harbor	R13301-228-2110	Not Determined	1968

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629617		Oak Harbor	S8055-00-00008-0	Not Determined	1968
629618		Oak Harbor	S8015-00-00009-0	Not Determined	1968
629620		Oak Harbor	S8140-00-02001-0	Not Determined	1968
629621		Oak Harbor	S8140-00-02020-0	Not Determined	1968
629624		Oak Harbor	S8140-00-01004-0	Not Determined	1968
629626		Oak Harbor	S8140-00-02024-0	Not Determined	1968
629627		Oak Harbor	S7730-02-00017-1	Not Determined	1968
629628		Oak Harbor	S7285-40-00005-0	Not Determined	1968
629630		Oak Harbor	S8140-00-05012-0	Not Determined	1968
629631		Oak Harbor	S6515-03-12008-0	Not Determined	1968
629633		Oak Harbor	R13311-448-0820	Not Determined	1968
629637		Oak Harbor	S8140-00-02018-0	Not Determined	1968
629638		Oak Harbor	S8140-00-01002-0	Not Determined	1968
629639		Oak Harbor	S6455-00-00021-0	Not Determined	1968
629640		Oak Harbor	S8015-02-00022-0	Not Determined	1968
629643		Oak Harbor	S7005-00-0000R-3	Not Determined	1968
629644		Oak Harbor	R13434-179-4010	Not Determined	1968
629648		Oak Harbor	S8140-00-02017-0	Not Determined	1968
629652		Oak Harbor	S8140-00-01001-0	Not Determined	1968
629653		Oak Harbor	S7730-02-00086-0	Not Determined	1968
629654		Oak Harbor	S6430-00-00003-0	Not Determined	1968
629655		Oak Harbor	S6455-00-00020-0	Not Determined	1968
629658		Oak Harbor	S8140-00-05013-0	Not Determined	1968
629660		Oak Harbor	S8140-00-02014-0	Not Determined	1968
629662		Oak Harbor	S8140-00-02015-0	Not Determined	1968
629666		Oak Harbor	R13327-316-0980	Not Determined	1968
629668		Oak Harbor	S8140-00-02019-0	Not Determined	1968
629670		Oak Harbor	S8140-00-02002-0	Not Determined	1968

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629671		Oak Harbor	S8015-02-00018-0	Not Determined	1968
629673		Oak Harbor	S8140-00-05005-0	Not Determined	1968
629675		Oak Harbor	S8140-00-05001-0	Not Determined	1968
629676		Oak Harbor	S8140-00-02016-0	Not Determined	1968
629678		Oak Harbor	S8140-00-05004-0	Not Determined	1968
629679		Oak Harbor	S8140-00-05009-0	Not Determined	1968
629682		Oak Harbor	R13303-254-3900	Not Determined	1968
629683		Oak Harbor	S8140-00-02022-0	Not Determined	1968
629684		Oak Harbor	S7730-02-00018-0	Not Determined	1968
629685		Oak Harbor	S8015-00-00008-0	Not Determined	1968
629687		Oak Harbor	S7730-02-00086-1	Not Determined	1968
629688		Oak Harbor	R13327-369-1850	Not Determined	1968
629689		Oak Harbor	S8140-00-05008-0	Not Determined	1968
629690		Oak Harbor	R23330-493-3080	Not Determined	1968
629694		Oak Harbor	S6515-00-02007-0	Not Determined	1968
629696		Oak Harbor	S7655-00-01011-0	Not Determined	1968
629697		Oak Harbor	S8140-00-05007-0	Not Determined	1968
629698		Oak Harbor	S8265-00-01003-1	Not Determined	1968
629699		Oak Harbor	S8050-00-06011-0	Not Determined	1968
629701		Oak Harbor	S8140-00-05006-0	Not Determined	1968
629704		Oak Harbor	S8015-02-00025-0	Not Determined	1968
629707		Oak Harbor	S8140-00-01005-0	Not Determined	1969
629708		Oak Harbor	S8050-00-10021-0	Not Determined	1969
629712		Oak Harbor	S7730-02-00083-0	Not Determined	1969
629715		Oak Harbor	S6515-03-12009-0	Not Determined	1969
629716		Oak Harbor	S7730-02-00079-0	Not Determined	1969
629717		Oak Harbor	S8140-00-01014-0	Not Determined	1969

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629718		Oak Harbor	S8140-00-01009-0	Not Determined	1969
629719		Oak Harbor	R13434-220-4010	Not Determined	1969
629720		Oak Harbor	S8015-02-00021-0	Not Determined	1969
629721		Oak Harbor	S8140-00-01017-0	Not Determined	1969
629723		Oak Harbor	R13324-035-3100	Not Determined	1969
629725		Oak Harbor	S8140-00-01019-0	Not Determined	1969
629726		Oak Harbor	S6305-00-00021-0	Not Determined	1969
629727		Oak Harbor	S8140-00-01007-0	Not Determined	1969
629729		Oak Harbor	R13311-442-1520	Not Determined	1969
629731		Oak Harbor	S8140-00-01012-0	Not Determined	1969
629732		Oak Harbor	S7575-00-03051-0	Not Determined	1969
629734		Oak Harbor	S7730-02-00081-0	Not Determined	1969
629737		Oak Harbor	S7730-02-00080-0	Not Determined	1969
629740		Oak Harbor	S7730-02-00076-1	Not Determined	1969
629741		Oak Harbor	S6455-00-00057-0	Not Determined	1969
629742		Oak Harbor	S8140-00-02011-0	Not Determined	1969
629743		Oak Harbor	R23330-035-1770	Not Determined	1969
629745		Oak Harbor	S8140-00-02012-0	Not Determined	1969
629746		Oak Harbor	S6515-03-12002-0	Not Determined	1969
629747		Oak Harbor	S8050-00-01001-2	Not Determined	1969
629748		Oak Harbor	R13324-202-4130	Not Determined	1969
629749		Oak Harbor	R13221-164-3400	Not Determined	1969
629752		Oak Harbor	S7730-02-00080-1	Not Determined	1969
629753		Oak Harbor	S8140-00-01013-0	Not Determined	1969
629754		Oak Harbor	S8140-00-01010-0	Not Determined	1969
629756		Oak Harbor	S8140-00-04003-0	Not Determined	1969
629758		Oak Harbor	S7730-02-00078-1	Not Determined	1969

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629760		Oak Harbor	S7575-00-07001-0	Not Determined	1969
629762		Oak Harbor	S8015-02-00014-0	Not Determined	1969
629764		Oak Harbor	S8055-00-00002-0	Not Determined	1969
629766		Oak Harbor	S8140-00-01015-0	Not Determined	1969
629768		Oak Harbor	S8140-00-02003-0	Not Determined	1969
629771		Oak Harbor	S7730-00-00012-4	Not Determined	1969
629772		Oak Harbor	S7725-00-00008-0	Not Determined	1969
629776		Oak Harbor	S8140-00-01011-0	Not Determined	1969
629777		Oak Harbor	R13303-150-4990	Not Determined	1969
629778		Oak Harbor	R13311-108-3050	Not Determined	1969
629780		Oak Harbor	S8140-00-01018-0	Not Determined	1969
629781		Oak Harbor	S8140-00-01016-0	Not Determined	1969
629783		Oak Harbor	R13301-008-3590	Not Determined	1969
629785		Oak Harbor	R23307-123-0720	Not Determined	1969
629786		Oak Harbor	S7730-02-00077-0	Not Determined	1969
629792		Oak Harbor	S8140-00-01008-0	Not Determined	1969
629793		Oak Harbor	S7730-02-00091-0	Not Determined	1969
629796		Oak Harbor	S7575-00-01023-0	Not Determined	1969
629797		Oak Harbor	S7730-02-00076-2	Not Determined	1969
629800		Oak Harbor	R23307-380-0640	Not Determined	1969
629801		Oak Harbor	R13311-021-3190	Not Determined	1969
629802		Oak Harbor	S7730-02-00078-0	Not Determined	1969
629809		Coupeville	R13233-310-1640	Not Determined	1935
629810		Coupeville	S6415-00-27008-0	Not Determined	1941
629811		Coupeville	S6415-00-23006-0	Not Determined	1941
629812		Coupeville	S6005-00-13002-0	Not Determined	1942

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629813		Coupeville	S6415-00-27001-0	Not Determined	1942
629814		Coupeville	R13233-260-3800	Not Determined	1969
629823		Oak Harbor	R13335-422-0770	Not Determined	1913
629832		Oak Harbor	R23329-068-0130	Not Determined	1935
629836		Oak Harbor	R13312-248-5080	Not Determined	1940
629837		Oak Harbor	R13326-150-0250	Not Determined	1942
629838		Oak Harbor	R23318-307-2030	Not Determined	1943
629839		Oak Harbor	R13312-256-5200	Not Determined	1943
629841		Oak Harbor	S7740-00-00012-0	Not Determined	1943
629842		Oak Harbor	R23308-359-0150	Not Determined	1943
629843		Oak Harbor	S6525-00-03012-0	Not Determined	1943
629844		Oak Harbor	S7740-00-00004-0	Not Determined	1943
629845		Oak Harbor	R13311-505-1270	Not Determined	1943
629846		Oak Harbor	S6525-00-0300A-0	Not Determined	1943
629847		Oak Harbor	R13336-508-0550	Not Determined	1946
629849		Oak Harbor	R13336-511-0360	Not Determined	1946
629856		Coupeville	S8370-00-00002-0	Not Determined	1952
629861		Oak Harbor	R13335-483-4090	Not Determined	1958
629864		Oak Harbor	S7740-00-00029-0	Not Determined	1960
629865		Oak Harbor	R13325-017-1560	Not Determined	1960
629873		Oak Harbor	R13327-334-1130	Not Determined	1963
629886		Oak Harbor	S8265-00-02004-0	Not Determined	1967
629889		Oak Harbor	R23307-139-2170	Not Determined	1967
629893		Oak Harbor	S7740-00-0000B-5	Not Determined	1968
629894		Oak Harbor	S8265-02-04001-0	Not Determined	1968
629900		Coupeville	R13230-187-0370	Not Determined	1959
629901		Coupeville	R13233-249-3680	Not Determined	1968
629904		Oak Harbor	R13326-150-0350	Not Determined	1942

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629906		Oak Harbor	R13326-045-0230	Not Determined	1942
629907		Oak Harbor	R13311-274-2180	Not Determined	1943
629908		Oak Harbor	R13335-513-4360	Not Determined	1943
629909		Oak Harbor	R23318-240-2180	Not Determined	1943
629910		Oak Harbor	S7740-00-00001-0	Not Determined	1943
629912		Oak Harbor	R13335-297-0280	Not Determined	1950
629913		Oak Harbor	R13311-462-1390	Not Determined	1952
629925		Coupeville	S7246-00-00012-0	Not Determined	1890
629928		Oak Harbor	R13327-198-1980	Not Determined	1922
629929		Oak Harbor	R13335-444-1230	Not Determined	1938
629930		Oak Harbor	R23330-167-5220	Not Determined	1950
629931		Oak Harbor	R13335-316-1140	Not Determined	1957
629933		Oak Harbor	R13335-412-4330	Not Determined	1958
629934		Oak Harbor	R13301-350-2950	Not Determined	1968
629936		Coupeville	R13102-427-4250	Not Determined	1955
629938		Oak Harbor	R13325-106-0190	Not Determined	1957
629940		Oak Harbor	R13335-367-4010	Not Determined	1959
629942		Coupeville	S8300-00-01002-0	Not Determined	1959
629946		Oak Harbor	R13326-421-2780	Not Determined	1945
629947		Oak Harbor	R13326-338-2970	Not Determined	1946
629956		Coupeville	S6415-00-09003-0	Not Determined	1910
629957		Coupeville	R13104-460-4100	Not Determined	1920
629958		Coupeville	R13104-475-3900	Not Determined	1947
629960		Coupeville	R13104-427-3800	Not Determined	1968
629969		Coupeville	R13104-409-3940	Not Determined	1952
629970		Oak Harbor	S7740-00-0000A-6	Not Determined	1954
629975		Oak Harbor	R13335-275-3920	Not Determined	1956
629976		Oak Harbor	R13335-517-4710	Not Determined	1963
629977		Oak Harbor	R13327-502-2520	Not Determined	1963

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
629979		Coupeville	R13233-193-3970	Not Determined	1935
629988		Coupeville	R13233-211-3980	Not Determined	1965
630009		Coupeville	S8060-00-10001-0	Not Determined	1880
630048		Oak Harbor	R13335-402-3810	Not Determined	1950
630049		Oak Harbor	S7740-00-0000A-5	Not Determined	1953
630050		Oak Harbor	S7740-00-0000A-4	Not Determined	1953
630057		Oak Harbor	S7740-00-0000B-3	Not Determined	1958
630061		Oak Harbor	R13435-336-3050	Not Determined	1963
630062		Oak Harbor	R13302-251-1430	Not Determined	1964
630063		Oak Harbor	S7020-00-00009-2	Not Determined	1964
630064		Oak Harbor	S7740-00-0000B-4	Not Determined	1965
630070		Oak Harbor	S7020-01-00003-0	Not Determined	1969
630073		Coupeville	R13233-040-4160	Not Determined	1956
630074		Coupeville	S6415-00-31004-0	Not Determined	1961
630081	Chapman Rental House	Coupeville	R13104-436-3940	Not Determined	1918
630087		Oak Harbor	R13335-261-3850	Not Determined	1959
630092		Oak Harbor	R13335-386-3750	Not Determined	1967
630093		Oak Harbor	R13335-275-2640	Not Determined	1968
630099		Coupeville	R13233-258-3970	Not Determined	1951
630100		Coupeville	R13233-250-3850	Not Determined	1956
630101		Coupeville	S6415-00-31007-0	Not Determined	1958
630102		Coupeville	R13233-363-4140	Determined Not Eligible	1960
630103		Coupeville	R13233-133-4550	Determined Not Eligible	1969
630121		Oak Harbor	R13326-341-0520	Not Determined	1968
630124	Island County Courthouse	Coupeville	S6415-00-21000-0	Not Determined	1948
630125		Coupeville	R13233-240-3830	Not Determined	1968
630131		Coupeville	R13122-410-0750	Not Determined	1940

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
630132		Coupeville	R13116-271-4200	Not Determined	1940
630141		Coupeville	R13233-380-3350	Not Determined	1874
630142		Coupeville	R13233-230-3860	Not Determined	1959
630151		Oak Harbor	R13335-414-3700	Not Determined	1950
630156		Oak Harbor	R13326-012-3520	Not Determined	1964
630157		Oak Harbor	R13335-320-2850	Not Determined	1964
630158		Oak Harbor	R13326-365-0580	Not Determined	1965
630159		Oak Harbor	R13326-484-2530	Not Determined	1967
630184		Oak Harbor	R13326-314-2460	Not Determined	1945
630189		Coupeville	R13104-375-5250	Not Determined	1950
630192		Oak Harbor	S8050-00-09001-0	Not Determined	1965
630232		Coupeville	R13219-100-1950	Not Determined	1860
630233		Coupeville	R13105-478-4660	Not Determined	1876
630234		Coupeville	R13104-305-1970	Not Determined	1890
630235		Coupeville	R13109-465-4760	Not Determined	1891
630236		Coupeville	R13110-085-1980	Not Determined	1902
630237		Coupeville	R13103-332-1790	Not Determined	1910
630238		Coupeville	R13109-500-4220	Not Determined	1948
630239		Coupeville	R23119-235-0880	Not Determined	1963
630240		Coupeville	R13103-502-4800	Not Determined	1969
630251		Oak Harbor	R23332-443-0120	Not Determined	1917
630252		Oak Harbor	R13222-320-0550	Not Determined	1923
630254		Oak Harbor	R13435-064-3640	Not Determined	1924
630257		Oak Harbor	R23330-143-4350	Not Determined	1926
630259		Oak Harbor	R13436-065-1990	Not Determined	1930
630261		Oak Harbor	R13313-305-3320	Not Determined	1945
630264		Oak Harbor	R23330-312-0600	Not Determined	1956

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
630265		Oak Harbor	R13325-184-3900	Not Determined	1957
630270		Oak Harbor	R13324-462-1970	Not Determined	1948
630273		Oak Harbor	R13435-084-0670	Not Determined	1910
630276		Oak Harbor	S8475-00-00003-0	Not Determined	1967
665633	North Fork Levee, North Fork Levee	Skagit City	33030900140003/P15559	Not Determined	1885, 1935
665634	Dugualla Bay Levee, Dugualla Bay Levee	Whidbey Island	R233070734030	Not Determined	1920
665641	NASW Pump Station, NASW Pump Station	Oak Harbor		Not Determined	1952
665755	Reynolds House	Coupeville		Determined Not Eligible	1928
666001	Private	Coupeville		Determined Not Eligible	1951
666911	Kathleen Ryan	Coupeville		Determined Not Eligible	1960
668248	Private	Oak Harbor	R13323-0623-2810	Determined Not Eligible	1954
668319	Island County Dike District # 3 Dike, Dugualla Bay Dike	Oak Harbor		Determined Not Eligible	1914
669208	Private	Oak Harbor		Determined Not Eligible	1927
669783	Island Property Management	Oak Harbor		Determined Not Eligible	1940
670504	Coupeville Water Treatment Building	Coupeville	699453R13233-169-4320	Determined Not Eligible	1968
671319	Private	Oak Harbor		Determined Not Eligible	1952

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
671568	Building 985 - Survival Equipment Shop, Building 985 - Survival Equipment Shop	NAS Whidbey Island		Determined Not Eligible	1967
671589	Building 2681, Hangar 9, Building 2681, Hangar 9	NAS Whidbey Island		Determined Not Eligible	1984
672268	Joe & Val Hillers	Coupeville		Determined Not Eligible	1960
672297	NAS Whidbey Island- Building 2699, Hangar 10	NAS Whidbey Island		Determined Not Eligible	1986
672367	Ground Support Equipment (GSE) Shop, GSE Compound - Building 995	NAS Whidbey Island		Determined Not Eligible	1969
672368	South Parking Shed, Ground Support Equipment (GSE) Compound - Building 995A	NAS Whidbey Island		Determined Not Eligible	1969
672370	North Parking Shed, Ground Support Equipment (GSE) Compound - Building 995B	NAS Whidbey Island		Determined Not Eligible	1969
672371	Ground Support Equipment (GSE) Powder Coat Facility, GSE Compound - Building 995C	NAS Whidbey Island		Determined Not Eligible	1969
672379	Facility 2525 - Turbo Fan Jet Engine Test Facility, Facility 2525 - Aircraft Turbo Jet Test Cell	NAS Whidbey Island		Determined Not Eligible	1971
672380	Test Cell Fuel Storage Tanks , Facility 2525A - Test Cell Fuel Storage Tanks	NAS Whidbey Island		Determined Not Eligible	1971
672382	Racon Hill - Building 2665, ASR-8 Radar Building	NAS Whidbey Island		Determined Not Eligible	1982

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
672399	Building 2740 - Medium Attack Weapons School, Pacific, Building 2740 - Fleet Aviation Specialized Operational (FASO) Academic Training Building	NAS Whidbey Island		Determined Not Eligible	1988
672401	Building 2528 - Air Start Building, Building 2528 - Air Start Building	NAS Whidbey Island		Determined Not Eligible	1970
672402	Building 2557, South Wash Rack Control Building, Building 2557, South Wash Rack Control Building	NAS Whidbey Island		Determined Not Eligible	1973
672403	Racon Hill - Facility 2664, Facility 2664 - Radar Tower	NAS Whidbey Island		Determined Not Eligible	1982
672404	Building 2558, North Wash Rack Control Building, Building 2558, North Wash Rack Control Building	NAS Whidbey Island		Determined Not Eligible	1973
672405	Building 2581, Air Start/Compression Building, Building 2581, Air Start/Compression Building	NAS Whidbey Island		Determined Not Eligible	1975
672415	Fire and Rescue, Vehicle Alert , Facility 201714 - Ault Field Fire and Rescue, Vehicle Alert	NAS Whidbey Island		Determined Not Eligible	1962
672417	Equipment Shelter, Building 2577 - Ault Field Equipment Shelter	NAS Whidbey Island		Determined Not Eligible	1974
672419	AN/SPN 42T3 Generator Building , Building 2524 - Ault Field AN/SPN 42T3 Generator Building	NAS Whidbey Island		Determined Not Eligible	1970
672420	Precision Approach Radar (PAR) , Facility 201821 - Ault Field PAR	NAS Whidbey Island		Determined Not Eligible	1963
672423	WWII-era navigation marker , Ault Field - WWII-era navigation marker	NAS Whidbey Island		Determined Not Eligible	1942

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
672433	Building 2734, Air Passenger Terminal, Building 2734, Air Passenger Terminal	NAS Whidbey Island		Determined Not Eligible	1988
672434	Building 2631, Building 2631 - VP AW Training	NAS Whidbey Island		Determined Not Eligible	1978
672435	Building 2584, POD Administration/Avionics and Storage, Building 2584, POD Administration/Avionics and Storage	NAS Whidbey Island		Determined Not Eligible	1975
672436	Building 2621 - Liquid Oxygen (LOX) Facility, Building 2621 - LOX Facility	NAS Whidbey Island		Determined Not Eligible	1978
672437	OLF Coupeville - Building 10, Runway Lighting Vault, Building 10, Runway Lighting Vault	NAS Whidbey Island		Determined Not Eligible	1967
672438	OLF Coupeville - Building 11, Potable Water Well Pump House, Building 11, Potable Water Well Pump House	NAS Whidbey Island		Determined Not Eligible	1967
672439	OLF Coupeville - Building 2709, Crash Truck Shelter, Building 2709, Crash Truck Shelter	NAS Whidbey Island		Determined Not Eligible	1986
672440	OLF Coupeville - Radome, Radome	NAS Whidbey Island		Determined Not Eligible	0
672445	Low Frequency Homer Beacon Building , Ault Field - Building 2678, Low Frequency Homer Beacon Building	NAS Whidbey Island		Determined Not Eligible	1945
672446	Tactical Air Navigation (TACAN) Building , Building 2596 - Ault Field TACAN Building	NAS Whidbey Island		Determined Not Eligible	1976

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
672447	Jet Aircraft Power Check Facility , Facility 201796 - Ault Field Jet Aircraft Power Check Facility	NAS Whidbey Island		Determined Not Eligible	1944
672449	Chaff Build-Up Facility , Building 2561 - Ault Field Chaff Build-Up Facility	NAS Whidbey Island		Determined Not Eligible	1973
672450	Building 976 - Systems Training Building , Building 976 - Aircraft Systems Training Building	NAS Whidbey Island		Determined Not Eligible	1966
672587	Whidbey Island Game Farm, Pacific Rim Institute for Environmental Stewardship	Coupeville		Determined Eligible	1946
672688	Private	Coupeville		Determined Eligible	1890
672825	Ault Field - Quarters G, Building 3230	NAS Whidbey Island		Determined Eligible	1935
672826	Ault Field - Quarters R, Building 3220	NAS Whidbey Island		Determined Eligible	1930
672828	Ault Field - Quarters P, Building 1140	NAS Whidbey Island		Determined Eligible	1900
672829	Ault Field - Riksen Farm House, Quarters O, Building 920	NAS Whidbey Island		Determined Eligible	1900
672830	Ault Field - Quarters F, Building 3305	NAS Whidbey Island		Determined Eligible	1935
672831	Ault Field - Quarters E, Building 3295	NAS Whidbey Island		Determined Eligible	1935
673039	Naval Air Station Whidbey - Whidbey Lanes Bowling Alley, BUILDING 2510	NAS Whidbey Island		Determined Not Eligible	1969

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
673907	Ault Field - Operational Storage, Building 2704	NAS Whidbey Island		Determined Not Eligible	1984
673908	Ault Field - Shop Space, Building R-14	NAS Whidbey Island		Determined Not Eligible	1976
673909	Ault Field - Shop Space, Building R-12	NAS Whidbey Island		Determined Not Eligible	1976
673910	Ault Field - LOX Cart Shelter, Building 2732	NAS Whidbey Island		Determined Not Eligible	1987
673911	Ault Field - Pump House/Air Craft Rince Facility, Building 2635	NAS Whidbey Island		Determined Not Eligible	1978
673912	Ault Field - Inert Store House, Building 2666	NAS Whidbey Island		Determined Not Eligible	1984
673913	Ault Field - Airfield Taxiways and Aprons	NAS Whidbey Island		Determined Not Eligible	1954, 1964
674221	Fort Casey Building 2, Campground Comfort Station	NAS Whidbey Island		Determined Not Eligible	1964
674330	Dean House, Patmore House, Zustiak House	Coupeville	264840/ S7070-00-10007-0	Not Determined	1918
674429	Auto Hobby Shop, Bldg 2549	NAS Whidbey Island		Determined Not Eligible	1974
674432	CHILD DEVELOPMENT CENTER, BLDG 2679	NAS Whidbey Island		Determined Not Eligible	1984
674433	MT RAINIER BLDG, BARRACKS #13, BLDG 2701	NAS Whidbey Island		Determined Not Eligible	1988
674532	Campground Comfort Station, Comfort Station #6	Oak Harbor		Determined Not Eligible	1965
674821	R-13	NAS Whidbey Island		Determined Not Eligible	1976
675127	R-21, Medical Storage	NAS Whidbey Island		Determined Not Eligible	1977

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
675467	R-45, Line Maintenance Shelter	NAS Whidbey Island		Determined Not Eligible	1976
675601	Potable Water Tank, Building 197, Water Tank	Oak Harbor		Determined Not Eligible	1944
676190	Private	Oak Harbor		Determined Not Eligible	1950
676408	House	Coupeville	R13233-310-1640	Not Determined	1935
676414	House	Coupeville	R13233-276-1160	Not Determined	1946
676884	TAXIWAY, FACILITY 201422	NAS Whidbey Island		Determined Not Eligible	1951
676890	CHAIN ARRESTING GEAR, FACILITY 201926	NAS Whidbey Island		Determined Not Eligible	1967
676891	CARRIER DECK LIGHTING, FACILITY 201926	NAS Whidbey Island		Determined Not Eligible	1968
676892	RUNWAY EDGE LIGHTING, FACILITY 201929	NAS Whidbey Island		Determined Not Eligible	1968
676893	OPTICAL LANDING SYSTEM, FACILITY 201961	NAS Whidbey Island		Determined Not Eligible	1971
676910	FLEET & FAMILY INFO CENTER, BUILDING 2556	NAS Whidbey Island		Determined Not Eligible	1975
676911	TEST CELL II, BUILDING 2765	NAS Whidbey Island		Determined Not Eligible	1994
676950	Crew Shelter, R-75	NAS Whidbey Island		Determined Not Eligible	1970
677631	WATER TANK-2712	NAS Whidbey Island		Determined Not Eligible	1965
677632	Potable Water Tank - 867	NAS Whidbey Island		Determined Not Eligible	1986
677633	Potable Water Reservoir 388/389	NAS Whidbey Island		Not Determined	1970
677634	POTABLE WATER TANK - 2849	NAS Whidbey Island		Not Determined	2004

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
678355	Building 2614, Waste Water Treatment Plant	NAS Whidbey Island		Determined Not Eligible	1977
678416	HOSPITAL, BUILDING 993	NAS Whidbey Island		Determined Not Eligible	1969
678955	R-25, A/C Line Maintenance (6d)	NAS Whidbey Island		Determined Not Eligible	1976
678956	R-24, A/C Line Maintenance (6d)	NAS Whidbey Island		Determined Not Eligible	1976
678957	R-31, A/C Line Maintenance	NAS Whidbey Island		Determined Not Eligible	1976
678958	Building 2511, Morale, Welfare, Recreation Storage	NAS Whidbey Island		Determined Not Eligible	1968
678959	Building 2640, Compressor Building	NAS Whidbey Island		Determined Not Eligible	1972
679036	Building 2753, CNAF/FITT Team	NAS Whidbey Island		Determined Not Eligible	1973
679302	Building 2555: Public Works Storage, Building 2555: Ault Field Recycling Center	NAS Whidbey Island		Determined Not Eligible	1974
679303	Building 2595: Navy Exchange Gas Station, Building 2595: Navy Exchange Gas Station	NAS Whidbey Island		Determined Not Eligible	1978
679304	Building 2641: Arts and Crafts Hobby Shop, Building 2641: Security Training	NAS Whidbey Island		Determined Not Eligible	1980
679309	Building 2537, Storage Tank Non Potable	NAS Whidbey Island		Determined Not Eligible	1970
679857	Building 2848: McDonald's,	NAS Whidbey Island		Determined Not Eligible	1984

HISTORIC_I	SiteNameHi	Location	TaxParcel_	RegisterTy	BuiltYear
680638	Forest Loop Campground Comfort Station No. 2, Building 2	NAS Whidbey Island		Determined Not Eligible	1964
700399	Willowood Barn, Willowood Farm; Smith Ranch	Coupeville		Determined Eligible	1880
700400	Barn, Tessaro Barn	Coupeville		Determined Eligible	1905
700454	Barn, Summers Farm	Mount Vernon		Determined Eligible	1895
700711	Pratt Sheep Barn I, Pratt Farm	Coupeville		Determined Eligible	1935
700757	Pratt Sheep Barn, Pratt Sheep Barn II	Coupeville		Determined Eligible	1935
700759	Crockett, Hugh, Barn, Boyer Farm	Coupeville		Determined Eligible	1860
628900		Oak Harbor		Not Determined	1958

Heritage Barn Register Listed

SITE_ID	Comments	Location
IS00227	LeSourd Barn and Granary	Coupeville
IS00229	Kineth, John Jr., Barn	Coupeville
IS00231	Sherman Hog House	Coupeville
IS00232	Willowood Barn	Coupeville
IS00234	Barn	Coupeville
IS00295	Jenne, Edward and Agnes, Farm	Coupeville
IS00302	Calhoun, Thomas and Mary, Farm	Coupeville
IS00313	Boyer, Freeman, Barn	Coupeville
IS00314	Keith, Sam, Farm	Coupeville
IS00338	Clark Sherman Farm	Coupeville
IS00339	Rip, Lawrence and Joyce, Farm	Coupeville
IS00340	Gus Reuble Farm	Coupeville
IS00343	James, William and Florence, Farm	Oak Harbor
IS00344	Pratt Sheep Barn I	Coupeville
IS00345	Ernest Watson House	Coupeville
IS00346	Harmon/Pearson/Engle Farm	Coupeville
IS00347	Aloha Farms	Coupeville
IS00348	Barn	Oak Harbor
IS00352	Pratt Sheep Barn	Coupeville
IS00353	Case Farm	Oak Harbor
IS00354	Gallagher/Schreck/Sherman Farm	Coupeville
IS00355	Crockett, Hugh, Barn	Coupeville
IS00356	Hookstra, Lambert, Farm	Oak Harbor

Washington Heritage Register

SITE_ID	Comments	Location
IS00226	Crockett, Colonel Walter, Barn	Coupeville
IS00098	Grennan and Cranney Store	Coupeville
SK00337	Barn	Mount Vernon
IS00310	Deception Pass State Park	Oak Harbor

ELNHR 2016 Inventory

Name	Area	Status
Charlie Mitchell Barn	San de Fuca Uplands	Contributing
Zylstra/Sherod House	San de Fuca Uplands	Contributing
Oly Allison/Burke House	San de Fuca Uplands	Not Contributing
Earlywine/Nienhuis Property (John Neinhuis Place/L. Lewis Property)	San de Fuca Uplands	Contributing
Old Power Place	San de Fuca Uplands	Contributing
Gouchin/Criswell House	San de Fuca Uplands	Not Contributing
San de Fuca School	San de Fuca Uplands	Contributing
Lee/Hall House	San de Fuca Uplands	Not Contributing
Capt. R.B. Holbrook House	San de Fuca Uplands	Contributing
Maddex House	San de Fuca Uplands	Not Contributing
Nienhuis/Leach Place	San de Fuca Uplands	Contributing
Gabriel/Reynolds House	San de Fuca Uplands	Not Contributing
Liberal League Hall/San de Fuca Community Chapel	San de Fuca Uplands	Contributing
Hingston House	San de Fuca Uplands	Contributing
Tuft Cottage/Mrs. J. Arnold House	San de Fuca Uplands	Contributing

Name	Area	Status
Armstrong/Trumball House	San de Fuca Uplands	Contributing
Fisher/Hingston/Trumball General StoreL	San de Fuca	Contributing
Hingston/Trumball Store	San de Fuca Uplands	Contributing
Armstrong/Scoby House	San de Fuca Uplands	Contributing
Charles Grimes House	San de Fuca Uplands	Not Contributing
Hordyk Place/VanderVoet Farm	San de Fuca Uplands	Contributing
Walden House	San de Fuca Uplands	Not Contributing
Lupien House	San de Fuca Uplands	Not Contributing
Isaacson/Rector House	San de Fuca Uplands	Not Contributing
Weidenbach House	San de Fuca Uplands	Contributing
VandeWerfhorst House	San de Fuca Uplands	Not Contributing
A.W. Monroe/VandeWerfhorst Place	San de Fuca Uplands	Contributing
Farrell/Johnson House	San de Fuca Uplands	Not Contributing
Van Dam Place	San de Fuca Uplands	Contributing
Eldred Van Dam House	San de Fuca Uplands	Not Contributing
H.H. Rhodes Place	San de Fuca Uplands	Contributing

Name	Area	Status
Arnold Farm	NULSan de Fuca UplandsL	Contributing
Benson/Robinett House	San de Fuca Uplands	Not Contributing
Henry Arnold/Grasser House	San de Fuca Uplands	Contributing
Robart Cottage	San de Fuca Uplands	Contributing
Eerkes/Cleaver House	San de Fuca Uplands	Not Contributing
A.W. Monroe House	San de Fuca Uplands	Contributing
Baher House/San de Fuca Cottage	San de Fuca Uplands	Not Contributing
Samuel Libbey Ranch	San de Fuca Uplands	Contributing
Morris Place	San de Fuca Uplands	Contributing
Frey/Stone House	San de Fuca Uplands	Not Contributing
Case Cabin/Evans House	San de Fuca Uplands	Not Contributing
Art Holmburg Place	West Woodlands	Contributing
Captain Barrington House	West Woodlands	Not Contributing
Maxwell Cottage	West Woodlands	Not Contributing
Silvia House	West Woodlands	Not Contributing
Gelb/Alexander House	West Woodlands	Not Contributing

Name	Area	Status
Garrison House	West Woodlands	Not Contributing
Sherman/Grasser House	West Woodlands	Not Contributing
Cook/Sherman House	West Woodlands	Contributing
Old Art Black Barn	Coupeville	Contributing
Powell House	Coupeville	Contributing
Edmonds House (Pinkston House)	Coupeville	Contributing
Wharf Warehouse and Dock	Coupeville	Contributing
Alexander Blockhouse	Coupeville	Contributing
Fire Hall	Coupeville	Contributing
Horace Holbrook House	Coupeville	Contributing
Heckenbury House	Coupeville	Contributing
Telephone Exchange Building	Coupeville	Contributing
Flora A.P. Engle House	Coupeville	Contributing
Leach House	Coupeville	Contributing
Alvah D. Blowers House	Coupeville	Contributing
James Gillespie House	Coupeville	Contributing

Name	Area	Status
John and Jane Kineth Sr. House	Coupeville	Contributing
Methodist Church	Coupeville	Contributing
Carl Gillespie House	Coupeville	Contributing
Highwarden House	Coupeville	Contributing
Jacob Jenne House	Coupeville	Contributing
Dr. White???'s Office	Coupeville	Contributing
Williams House (Higgins House)	Coupeville	Contributing
Joseph Libbey House	Coupeville	Contributing
Libbey House	Coupeville	Not Contributing
Reverend Lindsey House	Coupeville	Contributing
Congregational Church	Coupeville	Contributing
Babcock Place	Coupeville	Not Contributing
Chansey House (Nichols/Bennett House)	Coupeville	Contributing
Sergeant Clark House	Coupeville	Contributing
Frank Newberry House	Coupeville	Contributing
Pickard House	Coupeville	Not Contributing

Name	Area	Status
Chapman House	Coupeville	Contributing
Pat???'s Place	Coupeville	Contributing
Hancock/Partridge House (Dixon/Partridge House)	Coupeville	Contributing
Prairie Center Mercantile	Coupeville	Not Contributing
Will Jenne House	Coupeville	Contributing
James Wanamaker House	Coupeville	Contributing
A.B. Coates House	Coupeville	Contributing
A.S. Coates House	Coupeville	Not Contributing
Morrow/Franzen House (Spangler/Franzen Rental House)	Coupeville	Contributing
Bearss/Barrett House	Coupeville	Contributing
Masonic Lodge No. 15	Coupeville	Contributing
Wangness/Ryan House	Coupeville	Not Contributing
Wanamaker/Youderian House	Coupeville	Not Contributing
Morris House	Coupeville	Contributing
Ed Clark House	Coupeville	Contributing
Howell/Harpole House (Howell/Wright House)	Coupeville	Contributing

Name	Area	Status
Ives House	Coupeville	Contributing
Stark House	Coupeville	Contributing
Ceci House	Coupeville	Not Contributing
Albert Kineth House	Coupeville	Contributing
Polly Harpole???'s Maternity Home	Coupeville	Contributing
County Jail/Boy Scout Building	Coupeville	Contributing
Charles Angel House	Coupeville	Contributing
Pennington Farmhouse	Coupeville	Not Contributing
Newcomb Property	Coupeville	Contributing
Newcomb House	Coupeville	Contributing
Benson House	Coupeville	Not Contributing
Benson/Bunting House	Coupeville	Contributing
Mock House	Coupeville	Contributing
Johnson House	Coupeville	Contributing
Boothe House	Coupeville	Contributing
King/McCabe House	Coupeville	Contributing

Name	Area	Status
Schroeder Rental House	Coupeville	Not Contributing
Black/Lindsey House	Coupeville	Contributing
Dr. White House	Coupeville	Contributing
Dean/Patmore/Zustiak House	Coupeville	Not Contributing
E.O. Lovejoy/Yorioka House	Coupeville	Contributing
Bradt House	Coupeville	Not Contributing
Almberg House	Coupeville	Not Contributing
Bergman House	Coupeville	Contributing
Duvall House	Coupeville	Contributing
Fairhaven	Coupeville	Contributing
Sill/Alexander House	Coupeville	Not Contributing
Gillespie Meat Market	Coupeville	Contributing
Cushen Ford Garage	Coupeville	Not Contributing
Terry's Dryer/Gillespie Livery Building	Coupeville	Contributing
Island County Abstract Office	Coupeville	Contributing
Island County Times Building	Coupeville	Contributing

Name	Area	Status
Judge Still Law Office	Coupeville	Contributing
Benson Confectionery	Coupeville	Contributing
Elkhorn Saloon	Coupeville	Contributing
Tom Howell???'s Barbershop	Coupeville	Contributing
Coupeville Cash Store	Coupeville	Contributing
Post Office	Coupeville	Contributing
John Robertson???'s Store	Coupeville	Contributing
Whidbey Mercantile Company	Coupeville	Contributing
John Robertson House	Coupeville	Contributing
Sedge Building	Coupeville	Contributing
Puget Race Drug Store	Coupeville	Contributing
Glenwood Hotel	Coupeville	Contributing
Col. Granville Haller House	Coupeville	Contributing
Island County Bank	Coupeville	Contributing
Samsel/Zylstra Law Office	Coupeville	Contributing
Capt. Thos. Kinney House	Coupeville	Contributing

Name	Area	Status
Captain Clapp House	Coupeville	Contributing
Fullington House	Coupeville	Contributing
Susie & Aleck House	Coupeville	Not Contributing
Deasy House	Coupeville	Not Contributing
Pontiac Dealership/Auto Barn	Coupeville	Contributing
Cushen House	Coupeville	Contributing
Methodist Parsonage	Coupeville	Contributing
Thomas Griffith House	Coupeville	Contributing
First Methodist Parsonage	Coupeville	Contributing
Jacob Straub House	Coupeville	Contributing
Jefferds House	Coupeville	Contributing
Hesselgrave House	Coupeville	Contributing
Hesselgrave/Folkart House	Coupeville	Not Contributing
Coupeville Courier Printing Office	Coupeville	Contributing
Edwards House	Coupeville	Not Contributing
Clapp/Ghormley House	Coupeville	Contributing

Name	Area	Status
Conrad House	Coupeville	Contributing
Munson House (Ervin Rental)	Coupeville	Contributing
Gould/Canty House	Coupeville	Contributing
Capt. Thomas Coupe House	Coupeville	Contributing
Clark House	Coupeville	Not Contributing
Solid Granary	Coupeville	Not Contributing
Chris Solid House	Coupeville	Contributing
Chromy House	Coupeville	Contributing
Fred Nuttall???'s House	Coupeville	Contributing
Howard House	Coupeville	Contributing
Ernest Watson House	Coupeville	Contributing
Bob Cushen House	Coupeville	Not Contributing
Larios House	Coupeville	Not Contributing
Dominick House	Coupeville	Not Contributing
Abbott House	Coupeville	Not Contributing
Coupeville City Hall	Coupeville	Contributing
James Zylstra House	Coupeville	Contributing

Name	Area	Status
Todd/Lovejoy House	Coupeville	Contributing
Meyer House	Coupeville	Not Contributing
Courthouse Vault	Coupeville	Contributing
McCutcheon Honeymoon Cottage	Coupeville	Not Contributing
Peralta House	Coupeville	Not Contributing
Williams House	Coupeville	Contributing
Hanks House	Coupeville	Not Contributing
Ward/Clark House	Coupeville	Contributing
Abbott/Knowles House	Coupeville	Contributing
Frain/Burton Engle House	Coupeville	Contributing
Reuble Squash Barn	Coupeville	Contributing
Thomas/Sullivan House	East Woodlands	Contributing
Carl Marsh House	East Woodlands	Not Contributing
Lewis Shop	East Woodlands	Not Contributing
Thomas E. Clark House	East Woodlands	Not Contributing
Strong Granary	East Woodlands	Contributing
Willard/Argent Place	East Woodlands	Not Contributing

Name	Area	Status
Fort Casey Family Housing/Smith House	East Woodlands	Not Contributing
Thomas/Sullivan/Patmore House	East Woodlands	Not Contributing
Strong Farm	East Woodlands	Contributing
Mulder House	East Woodlands	Contributing
Myers Property	East Woodlands	Contributing
John Kineth, Jr. Farmhouse	Smith Prairie	Contributing
Harp Place	Smith Prairie	Contributing
Old Marvin Place	Penn Cove	Not Contributing
Muzzall Farm	Penn Cove	Contributing
Muzzall Rental House	Penn Cove	Not Contributing
Gates House	Penn Cove	Not Contributing
Preacher Lowdy Place	Penn Cove	Not Contributing
McWilliams Bungalow	Penn Cove	Contributing
Still Log Cabin	Penn Cove	Contributing
San de Fuca Dock/Standard Oil Dock	Penn Cove	Not Contributing
Melvin Grasser House	Penn Cove	Contributing

Name	Area	Status
Brown Cottage/Shelton House	Penn Cove	Not Contributing
Old County Courthouse/Grennan & Cranney Store	Penn Cove	Contributing
George Libbey House	Penn Cove	Contributing
Fisher Place	Penn Cove	Contributing
Dean House	Penn Cove	Not Contributing
Hart House	Penn Cove	Not Contributing
Whid-Isle Inn/Captain Whidbey Inn	Penn Cove	Contributing
Cove Cottage	Penn Cove	Not Contributing
Stone House	Penn Cove	Not Contributing
Smith Cottage	Penn Cove	Contributing
Smith/Davison House	Penn Cove	Not Contributing
Smith Net House	Penn Cove	Contributing
Pratt Boathouses	Penn Cove	Contributing
Old Hewitt Place	Penn Cove	Not Contributing
Old Grade School/Priest Place	Penn Cove	Not Contributing
A. Kineth House	Penn Cove	Contributing

Name	Area	Status
Sabin Shop	Penn Cove	Not Contributing
Sabin House	Penn Cove	Not Contributing
Well's Duplex	Penn Cove	Not Contributing
Walton Aubert House - Fiddler???'s Green	Penn Cove	Contributing
Tom Briscoe House	Penn Cove	Not Contributing
O'Leary Cottage/Snakelum House	Penn Cove	Contributing
Andherst Cottage	Penn Cove	Not Contributing
Davis Blockhouse & Sunnyside Cemetery	Ebey's Prairie	Contributing
O'Dell/F. Reuble House	Ebey's Prairie	Contributing
NPS Sheep Barn	Ebey's Prairie	Contributing
TNC Sheep Barn	Ebey's Prairie	Contributing
Frank Pratt House	Ebey's Prairie	Contributing
Jacob & Sarah Ebey House & Blockhouse	Ebey's Prairie	Contributing
Ferry House	Ebey's Prairie	Contributing
Ralph Engle Worker Housing	Ebey's Prairie	Contributing
John Gould House	Ebey's Prairie	Contributing

Name	Area	Status
Francis A. LeSourd House	Ebey's Prairie	Contributing
John LeSourd House	Ebey's Prairie	Contributing
Comstock/Sherman House	Ebey's Prairie	Not Contributing
Sherwood/Abbott/Franzen House	Ebey's Prairie	Not Contributing
Cawsey House	Ebey's Prairie	Contributing
Harmon/Pearson/Engle House	Ebey's Prairie	Contributing
Glazier/Herrett House	Ebey's Prairie	Contributing
Gallagher/Shreck Place (Gallagher Place/A. Sherman House)	Ebey's Prairie	Contributing
Samuel E. Hancock House	Ebey's Prairie	Contributing
Ed Jenne House	Ebey's Prairie	Contributing
Elisha Rockwell House	Ebey's Prairie	Contributing
Stoddard/Engle House	Ebey's Prairie	Not Contributing
William Engle House	Ebey's Prairie	Contributing
Old Boyer Place	Ebey's Prairie	Contributing
Charles T. Terry House	Ebey's Prairie	Contributing
James Place	Ebey's Prairie	Not Contributing

Name	Area	Status
Tuft House	Ebey's Prairie	Contributing
John Crockett House	Ebey's Prairie	Contributing
Hancock Granary	Ebey's Prairie	Contributing
Sherman Squash Barn	Ebey's Prairie	Contributing
Comstock Barn (Old Al Comstock Place)	Ebey's Prairie	Contributing
Fort Casey Officers Quarters	Fort Casey Uplands	Contributing
Wiley Barn	Fort Casey Uplands	Contributing
Keith House	Fort Casey Uplands	Contributing
Reuble Farm	Fort Casey Uplands	Contributing
Old Anderson Place	Fort Casey Uplands	Contributing
Partridge House	Fort Casey Uplands	Not Contributing
Waterman Logging House	Fort Casey Uplands	Not Contributing
Fort Casey Military Reservation/Camp Casey	Fort Casey Uplands	Contributing
Fort Casey Military Reservation/Fort Casey State Park	Fort Casey Uplands	Contributing
Old Hunting Lodge	Fort Casey Uplands	Contributing
Sherman Hog House	Fort Casey Uplands	Contributing

Name	Area	Status
R.C. Hill Home/J.T. Fielding Place	Fort Casey Uplands	Contributing
Gillespie House/Reuble Farm	Fort Casey Uplands	Contributing
Crockett/Boyer Barn (Hugh Crockett House)	Crockett Prairie	Contributing
Quonset House	Crockett Prairie	Not Contributing
Col. Walter Crockett Farmhouse & Blockhouse	Crockett Prairie	Contributing
Fort Casey Storage Buildings	Crockett Prairie	Contributing
Gilbert Place/Eggerman Farm	Crockett Prairie	Contributing
Calhoun House (Sam Crockett House)	Crockett Prairie	Contributing
Clarence Wanamaker Farm	Crockett Prairie	Contributing
Fort Casey Pump House	Crockett Prairie	Contributing
Hapton/Gould House (John Gould/Miller House)	Crockett Prairie	Contributing
Old Fort Casey Wharf	Crockett Prairie	Contributing
Keystone Cottage	Crockett Prairie	Not Contributing
Schulke House (Schulke/Steadman House)	Crockett Prairie	Contributing
Fort Ebey State Park	Coastal Strip	Contributing

NR Listed Historic Properties

Reference Number	Name	Type	Location
73001869	Central Whidbey Island Historic District	District	Central Whidbey Island - Coupeville
82004285	Deception Pass	Structure	Highway 20 - Anacortes

Archaeological Sites

SITE_ID	Comments	Elig_Name
IS00013	SNAKELUM POINT MIDDEN, PRE CONTACT VILLAGE, PRE CONTACT SHELL MIDDEN, PRE CONTACT LITHIC MATERIAL, FEATURE, HISTORIC OBJECTS, 900 X 15M	Survey/Inventory
IS00014	TOP OF MAUL, HUMAN SKELETON WAS REBURIED.	Survey/Inventory
IS00031	FCR, STONE DEBITAGE, BONE	Survey/Inventory
IS00032	HOUSE BASEMENT ON TOP OF KNOLL REVEALED BURIALS AND CLAMSHELL.	Survey/Inventory
IS00033	PRE CONTACT SHELL MIDDEN	Survey/Inventory
IS00034	PRE CONTACT SHELL MIDDEN	Survey/Inventory
IS00035	DIKING DISTRICT HAS DREDGED CHANNEL WHERE FISH WEIR WAS REPORTED.	Survey/Inventory
IS00036	FCR, FISH WEIR	Survey/Inventory
IS00037	FORM STATES THAT ARTIFACTS WERE FOUND "IN MIDDEN - ALSO BURIAL".	Survey/Inventory
IS00038	PRE CONTACT SHELL MIDDEN, LITHIC MATERIAL	Determined Not Eligible
IS00039	PRE CONTACT SHELL MIDDEN	Survey/Inventory
IS00043	PRE CONTACT SHELL MIDDEN	Survey/Inventory
IS00048	FCR, BONE, LITHIC ITEMS, ANTLER WEDGES	Survey/Inventory
IS00049	CKWOLA, PRE CONTACT SHILL MIDDEN, BURIAL, FCR, FISH BONE, SHELLFISH, 80 X 5-30M	Survey/Inventory
IS00050	FCR, CHIPPED LITHIC DEBRIS, BONE, POSSIBLE SEMI-CIRCULAR TRENCH NEAR END OF SPIT, ~47 X ~25M	Survey/Inventory
IS00051	FCR, BONE	Survey/Inventory
IS00052	SEMI-CIRCULAR TRENCH. A LARGE POTLATCH HOUSE WAS LOCATED HERE UNTIL THE FIRST DECADE OF THIS CENTURY. LOCALS REPORT BURIALS WITH TRADE GOODS UNCOVERED IN BLUFFS.	Survey/Inventory
IS00053	5 EXCAVATED CAIRNS. DRILLED ANCHOR STONE	Survey/Inventory
IS00054	PRE CONTACT SHELL MIDDEN INCLUDING FCR, BONE, AT LEAST TWO HUMAN BURIALS REMOVED, 330 X 50M, LATE MARPOLE PHASE 820 +/- 80	Survey/Inventory
IS00055	CAMP/ VILLAGE SITE, PRE CONTACT SHELL MIDDEN, WORKED BONE, LITHIC MATERIAL AND ANTLER AND FMR110 X 30M	Determined Eligible

SITE_ID	Comments	Elig_Name
IS00056	PRE CONTACT SHELL MIDDEN, , 10 X 5M	Survey/Inventory
IS00057	SEVERAL MOUNDS AND DEPRESSIONS, ONE BASALT CHIP	Survey/Inventory
IS00058	FCR	Survey/Inventory
IS00059	3 CAIRNS, STONES ENCIRCLING LARGE CIRCULAR DEPRESSION.	Survey/Inventory
IS00060	PRE CONTACT CAMP, SHELL MIDDEN, FMR, BONE AND LITHIC MATERIAL, 70 X 15M	Determined Eligible
IS00061	FCR, BONE. HUMAN BURIALS COLLECTED.	Survey/Inventory
IS00062	FCR, FISH BONES, SHELLFISH	Survey/Inventory
IS00063	PRE CONTACT SHELL MIDDEN, LITHIC MATERIAL, FCR, MAMMAL/ BIRD BONE, 42 X 33 X .8M	Survey/Inventory
IS00064	PRE CONTACT SHEL MIDDEN	Survey/Inventory
IS00065	LOCALS REPORT FINDING LITHIC ITEMS IN THIS AREA APPROX. 15 YEARS AGO.	Survey/Inventory
IS00066	FCR, PRE CONTACT SHELL MIDDEN, 130 X 90CM	Survey/Inventory
IS00067	ANTLER WEDGE ON BEACH, LOCALS HAVE COLLECTED PROJECTILE POINTS FROM HERE OR EBEBY'S LANDING.	Survey/Inventory
IS00068	FCR, MAUL, NET WEIGHTS	Survey/Inventory
IS00069	SHELL MIDDEN, SHELLS, MOSTLY DESTROYED	Survey/Inventory
IS00070	SEVERAL ROCK PILES WITH ADJACENT IRREGULAR PITS. UNCERTAIN IF THESE ARE HISTORIC OR PREHISTORIC.	Survey/Inventory
IS00071	HIGHDENSITY SHELL MIDDEN W/ FCR, CHARCOAL AND ASH (CLOSELY SPACED DEPOSITS), 90 X 10M, 40-70CM IN DEPTH	Determined Eligible
IS00072	FCR, PESTLE	Survey/Inventory
IS00073	FCR, BONE. FORM MENTIONS OLDER HISTORIC REFUSE BUT IS NOT SPECIFIC ABOUT ITEMS.	Survey/Inventory
IS00074	DIRT AND ROCK MOUNDS AND DEPRESSIONS. SOME MAY BE CAIRNS, SOME ARE FROM FARMER'S FIELD.	Survey/Inventory
IS00075	SINGLE STEMMED PROJECTILE POINT. SALVAGED BURIAL.	Survey/Inventory
IS00076	FCR, HOLLOWED OUT ANTLER TINE. LOCALS COLLECTED MANY ARTIFACTS WHEN SITE WAS GRADED.	Survey/Inventory

SITE_ID	Comments	Elig_Name
IS00077	GROUND STONE ANTHROPOMORPHIC BOWL. 1953 SITE FORM LISTS SITE TYPE AS "SHELL MIDDEN. BOX BURIALS. BURIALS PROBABLY SKAGIT."	Survey/Inventory
IS00078	FCR, BONE	Survey/Inventory
IS00082	FCR, DEER AND BIRD BONES	Determined Eligible
IS00088	FCR,BONE, LITHIC DEBRIS, SEMI-CIRCULAR TRENCH	Survey/Inventory
IS00090	FCR, BONE & STONE ARTIFACTS, ASH AND SEA URCHIN LENSES	Survey/Inventory
IS00091	CAMAS OVEN. LITHIC SCATTER. SERIES OF AT LEAST 5 MOUNDS OF FCR. BASALT FLAKE.	Survey/Inventory
IS00093	CHARRED ROCKS, GREEN SEA URCHIN SPINES	Survey/Inventory
IS00097	PRE CONTACT CAMP, SHELL MIDDEN, LITHIC MATERIAL, BONE AND FMR, HISTORIC WELL, 295 X 85M	Determined Eligible
IS00101	FORT CASEY LIGHTHOUSE	Potentially Eligible
IS00103	FORT CASEY STATE PARK	Survey/Inventory
IS00107	FCR, LITHIC DEBRIS. FCR IS CONCENTRATED IN SOME PLACES IN WHAT MAY BE HEARTHES.	Survey/Inventory
IS00110	ALL OBSERVED MATERIALS ARE IN A PRIVATE COLLECTION. 15-30 CHIPPED STONE PROJECTILE POINTS.	Survey/Inventory
IS00111	FCR, LOW DENSITY OF LITHIC MATERIALS	Survey/Inventory
IS00112	ONE BIFACE AND ONE CLOVIS POINT. BOTH IN PRIVATE COLLECTION.	Survey/Inventory
IS00113	FLAKES. CHARCOAL AND MAMMAL BONES ARE PRESENT HERE BUT DO NOT APPEAR TO BE PART OF THE SITE.	Survey/Inventory
IS00114	FCR, FLAKES, FLAKED COBBLE. CHARCOAL AND BONE ARE ALSO PRESENT BUT DO NOT APPEAR TO BE PART OF SITE.	Survey/Inventory
IS00115	FCR, FLAKES. CHARCOAL AND BONE ARE ALSO PRESENT BUT DO NOT APPEAR TO BE PART OF SITE.	Survey/Inventory
IS00116	FCR, LITHIC DEBRIS, BONE.	Survey/Inventory
IS00117	FLAKES, CHOPPERS	Survey/Inventory
IS00118	FLAKES. CHARCOAL AND MAMMAL BONES ARE PRESENT HERE BUT DO NOT APPEAR TO BE PART OF THE SITE.	Survey/Inventory

SITE_ID	Comments	Elig_Name
IS00119	SHELL MIDDEN	Survey/Inventory
IS00120	FCR, FISH BONES, SHELLFISH, LITHIC DEBRIS. FORM MENTIONS THAT "EARLY HISTORIC DEBRIS ALSO OCCURS IN THIS AREA".	Survey/Inventory
IS00121	ALL OBSERVED LITHIC MATERIALS ARE IN A PRIVATE COLLECTION.	Survey/Inventory
IS00124	PRE CONTACT LITHIC MATERIAL/ SHELL MIDDEN	Survey/Inventory
IS00200	FCR, ANTLER, BONE, FLAKES, CHOPPERS	Survey/Inventory
IS00206	EBEYS LANDING ARCHAEOLOGICAL SITE, SITE TYPE SHELL MIDDEN, 90 FT LENGTH, WIDTH UNKNOWN, SHELL MIDDEN MADE UP OF COARSELY BROKEN SHELLS.	Survey/Inventory
IS00207	SITE NAME-UNDETERMINED, SITE DIMENSIONS-53 METERS, DATE OF USE-UNDETERMINED, SHELL MIDDEN.	Survey/Inventory
IS00209	SITE NAME-UNKNOWN, SITE DIMENSIONS-150 X 63 METERS, DATE OF USE-UNDETERMINED, LITHIC SCATTER.	Survey/Inventory
IS00210	SITE NAME-WHIDBEY 1, THE BOTTLE SITE, SITE DIMENSIONS-30 X 5 METERS, DATE OF USE-1870 TO 1917, HISTORIC OBJECTS.	Potentially Eligible
IS00214	ROWLAND, PREHISTORIC SHELL MIDDEN, 9 X 9CM & 5 X 5CM CONCENTRATIONS	Survey/Inventory
IS00215	PREHISTORIC SHELL MIDDEN W/ FCR, FAUNAL MATERIAL (MAMMAL AND FISH BONES) AND ROCK CAIRN, 84 X 25M, 80 CM IN DEPTH	Survey/Inventory
IS00217	LIBBY SHELL MIDDEN, 30 X 31FT	Survey/Inventory
IS00218	PARTRIDGE POINT/ WEST BEACH SHELL MIDDEN/ BURIAL AREA, 100 X100M X 50-60 CM DEEP	Survey/Inventory
IS00221	FERRY HOUSE ARCHAEOLOGICAL SITE, PRE CONTACT HEARTH FEATURE, HISTORIC REFUSE SCATTER, HISTORIC RESIDENTIAL STRUCTURE AND ROAD, 85 X 49M X 70CM, 1850, 9500-200BP	Determined Eligible
IS00222	EBEY BEACH SITE, PRE CONTACT SHELL MIDDEN, 27.43 E/W X 10-11CM	Survey/Inventory
IS00223	PRE CONTACT SHELL MIDDEN, 3 X 3 M	Survey/Inventory
IS00224	JACOB EBAY HOUSE HISTORIC HOMESTEAD, 120 X 80 M, 1850-PRESENT	Determined Eligible
IS00235	PRE-CONTACT BURIAL, SHELL MIDDEN, HUMAN REMAINS, SITE DIMENSIONS UNDETERMINED.	Survey/Inventory

SITE_ID	Comments	Elig_Name
IS00236	HISTORIC STRUCTURE UNKNOWN, CONCRETE AGGREGATE FEATURES, 1250 X 80M, CA. LATE 19TH - EARLY 20TH CENTURY.	Survey/Inventory
IS00237	PRE-CONTACT SHELL MIDDEN, 25 X 20M, BASALT FLAKE.	Survey/Inventory
IS00239	HISTORIC STRUCTURE UNKNOWN, 130 X 96M, CA. LATE 19TH CENTURY - 1941, BRICK FRAGMENTS, CERAMIC TILE, CEMENT FRAGMENTS, PLASTER.	Survey/Inventory
IS00240	PRE-CONTACT SHELL MIDDEN, 500 X 100M, SHELL FRAGMENTS, FISH BONE.	Survey/Inventory
IS00241	HISTORIC DEBRIS SCATTER, 55 GALLON BARREL, GLASS, JARS 175 X 125M, CA. 1940S-1950S.	Potentially Eligible
IS00242	PRE-CONTACT SHELL MIDDEN, 35 X 18M, SHELL.	Survey/Inventory
IS00243	HISTORIC LOGGING, 23 X 34M, CA. LATE 1800S, BURNED LOG, OLD TREE STUMPS, WAGON ROAD.	Survey/Inventory
IS00245	HISTORIC POST MOLD, ISOLATE, CA. 1899.	Survey/Inventory
IS00246	FARM TWO A, PRE-CONTACT LITHIC MATERIAL, 525 X 275M, DEBITAGE, CORES, PROJECTILE POINT FRAGMENTS.	Survey/Inventory
IS00247	FARM TWO B, PRE-CONTACT LITHIC MATERIAL, 175 X 90M, DEBITAGE.	Survey/Inventory
IS00248	FARM TWO C, PRE-CONTACT LITHIC DEBITAGE, 275 X 175M, FLAKED COPBBLE.	Survey/Inventory
IS00249	FARM TWO D, PRE-CONTACT ISOLATE, FLAKE WITHOUT CORTEX.	Survey/Inventory
IS00250	FARM TWO E, PRE-CONTACT LITHIC ISOLATE, FLAKE.	Survey/Inventory
IS00251	FARM ONE A, PRE-CONTACT LITHIC MATERIAL, 125 X 50M, COBBLES, FLAKED COBBLE, COBBLE SPALL, SHATTER.	Survey/Inventory
IS00252	FARM ONE B, HISTORIC AND PRE-CONTACT COMPONENTS, 135 X 125M, FLAKED COBBLES, CERAMIC, FMR, SHATTER, CHINESE STYLE CERAMIC, CA. 1850S - 1900S.	Survey/Inventory
IS00253	FARM ONE C, PRE-CONTACT LITHIC MATERIAL, 175 X 115M, CORE, FLAKE TOOL, SHATTER PIECES.	Survey/Inventory
IS00254	FARM ONE D, PRE-CONTACT LITHIC MATERIAL, 2 X 2M, FLAKE, BIFACE.	Survey/Inventory
IS00255	FARM ONE E, PRE-CONTACT LITHIC MATERIAL, 10 X 10M, FLAKE, SHATTER PIECES.	Survey/Inventory
IS00256	PRE-CONTACT ISOLATE, FARM ONE F, FLAKED COBBLE.	Survey/Inventory
IS00257	PRE-CONTACT ISOLATE, FARM ONE G, FLAKED COBBLE.	Survey/Inventory

SITE_ID	Comments	Elig_Name
IS00258	FARM ONE H, PRE-CONTACT LITHIC ISOLATE, FLAKE.	Survey/Inventory
IS00259	FARM ONE I, PRE-CONTACT ISOLATE, FLAKE.	Survey/Inventory
IS00260	FARM ONE J, PRE-CONTACT LITHIC ISOLATE, FLAKE.	Survey/Inventory
IS00261	FARM ONE K, PRE-CONTACT LITHIC ISOLATE, FLAKED COBBLE.	Survey/Inventory
IS00263	PRE-CONTACT SHELL MIDDEN, FMR, CHARCOAL LENSES, POSSIBLE POST MOLDS, MAMMAL BONES, 57 X 105 M.	Survey/Inventory
IS00264	PRE-CONTACT SHELL MIDDEN, SHELL, FCR, CHARCOAL, 180 X 10M/	Survey/Inventory
IS00265	PRE-CONTACT SHELL MIDDEN, FMR, SHELL, 24.4 X 16.75M.	Survey/Inventory
IS00283	HISTORIC STRUCTURE UNKNOWN, 2 CONCRETE FOUNDATIONS, BRICK DUMP, REFUSE, GLASS, FAUNAL BONE, NAILS, WHITEWARE SHERD, 185 X 45M, CA. MID 20TH CENTURY.	Potentially Eligible
IS00284	HISTORIC STRUCTURE UNKNOWN, 185 X 115M, 2 CONCRETE PADS, CONCRETE FOUNDATION WALL, DEPRESSION, REFUSE, GLASS, TILE, NAILS, SHELL CASINGS, BOTTLE CAP, PLASTIC, FOUR HOLE BUTTON, CERAMIC, CA. MID 20TH CENTURY.	Determined Not Eligible
IS00286	HISTORIC CONCRETE BOX, WATERLINE PIPE, VALVE, CA. 1943, 60 X 84 INCHES	Potentially Eligible
IS00293	PRE CONTACT SHELL MIDDEN, 7 X 7M	Survey/Inventory
IS00294	PRE CONTACT SHELL LENS, 5 X 5M	Survey/Inventory
IS00297	PRE CONTACT SHELL MIDDEN, PRE CONTACT CAIRN, 32 X 13M	Survey/Inventory
IS00300	PIT ROAD SITE, REDEPOSITED SITE (FROM 45IS45), PRE CONTACT HUMAN REMAINS, PRE CONTACT SHELL MIDDEN, 150 X 41 M	Survey/Inventory
IS00303	SCHULKE/STEADMAN HOUSE REFUSE, MAMMAL BONES, GLASS, METAL, CERAMIC, 60 X 30M, CA. 1900-1918	Potentially Eligible
IS00304	KEYSTONE BEACH LITHIC SITE, PRE CONTACT LITHIC MATERIAL, FLAKES, 10 X 5M	Survey/Inventory
IS00305	SHEEP BARN LITHICS, PRE CONTACT LITHIC MATERIAL, FLAKED COBBLE, FLAKED PEBBLE, 30 X 5M	Survey/Inventory
IS00306	HIGHWAY NORTH ISOLATE, PRE CONTACT ISOLATE, SCRAPER OR ADZE BLADE	Survey/Inventory
IS00308	PRE CONTACT SHELL MIDDEN, FCR, SHELL, MAMMAL BONE, FISH BONE, ~30 X ~20M	Survey/Inventory
IS00309	HISTORIC DEBRIS SCATTER, MODIFIED MAMMAL BONE, GLASS, METAL, PORCELAIN, ~ 105 X 182 CM, CA. PRE 1950S	Potentially Eligible

SITE_ID	Comments	Elig_Name
IS00315	PRE-CONTACT ISOLATE, FLAKED COBBLE/COBBLE TOOL	Survey/Inventory
IS00316	KEYSTONE ROAD HISTORIC SITE, STRUCTURAL FOUNDATION REMNANTS, 1,312 X 656 FT, CA. 1943	Potentially Eligible
IS00317	HISTORIC ISOLATE, WHITEWARE FRAGMENT, CA. PRE 1950	Survey/Inventory
IS00318	HISTORIC ISOLATE, WHITEWARE FRAGMENT, CA. PRE 1950	Survey/Inventory
IS00319	HISTORIC GLASS ISOLATE, CA. PRE-1950	Survey/Inventory
IS00320	OLF THRIFTMASTER, HISTORIC OBJECT, CHEVROLET THRIFTMASTER PICKUP TRUCK, CA. 1950	Survey/Inventory
IS00322	PRE-CONTACT SHELL MIDDEN, 51M X ?	Survey/Inventory
IS00323	CASHVALU GAS SITE, GASOLINE PUMP, CEMENT-LINED CAVITY, HARDWARE CLOTH, CONCRETE SLAB, HISTORIC DEBRIS SCATTER, 460 X 330 FT, CA. 1940 - 1950	Potentially Eligible
IS00324	GATE A-65 HISTORIC SCATTER, GLASS, PORCELAIN FRAGMENTS, 10 X 2M, CA. 1940-1950	Potentially Eligible
IS00325	PRE CONTACT BLOCKY FIRE-CRACKED ROCKS, FOUR FRAGMENTS APPEARED TO ONCE HAVE BEEN A SINGLE, LARGER ROCK	Survey/Inventory
IS00327	PRE CONTACT SHELL MIDDEN, ~8 X ~2.5 M	Survey/Inventory
IS00329	PRE-CONTACT SHELL MIDDEN, 28 X 13M	Survey/Inventory
IS00332	HISTORIC ISOLATE, HISTORIC BOTTLE BASE, CA. 1949	Survey/Inventory
IS00334	PRECONTACT SHELL MIDDEN, SHELL, FMR, LITHIC DEBITAGE, 35 X 20M	Survey/Inventory
IS00336	HISTORIC ROAD, WALLS, CONCRETE, WOOD DECKING, 18 X 6FT, CA. PRE 1950	Potentially Eligible
IS00337	PRE CONTACT SHELL MIDDEN, 5 X 2M	Survey/Inventory
IS00350	HISTORIC ERA DEBRIS SCATTER, GLASS INSULATORS, FOUND IN TELEPHONE POL REPLACEMENT BACKFILL, CA. 1920	Potentially Eligible
IS00351	HISTORIC DEBRIS SCATTER, GLASS BOTTLES, JARS, CANS, ~164 X ~82FT, CA. EARLY 1900S, PRE-1950S	Potentially Eligible
IS00360	Pratt Trail Cobble Chopper, pre contact lithic isolate	Survey/Inventory
IS00361	Pre contact camp, Pre contact shell midden, 80 x 13m	Survey/Inventory
SJ00349	SHELL MIDDEN, 16M L X 2M W X 30CM D, CULTURAL MATERIALS INCLUDING FAUNAL MATERIALS CONSISTING OF REMAINS OF AT LEAST 6 VARIETIES OF SHELLFISH	Survey/Inventory

SITE_ID	Comments	Elig_Name
SK00025	THIN SHELL DEPOSIT ON TOP OF ROCKY CLIFFS	Survey/Inventory
SK00027	3 DRYING TRENCHES	Survey/Inventory
SK00033	LONG HOUSE DEPRESSIONS, SHELL MIDDEN CONTAINING BURIALS, DARK SOIL, BONE, FCR.	Survey/Inventory
SK00034	MANY CELTS, SLATE POINTS, ANTLER TOOL, HAMMERS	Survey/Inventory
SK00046	LIGHTHOUSE POINT MIDDEN, SHELL DEPOSIT, 50M L (N/S) X 30M W (E/W) X .5M D, LAYER OF COARSE SHELL	Survey/Inventory
SK00077	FCR, COBBLE TOOL	Survey/Inventory
SK00079	FCR, CHARCOAL	Survey/Inventory
SK00099	FCR, HEARTH, WORKED STONE, BARBED BONE POINT, BASKETRY TWINE, WOOD PLANKS.	Survey/Inventory
SK00114	HISTORIC VILLAGE USED BY FISHERMAN AND AS SUMMER CABINS. HOMEMADE AND COMMERCIALY MADE BOATS, FISHING NETS, DOCK FACILITIES.	Potentially Eligible
SK00121	DUMP CA. 1870 TO PRESENT	Potentially Eligible
SK00168	FCR, CHARCOAL, ASH, BONE	Survey/Inventory

Archaeological Districts

SITE_ID	Comments	Elig_Name
D100011	SQWIKWIKWAB (FISHTOWN ARCH. DISTRICT)	Determined Eligible - NPS

Cemetery Sites

SITE_ID	Comments	Elig_Name
IS00013	SNAKELUM POINT MIDDEN, PRE CONTACT VILLAGE, PRE CONTACT SHELL MIDDEN, PRE CONTACT LITHIC MATERIAL, FEATURE, HISTORIC OBJECTS, 900 X 15M	Survey/Inventory
IS00014	TOP OF MAUL, HUMAN SKELETON WAS REBURIED.	Survey/Inventory
IS00032	HOUSE BASEMENT ON TOP OF KNOLL REVEALED BURIALS AND CLAMSHELL.	Survey/Inventory
IS00037	FORM STATES THAT ARTIFACTS WERE FOUND "IN MIDDEN - ALSO BURIAL".	Survey/Inventory
IS00049	CKWOLA, PRE CONTACT SHILL MIDDEN, BURIAL, FCR, FISH BONE, SHELLFISH, 80 X 5-30M	Survey/Inventory
IS00050	FCR, CHIPPED LITHIC DEBRIS, BONE, POSSIBLE SEMI-CIRCULAR TRENCH NEAR END OF SPIT, ~47 X ~25M	Survey/Inventory
IS00052	SEMI-CIRCULAR TRENCH. A LARGE POTLATCH HOUSE WAS LOCATED HERE UNTIL THE FIRST DECADE OF THIS CENTURY. LOCALS REPORT BURIALS WITH TRADE GOODS UNCOVERED IN BLUFFS.	Survey/Inventory
IS00054	PRE CONTACT SHELL MIDDEN INCLUDING FCR, BONE, AT LEAST TWO HUMAN BURIALS REMOVED, 330 X 50M, LATE MARPOLE PHASE 820 +/- 80	Survey/Inventory
IS00061	FCR, BONE. HUMAN BURIALS COLLECTED.	Survey/Inventory
IS00075	SINGLE STEMMED PROJECTILE POINT. SALVAGED BURIAL.	Survey/Inventory
IS00077	GROUND STONE ANTHROPOMORPHIC BOWL. 1953 SITE FORM LISTS SITE TYPE AS "SHELL MIDDEN. BOX BURIALS. BURIALS PROBABLY SKAGIT."	Survey/Inventory
IS00082	FCR, DEER AND BIRD BONES	Determined Eligible
IS00088	FCR,BONE, LITHIC DEBRIS, SEMI-CIRCULAR TRENCH	Survey/Inventory
IS00217	LIBBY SHELL MIDDEN, 30 X 31FT	Survey/Inventory
IS00218	PARTRIDGE POINT/ WEST BEACH SHELL MIDDEN/ BURIAL AREA, 100 X100M X 50-60 CM DEEP	Survey/Inventory
IS00235	PRE-CONTACT BURIAL, SHELL MIDDEN, HUMAN REMAINS, SITE DIMENSIONS UNDETERMINED.	Survey/Inventory
IS00263	PRE-CONTACT SHELL MIDDEN, FMR, CHARCOAL LENSES, POSSIBLE POST MOLDS, MAMMAL BONES, 57 X 105 M.	Survey/Inventory
IS00271	CEMETERY	Inventory
IS00272	SNAKLIN MONUMENT	Inventory
IS00273	SUNNYSIDE CEMETERY	Inventory
IS00279	FIRCREST CEMETERY	Inventory

SITE_ID	Comments	Elig_Name
IS00280	MAPLE LEAF CEMETERY	Inventory
IS00300	PIT ROAD SITE, REDEPOSITED SITE (FROM 45IS45), PRE CONTACT HUMAN REMAINS, PRE CONTACT SHELL MIDDEN, 150 X 41 M	Survey/Inventory
IS00331	COUPEVILLE BEACH HUMAN SKELETAL REMAINS (HR13-00007)	Inventory
SK00033	LONG HOUSE DEPRESSIONS, SHELL MIDDEN CONTAINING BURIALS, DARK SOIL, BONE, FCR.	Survey/Inventory
SK00035	SHELL MIDDEN WITH BURIALS, WOODEN PEG FROM BURIAL BOX. CELTS, GROUND SLATE KNIVES, HAMMERS, SPEARHEADS. BASKET FRAGMENTS COLLECTED BY OWNER AND STUDENTS.	Survey/Inventory
SK00099	FCR, HEARTH, WORKED STONE, BARBED BONE POINT, BASKETRY TWINE, WOOD PLANKS.	Survey/Inventory

Historic Districts

SITE_ID	Comments	Elig_Name
D100011	SQWIKWIKWAB (FISHTOWN ARCH. DISTRICT)	National Register, Washington Heritage Register
D100006	Central Whidbey Island Historic District	National Register, Washington Heritage Register

Appendix G

Properties No Longer in the Area of Potential Effects

Summary of Sites and Buildings That Are No longer in the APE

Comparison of Initial Inventory and Final Inventory

Type	Initial Inventory	Final Inventory	Difference
Buildings and Structures (50 years and older)	2426	1989	437
Washington Heritage Barn Register Listed	32	23	9
Historic Districts	3	2	1
Washington Heritage Register Listed	5	4	1
National Register of Historic Places Listed	3	2	1
Cemetery Sites	33	27	6
Archaeological Sites	193	151	42
Archaeological Districts	1	1	0
ELNHR 2016 Inventory	280	288	-8

Change between Initial Inventory and Final Inventory

Type	Duplicate Listing	No longer within APE	Total
Buildings and Structures (50 years and older)	362	75	437
Washington Heritage Barn Register Listed	9	0	9
Historic Districts	1	0	1
Washington Heritage Register Listed	1	0	1
National Register of Historic Places Listed*	0	1	1
Cemetery Sites	6	0	6
Archaeological Sites	42	0	42
Archaeological Districts	0	0	0

ELNHR 2016 Inventory**	-8	0	-8
------------------------	----	---	----

* One NR eligible resource was mistakenly included in the initial inventory (Loers Benjamin House)

** Eight Buildings from ELNHR Inadvertently omitted from initial inventory

Note: duplicate records were removed for properties on NASWI and those listed twice in initial inventory because of overlap between ELNHR boundary and the 65 dB DNL

Buildings and Structures (50 years and older) No Longer in the APE

Historic ID	Site Name	Location	Tax Parcel	Register Status	Built Year
102267	Ault Field - Site 201211, Golf Course	Oak Harbor		Determined Eligible	Not
102335	Sea Plane Base - Water Pumphouse, Building 328, Water Pumphouse Well No. 5	Oak Harbor		Determined Eligible	Not
102338	Seaplane Base Pier and Breakwater, Facility 479 - Mooring Pier	Oak Harbor		Determined Eligible	1943
102359	Ault Field - Water Pump House, Building 337, Water Pump House	Oak Harbor		Determined Eligible	Not
115146	Pier Approach and Fuel Pier, Facility 479, Pier/Breakwater	Oak Harbor		Not Determined	
115166	Water Pump House, Building 337, Water Pump House	Oak Harbor		Not Determined	
627701		Oak Harbor	S6055-00-0000B-0	Not Determined	1923
627740		Oak Harbor	R13336-119-0350	Not Determined	1927
627956		Oak Harbor	R13335-227-3990	Not Determined	1948
627963		Oak Harbor	R13335-221-4330	Not Determined	1948
628170		Oak Harbor	S6055-00-01008-0	Not Determined	1952
628279		Oak Harbor	S6055-00-02002-0	Not Determined	1953

Historic ID	Site Name	Location	Tax Parcel	Register Status	Built Year
628285		Oak Harbor	R13335-259-1300	Not Determined	1953
628301		Oak Harbor	S6055-00-01007-0	Not Determined	1953
628315		Oak Harbor	S6055-00-03006-0	Not Determined	1954
628333		Oak Harbor	S6055-00-03004-0	Not Determined	1954
628347		Oak Harbor	S6055-00-03002-0	Not Determined	1954
628355		Oak Harbor	S6055-00-01006-0	Not Determined	1954
628357		Oak Harbor	R13436-445-2100	Not Determined	1954
628407		Oak Harbor	S6055-00-04008-0	Not Determined	1955
628408		Oak Harbor	S6055-00-01003-0	Not Determined	1955
628431		Oak Harbor	R13335-221-4160	Not Determined	1956
628444		Oak Harbor	S6600-00-05009-0	Not Determined	1956
628466		Oak Harbor	S6600-00-01002-0	Not Determined	1956
628467		Oak Harbor	S6055-00-02001-0	Not Determined	1956
628485		Oak Harbor	S6055-00-03003-0	Not Determined	1956
628487		Oak Harbor	S6600-00-05011-0	Not Determined	1956

Historic ID	Site Name	Location	Tax Parcel	Register Status	Built Year
628497		Oak Harbor	S6600-00-02009-0	Not Determined	1957
628504		Oak Harbor	S7285-21-00036-0	Not Determined	1957
628508		Oak Harbor	S7285-21-00041-0	Not Determined	1957
628539		Oak Harbor	S7285-21-00037-0	Not Determined	1957
628569		Oak Harbor	R13436-442-1940	Not Determined	1957
628573		Oak Harbor	S7285-21-00035-0	Not Determined	1957
628584		Oak Harbor	S6055-00-01004-0	Not Determined	1957
628590		Oak Harbor	S6055-00-02003-0	Not Determined	1957
628612		Oak Harbor	S6600-00-01001-0	Not Determined	1957
628620		Oak Harbor	S6600-00-02008-0	Not Determined	1957
628657		Oak Harbor	S6055-00-02004-0	Not Determined	1957
628662		Oak Harbor	R13335-275-0940	Not Determined	1957
628665		Oak Harbor	S6055-00-04009-0	Not Determined	1957
628698		Oak Harbor	S6055-00-03005-0	Not Determined	1958
628775		Oak Harbor	S6600-00-05010-0	Not Determined	1958

Historic ID	Site Name	Location	Tax Parcel	Register Status	Built Year
628913		Oak Harbor	S6600-00-01005-0	Not Determined	1959
628916		Oak Harbor	S6600-00-02005-0	Not Determined	1959
628947		Oak Harbor	S6600-00-05008-0	Not Determined	1959
628953		Oak Harbor	S6600-00-01006-0	Not Determined	1959
628955		Oak Harbor	S6600-00-02007-0	Not Determined	1959
628960		Oak Harbor	S6600-00-02006-0	Not Determined	1959
628973		Oak Harbor	R13335-221-4240	Not Determined	1959
628980		Oak Harbor	S6600-00-01004-0	Not Determined	1959
628994		Oak Harbor	S6600-00-05007-0	Not Determined	1959
629010		Oak Harbor	S6600-00-01007-0	Not Determined	1959
629020		Oak Harbor	S6600-00-01003-0	Not Determined	1959
629025		Oak Harbor	S6600-00-02004-0	Not Determined	1959
629039		Oak Harbor	S6600-00-01009-0	Not Determined	1960
629085		Oak Harbor	S6600-00-05006-0	Not Determined	1960
629111		Oak Harbor	S7285-21-00033-0	Not Determined	1960

Historic ID	Site Name	Location	Tax Parcel	Register Status	Built Year
629151		Oak Harbor	R13336-128-0340	Not Determined	1961
629192		Oak Harbor	S6055-00-01005-0	Not Determined	1962
629226		Oak Harbor	S6410-02-00002-0	Not Determined	1962
629332		Oak Harbor	S6055-00-01009-0	Not Determined	1964
629345		Oak Harbor	R13436-407-2330	Not Determined	1964
629358		Oak Harbor	S6410-03-00039-0	Not Determined	1964
629441		Oak Harbor	R13336-111-0340	Not Determined	1966
629477		Oak Harbor	S6600-00-05005-0	Not Determined	1967
629500		Oak Harbor	S6600-00-05004-0	Not Determined	1967
629619		Oak Harbor	R13335-269-2310	Not Determined	1968
629790		Oak Harbor	S8140-00-04005-0	Not Determined	1969
629895		Oak Harbor	S7285-21-00034-0	Not Determined	1968
629982		Oak Harbor	S7285-00-0A001-2	Not Determined	1958
629999		Oak Harbor	S7285-00-0A001-4	Not Determined	1956
630054		Oak Harbor	S7285-00-0A002-0	Not Determined	1956

Historic ID	Site Name	Location	Tax Parcel	Register Status	Built Year
630079		Oak Harbor	S7285-00-0A001-1	Not Determined	1968
630088		Oak Harbor	S7285-01-00003-0	Not Determined	1960
630116		Oak Harbor	S7285-01-00001-0	Not Determined	1959

NR Register Listed Historic Properties No Longer in the APE

Reference Number	Name	Type	Location
77001334	Loers, Benjamin, House	Building	2046 Swantown Road - Oak Harbor

Note: Loers, Benjamin, House was inadvertently listed on the initial inventory but it is not within the APE

Appendix H
Maps of Archaeological and Cemetery Sites in the Area of Potential
Effects

Not for Public Distribution

Appendix H
Maps of Archaeological and Cemetery Sites in the Area of Potential
Effects

Not for Public Distribution

Appendix I

Central Whidbey Island Contributing Structures, Roads, and Views

ELNHR 2016 Inventory

Name	Area	Status
Charlie Mitchell Barn	San de Fuca Uplands	Contributing
Zylstra/Sherod House	San de Fuca Uplands	Contributing
Earlywine/Nienhuis Property (John Neinhuis Place/L. Lewis Property)	San de Fuca Uplands	Contributing
Old Power Place	San de Fuca Uplands	Contributing
San de Fuca School	San de Fuca Uplands	Contributing
Capt. R.B. Holbrook House	San de Fuca Uplands	Contributing
Nienhuis/Leach Place	San de Fuca Uplands	Contributing
Liberal League Hall/San de Fuca Community Chapel	San de Fuca Uplands	Contributing
Hingston House	San de Fuca Uplands	Contributing
Tuft Cottage/Mrs. J. Arnold House	San de Fuca Uplands	Contributing
Armstrong/Trumball House	San de Fuca Uplands	Contributing
Fisher/Hingston/Trumball General StoreL	San de Fuca	Contributing
Hingston/Trumball Store	San de Fuca Uplands	Contributing
Armstrong/Scoby House	San de Fuca Uplands	Contributing
Hordyk Place/VanderVoet Farm	San de Fuca Uplands	Contributing
Weidenbach House	San de Fuca Uplands	Contributing
A.W. Monroe/VandeWerfhorst Place	San de Fuca Uplands	Contributing
Van Dam Place	San de Fuca Uplands	Contributing
H.H. Rhodes Place	San de Fuca Uplands	Contributing

Name	Area	Status
Arnold Farm	NULSan de Fuca UplandsL	Contributing
Henry Arnold/Grasser House	San de Fuca Uplands	Contributing
Robart Cottage	San de Fuca Uplands	Contributing
A.W. Monroe House	San de Fuca Uplands	Contributing
Samuel Libbey Ranch	San de Fuca Uplands	Contributing
Morris Place	San de Fuca Uplands	Contributing
Art Holmburg Place	West Woodlands	Contributing
Cook/Sherman House	West Woodlands	Contributing
Old Art Black Barn	Coupeville	Contributing
Powell House	Coupeville	Contributing
Edmonds House (Pinkston House)	Coupeville	Contributing
Wharf Warehouse and Dock	Coupeville	Contributing
Alexander Blockhouse	Coupeville	Contributing
Fire Hall	Coupeville	Contributing
Horace Holbrook House	Coupeville	Contributing
Heckenbury House	Coupeville	Contributing
Telephone Exchange Building	Coupeville	Contributing
Flora A.P. Engle House	Coupeville	Contributing
Leach House	Coupeville	Contributing
Alvah D. Blowers House	Coupeville	Contributing
James Gillespie House	Coupeville	Contributing
John and Jane Kineth Sr. House	Coupeville	Contributing
Methodist Church	Coupeville	Contributing

Name	Area	Status
Carl Gillespie House	Coupeville	Contributing
Highwarden House	Coupeville	Contributing
Jacob Jenne House	Coupeville	Contributing
Dr. White???'s Office	Coupeville	Contributing
Williams House (Higgins House)	Coupeville	Contributing
Joseph Libbey House	Coupeville	Contributing
Reverend Lindsey House	Coupeville	Contributing
Congregational Church	Coupeville	Contributing
Chansey House (Nichols/Bennett House)	Coupeville	Contributing
Sergeant Clark House	Coupeville	Contributing
Frank Newberry House	Coupeville	Contributing
Chapman House	Coupeville	Contributing
Pat???'s Place	Coupeville	Contributing
Hancock/Partridge House (Dixon/Partridge House)	Coupeville	Contributing
Will Jenne House	Coupeville	Contributing
James Wanamaker House	Coupeville	Contributing
A.B. Coates House	Coupeville	Contributing
Morrow/Franzen House (Spangler/Franzen Rental House)	Coupeville	Contributing
Bearss/Barrett House	Coupeville	Contributing
Masonic Lodge No. 15	Coupeville	Contributing
Morris House	Coupeville	Contributing
Ed Clark House	Coupeville	Contributing
Howell/Harpole House (Howell/Wright House)	Coupeville	Contributing

Name	Area	Status
Ives House	Coupeville	Contributing
Stark House	Coupeville	Contributing
Albert Kineth House	Coupeville	Contributing
Polly Harpole???'s Maternity Home	Coupeville	Contributing
County Jail/Boy Scout Building	Coupeville	Contributing
Charles Angel House	Coupeville	Contributing
Newcomb Property	Coupeville	Contributing
Newcomb House	Coupeville	Contributing
Benson/Bunting House	Coupeville	Contributing
Mock House	Coupeville	Contributing
Johnson House	Coupeville	Contributing
Boothe House	Coupeville	Contributing
King/McCabe House	Coupeville	Contributing
Black/Lindsey House	Coupeville	Contributing
Dr. White House	Coupeville	Contributing
E.O. Lovejoy/Yorioka House	Coupeville	Contributing
Bergman House	Coupeville	Contributing
Duvall House	Coupeville	Contributing
Fairhaven	Coupeville	Contributing
Gillespie Meat Market	Coupeville	Contributing
Terry's Dryer/Gillespie Livery Building	Coupeville	Contributing
Island County Abstract Office	Coupeville	Contributing
Island County Times Building	Coupeville	Contributing

Name	Area	Status
Judge Still Law Office	Coupeville	Contributing
Benson Confectionery	Coupeville	Contributing
Elkhorn Saloon	Coupeville	Contributing
Tom Howell's Barbershop	Coupeville	Contributing
Coupeville Cash Store	Coupeville	Contributing
Post Office	Coupeville	Contributing
John Robertson's Store	Coupeville	Contributing
Whidbey Mercantile Company	Coupeville	Contributing
John Robertson House	Coupeville	Contributing
Sedge Building	Coupeville	Contributing
Puget Race Drug Store	Coupeville	Contributing
Glenwood Hotel	Coupeville	Contributing
Col. Granville Haller House	Coupeville	Contributing
Island County Bank	Coupeville	Contributing
Samsel/Zylstra Law Office	Coupeville	Contributing
Capt. Thos. Kinney House	Coupeville	Contributing
Captain Clapp House	Coupeville	Contributing
Fullington House	Coupeville	Contributing
Pontiac Dealership/Auto Barn	Coupeville	Contributing
Cushen House	Coupeville	Contributing
Methodist Parsonage	Coupeville	Contributing
Thomas Griffith House	Coupeville	Contributing
First Methodist Parsonage	Coupeville	Contributing
Jacob Straub House	Coupeville	Contributing

Name	Area	Status
Jefferds House	Coupeville	Contributing
Hesselgrave House	Coupeville	Contributing
Coupeville Courier Printing Office	Coupeville	Contributing
Clapp/Ghormley House	Coupeville	Contributing
Conrad House	Coupeville	Contributing
Munson House (Ervin Rental)	Coupeville	Contributing
Gould/Canty House	Coupeville	Contributing
Capt. Thomas Coupe House	Coupeville	Contributing
Chris Solid House	Coupeville	Contributing
Chromy House	Coupeville	Contributing
Fred Nuttall???'s House	Coupeville	Contributing
Howard House	Coupeville	Contributing
Ernest Watson House	Coupeville	Contributing
Coupeville City Hall	Coupeville	Contributing
James Zylstra House	Coupeville	Contributing
Todd/Lovejoy House	Coupeville	Contributing
Courthouse Vault	Coupeville	Contributing
Williams House	Coupeville	Contributing
Ward/Clark House	Coupeville	Contributing
Abbott/Knowles House	Coupeville	Contributing
Frain/Burton Engle House	Coupeville	Contributing
Reuble Squash Barn	Coupeville	Contributing
Thomas/Sullivan House	East Woodlands	Contributing
Strong Granary	East Woodlands	Contributing

Name	Area	Status
Strong Farm	East Woodlands	Contributing
Mulder House	East Woodlands	Contributing
Myers Property	East Woodlands	Contributing
John Kineth, Jr. Farmhouse	Smith Prairie	Contributing
Harp Place	Smith Prairie	Contributing
Muzzall Farm	Penn Cove	Contributing
McWilliams Bungalow	Penn Cove	Contributing
Still Log Cabin	Penn Cove	Contributing
Melvin Grasser House	Penn Cove	Contributing
Old County Courthouse/Grennan & Cranney Store	Penn Cove	Contributing
George Libbey House	Penn Cove	Contributing
Fisher Place	Penn Cove	Contributing
Whid-Isle Inn/Captain Whidbey Inn	Penn Cove	Contributing
Smith Cottage	Penn Cove	Contributing
Smith Net House	Penn Cove	Contributing
Pratt Boathouses	Penn Cove	Contributing
A. Kineth House	Penn Cove	Contributing
Walton Aubert House - Fiddler???'s Green	Penn Cove	Contributing
O'Leary Cottage/Snakelum House	Penn Cove	Contributing
Davis Blockhouse & Sunnyside Cemetery	Ebey's Prairie	Contributing
O'Dell/F. Reuble House	Ebey's Prairie	Contributing
NPS Sheep Barn	Ebey's Prairie	Contributing
TNC Sheep Barn	Ebey's Prairie	Contributing

Name	Area	Status
Frank Pratt House	Ebey's Prairie	Contributing
Jacob & Sarah Ebey House & Blockhouse	Ebey's Prairie	Contributing
Ferry House	Ebey's Prairie	Contributing
Ralph Engle Worker Housing	Ebey's Prairie	Contributing
John Gould House	Ebey's Prairie	Contributing
Francis A. LeSourd House	Ebey's Prairie	Contributing
John LeSourd House	Ebey's Prairie	Contributing
Cawsey House	Ebey's Prairie	Contributing
Harmon/Pearson/Engle House	Ebey's Prairie	Contributing
Glazier/Herrett House	Ebey's Prairie	Contributing
Gallagher/Shreck Place (Gallagher Place/A. Sherman House)	Ebey's Prairie	Contributing
Samuel E. Hancock House	Ebey's Prairie	Contributing
Ed Jenne House	Ebey's Prairie	Contributing
Elisha Rockwell House	Ebey's Prairie	Contributing
William Engle House	Ebey's Prairie	Contributing
Old Boyer Place	Ebey's Prairie	Contributing
Charles T. Terry House	Ebey's Prairie	Contributing
Tuft House	Ebey's Prairie	Contributing
John Crockett House	Ebey's Prairie	Contributing
Hancock Granary	Ebey's Prairie	Contributing
Sherman Squash Barn	Ebey's Prairie	Contributing
Comstock Barn (Old Al Comstock Place)	Ebey's Prairie	Contributing
Fort Casey Officers Quarters	Fort Casey Uplands	Contributing

Name	Area	Status
Wiley Barn	Fort Casey Uplands	Contributing
Keith House	Fort Casey Uplands	Contributing
Reuble Farm	Fort Casey Uplands	Contributing
Old Anderson Place	Fort Casey Uplands	Contributing
Fort Casey Military Reservation/Camp Casey	Fort Casey Uplands	Contributing
Fort Casey Military Reservation/Fort Casey State Park	Fort Casey Uplands	Contributing
Old Hunting Lodge	Fort Casey Uplands	Contributing
Sherman Hog House	Fort Casey Uplands	Contributing
R.C. Hill Home/J.T. Fielding Place	Fort Casey Uplands	Contributing
Gillespie House/Reuble Farm	Fort Casey Uplands	Contributing
Crockett/Boyer Barn (Hugh Crockett House)	Crockett Prairie	Contributing
Col. Walter Crockett Farmhouse & Blockhouse	Crockett Prairie	Contributing
Fort Casey Storage Buildings	Crockett Prairie	Contributing
Gilbert Place/Eggerman Farm	Crockett Prairie	Contributing
Calhoun House (Sam Crockett House)	Crockett Prairie	Contributing
Clarence Wanamaker Farm	Crockett Prairie	Contributing
Fort Casey Pump House	Crockett Prairie	Contributing
Hapton/Gould House (John Gould/Miller House)	Crockett Prairie	Contributing
Old Fort Casey Wharf	Crockett Prairie	Contributing
Schulke House (Schulke/Steadman House)	Crockett Prairie	Contributing
Fort Ebey State Park	Coastal Strip	Contributing

Contributing View Listed on the 1998 Central Whidbey Island Historic District National Register Form

Ebey's Prairie from the cemetery, and from Engle Road

Entry to Coupeville (from Ebey's Prairie into Prairie Center, and along Main Street) and Front Street in Coupeville View from Front Street and the Wharf, across Penn Cove

View to Crockett Prairie and Camp Casey from Wanamaker Road

View to Crockett Prairie and uplands from the top of Patmore Road

View to Crockett Prairie and uplands from Keystone Spit

View to Grasser's Lagoon from Highway 20

Views to and across Penn Cove along Madrona Way

Views from the bluff trail to Ebey's Prairie and Coastal Strip

View of Smith Prairie from Highway 20, entering the Reserve

Views from Monroe's Landing across the cove to Coupeville

Views from fort Casey across Keystone Spit and Crockett Lake

View from Hwy 20 across Ebey's Prairie

Engle Road to Uplands and west coast

Views to Grasser's Hill from Madrona Way

Contributing Roads Listed on the 1998 Central Whidbey Island Historic District National Register Form

Fort Casey Road

Engle Road

Wanamaker Road

Keystone Road

Patmore Road

Parker Road

Front Street

Main Street

Ebey Road

Terry Road (Includes Broadway north of Hwy. 20) Sherman Road

Cemetery Road

Cook Road

Madrona Way

Libby Road

Zylstra Road

Pen Cove Road

Monroe's Landing Road

Scenic Heights Road

Van Dam Road

West Beach Road

Appendix J

Eligible and Listed Properties within Substantive Change in Noise Exposure Area

Eligible and Listed Historic Districts in Substantive Change in Noise Exposure Area

Site ID	Name	Listing
D100006	Central Whidbey Island Historic District	National Register, Washington Heritage Register

Archaeological Sites in Substantive Change in Noise Exposure Area

Site ID	Comments	Elig_Name
IS00316	KEYSTONE ROAD HISTORIC SITE, STRUCTURAL FOUNDATION REMNANTS, 1,312 X 656 FT, CA. 1943	Potentially Eligible
IS00351	HISTORIC DEBRIS SCATTER, GLASS BOTTLES, JARS, CANS, ~164 X ~82FT, CA. EARLY 1900S, PRE-1950S	Potentially Eligible

Eligible Buildings and Structures in Substantive Change in Noise Exposure Area

HISTORIC_I	SiteNameHi	Loc_FullAd	TaxParcel_	RegisterTy	BuiltYear
700759	Crockett, Hugh, Barn, Boyer Farm	Coupeville		Determined Eligible	1860
672587	Whidbey Island Game Farm, Pacific Rim Institute for Environmental Stewardship	Coupeville		Determined Eligible	1946

Heritage Barn Register Listed Properties in Substantive Change in Noise Exposure Area

SITE_ID	Comments	Elig_Name
IS00229	Kineth, John Jr., Barn	National Register, Washington Heritage Barn Register, Washington Heritage Register
IS00314	Keith, Sam, Farm	Washington Heritage Barn Register
IS00340	Gus Reuble Farm	Washington Heritage Barn Register
IS00343	James, William and Florence, Farm	Washington Heritage Barn Register
IS00355	Crockett, Hugh, Barn	Washington Heritage Barn Register
IS00356	Hookstra, Lambert, Farm	Washington Heritage Barn Register

Contributing ELNHR Buildings and Structures Within the Substantive Change in Noise Exposure Area

Name	Parcel	Area
Hapton/Gould House (John Gould/Miller House)	R13114-120-5030	Crockett Prairie
Fort Casey Pump House	R13114-250-4610	Crockett Prairie
Clarence Wanamaker Farm	R13114-333-2200	Crockett Prairie
Calhoun House (Sam Crockett House)	R13115-345-4930	Crockett Prairie
Gilbert Place/Eggerman Farm	R13111-060-0100, R13111-066-0660	Crockett Prairie
Col. Walter Crockett Farmhouse & Blockhouse	R13115-220-2200	Crockett Prairie
Crockett/Boyer Barn (Hugh Crockett House)	R13110-134-3980	Crockett Prairie
Gillespie House/Reuble Farm	R13110-338-3570	Fort Casey Uplands
Old Anderson Place	R13110-085-1980	Fort Casey Uplands

Name	Parcel	Area
Reuble Farm	R13110-316-2920	Fort Casey Uplands
Keith House	R13103-078-2490	Fort Casey Uplands
Wiley Barn	R13103-139-2760	Fort Casey Uplands
O'Leary Cottage/Snakelum House	S8010-00-00070-0	Penn Cove
Walton Aubert House – Fiddler's Green	S8010-00-00006-0	Penn Cove
Harp Place	R13111-248-4630	Smith Prairie
John Kineth, Jr. Farmhouse	R13101-287-1000	Smith Prairie
Myers Property	R13111-198-0120	East Woodlands
Mulder House	R13103-419-2630	East Woodlands
Thomas/Sullivan House	R13103-332-1790	East Woodlands
Reuble Squash Barn	R13104-419-4450	Coupeville
Bearss/Barrett House	R13104-280-4190	Coupeville
Morrow/Franzen House (Spangler/Franzen Rental House)	R13104-310-3980	Coupeville
A.B. Coates House	R13104-336-3990	Coupeville
James Wanamaker House	R13104-331-4200	Coupeville
Melvin Grasser House	R13230-215-2340	Penn Cove

Name	Parcel	Area
Old County Courthouse/Grennan & Cranney Store	R13230-060-2580	Penn Cove
George Libbey House	R13230-154-2610	Penn Cove
Fisher Place	R13230-099-2780	Penn Cove
Whid-Isle Inn/Captain Whidbey Inn	S7530-00-00005-0	Penn Cove
Smith Cottage	R13232-197-0060	Penn Cove
A. Kineth House	R13232-136-1940	Penn Cove
Still Log Cabin	S8060-00-0E012-0	Penn Cove
San de Fuca School	S8060-00-14001-0	San de Fuca Uplands
Capt. R.B. Holbrook House	S8060-00-19004-1	San de Fuca Uplands
Liberal League Hall/San de Fuca Community Chapel	S8060-00-09032-0	San de Fuca Uplands
Hingston House	S8060-00-09001-0	San de Fuca Uplands
Tuft Cottage/Mrs. J. Arnold House	S8060-00-10013-0	San de Fuca Uplands
Armstrong/Trumball House	S8060-00-10006-0	San de Fuca Uplands
Fisher/Hingston/Trumball General StoreL	S8060-00-10001-0	San de Fuca Uplands
Hingston/Trumball Store	S8060-00-10001-0	San de Fuca Uplands
Armstrong/Scoby House	S8060-00-17002-0	San de Fuca Uplands

Name	Parcel	Area
Henry Arnold/Grasser House	R13220-030-2950	San de Fuca Uplands
Robart Cottage	R13221-046-1290	San de Fuca Uplands
NPS Sheep Barn	R13105-270-3320	Ebey's Prairie

Appendix K
Maps of Archaeological and Cemetery Sites within Substantive Change
in Noise Exposure Area
Not for Public Distribution

Appendix K
Maps of Archaeological and Cemetery Sites within Substantive Change
in Noise Exposure Area
Not for Public Distribution

Government-to-Government Consultation Documentation

This page intentionally left blank.

Government-to-Government Consultation Documentation

Table of Contents

	Page
<u>Government-to-Government Consultation – American Indian Tribes and Nations</u>	
October 10, 2014 – Letter to Federally Recognized American Indian Tribes and Nations	681
November 30, 2016 – Letter to Federally Recognized American Indian Tribes and Nations	685
- Jamestown S’Klallam Tribe (letter provided)	
- Lummi Tribe of the Lummi Reservation	
- Samish Indian Nation	
- Stillaguamish Tribe of Indians of Washington	
- Suquamish Indian Tribe of the Port Madison Reservation	
- Swinomish Indian Tribal Community	
- Tulalip Tribes of Washington	
- Upper Skagit Indian Tribe	
November 30, 2016 – Informational Letter to American Indian Tribes and Nations	687
- Confederated Tribes and Bands of the Yakama Nation (letter provided)	
- Confederated Tribes of the Chehalis Reservation	
- Confederated Tribes of the Colville Reservation	
- Cowlitz Indian Tribe	
- Hoh Indian Tribe	
- Kalispel Tribe	
- Lower Elwha Klallam Tribe	
- Makah Tribe	
- Muckleshoot Indian Tribe	
- Nisqually Indian Tribe	
- Nooksack Indian Tribe	
- Port Gamble S’Klallam Tribe	
- Puyallup Tribe	
- Quileute Nation	
- Quinault Nation	
- Sauk-Suiattle Indian Tribe	
- Shoalwater Bay Tribe	

- Skokomish Indian Tribe
- Snoqualmie Tribe
- Spokane Tribe of Indians
- Squaxin Island Tribe

December 13, 2016 – Swinomish Indian Tribal Community – Request for Government-to-Government Consultation 689

December 20, 2016 – Email to Jo Jo Jefferson and James Harrison, Swinomish Indian Tribal Community 691

December 21, 2016 – Letter to Chairman Cladoosby, Swinomish Indian Tribal Community 693

June 7, 2017 – Email to Debra Lekanoff, Swinomish Indian Tribal Community 695

June 7, 2017 – Response to Kendall Campbell, Availability..... 697

September 27, 2017 – Email to Kendall Campbell, Withdrawal of Request for Consultation..... 699



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/1504
10 October 2014

The Honorable W. Ron Allen
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382

Dear Chairman Allen,

SUBJECT: NOTIFICATION OF PROPOSED INCREASE OF THE EA-18G
GROWLER AIRCRAFT AT NAVAL AIR STATION (NAS) WHIDBEY
ISLAND IN OAK HARBOR, WASHINGTON

I would like to inform you that the Department of the Navy (Navy) is preparing an Environmental Impact Statement (EIS) for the proposed increase of EA-18G Growler aircraft and aircraft operations, and development of support facilities, at Naval Air Station Whidbey Island, Washington. The Notice of Intent to study the environmental effects of this proposed action will be published in the Federal Register on October 10, 2014 and additional information is available on the project website at www.whidbeyeis.com.

Although in the preliminary stages of development, I would like to invite you to review the enclosed information on the proposed action to be studied in the EIS and evaluate whether you believe there may be a potential for this action to significantly affect tribal treaty harvest rights, resources or lands. This invitation is made pursuant to the Navy's policy for government-to-government consultation with American Indian and Alaska Native tribes.

In 2013, the Department of Defense (DoD) identified a need to increase electronic attack capability and Congress authorized the procurement of additional aircraft to meet new mission requirements. The primary aircraft that supports electronic attack capability in the DoD is the Navy's EA-18G Growler aircraft. NAS Whidbey Island is the home to the Navy's tactical electronic attack community and the infrastructure that supports them. The Navy initiated an EIS in September 2013 to analyze increasing the number of EA-18G aircraft (addition of 13 aircraft) at NAS Whidbey Island, along with a corresponding increase in training operations.

5090
Ser N44/1504
10 October 2014

Since then, the Navy revised the scope of the ongoing EIS to analyze the potential increase in EA-18G aircraft from 13 to up to 36 aircraft. The number of EA-18G aircraft ultimately procured will be determined by Congress. Nonetheless, the Navy has elected to include the potential increase in the ongoing EIS in order to be transparent and to ensure a holistic analysis of environmental impacts from the proposed action. In support of the EIS process, the Navy will hold public scoping meetings on October 28, 29, and 30. You will be receiving a separate notification letter inviting you and your staff to attend these meetings if you would like to ask questions in person.

If you would like to initiate government-to-government consultation, please provide the name(s) and title(s) of the tribal officials to contact to coordinate our first meeting. I look forward to discussing your questions and concerns about this proposed project.

If you have questions or concerns, or require further information regarding the proposed undertaking please contact me directly at michael.nortier@navy.mil, or (360)257-2037, or, have your staff contact Ms. Kendall Campbell the installation Cultural Resources Program Manager at kendall.campbell1@navy.mil or (360) 257-6780.

Sincerely,



M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosure: 1. Description of Proposed Action and Proposed Alternatives

Copy to:
Mr. Gideon U. Cauffman
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

ENCLOSURE 1. DESCRIPTION OF PROPOSED ACTION AND PROPOSED ALTERNATIVES

Naval Air Station (NAS) Whidbey Island is located in Island County, Washington, on Whidbey Island in the northern Puget Sound region. The main air station (Ault Field) is located in the north-central part of the island, adjacent to the Town of Oak Harbor. Outlying Landing Field (OLF) Coupeville is located approximately 10 miles south of Ault Field in the Town of Coupeville. OLF Coupeville is primarily dedicated to Field Carrier Landing Practice (FCLP) operations.

NAS Whidbey Island is the only naval aviation installation in the Pacific Northwest and has supported the electronic attack (VAQ) community for more than 35 years. It is the only home base location for the VAQ community in the United States and provides facilities and support services for: nine Carrier Air Wing (CVW) squadrons, three Expeditionary (EXP) squadrons, one Reserve squadron and one Fleet Replacement Squadron (FRS).

The Navy proposes to support and conduct VAQ airfield operations and provide facilities and functions to home base additional VAQ aircraft at NAS Whidbey Island. No changes to existing ranges or airspace are proposed. The proposed action includes the following:

- Continue and expand the existing VAQ operations at NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;
- Increase VAQ capabilities and augment the VAQ FRS (an increase of between 13 and 36 aircraft) to support an expanded DoD mission for identifying, tracking and targeting in a complex electronic warfare environment;
- Construct and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station ~~up to 860~~ additional personnel ~~at~~ and ~~relocate~~ ~~approximately 2,150~~ ~~their~~ family members ~~at~~ ~~the~~ NAS Whidbey Island and the surrounding community.

The purpose of the proposed action is to improve the Navy's electronic attack capability and to provide the most effective force structure and tactical airborne electronic attack capabilities to operational commanders.

The action alternatives represent force structure changes that support an expanded DoD mission for identifying, tracking and targeting in a complex electronic warfare environment. This EIS will address the No Action Alternative and four alternatives:

No Action Alternative: Implementing the No Action Alternative, or taking "no action," means that legacy EA-6B Prowlers would

continue to gradually transition to next generation EA-18G Growler aircraft (82 aircraft) and annual EA-18G Growler airfield operations would be maintained at levels consistent with those identified in the 2005 and 2012 transition EAs. Under the No Action Alternative the Navy would not improve the Navy's Electronic Attack capability by adding VAQ squadrons or aircraft. While the No Action Alternative does not meet the purpose and need of the proposed action, it serves as a baseline against which impacts of the proposed action can be evaluated.

The Navy will analyze the potential environmental impacts of airfield operations, facilities and functions at NAS Whidbey Island associated with the following four force structure alternatives:

Action Alternative 1: Expand EXP capabilities by establishing two new EXP squadrons and augmenting FRS by three additional aircraft (a net increase of 13 aircraft);

Action Alternative 2: Expand CVW capabilities by adding two additional aircraft to each existing CVW squadron and augmenting FRS by six additional aircraft (a net increase of 24 aircraft);

Action Alternative 3: Expand CVW capabilities by adding three additional aircraft to each existing CVW squadron and augmenting FRS by eight additional aircraft (a net increase of 35 aircraft); and

Action Alternative 4: Expand EXP and CVW capabilities by establishing two new EXP squadrons, adding two additional aircraft to each existing CVW squadron, and augmenting FRS by eight additional aircraft (a net increase of 36 aircraft).

The environmental analysis in the EIS will focus on several aspects of the proposed action: aircraft operations at Ault Field and OLF Coupeville; facility construction; and personnel changes. Resource areas to be addressed in the EIS will include, but not be limited to: air quality, noise, land use, socioeconomic, natural resources, biological resources, cultural resources, and safety and environmental hazards.

The analysis will evaluate direct and indirect impacts, and will account for cumulative impacts from other relevant activities near the installation. Relevant and reasonable measures that could avoid or mitigate environmental effects will also be analyzed. Additionally, the DoN will undertake any consultation applicable by law and regulation. No decision will be made to implement any alternative until the EIS process is completed and a Record of Decision is signed by the Assistant Secretary of the Navy (Energy, Installations and Environment) or designee.



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090

Ser N44/2515

November 30, 2016

The Honorable W. Ron Allen
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342

Dear Chairman Allen:

SUBJECT: CONTINUATION OF GOVERNMENT TO GOVERNMENT
CONSULTATION AND NOTIFICATION OF DRAFT ENVIRONMENTAL
IMPACT STATEMENT FOR THE PROPOSED INCREASE OF THE EA-18G
GROWLER AIRCRAFT AT NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON

In recognition of our government-to-government responsibilities, I would like to update you on the Navy's ongoing National Environmental Policy Act (NEPA) review for the proposed increase of EA-18G Growler aircraft and aircraft operations at Naval Air Station (NAS) Whidbey Island, Island County, Washington. The Department of the Navy released a Draft Environmental Impact Statement (DEIS) on November 10, 2016 which is available on the project website at www.whidbeyeis.com.

I would like to invite you to review the DEIS to evaluate whether you believe there may be a potential for this action to significantly affect tribal treaty harvest rights, resources, and/or lands. This invitation is made pursuant to the Navy's policy for government-to-government consultation with American Indian and Alaska Native tribes.

The DEIS was prepared by the Navy over the past two years since our initial government-to-government communication with you in November of 2014. The DEIS includes the Navy's preliminary analysis addressing the continued support of the electronic attack mission at NAS Whidbey Island and describes the Navy's proposed actions including:


- Continue and expand the existing electronic attack operations at the NAS Whidbey Island complex, which includes Ault Field and OLF Coupeville;
- Increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;
- Construct and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

5090
Ser N44/2515
November 30, 2016

If you would like to initiate government-to-government consultation, please provide the name(s) and title(s) of the tribal officials to contact to coordinate our first meeting. If you have any questions or concerns, or require further information regarding the proposed action, please contact me directly at (360) 257-2037 or geoffrey.moore@navy.mil. You may also have your staff contact Kendall Campbell, Cultural Resources Program Manager, at (360) 257-6780 or kendall.campbell1@navy.mil.

Thank you for your continued partnership, and I look forward to discussing your questions and concerns about this proposed project.

Sincerely,


G. C. MOORE
Captain, U. S. Navy
Commanding Officer

Copy to: Mr. David Brownell
Cultural Resource Specialist
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382-9342



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090

Ser N44/2512

30 Nov 16

The Honorable JoDe L. Goudy
Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948-0151

Dear Chairman Goudy:

I am writing to make you aware that the United States Navy has released a Draft Environmental Impact Statement (EIS) for the proposed increase of EA-18G Growler aircraft and aircraft operations at Naval Air Station (NAS) Whidbey Island, Island County, Washington. Our goal is to ensure that you are receiving the most accurate and up-to-date information that is available and to promote open discussion and relationship building.

The mission of the U.S. Navy adapts to address evolving global events, increasing geopolitical tensions, and emerging threats. As our mission evolves so do the requirements we place on our natural surroundings. This requires the preparation of EIS and Environmental Assessments in compliance with the National Environmental Policy Act (NEPA), as well as Section 106 consultation under the National Historic Preservation Act, and government-to-government consultations with Indian tribes. These processes are intended to ensure that decision makers consider the potential environmental and cultural effects of proposed actions, provide the opportunity for public involvement, and help guarantee that the U.S. Navy is a responsible steward of our shared environment.

In 2013, the Department of Defense (DoD) identified a need to increase electronic attack capability and Congress authorized the procurement of additional aircraft to meet the new mission requirements. The primary aircraft that supports electronic attack capability in the DoD is the Navy's EA-18G Growler aircraft. NAS Whidbey Island is the home to the Navy's tactical electronic attack community and the infrastructure that supports them. The Navy initiated an EIS to analyze increasing the number of EA-18G Growler aircraft at NAS Whidbey Island, along with a corresponding increase in training operations at the installation.

The Navy has just released the Draft EIS for comment and review. The Draft EIS can be found at www.whidbeyeis.com. The Draft EIS provides the Navy's preliminary analysis addressing the continued support of the electronic attack mission at NAS Whidbey Island and describes the Navy's proposed actions including:

- Continue and expand the existing electronic attack operations at the NAS Whidbey Island complex, which includes Ault Field and Outlying Field Coupeville;
- Increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment;

5090
Ser N44/2512
30 Nov 16


- Construct and renovate facilities at Ault Field to accommodate additional aircraft; and
- Station additional personnel and their family members at NAS Whidbey Island and in the surrounding community.

The Draft EIS for this proposed action specifically looks at impacts resulting from the increase and aircraft and operations at the NAS Whidbey Island Installation. An environmental analysis of training and testing at existing range complexes throughout the Northwest Training and Testing Study Area was recently completed, and can be found at www.nwtteis.com.

If you would like more information on the Draft EIS for the home basing of the EA-18G Growler please do not hesitate to contact Lisa Padgett, Home Basing NEPA Program Manager, at (757) 836-8446 or lisa.padgett@navy.mil. For more information on training and testing throughout the Northwest, please contact John Mosher, U.S. Pacific Fleet Northwest Environmental Manager, at (360) 257-3234 or john.g.mosher@navy.mil.

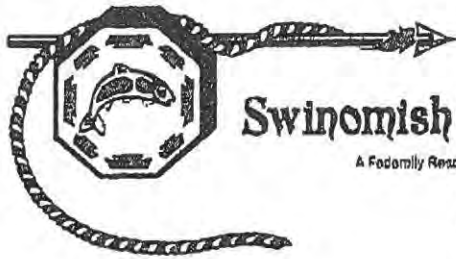
The United States Navy remains committed to doing our best to keep our nation safe while also protecting our environment and building partnerships with our sovereign neighbors and partners.

Sincerely,



G. C. MOORE
Captain, U.S. Navy
Commanding Officer

Enclosure: United States Department of the Navy Draft Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex



Phone (360) 466-7280
Fax (360) 466-1815

Swinomish Indian Tribal Community

A Federally Recognized Indian Tribe Organized Pursuant to 25 U.S.C. § 470

11430 Moorage Way
LaConner, WA 98257

December 13, 2016

Commanding Officer G.C. Moore
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278

RE: Your Letter of November 30, 2016: Request for Government-to-Government Consultation Regarding Draft Environmental Impact Statement and Proposed Increase of the EA-18G Growler Aircraft at NAS Whidbey Island

Dear Captain Moore,

The Swinomish Indian Tribal Community is formally requesting a Government-to-Government consultation with regard to the Draft Environmental Assessment regarding a proposed increase of EA-18G Growler aircraft at NAS Whidbey Island as discussed in your letter dated November 30, 2016.

We look forward to conferring with you about this important issue. Please contact the following individuals in order to set up a meeting: Mrs. Josephine Jefferson, Tribal Historic Preservation Officer at (360) 466-7352 [jjefferson@swinomish.nsn.us] or Mr. James Harrison, Deputy Tribal Historic Preservation Officer at (360) 466-2722 [jharrison@swinomish.nsn.us].

Sincerely,

M. Brian Cladoosby
Chairman, Swinomish Indian Senate

Chairman Swinomish Indian Tribal Community
11404 Moorage Way
LaConner, WA 98257

Kirchler-Owen, Leslie

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 <kendall.campbell1@navy.mil>
Sent: Tuesday, December 20, 2016 6:00 PM
To: Stallings, Sarah CIV NAVFAC Atlantic; Padgett, Lisa M CIV USFF, N46
Cc: Williamson, Todd H CIV NAVFAC LANT, EV; Romero, Joseph CAPT USFF, N01L; Bianchi, Michael C NAVFAC NW, PRW4; Meders, Laura E CIV NAS Whidbey Is, N00S
Subject: FW: Chairman Cladoosby's request for GtG consultation
Attachments: Request for GtG for Growler EIS (Swinomish) Dec 13 2016.pdf

Lisa,

Per our conversation earlier today I wanted to forward for the record my second attempt to contact Swinomish staff to coordinate the tribe's requested GtG consultation. I also called and left a phone message for Jo Jo today.

I have attached a faxed copy of the letter we received today from Chairman Cladoosby requesting the GtG consultation. As soon as mail control provides me with a scan or copy of the original I will provide a another copy of the letter.

As I mentioned, Jo Jo and James are Swinomish staff member that I routinely communicate with regarding projects at NASWI. I will keep you all posted as I hear back from the tribe.

Happy Holidays!!!!

Best,
Kendall

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4
Sent: Tuesday, December 20, 2016 3:44 PM
To: 'jjefferson@swinomish.nsn.us'; 'James Harrison'
Subject: Chairman Cladoosby's request for GtG consultation

Hi Jo Jo,

Following up on the message I left for you earlier, the Navy received today Chairman Cladoosby's request for Government to Government consultation regarding the Draft Environmental Impact Assessment for the Proposed Increase of the EA-18G Growler Aircraft at NASWI. He listed you and James as the staff points of contact to set up the meeting.

I am exceedingly pleased Chairman Cladoosby desires to share the tribe's interest in this DEIS and I am contacting you to begin coordinating this consultation.

At this time I know of a few dates in January that are available and several days in March. Currently Captain Moore and the Navy team are available all day Friday January 20th and Friday January 27th in the afternoon. Our schedule is fairly flexible in the month of March with availability the first week and a half of March (except for March 10) and the final two weeks of March. Will any of these dates work with Chairman Cladoosby and the tribes schedule?

This week I am in the office all week except for Friday and will be back (after my birthday!) on Dec 29. I am looking forward to working with you and James to coordinate this meeting.

All my best to you and your family this holiday season.

Warmest Regards,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexinton Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780



DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/2736
December 21, 2016

The Honorable M. Brian Cladoosby
Swinomish Indian Tribal Community
11404 Moorage Way
La Conner, WA 98257-9450

Dear Chairman Cladoosby:

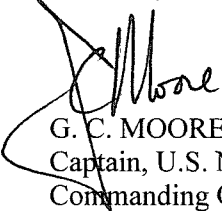
SUBJECT: REQUEST FOR GOVERNMENT-TO-GOVERNMENT CONSULTATION
REGARDING THE DEPARTMENT OF THE NAVY DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED
INCREASE OF THE EA-18G GROWLER AIRCRAFT AT NAVAL AIR
STATION WHIDBEY ISLAND

Thank you for your letter of December 13, 2016, requesting government-to-government consultation with the Navy on the Draft Environmental Impact Statement for the Proposed Increase of the EA-18G Growler Aircraft at Naval Air Station (NAS) Whidbey Island. I value the Swinomish Indian Tribal Community's (Swinomish) concern for the potential effects the proposed action may have to tribal rights and resources.

I am fully committed to taking appropriate action to fulfill our federal trust responsibility and government-to-government consultation with the Swinomish. My staff will contact your staff to coordinate a time and place for our consultation.

In the interim, please let me know if you have any additional concerns. You may contact me directly at 360-257-2037 or geoffrey.moore@navy.mil.

Sincerely,



G. C. MOORE
Captain, U.S. Navy
Commanding Officer

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [<mailto:kendall.campbell1@navy.mil>]
Sent: Wednesday, June 7, 2017 11:15 AM
To: Debra Lekanoff <dlekanoff@swinomish.nsn.us>; Josephine Jefferson <jjefferson@swinomish.nsn.us>
Cc: James Harrison <jharrison@swinomish.nsn.us>; Meders, Laura E CIV NAS Whidbey Is, N00S <laura.meders@navy.mil>
Subject: Chairman Cladoosby request for GtG Consultation with NASWI

Good Morning Debra,

I hope you are enjoying the beautiful start to January in the Northwest. I am crossing my fingers we escape the typical grey skies of January this year.

I wanted to touch base with you regarding the December 2016 request from Chairman Cladoosby's for GtG with NAS Whidbey Island regarding the EA-18G Growler operations EIS. The Navy has provided possible dates for this consultation on several occasions and I want to update those dates again, as well as provide you an advanced copy of a second response letters to Chairman Cladoosby from NAS Whidbey Island Commanding Officer, Captain Geoffrey Moore. The attached letter went out in the mail this morning, so you will hopefully have the hard copy by Monday.

The last set of dates I provided were in May and June. The majority of those dates have passed or are no longer available. The next sets of dates we have set aside are:

June 23 and the afternoon of June 26
Aug 21, 22
Sept 13, 14

Although those dates are specifically set aside on our calendar for this meeting, we are more than happy to discuss potential dates that may work better for the Swinomish.

Please feel free to contact me if you have any questions and do not hesitate to call if we can do anything further to help facilitate this consultation.

All My Best,
Kendall

Kendall Campbell
NASWI Archaeologist and Cultural Resources Program Manager
1115 W. Lexington Dr.
Oak Harbor, WA 98278-3500
Kendall.campbell1@navy.mil
360-257-6780

From: Debra Lekanoff

Sent: Wednesday, June 07, 2017 2:00 PM

To: Campbell, Kendall D CIV NAVFAC NW, PRW4; Josephine Jefferson; Larry Wasserman

Cc: James Harrison; Meders, Laura E CIV NAS Whidbey Is, N00S; Kelly George; James Jannetta; Tom Ehrlichman (tom@dykesehrlichman.com)

Subject: RE: Chairman Cladoosby request for GtG Consultation with NASWI

Thank you for the follow up, as I have been busy and not able to get back to you. Let me check with my staff on their availability and see if our technical staff can engage with your technical staff to review the project

Debra

From: Debra Lekanoff [<mailto:dlekanoff@swinomish.nsn.us>]

Sent: Wednesday, September 27, 2017 7:41 AM

To: Campbell, Kendall D CIV NAVFAC NW, PRW4; Larry Wasserman; Josephine Jefferson; Stan Walsh

Cc: Stephen LeCuyer; Kelly George

Subject: [Non-DoD Source]

Kelly,

I'm sorry ,we must have crossed paths between now and then and the message must have been lost that we do not require consultation on this project at this time.

Just a quick update, we've had some shifting and employment and we've had quite a busy schedule the past few months. However a few months back, after reviewing the information on The Growler project, the Environmental Policy Director Larry Wasserman thought we needed to track the project but we would not need consultation at this time. I would pause and ask if you thought there was an environmental concern thought perhaps you need to resend the information any updates to Mr. Wasserman and to his team, Mr. Stan Walsh.

Also, if there is a there was a cultural component that you are aware of the project, we would have our THPO Josephine Jefferson, engage directly with you. If you can resend her the information any updates as well.

Thank you for your patience and we apologize for the late reply back . Again if you have updates on this project, please send them to Mr. Wasserman, Mr. Walsh and Mrs. Jefferson. and they will review and get back to you.

If they believe there is a need for consultation they'll coordinate with us both and if you feel there is a need for consultation on the environmental or culture component please advise.

Debra

Resolution of Adverse Effects to Historic Properties

This page intentionally left blank.

Resolution of Adverse Effects to Historic Properties Table of Contents

	Page
July 24, 2018 – Email sent to Consulting Parties	707
- Draft Agenda	
- Consultation Plan	
August 2, 2018 – First Meeting with Consulting Parties	717
- Agenda	
- Consultation Plan and Draft Schedule	
August 10, 2018 – Email to Consulting Parties with Draft Minutes from August 2 Meeting	731
August 16, 2018 – Email from Ms. Maryon Attwood, Citizens of Ebey’s Reserve	741
August 16, 2018 – Email from Mayor Hughes, Town of Coupeville.....	757
August 17, 2018 – Letter from Wilbur Bishop, Trust Board of Ebey’s Landing Historic National Reserve.....	763
August 20, 2018 – Email from Dr. Allyson Brooks, Washington SHPO	767
August 20, 2018 – Second Meeting with Consulting Parties.....	771
- Agenda	
- Meeting Minutes from previous meeting	
- Section 106 Resolution Options dtd 20 Aug 2018	
August 20, 2018 – Email from Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve	783
August 21, 2018 – Email from Ms. Helen Price Johnson, Island County Commissioner.....	787
August 24, 2018 – Letter from Dr. Allyson Brooks, Washington SHPO	791
September 4, 2018 – Third Meeting with Consulting Parties	795
- Agenda	
- Meeting Minutes from previous meeting	
- Matrix with 20 Resolution Options to Discuss	
- Letter from Dr. Allyson Brooks, Washington SHPO (August 24, 2018)	
September 7, 2018 – Email from Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve	807
September 11, 2018 – Email from Ms. Maryon Attwood, Citizens of Ebey’s Reserve.....	821
September 13, 2018 – Email from Mr. Roy Zipp, Operations Manager, National Park Service	825

September 14, 2018 – Email from Ms. Maryon Attwood, Citizens of Ebey’s Reserve.....	833
September 17, 2018 – Email amending earlier correspondence from Mr. Roy Zipp, Operations Manager, National Park Service.....	839
September 17, 2018 – Fourth Meeting with Consulting Parties	845
- Agenda	
- Summary of Mitigation Options	
- Meeting Minutes from previous meeting	
September 20, 2018 - Email from Ms. Maryon Attwood, Citizens of Ebey’s Reserve	859
September 26, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	871
September 26, 2018 – Email from Commissioner Helen Price-Johnson, Island County, WA	873
September 27, 2018 – Fifth Meeting with Consulting Parties	875
- Agenda	
- Draft MOA	
- Meeting Minutes from previous meeting	
September 27, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	903
September 27, 2018 - Email from Ms. Maryon Attwood, Citizens of Ebey’s Reserve	905
September 28, 2018 – Email from Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve	913
September 28, 2018 – Email from Roy Zipp, Operations Manager, National Park Service.....	915
October 8, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	1085
October 16, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	1103
October 16, 2018 - Email from Ms. Maryon Attwood, Citizens of Ebey’s Reserve.....	1105
October 22, 2018 – Email from Roy Zipp, Operations Manager, NPS	1107
October 23, 2018 – Sixth Meeting with Consulting Parties.....	1113
- Agenda	
- Meeting Minutes from previous meeting	
October 23, 2018 – Sixth Meeting with Consulting Parties, Meeting Minutes.....	1123
October 23, 2018 – Trust Board of Ebey’s Landing National Historical Reserve, Business Meeting Minutes	1131
October 25, 2018 – Letter from Mayor Stinson, City of Port Townsend.....	1135
October 26, 2018 – Email from Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve	1147

October 26, 2018 – Gov. Inslee Letter to Assistant Secretary of the Navy.....	1151
November 7, 2018 – Email to Consulting Parties Revised Draft MOA Version 2.....	1155
November 8, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	1173
November 13, 2018 – Trust Board of Ebey’s Landing National Historical Reserve, Workshop Minutes	1175
November 14, 2018 – Letter from Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve	1177
November 16, 2018 – Email from Mr. Reid Nelson, Director at Office of Federal Agency Programs, Advisory Council on Historic Preservation.....	1179
November 21, 2018 – Email from CAPT Matt Army, NAS Whidbey Island Commanding Officer.....	1181
November 21, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	1187
November 23, 2018 – Email from Mr. Reid Nelson, Director at Office of Federal Agency Programs, Advisory Council on Historic Preservation.....	1191
November 27, 2018 – Email from Roy Zipp, Operations Manager, NPS	1195
November 27, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	1203
November 28, 2018 – Email from Mr. Reid Nelson, Director at Office of Federal Agency Programs, Advisory Council on Historic Preservation.....	1209
November 28, 2018 – Email from Mr. Tom McCulloch, Assistant Director at Office of Federal Agency Programs, Advisory Council on Historic Preservation.....	1217
November 28, 2018 – Email from Dr. Allyson Brooks, Washington SHPO.....	1225
November 28, 2018 – Email from CAPT Matt Army, NAS Whidbey Island Commanding Officer.....	1227
November 29, 2018 – Letter from Dr. Allyson Brooks, Washington SHPO.....	1229
November 30, 2018 – Emails (2) from Dr. Allyson Brooks, Washington SHPO.....	1231
Public Comments Received on Draft MOA	1235

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Stallings, Sarah CIV NAVFAC Atlantic](#)
Cc: [Shurling, Cynthia](#)
Subject: FW: Section 106 Consultation to Resolve Adverse Effects to Historic Properties for the proposed undertaking to Increase Growler Operations at NAS Whidbey Island
Date: Tuesday, July 24, 2018 5:07:28 PM

For the Admin Record.

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4
Sent: Tuesday, July 24, 2018 2:03 PM
To: 'Scott Schuyler' <ScottS@UPPERSKAGIT.com>
Subject: RE: Section 106 Consultation to Resolve Adverse Effects to Historic Properties for the proposed undertaking to Increase Growler Operations at NAS Whidbey Island

Thanks Scott,

Not a problem. I will keep you updated on the MOA development progress and include you on future correspondence and invitations.

All My Best,
Kendall

-----Original Message-----

From: Scott Schuyler [REDACTED]
Sent: Tuesday, July 24, 2018 1:49 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] RE: Section 106 Consultation to Resolve Adverse Effects to Historic Properties for the proposed undertaking to Increase Growler Operations at NAS Whidbey Island

Sorry Kendal I'm double booked on the 2nd.

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Sent: Tuesday, July 24, 2018 12:20 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: Section 106 Consultation to Resolve Adverse Effects to Historic Properties for the proposed undertaking to Increase Growler Operations at NAS Whidbey Island

Good Afternoon,

I would like to invite you to join the Navy and other consulting parties to attend the kick off meeting to begin consultation on the resolution of adverse effects to historic properties based on the increased frequentness of noise exposure to landscapes in the Central Whidbey Island Historic District. The kickoff meeting will be held on Thursday, August 2, 2018 from 9:00am to 11:00am at the Reuble Farmstead (593 Fort Casey Road, Coupeville, Washington 98239). We have established a conference call line for those who may not be able to travel or whose schedules cannot accommodate meeting in person. The call in number is 1-800-747-5150 Participant code: 9465240#.

Space is limited at the Reuble Farm so please let me know if you intend to attend in person or call in. Although I have received responses from a number of participants to our invitation to participate in the consultation process to develop the MOA, I want to make sure we can accommodate any invitee who has not yet had the opportunity to respond. I also want to thank Roy Zipp for allowing us the use of Reuble Farm as a consultation location.

Since many of the consultation participants may be unfamiliar with this process and the development of a

Memorandum of Agreement (MOA) to resolve adverse effects to historic properties, I have attached a proposed agenda to give you an idea of the meeting's intent, as well as a consultation plan that provides an overview of the purpose and process of this part of the section 106 consultation process. For those who participated in the development of the OLF Security Enhancements MOA this plan is very similar to the consultation protocol that guided that consultation. I am happy to provide further clarification or explanation at or before the meeting if requested.

The Navy looks forward to working with you and all of our consulting partners in this consultation. If you have any questions please do not hesitate to contact me at [REDACTED]

All My Best,
Kendall

Kendall Campbell
Archaeologist and Cultural Resources Program Manager NAS Whidbey Island
[REDACTED]
Oak Harbor, WA 98278
[REDACTED]

Consultation for the Resolution of Adverse Effects to Historic Properties and Development of a
Section 106 Memorandum of Agreement (MOA) for the Proposed Growler Airfield Operations
Increase at Naval Air Station Whidbey Island

AGENDA

2 August 2018

I. Introductions

II. Review

- a. Consultation Plan
- b. Proposed Schedule and Milestones

III. Discussion

- a. *Proposal of alternatives* to avoid, minimize, or mitigate the adverse effects of the OLF Coupeville security enhancements project; and
- b. *Evaluation of alternatives* and their potential to resolve the adverse effects of increased noise exposure.

IV. Development of Draft MOA and Next Steps

**Consultation Plan for Resolution of Adverse Effects to
Historic Properties and Development of a Section 106
Memorandum of Agreement for the
Proposed Growler Airfield Operations Increase at
Naval Air Station Whidbey Island**

I. PURPOSE

1. To facilitate a common understanding of the Navy mission and effects to historic properties with a direct nexus to the Proposed Growler Airfield Operations Increase at NAS Whidbey Island among government and non-government stakeholders;
2. To define options to resolve the adverse effects by exploring the advantages and disadvantages of each option,
3. To arrive, if possible, at a consensus on the mitigation option(s) to be memorialized in the Memorandum of Agreement (MOA).

II. THE MOA PROCESS

1. Understanding the Adverse Effect

Adverse Effect is defined at *36 CFR 800.5(a)(1)*:

“An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.”

For the current consultation the type of adverse effect identified is an indirect adverse effect to contributing landscapes components of the Central Whidbey Island Historic District from a substantive increase in noise exposure, specifically to the perceptual qualities of views from documented points on the landscape.

Understanding the adverse effect is critical to achieving mutual decisions that support long-term resolution.

The consultation will focus on the following:

What is/are the significant features affected?

How does the undertaking diminish the integrity of those features?

What resolutions would mitigate the identified effects to the integrity of those features?

2. Resolving Adverse Effects

When adverse effects are identified in a section 106 consultation, the Navy must consult with the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Officer

(SHPO), and other consulting parties to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects to historic properties. See *36 CFR 800.6(b)(2)*. Appendix A.

Consultation to resolve the adverse effect does not mean the Navy must resolve the adverse effect to the satisfaction of the consulting parties. The ultimate responsibility for deciding what actions, if any, should be taken to avoid, minimize, or mitigate the adverse effect is with the Navy.

In seeking resolution of adverse effects, the goal of consultation is to:

- improve understanding of technical and legal issues necessary to make informed decisions
- explore a wide range of options
- develop and achieve mutual decisions
- promote integrity and longevity of decisions
- formulate and memorialize an agreement document

3. Memorandum of Agreement

If the Navy, the Council, and the SHPO agree on a means to resolve the adverse effects, they shall execute a memorandum of agreement (MOA). See *36 CFR 800.6(b)(2)*.

An agreement document addresses the resolution of adverse effects to historic properties arrived at through consultation. The types of resolution depend on why the historic property is eligible and is commensurate with the scale and scope of the undertaking.

An MOA is an agreement that commits a Federal agency to carry out clearly specified measures to mitigate the adverse effect on historic properties. The MOA is evidence that the Federal agency has complied with section 106 and that the agency shall carry out the undertaking in accordance with the MOA. See *36 CFR 800.6(2)(c)*.

4. MOA signatures

- a. Required Signatories: The Section 106 regulations require two signatories for any MOA: the Federal agency and the SHPO. The ACHP must be a signatory if the ACHP has elected to participate in the consultation process.

Signatory parties must sign the MOA for the agreement to take effect and their approval is needed to amend or terminate the agreement.

- b. Invited Signatories: A Federal agency may invite additional parties to be signatories who assume a responsibility under the stipulations of the MOA.

An invited signatory does not have to sign the MOA for the MOA to take effect. If the invited signatory does elect to sign the MOA that party's approval is needed to amend or terminate the MOA.

- c. **Concurring Parties:** A Federal agency may invite other consulting parties in the Section 106 process to sign the document as concurring parties.

Concurring parties do not have the rights of signatories and their approval is not necessary to execute, amend, or terminate the MOA. Signing as a concurring party provides a means for all consulting parties to express agreement with the contents of the MOA and acceptance of the outcome of the process.

III. CONSULTATION PROCESS

1. **Consulting Party Roles and Responsibilities**

If the full group of participating consultation members cannot reach consensus, the representatives of the Navy, ACHP, and SHPO are expected to participate in the final consensus-building effort.

Should any consulting party wish to withdraw from the process, they will provide a written explanation to the group.

Should any consulting party wish to request another party be removed from the consultation process they will provide a written statement explaining their request. The representatives of the Navy, ACHP, and SHPO will review and respond to the request with a consensus decision on whether the requested party should be removed from the consultation.

Consulting Party Member Objectives

The group members will:

- engage in a thoughtful, thorough deliberation
- share relevant information with the other group members
- keep the group informed about constituent perspectives
- work to identify a wide range of viable options
- openly discuss and evaluate those options
- refrain from undermining group recommendations and reports

3. **Public Input**

The Navy will make a Final Draft MOA available for public review and comment to provide members of the public an opportunity to express their views on resolving the adverse effects. See 36 CFR 800.6(a)(4).

4. **Decision Making and Deliberation**

The group's highest goal is consensus. A consensus agreement is one that all group members can support, built by identifying and exploring all parties' interests and by developing an outcome that satisfies these interests to the greatest extent possible. To enhance creativity

during meetings, individuals are not expected to restrict themselves to the prior positions held by their organizations, agencies or constituencies. The goal of the consultation effort is to have frank and open discussion of the topics in question and the options to address the topics. Therefore, ideas raised in the process of the dialogue, prior to agreement by the whole group, are for discussion purposes only and should not be construed to reflect the position of a member or to prematurely commit the group.

If consensus is not possible, the Navy, ACHP, and SHPO will work to build a consensus of their own, using the whole group's deliberation as the basis for their work. Finally, if full agency consensus is not possible, the lead agency may use the group's work to make decisions in line with their regulatory authority and in keeping with the limitations of that authority.

5. Communication with Other Groups, Individuals, and the Media

As a consultation group, the goal is to maintain an environment that promotes open, frank and constructive discussion. Such an environment must be built on mutual respect and trust, and avoidance of actions that would damage that trust. Therefore, consultation meeting sessions and discussion are closed working sessions unless the consulting parties as a group decide otherwise.

In communicating about the group's work, including communicating with the media, we request each consulting party should agree to speak only for herself or himself; to avoid characterizing the personal position or comments of other participants; and to always be thoughtful of the impact that specific public statements may have on the group and its ability to complete its work. No one will speak for any group as a whole without the consensus of that group. Should anyone wish the group to release information to the media, the group will do so only through a mutually agreeable statement, drafted by consensus of all of that group's members.

6. Discussion Guidelines

The following guidelines encourage productive deliberation. All parties will commit to best efforts at following them:

OPENNESS

- To other points of view
- To outcome
- To all representatives

LISTENING

- Focus on each speaker rather than prepare your response
- No interruptions

FAIRNESS

- Speak briefly
- Everyone participates

RESPECT

Disagree without being disagreeable
No personal attacks

COMMITMENT

Prepare for each meeting or discussion
Attend each session
Honor the agenda and make agenda changes with the whole group
Begin and end on time
Get up to speed if didn't attend previous meeting

All parties agree to act in good faith in all aspects of the group deliberations, to conduct themselves in a manner that promotes joint problem solving and collaboration, and to consider the input and viewpoint of other participants. Members agree not to use specific offers, positions, or statements made by another member during non- public discussions for any other purpose not previously agreed to in writing by the Members involved. Personal attacks will not be tolerated. Negative generalizations are not productive and have the potential to impede the ability of the group to reach consensus. All members will be given an equal opportunity to be heard with the intention of encouraging the free and open exchange of ideas, views, and information prior to achieving consensus. Members and other participants are requested not to bring cellular telephones into the consultations.

As part of this process, all participating organizations recognize that they are part of a decision-making process and not a study or data collection effort.

IV. DRAFT SCHEDULE AND MILESTONES

Activity	Date
Opening Meeting Affirm purpose, process, participation, etc. Meeting schedule Range of Options Evaluating Options Alternatives Evaluation Building on the Most Viable Options	August 2, 2018
Review of Draft MOA Informal Discussion Consensus Building –	Anticipated: August 8, 2018
Meeting #2	Anticipated: August 16, 2018
Final Revisions Review	Anticipated: August 30, 2018
Public Review Period	Anticipated: September 4, 2018

Final Agreement

Anticipated: October 1, 2018

Circulation for Signature

Anticipated: October 9, 2018

Prepared By:

Kendall Campbell
NASWI Archaeologist and
Cultural Resource Program Manager

2 August 2018, 0900 – 1100 AM

Growler Section 106 Consultation Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Moore – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
Commander Malik (telephone) - JAGC, USN Fleet Environmental Counsel U.S. Fleet Forces Command
Commander Thedwall (telephone) – Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
Lisa Padgett (telephone) – Home Basing NEPA Program Manager, USFF
Bill Manley (telephone) – DFPO, NAVFAC Headquarters
Sarah Stallings (telephone) - Environmental Planning, NAVFAC Atlantic
Lieutenant Commander Parr (telephone) – Regional Legal Service Office, NAVFAC Northwest

Advisory Council on Historic Preservation

Katharine (Kate) Kerr (telephone) – Program Analyst, Office of Federal Agency Programs
Dr. Tom McCulloch (telephone) – Assistant Director, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks (telephone) – Washington State Historic Preservation Officer (SHPO)
Dr. Robert Whitlam (telephone)- Washington State Archaeologist

Washington State Governor’s Office

Jim Baumgart (telephone) – Washington State Governor’s Office Policy Advisor, Human Services Division

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Port Townsend

Mayor Deborah Stinson – *City of Port Townsend*

Coupeville

Mayor Molly Hughes – Town of Coupeville

Citizens of Ebey’s Reserve

Maryon Atwood - President

Island County

Commissioner Helen Price Johnson – Island County Commissioner

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR

Environmental Impact Statement Team

Cindy Shurling (telephone) – Consultant team

Introduction –

Captain Moore thanked everyone for participating and discussed how the 106 process has been going on for years and that he is excited to participate in this; Captain Moore noted that the draft analysis was released about six weeks ago, and that this will be an opportunity to discuss that and then lead into that discussion about the mitigation. He noted the importance for everyone to listen to each other and to give each other a chance to talk. Captain Moore thanked everyone for attending, and then turned the meeting over to Ms. Campbell.

Ms. Campbell noted that the purpose of the meeting is to discuss mitigating the adverse effect to historic properties identified in the Navy's determination and come up with communally generated ideas/options; the goal is open conversation and to allow everyone a chance to provide input.

Meeting attendees acknowledged receipt of a copy of the agenda and the Consultation Plan for Resolution of Adverse Effects to Historic Properties and Development of a Section 106 Memorandum of Agreement for the Proposed Growler Airfield Operations Increase at Naval Air Station Whidbey Island.

Discussion and Clarifications of the Meeting Agenda and Memorandum of Agreement (MOA) –

Commissioner Price Johnson noted that the security enhancements were on the agenda. Ms. Campbell clarified that this is a typo, as she had built the agenda from the memorandum of agreement (MOA) for the Outlying Field (OLF) security enhancements, which is in the process of being finalized and signed. In January and February, the Navy had final comments and were ready to move to signature on the OLF security enhancements. It was signed by the Regional Admiral and Captain Moore. The Navy will next send this to Dr. Brooks, to the Advisory Council on Historic Preservation (ACHP), and then will send around to others.

For this MOA (Proposed Growler Airfield Operations), the signatories will be Admiral Gray (Regional Admiral) and the Commanding Officer of NASWI Capt. Army, who takes over on August 17th.

Commissioner Price Johnson asked for clarification of what it means to be a signatory. Ms. Campbell provided the following background. Additional information can be found in the MOA Consultation Plan sent to all consulting parties on July 24, 2018 via email:

- *Signatories* - those individuals/parties that can change the MOA, end it, etc. Typically, this includes the proponents, the SHPO, the ACHP (when they are participating), and tribes (if involved).
- *Invited Signatories* – these individuals/groups would have the similar authorities; typically, the Navy asks people who have a responsibility within the MOA (could be financial). [For the OLF Security Enhancements– the Navy did not invite any other signatories.]
- *Concurring parties* –those that can sign to show that they participated; this provides an opportunity to say consulting parties agree with the developed mitigation strategy.

Commissioner Price Johnson then asked about the Accident Potential Zones (APZs) and if they (the county) would be required to take action. The Navy noted that the mitigation for this undertaking is to meet our obligations under section 106 of the National Historic Preservation Act and is not tied to the APZs.

Section 106 Process and Determinations Document - Ms. Griffin noted her concern with the 106 process for this undertaking. She indicated her feeling that the 106 consultation effort had not been coordinated with the NEPA document. In particular Ms. Griffin pointed out that the determination of effects was not completed when the public was provided opportunity to comment on the Draft EIS. She noted that this was a hindrance for her. Ms. Griffin indicated that the disclosure of adverse effect is acknowledged, but feels that there is no time to comment, which procedurally is difficult.

Ms. Griffin expressed she would have preferred that the 106 findings be included in the Draft EIS. Ms. Kerr from ACHP explained the difference between NEPA and NHPA processes and that impacts under NEPA are not the same as NHPA effects to cultural resources and historic properties. The National Environmental Policy Act (NEPA) analysis is for an overall cultural resources evaluation, while Section 106 specifically focuses on effects to historic properties (i.e., listed or determined eligible to the National Register of Historic Places [NRHP]).

Ms. Griffin also requested clarification on the determinations document finding of impacts to what she referenced as viewsheds. Ms. Campbell suggested moving into the discussion of generating mitigation ideas as a way to address Ms. Griffin's concerns. Ms. Griffin added that if we have moved to the mitigation then we are not allowing discussion of avoidance and minimization. Ms. Campbell suggested that since the Navy determined that there is an adverse effect, they are looking at how to minimize and avoid effects and that this discussion is included in the 106 determination document. She also noted that there is some confusion in the document that may be a result of the copy/edit process, as the editor deleted formatting, so there is not a heading for Sections.

Ms. Griffin asked how the findings related to the viewpoints identified in the document and how these were chosen over all other things. Commissioner Price Johnson also asked for explanation of the adverse effect to the "viewshed". Dr. Brooks stated the SHPO's perspective is that the adverse effect is to the NRHP property and the harm is no to the viewshed. As such her perspective is that there is one finding per project, and this was evaluated on setting, feeling, and association to Coupeville (Central Whidbey Island Historic District) and the Ebey's Landing National Historical Reserve.

Ms. Campbell explained that in looking at the Central Whidbey Island Historic District, the Navy reviewed how the undertaking could potentially diminish the integrity of all historic properties within the Area of Potential Effect (APE). The landscapes are character-defining; they contribute to the Central Whidbey Island Historic District. The landscape components are made-up of views, traffic flow, cluster arrangements, etc. A quiet soundscape is not a part of the character defining qualities of the landscape because a quiet soundscape is not a characteristic that contributes to the historic significance of the Central Whidbey Island Historic District. However, with regard to the perceptual quality of the views, qualities such as noise, smells, views, etc. characterize the landscapes that contribute to the historic significance of the District and as such the integrity of the setting and feeling are diminished in certain areas by increased noise. This is directly connected to the character defining features. Dr. Brooks further indicated the seven elements of integrity (location, design, setting, materials, workmanship, feeling, and association), which are related to the regulations guiding the National Historic Preservation Act.

Commissioner Price Johnson asked if the actions could have an indirect adverse effect to working farms and if not, are the things that are listed at the end of the document on page 71 are the only ones that have an adverse effect. Ms. Campbell explained that the evaluation is confined to the NHPA and the evaluation of historic properties; the agricultural economy is not a historic property type and not evaluated as part of the section 106 consultation. Commissioner Price Johnson asked how the Navy separates out the people from the District and asked Dr. Brooks to explain the health and well-being of the Reserve vs. Section 106.

Dr. Brooks explained that issues to farm workers need to be discussed under NEPA, whereas 106 looks at how the undertaking is diminishing the integrity of eligible or potentially eligible historic properties. It was noted that landscapes are not a property type, but are contributing historic components of a historic district.

Mayor Hughes asked whether the consultation is focusing on districts or buildings, which are critical parts of the reserve as a district (and with the intentional preservation of small farms and rural agricultural lifestyle), and voiced concern for potential loss of small farming, which occurs in the historic district. Dr. Brooks offered her opinion that Rural agriculture must be addressed as part of the mitigation. Mayor Hughes noted the three mitigation proposals offered by the Navy, although in her opinion may be ridiculous, are a place to start; *but the increased use at OLF should be proportional to the increase in total FCLP's on the base. If the total number FCLP operations is increasing by 20%, then Coupeville should not get more than a 20% increase from our current numbers.*

Discussion of Mitigation, Operations, and Potential Minimization – Discussion of mitigation began with the group noting that the preferred alternative in the EIS proposes a change to the proportion of operations between Ault Field and OLF Coupeville that represents a historic change. Several consulting parties stated that there is no record that the proportion of FCLP's at OLF Coupeville has ever been greater than Ault Field. As such these attendees observed that if this historic level of change cannot be avoided that they desired to see it minimized.

Ms. Griffin noted that the purpose of 106 was to look at how the Navy's proposed actions may affect historic resources, but she believes that something has gone awry in the process when the identified impacts of the undertaking are focused on the area that is most worthy of protection. Ms. Griffin expressed concern that the preferred alternative appears to impact the Reserve disproportionately and wondered why there was no further discussion to look at minimizing impacts through selection of other alternatives to the action.

Dr. Brooks noted that she was with Jim Baumgart, the Governor's policy aide; the discussion was that the Navy needs to evaluate how to diminish the nose and whether that means alternative means of carrying out the operations. Ms. Campbell explained that for the section 106 consultation the proposed undertaking has always been the maximum level of change at both airfields so that it considers the maximum potential effect to historic properties from all alternatives and scenarios. Further she explained that since the 106 analysis presented in the determinations document was based on the aggregate of proposed change at each airfield the methodology for analyzing adverse effects was consistent across the entirety of the APE and applied consistently regardless of historic property type or location.

[Mayor Hughes needed to step out and was joined by Commissioner Price Johnson, who noted she would be contacting Dr. Brooks for a separate conversation for further explanation of the 106 process.]

Ms. Griffin observed that this would be the first time in history with OLF, where they would be shifting a great majority of the Field Carrier Landing Practices (FLCPs) away from the base and to the OLF, which she believed was never intended to be the main location. Captain Moore said that OLF Coupeville existed for this purpose in 1960's and 1970's. During the late 1990's, the base did take some measures to reduce flights at OLF and stopped mining practice in Admiralty Bay using aircraft. Before the Navy was constrained to 6120 operations, there were at times anywhere from 5,000 to 10,000 operations. He noted a number of factors influence the distribution of FLCPs at each airfield. He also clarified that the total number of FCLPs proposed are not historically higher, even if the percentage (distribution) is shifting to a great total number of FCLPs being performed at OLF.

Ms. Atwood noted that the community could not tolerate the noise at the points in history Captain Moore was referencing. Ms. Atwood pointed out that the Commander of NAS Whidbey Island came down to Coupeville at that time and people were not pleased with the level of operations in the 1960' and 1970's. She said that people are angry with the 80/20 preferred alternative and prefer it to not go over the 50/50. She felt this came late in the discussion; the public was not able to see a preferred alternative, and now it is too late to comment on this. Ms. Campbell explained that for the section 106 consultation the Navy has looked at maximum change at both airfields from the start of the consultation process so that the full effects from conducting the majority of FCLP's are considered in the analysis.

Ms. Atwood provided a comment on efforts to find solutions that minimize noise effects noting that the measures suggested by Navy in the section 106 determination document, like advertising, do not mitigate the noise. She also offered that the Whidbey Camano Land trust is no longer taking Navy money for the creation of conservation easements. Captain Moore indicated that the Navy has not been made aware of this and is always looking for conservation partners.

Ms. Griffin raised the issue of the landscape pattern, which includes scenic easements that allow for very limited development rights and are structured so agricultural activities could continue. The easements are meant to allow some economic activity, and they still preserve the landscape and further discussed the Ebey's Landing National Historical Reserve's use of easements.

Ms. Campbell noted that the Navy worked through the Readiness and Environmental Protection Integration (REPI) program. The most current actions relate to natural resources. The Navy is looking at possibilities of adjusting the language to include reference to historic preservation ideals as well. Ms. Campbell also raised the possibility of updating the National Park Service Land Use Change and Cultural Landscape Integrity study from 2003 as a potential mitigation. An updated study may provide a necessary baseline for assessing and monitoring how the final proposed mitigation and minimization efforts are successful in resolving the adverse effects to the integrity of the landscape.

Ms. Griffin noted that a landscape study would not be of interest to the Reserve as they are currently updating their land protection plan, and therefore, it is not the one that is being used for the REPI plan.

Mr. Zipp asked about chevrons, which are devices that can be added to jet engines to reduce noise, whether this was presented in the 106 determination. Captain Moore noted that the Navy is still investigating the use of chevrons on jet engines, which has shown promise, but is not yet advanced enough to deploy to the fleet.

Captain Moore noted his regret that the Navy was not invited to the table 40 years ago during the creation of the Reserve. The Navy is also a property owner in the Reserve as well as a part of the history of the Reserve. As the Navy is getting ready to celebrate the 75th Anniversary of OLF, is there a way of integrating the Navy into the Reserve's plan. The Navy is also looking at cumulative impacts, too.

Ms. Campbell put in reminder for the meeting purpose to look at mitigation measures due to the current undertaking, which is the increase in aircraft, squadron distribution, and increase in operations. Although the Navy does want to capture information about the community concerns as a whole (neighbor roles), this consultation was not about Navy presence on Whidbey Island and Growler noise in general.

Mapping in the 106 Document and Integration of Flight Patterns - Ms. Griffin asked for clarification on the +5 metric and how mapping worked in the Section 106 evaluation. Ms. Campbell first noted that she attempted to address Ms. Griffin's earlier concern that she could not see street names or distinguishing land forms on the maps in the document by making the shading lighter so that the base map was easier to distinguish. The group then looked at the large map (pg. 59) within the determination

document. Data was shared between NEPA analysis and this 106 determination; the Navy looked at the maximum amount of change in proposed operations at both airfields and looked at where the change in operations was going to substantively change the frequentness of noise exposure. For OLF, there are more areas where a substantive change in frequentness of noise exposure occurs. Specifically, the Navy looked at areas where a 5 dB DNL (decibels Day-Night Sound Level) or more change occurred. At Ault Field no area in the APE showed a dB DNL change of 5 or greater using the maximum amount of change in operations. At OLF Coupeville the maximum amount of change proposed in operations resulted in several areas where the data indicated the area would experience a change of 5 or greater dB DNL.

In response to some questions, Captain Moore indicated the Growler aircraft have a tighter turn radius which reflects some of the change in noise exposure at OLF represented in the section 106 maps. The tighter turn radius will reduce the frequency of noise exposure in some places and expose new places to increased frequency of noise. In addition, the undertaking proposes greater use of runway 14, than in the past. Captain Moore also stated that operations at OLF Coupeville are dynamic; there may be more operations during the winter when the winds are better. The Navy manages both natural and man-made constraints that effect how operations are conducted.

Ms. Atwood noted that the community is not necessarily expecting change in turning radius and use of runway 14 at OLF Coupeville and would want to know this. In addition, Ms. Atwood asked if there was truth to the rumor that the only reason why the Navy needs OLF is because we lack parallel runways at Ault Field. She further asked why the Navy does not just build a new parallel runway at Ault Field. Captain Moore indicated that the parallel runway solution is not an accurate statement of the variables that reflect airfield management and operations. First, there are fiscal constraints to being able to build another runway at Ault Field due to the Navy's need to support shipbuilding and maintenance and other aviation maintenance backlog as well as that Ault Field creates less realistic conditions for practicing landing on an aircraft carrier. For example, Ault Field is in a valley, so there is a limitation on flight patterns and operations that can be performed. In addition, the pilots would not get ideal training; resulting in more risk because the training is not as effective for preparing the pilots for what really happens when landing on a carrier. Ms. Griffin asked for clarification on whether the OLF is an approved runway adequate for the type of operations proposed. Captain Moore explained that OLF is sufficient to the proposed requirements because we do not do full-stop landings at OLF; they could do these if they reduced weight/fuel, but that would only happen in an emergency situation.

Ms. Griffin noted that with regard to the landscape areas, they need to see other information on the maps to get a sense of where things are located. Ms. Campbell noted that the Navy did include that information on the maps and had brought to the meeting larger copies of the maps with lighter shading to better see the landscape feature.

Potential Solutions – Programmatic View, REPI, and Scenic Easements - Mr. Zipp noted that if a person does rehab a house and exceeds 50% of value, they then would have to remodel it to address noise/vibration. This would have an economic incentive that could adversely affect historic structures and building code issues because addressing these issues in accordance with historic standards costs a lot of money – i.e., a line of indirect effects. Mr. Zipp suggested that they provide accommodations in the county so this impact cannot occur. Dr. Brooks suggested the possibility of soundproofing or structurally strengthening for noise/vibration. She indicated there is a discussion of how to help homeowners with this; the Governor is involved, and the Navy should be involved, too.

Ms. Griffin suggested that it could be a programmatic impact to the reserve, meaning that they could lose historic structures. Mayor Stinson suggesting providing noise cancelling headphones to farmers. Ms. Campbell mentioned the potential for discussion of a programmatic approach as an alternative focused on

long term solutions and studies. Ms. Kerr said it was premature to start this discussion, but can table it for now.

In response to a question about the need for a LSO to conduct FCLP, Captain Moore explained the LSO – landing signals officer – who stands on the edge of runway is in control of the aircraft as it comes in and provides changes to help land accurately.

Mr. Zipp noted a tool that NPS brings to the table – scenic easements. He articulated that the purpose is to try to harmonize the REPI programs easements with the language that is used to protect historic integrity to protect areas where it can be done. Ms. Griffin noted that every year the trust makes recommendations to the NPS for the priorities that reinforce the reserve. The question was asked if the Navy can purchase land and then keep under another’s ownership. Captain Moore responded the Navy committed to reviewing its authorities to purchase easements that would protect landscapes.

Ms. Griffin noted that the funding of an intern to help inventory is no longer needed. Ms. Campbell suggested that this also could be used to help organize the data.

Involvement of Others - Ms. Griffin asked how the public is being involved. Ms. Campbell explained that the 106 information was announced in a press release in June, was posted online, and is available on the EIS website. She noted that the public can comment on that the determination draft at any time. In addition, the public will have the opportunity to comment on the MOA once parties agreed to draft stipulations. There is no timeline for receiving comments on the 106 consultation and comments are accepted until the consultation effort concludes with the signing of the MOA. Ms. Griffin asked Dr. Brooks if she felt the Navy’s public involvement proposed was adequate. Dr. Brooks indicated that the Navy could determine how to meet the requirement for public involvement and posting documents online is one way to involve the public, but the State prefers how Washington State Department of Transportation conducts their public meetings where they typically have big whiteboards to allow the public to write out ideas.

Ms. Campbell asked Dr. Brooks to share the SHPO’s response and suggested strategies to resolve the adverse effect to historic properties with the consulting parties. Dr. Brooks responded that she has already made the Navy aware of what the state was proposing. Dr. Brooks further noted that the WA Governor will be speaking with Assistant Secretary of the Navy, Phyllis Bayer regarding mitigation. She noted that Jim Baumgart expressed that the Navy needs to work with the aircraft to reduce the jet engine noise. She also noted that the state has talked about operating schedules (weekends/school hrs.), funding to rehabilitate historic homes with soundproofing, and a barn program. She said the Navy is aware of these, and said she can write this in a formal letter if the Navy required something more formal.

Next Steps – Ms. Campbell noted that she will write-up a draft of the MOA, which will include the administrative stipulations and some ideas about what can be done to address resolution of adverse effects. She explained that the timeline was aggressive. Therefore, the Navy hoped to have a draft by next week and then at that point in time. Dr. Brooks asked that the Navy avoid the word “kiosk” and noted that Jim Baumgart is clear about measures the SHPO wants, and the Navy needs to make sure it is in the MOA.

Ms. Kerr indicated that at this point in the process the consulting parties are not ready to draft a MOA even a week from now as there needs to be more brainstorming and discussion on ideas. She would like to see a synopsis of the meeting in order to be clear that the minutes capture what was said and the expressed the intentions. She also needs a clear list of the ideas introduced and when the Navy can respond with alternatives that may be feasible and explain why they can or cannot take certain steps. All parties need a

greater understanding of ideas and feasibility and then the parties can get to the next step of preparing an agreement document and provide it for review.

Ms. Campbell asked if it would be helpful to do an excel spreadsheet regarding the feasibility of the ideas generated at this meeting, for which Ms. Kerr indicated “yes.” Ms. Kerr said that they may need other meetings scheduled to either discuss more input on the ideas or see if further discussion of alternatives are needed. Ms. Kerr suggested setting up a routine call every two to three weeks with the consulting parties to continue discussion. Ms. Campbell will provide notes and then the spreadsheet. Another meeting will be scheduled for mid-August to discuss the spreadsheet.

The meeting adjourned, and the conference call ended at about 11:00 AM PST.

**Consultation Plan for Resolution of Adverse Effects to
Historic Properties and Development of a Section 106
Memorandum of Agreement for the
Proposed Growler Airfield Operations Increase at
Naval Air Station Whidbey Island**

I. PURPOSE

1. To facilitate a common understanding of the Navy mission and effects to historic properties with a direct nexus to the Proposed Growler Airfield Operations Increase at NAS Whidbey Island among government and non-government stakeholders;
2. To define options to resolve the adverse effects by exploring the advantages and disadvantages of each option,
3. To arrive, if possible, at a consensus on the mitigation option(s) to be memorialized in the Memorandum of Agreement (MOA).

II. THE MOA PROCESS

1. Understanding the Adverse Effect

Adverse Effect is defined at *36 CFR 800.5(a)(1)*:

“An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.”

For the current consultation the type of adverse effect identified is an indirect adverse effect to contributing landscapes components of the Central Whidbey Island Historic District from a substantive increase in noise exposure, specifically to the perceptual qualities of views from documented points on the landscape.

Understanding the adverse effect is critical to achieving mutual decisions that support long-term resolution.

The consultation will focus on the following:

What is/are the significant features affected?

How does the undertaking diminish the integrity of those features?

What resolutions would mitigate the identified effects to the integrity of those features?

2. Resolving Adverse Effects

When adverse effects are identified in a section 106 consultation, the Navy must consult with the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Officer

(SHPO), and other consulting parties to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects to historic properties. See *36 CFR 800.6(b)(2)*. Appendix A.

Consultation to resolve the adverse effect does not mean the Navy must resolve the adverse effect to the satisfaction of the consulting parties. The ultimate responsibility for deciding what actions, if any, should be taken to avoid, minimize, or mitigate the adverse effect is with the Navy.

In seeking resolution of adverse effects, the goal of consultation is to:

- improve understanding of technical and legal issues necessary to make informed decisions
- explore a wide range of options
- develop and achieve mutual decisions
- promote integrity and longevity of decisions
- formulate and memorialize an agreement document

3. Memorandum of Agreement

If the Navy, the Council, and the SHPO agree on a means to resolve the adverse effects, they shall execute a memorandum of agreement (MOA). See *36 CFR 800.6(b)(2)*.

An agreement document addresses the resolution of adverse effects to historic properties arrived at through consultation. The types of resolution depend on why the historic property is eligible and is commensurate with the scale and scope of the undertaking.

An MOA is an agreement that commits a Federal agency to carry out clearly specified measures to mitigate the adverse effect on historic properties. The MOA is evidence that the Federal agency has complied with section 106 and that the agency shall carry out the undertaking in accordance with the MOA. See *36 CFR 800.6(2)(c)*.

4. MOA signatures

- a. Required Signatories: The Section 106 regulations require two signatories for any MOA: the Federal agency and the SHPO. The ACHP must be a signatory if the ACHP has elected to participate in the consultation process.

Signatory parties must sign the MOA for the agreement to take effect and their approval is needed to amend or terminate the agreement.

- b. Invited Signatories: A Federal agency may invite additional parties to be signatories who assume a responsibility under the stipulations of the MOA.

An invited signatory does not have to sign the MOA for the MOA to take effect. If the invited signatory does elect to sign the MOA that party's approval is needed to amend or terminate the MOA.

- c. **Concurring Parties:** A Federal agency may invite other consulting parties in the Section 106 process to sign the document as concurring parties.

Concurring parties do not have the rights of signatories and their approval is not necessary to execute, amend, or terminate the MOA. Signing as a concurring party provides a means for all consulting parties to express agreement with the contents of the MOA and acceptance of the outcome of the process.

III. CONSULTATION PROCESS

1. **Consulting Party Roles and Responsibilities**

If the full group of participating consultation members cannot reach consensus, the representatives of the Navy, ACHP, and SHPO are expected to participate in the final consensus-building effort.

Should any consulting party wish to withdraw from the process, they will provide a written explanation to the group.

Should any consulting party wish to request another party be removed from the consultation process they will provide a written statement explaining their request. The representatives of the Navy, ACHP, and SHPO will review and respond to the request with a consensus decision on whether the requested party should be removed from the consultation.

Consulting Party Member Objectives

The group members will:

- engage in a thoughtful, thorough deliberation
- share relevant information with the other group members
- keep the group informed about constituent perspectives
- work to identify a wide range of viable options
- openly discuss and evaluate those options
- refrain from undermining group recommendations and reports

3. **Public Input**

The Navy will make a Final Draft MOA available for public review and comment to provide members of the public an opportunity to express their views on resolving the adverse effects. See 36 CFR 800.6(a)(4).

4. **Decision Making and Deliberation**

The group's highest goal is consensus. A consensus agreement is one that all group members can support, built by identifying and exploring all parties' interests and by developing an outcome that satisfies these interests to the greatest extent possible. To enhance creativity

during meetings, individuals are not expected to restrict themselves to the prior positions held by their organizations, agencies or constituencies. The goal of the consultation effort is to have frank and open discussion of the topics in question and the options to address the topics. Therefore, ideas raised in the process of the dialogue, prior to agreement by the whole group, are for discussion purposes only and should not be construed to reflect the position of a member or to prematurely commit the group.

If consensus is not possible, the Navy, ACHP, and SHPO will work to build a consensus of their own, using the whole group's deliberation as the basis for their work. Finally, if full agency consensus is not possible, the lead agency may use the group's work to make decisions in line with their regulatory authority and in keeping with the limitations of that authority.

5. Communication with Other Groups, Individuals, and the Media

As a consultation group, the goal is to maintain an environment that promotes open, frank and constructive discussion. Such an environment must be built on mutual respect and trust, and avoidance of actions that would damage that trust. Therefore, consultation meeting sessions and discussion are closed working sessions unless the consulting parties as a group decide otherwise.

In communicating about the group's work, including communicating with the media, we request each consulting party should agree to speak only for herself or himself; to avoid characterizing the personal position or comments of other participants; and to always be thoughtful of the impact that specific public statements may have on the group and its ability to complete its work. No one will speak for any group as a whole without the consensus of that group. Should anyone wish the group to release information to the media, the group will do so only through a mutually agreeable statement, drafted by consensus of all of that group's members.

6. Discussion Guidelines

The following guidelines encourage productive deliberation. All parties will commit to best efforts at following them:

OPENNESS

- To other points of view
- To outcome
- To all representatives

LISTENING

- Focus on each speaker rather than prepare your response
- No interruptions

FAIRNESS

- Speak briefly
- Everyone participates

RESPECT

Disagree without being disagreeable
No personal attacks

COMMITMENT

Prepare for each meeting or discussion
Attend each session
Honor the agenda and make agenda changes with the whole group
Begin and end on time
Get up to speed if didn't attend previous meeting

All parties agree to act in good faith in all aspects of the group deliberations, to conduct themselves in a manner that promotes joint problem solving and collaboration, and to consider the input and viewpoint of other participants. Members agree not to use specific offers, positions, or statements made by another member during non- public discussions for any other purpose not previously agreed to in writing by the Members involved. Personal attacks will not be tolerated. Negative generalizations are not productive and have the potential to impede the ability of the group to reach consensus. All members will be given an equal opportunity to be heard with the intention of encouraging the free and open exchange of ideas, views, and information prior to achieving consensus. Members and other participants are requested not to bring cellular telephones into the consultations.

As part of this process, all participating organizations recognize that they are part of a decision-making process and not a study or data collection effort.

IV. DRAFT SCHEDULE AND MILESTONES

Activity	Date
Opening Meeting Affirm purpose, process, participation, etc. Meeting schedule Range of Options Evaluating Options Alternatives Evaluation Building on the Most Viable Options	August 2, 2018
Review of Draft MOA Informal Discussion Consensus Building –	Anticipated: August 8, 2018
Meeting #2	Anticipated: August 16, 2018
Final Revisions Review	Anticipated: August 30, 2018
Public Review Period	Anticipated: September 4, 2018

Final Agreement

Anticipated: October 1, 2018

Circulation for Signature

Anticipated: October 9, 2018

Prepared By:

Kendall Campbell
NASWI Archaeologist and
Cultural Resource Program Manager

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting
Date: Friday, August 10, 2018 7:50:02 PM
Attachments: [2Aug2018 Growler106ConsultationMinutes_DRAFT.docx](#)

Good Afternoon,

I would like to thank all who were able to attend in person or on the telephone for their participation in our August 2 consultation meeting. Please find attached a copy of the DRAFT minutes from that meeting. For those who participated, we request that you please review the attached minutes for accuracy to ensure the notes appropriately capture the discussion and provide edits and corrections where needed in track changes. The goal of the minutes is to make sure we capture the sentiments and concerns of all participants and any response or explanation provided by any individual. Please send any corrections and changes back to me by Friday Aug. 17 and I will generate final minutes for circulation before our next meeting for review and approval.

I ask that in reviewing the minutes please avoid adding any commentary or explanations that were not expressed in the meeting. If you would like to add to your discussion, introduce new discussion topics, or offer ideas for resolving adverse effects that were not discussed at the meeting, we would gladly accept these in a separate document. Any additional or new discussion points can be included in the agenda for our next meeting.

Per Katharine Kerr's suggestion at the end of the Aug 2 meeting, I would like to invite all consulting parties to participate in a follow-up phone conference on Tuesday, August 21 from 9:00-10:30am. The Call in number will be the same as the last meeting : 1-800-747-5150 Participant code: 9465240#.

I will circulate a draft agenda next week. Please feel free to email if you have a requested topic you would like discussed. In general, the meeting will cover approval of the last meeting minutes and continued discussion of ideas to resolve adverse effects. Prior to the meeting I will send a spreadsheet capturing some of the questions and ideas generated in our August 2 meeting and the Navy's response. For those who participated in the OLF Security Enhancements MOA, this will be similar to the feasibility spreadsheets generated after each of our meetings and draft reviews.

If you have any questions before the next meeting please contact me.

All My Best,
Kendall

Kendall Campbell
Archaeologist and Cultural Resources Program Manager
NAS Whidbey Island
[REDACTED]
Oak Harbor, WA 98278
[REDACTED]



2 August 2018, 0900 – 1100 AM

Growler Section 106 Consultation Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Moore – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
Commander Malik (telephone) - JAGC, USN Fleet Environmental Counsel U.S. Fleet Forces Command
Commander Thedwall (telephone) – Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
Lisa Padgett (telephone) – Home Basing NEPA Program Manager, USFF
Bill Manley (telephone) – DFPO, NAVFAC Headquarters
Sarah Stallings (telephone) - Environmental Planning, NAVFAC Atlantic
Lieutenant Commander Parr (telephone) – Regional Legal Service Office, NAVFAC Northwest

Advisory Council on Historic Preservation

Katharine (Kate) Kerr (telephone) – Program Analyst, Office of Federal Agency Programs
Dr. Tom McCulloch (telephone) – Assistant Director, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks (telephone) – Washington State Historic Preservation Officer (SHPO)
Dr. Robert Whitlam (telephone)- Washington State Archaeologist

Washington State Governor’s Office

Jim Baumgart (telephone) – Washington State Governor’s Office Policy Advisor, Human Services Division

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Port Townsend

Mayor Deborah Stinson – Town of Port Townsend

Coupeville

Mayor Molly Hughes – Town of Coupeville

Citizens of Ebey’s Reserve

Maryon Atwood - President

Island County

Commissioner Helen Price Johnson – Island County Commissioner

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR

Environmental Impact Statement Team

Cindy Shurling (telephone) – Consultant team

Introduction –

Captain Moore thanked everyone for participating and discussed how the 106 process has been going on for years and that he is excited to participate in this; Captain Moore noted that the draft analysis was released about six weeks ago, and that this will be an opportunity to discuss that and then lead into that discussion about the mitigation. He noted the importance for everyone to listen to each other and to give each other a chance to talk. Captain Moore thanked everyone for attending, and then turned the meeting over to Ms. Campbell.

Ms. Campbell noted that the purpose of the meeting is to discuss mitigating the adverse effect to historic properties identified in the Navy's determination and come up with communally generated ideas/options; the goal is open conversation and to allow everyone a chance to provide input.

Meeting attendees acknowledged receipt of a copy of the agenda and the Consultation Plan for Resolution of Adverse Effects to Historic Properties and Development of a Section 106 Memorandum of Agreement for the Proposed Growler Airfield Operations Increase at Naval Air Station Whidbey Island.

Discussion and Clarifications of the Meeting Agenda and Memorandum of Agreement (MOA) –

Commissioner Price Johnson noted that the security enhancements were on the agenda. Ms. Campbell clarified that this is a typo, as she had built the agenda from the memorandum of agreement (MOA) for the Outlying Field (OLF) security enhancements, which is in the process of being finalized and signed. In January and February, the Navy had final comments and were ready to move to signature on the OLF security enhancements. It was signed by the Regional Admiral and Captain Moore. The Navy will next send this to Dr. Brooks, to the Advisory Council on Historic Preservation (ACHP), and then will send around to others.

For this MOA (Proposed Growler Airfield Operations), the signatories will be Admiral Gray (Regional Admiral) and the Commanding Officer of NASWI Capt. Army, who takes over on August 17th.

Commissioner Price Johnson asked for clarification of what it means to be a signatory. Ms. Campbell provided the following background. Additional information can be found in the MOA Consultation Plan sent to all consulting parties on July 24, 2018 via email:

- *Signatories* - those individuals/parties that can change the MOA, end it, etc. Typically, this includes the proponents, the SHPO, the ACHP (when they are participating), and tribes (if involved).
- *Invited Signatories* – these individuals/groups would have the similar authorities; typically, the Navy asks people who have a responsibility within the MOA (could be financial). [For the OLF Security Enhancements– the Navy did not invite any other signatories.]
- *Concurring parties* –those that can sign to show that they participated; this provides an opportunity to say consulting parties agree with the developed mitigation strategy.

Commissioner Price Johnson then asked about the Accident Potential Zones (APZs) and if they (the county) would be required to take action. The Navy noted that the mitigation for this undertaking is to meet our obligations under section 106 of the National Historic Preservation Act and is not tied to the APZs.

Section 106 Process and Determinations Document - Ms. Griffin noted her concern with the 106 process for this undertaking. She indicated her feeling that the 106 consultation effort had not been coordinated with the NEPA document. In particular Ms. Griffin pointed out that the determination of effects was not completed when the public was provided opportunity to comment on the Draft EIS. She noted that this was a hindrance for her. Ms. Griffin indicated that the disclosure of adverse effect is acknowledged, but feels that there is no time to comment, which procedurally is difficult.

Ms. Griffin expressed she would have preferred that the 106 findings be included in the Draft EIS. Ms. Kerr from ACHP explained the difference between NEPA and NHPA processes and that impacts under NEPA are not the same as NHPA effects to cultural resources and historic properties. The National Environmental Policy Act (NEPA) analysis is for an overall cultural resources evaluation, while Section 106 specifically focuses on effects to historic properties (i.e., listed or determined eligible to the National Register of Historic Places [NRHP]).

Ms. Griffin also requested clarification on the determinations document finding of impacts to what she referenced as viewsheds. Ms. Campbell suggested moving into the discussion of generating mitigation ideas as a way to address Ms. Griffin's concerns. Ms. Griffin added that if we have moved to the mitigation then we are not allowing discussion of avoidance and minimization. Ms. Campbell suggested that since the Navy determined that there is an adverse effect, they are looking at how to minimize and avoid effects and that this discussion is included in the 106 determination document. She also noted that there is some confusion in the document that may be a result of the copy/edit process, as the editor deleted formatting, so there is not a heading for Sections.

Ms. Griffin asked how the findings related to the viewpoints identified in the document and how these were chosen over all other things. Commissioner Price Johnson also asked for explanation of the adverse effect to the "viewshed". Dr. Brooks stated the SHPO's perspective is that the adverse effect is to the NRHP property and the harm is no to the viewshed. As such her perspective is that there is one finding per project, and this was evaluated on setting, feeling, and association to Coupeville (Central Whidbey Island Historic District) and the Ebey's Landing National Historical Reserve.

Ms. Campbell explained that in looking at the Central Whidbey Island Historic District, the Navy reviewed how the undertaking could potentially diminish the integrity of all historic properties within the Area of Potential Effect (APE). The landscapes are character-defining; they contribute to the Central Whidbey Island Historic District. The landscape components are made-up of views, traffic flow, cluster arrangements, etc. A quiet soundscape is not a part of the character defining qualities of the landscape because a quiet soundscape is not a characteristic that contributes to the historic significance of the Central Whidbey Island Historic District. However, with regard to the perceptual quality of the views, qualities such as noise, smells, views, etc. characterize the landscapes that contribute to the historic significance of the District and as such the integrity of the setting and feeling are diminished in certain areas by increased noise. This is directly connected to the character defining features. Dr. Brooks further indicated the seven elements of integrity (location, design, setting, materials, workmanship, feeling, and association), which are related to the regulations guiding the National Historic Preservation Act.

Commissioner Price Johnson asked if the actions could have an indirect adverse effect to working farms and if not, are the things that are listed at the end of the document on page 71 are the only ones that have an adverse effect. Ms. Campbell explained that the evaluation is confined to the NHPA and the evaluation of historic properties; the agricultural economy is not a historic property type and not evaluated as part of the section 106 consultation. Commissioner Price Johnson asked how the Navy separates out the people from the District and asked Dr. Brooks to explain the health and well-being of the Reserve vs. Section 106.

Dr. Brooks explained that issues to farm workers need to be discussed under NEPA, whereas 106 looks at how the undertaking is diminishing the integrity of eligible or potentially eligible historic properties. It was noted that landscapes are not a property type, but are contributing historic components of a historic district.

Mayor Hughes asked whether the consultation is focusing on districts or buildings, which are critical parts of the reserve as a district (and with the intentional preservation of small farms and rural agricultural lifestyle), and voiced concern for potential loss of small farming, which occurs in the historic district. Dr. Brooks offered her opinion that Rural agriculture must be addressed as part of the mitigation. Mayor Hughes noted the three mitigation proposals offered by the Navy, although in her opinion may be ridiculous, are a place to start; but feels the use of the OLF should be proportional with the use of Ault Field

Discussion of Mitigation, Operations, and Potential Minimization – Discussion of mitigation began with the group noting that the preferred alternative in the EIS proposes a change to the proportion of operations between Ault Field and OLF Coupeville that represents a historic change. Several consulting parties stated that there is no record that the proportion of FCLP's at OLF Coupeville has ever been greater than Ault Field. As such these attendees observed that if this historic level of change cannot be avoided that they desired to see it minimized.

Ms. Griffin noted that the purpose of 106 was to look at how the Navy's proposed actions may affect historic resources, but she believes that something has gone awry in the process when the identified impacts of the undertaking are focused on the area that is most worthy of protection. Ms. Griffin expressed concern that the preferred alternative appears to impact the Reserve disproportionately and wondered why there was no further discussion to look at minimizing impacts through selection of other alternatives to the action.

Dr. Brooks noted that she was with Jim Baumgart, the Governor's policy aide; the discussion was that the Navy needs to evaluate how to diminish the nose and whether that means alternative means of carrying out the operations. Ms. Campbell explained that for the section 106 consultation the proposed undertaking has always been the maximum level of change at both airfields so that it considers the maximum potential effect to historic properties from all alternatives and scenarios. Further she explained that since the 106 analysis presented in the determinations document was based on the aggregate of proposed change at each airfield the methodology for analyzing adverse effects was consistent across the entirety of the APE and applied consistently regardless of historic property type or location.

[Mayor Hughes needed to step out and was joined by Commissioner Price Johnson, who noted she would be contacting Dr. Brooks for a separate conversation for further explanation of the 106 process.]

Ms. Griffin observed that this would be the first time in history with OLF, where they would be shifting a great majority of the Field Carrier Landing Practices (FLCPs) away from the base and to the OLF, which she believed was never intended to be the main location. Captain Moore said that OLF Coupeville existed for this purpose in 1960's and 1970's. During the late 1990's, the base did take some measures to reduce flights at OLF and stopped mining practice in Admiralty Bay using aircraft. Before the Navy was constrained to 6120 operations, there were at times anywhere from 5,000 to 10,000 operations. He noted a number of factors influence the distribution of FLCPs at each airfield. He also clarified that the total number of FCLPs proposed are not historically higher, even if the percentage (distribution) is shifting to a great total number of FCLPs being performed at OLF.

Ms. Atwood noted that the community could not tolerate the noise at the points in history Captain Moore was referencing. Ms. Atwood pointed out that the Commander of NAS Whidbey Island came down to Coupeville at that time and people were not pleased with the level of operations in the 1960' and 1970's. She said that people are angry with the 80/20 preferred alternative and prefer it to not go over the 50/50. She felt this came late in the discussion; the public was not able to see a preferred alternative, and now it is too late to comment on this. Ms. Campbell explained that for the section 106 consultation the Navy has looked at maximum change at both airfields from the start of the consultation process so that the full effects from conducting the majority of FCLP's are considered in the analysis.

Ms. Atwood provided a comment on efforts to find solutions that minimize noise effects noting that the measures suggested by Navy in the section 106 determination document, like advertising, do not mitigate the noise. She also offered that the Whidbey Camano Land trust is no longer taking Navy money for the creation of conservation easements. Captain Moore indicated that the Navy has not been made aware of this and is always looking for conservation partners.

Ms. Griffin raised the issue of the landscape pattern, which includes scenic easements that allow for very limited development rights and are structured so agricultural activities could continue. The easements are meant to allow some economic activity, and they still preserve the landscape and further discussed the Ebey's Landing National Historical Reserve's use of easements.

Ms. Campbell noted that the Navy worked through the Readiness and Environmental Protection Integration (REPI) program. The most current actions relate to natural resources. The Navy is looking at possibilities of adjusting the language to include reference to historic preservation ideals as well. Ms. Campbell also raised the possibility of updating the National Park Service Land Use Change and Cultural Landscape Integrity study from 2003 as a potential mitigation. An updated study may provide a necessary baseline for assessing and monitoring how the final proposed mitigation and minimization efforts are successful in resolving the adverse effects to the integrity of the landscape.

Ms. Griffin noted that a landscape study would not be of interest to the Reserve as they are currently updating their land protection plan, and therefore, it is not the one that is being used for the REPI plan.

Mr. Zipp asked about chevrons, which are devices that can be added to jet engines to reduce noise, whether this was presented in the 106 determination. Captain Moore noted that the Navy is still investigating the use of chevrons on jet engines, which has shown promise, but is not yet advanced enough to deploy to the fleet.

Captain Moore noted his regret that the Navy was not invited to the table 40 years ago during the creation of the Reserve. The Navy is also a property owner in the Reserve as well as a part of the history of the Reserve. As the Navy is getting ready to celebrate the 75th Anniversary of OLF, is there a way of integrating the Navy into the Reserve's plan. The Navy is also looking at cumulative impacts, too.

Ms. Campbell put in reminder for the meeting purpose to look at mitigation measures due to the current undertaking, which is the increase in aircraft, squadron distribution, and increase in operations. Although the Navy does want to capture information about the community concerns as a whole (neighbor roles), this consultation was not about Navy presence on Whidbey Island and Growler noise in general.

Mapping in the 106 Document and Integration of Flight Patterns - Ms. Griffin asked for clarification on the +5 metric and how mapping worked in the Section 106 evaluation. Ms. Campbell first noted that she attempted to address Ms. Griffin's earlier concern that she could not see street names or distinguishing land forms on the maps in the document by making the shading lighter so that the base map was easier to distinguish. The group then looked at the large map (pg. 59) within the determination

document. Data was shared between NEPA analysis and this 106 determination; the Navy looked at the maximum amount of change in proposed operations at both airfields and looked at where the change in operations was going to substantively change the frequentness of noise exposure. For OLF, there are more areas where a substantive change in frequentness of noise exposure occurs. Specifically, the Navy looked at areas where a 5 dB DNL (decibels Day-Night Sound Level) or more change occurred. At Ault Field no area in the APE showed a dB DNL change of 5 or greater using the maximum amount of change in operations. At OLF Coupeville the maximum amount of change proposed in operations resulted in several areas where the data indicated the area would experience a change of 5 or greater dB DNL.

In response to some questions, Captain Moore indicated the Growler aircraft have a tighter turn radius which reflects some of the change in noise exposure at OLF represented in the section 106 maps. The tighter turn radius will reduce the frequency of noise exposure in some places and expose new places to increased frequency of noise. In addition, the undertaking proposes greater use of runway 14, than in the past. Captain Moore also stated that operations at OLF Coupeville are dynamic; there may be more operations during the winter when the winds are better. The Navy manages both natural and man-made constraints that effect how operations are conducted.

Ms. Atwood noted that the community is not necessarily expecting change in turning radius and use of runway 14 at OLF Coupeville and would want to know this. In addition, Ms. Atwood asked if there was truth to the rumor that the only reason why the Navy needs OLF is because we lack parallel runways at Ault Field. She further asked why the Navy does not just build a new parallel runway at Ault Field. Captain Moore indicated that the parallel runway solution is not an accurate statement of the variables that reflect airfield management and operations. First, there are fiscal constraints to being able to build another runway at Ault Field due to the Navy's need to support shipbuilding and maintenance and other aviation maintenance backlog as well as that Ault Field creates less realistic conditions for practicing landing on an aircraft carrier. For example, Ault Field is in a valley, so there is a limitation on flight patterns and operations that can be performed. In addition, the pilots would not get ideal training; resulting in more risk because the training is not as effective for preparing the pilots for what really happens when landing on a carrier. Ms. Griffin asked for clarification on whether the OLF is an approved runway adequate for the type of operations proposed. Captain Moore explained that OLF is sufficient to the proposed requirements because we do not do full-stop landings at OLF; they could do these if they reduced weight/fuel, but that would only happen in an emergency situation.

Ms. Griffin noted that with regard to the landscape areas, they need to see other information on the maps to get a sense of where things are located. Ms. Campbell noted that the Navy did include that information on the maps and had brought to the meeting larger copies of the maps with lighter shading to better see the landscape feature.

Potential Solutions – Programmatic View, REPI, and Scenic Easements - Mr. Zipp noted that if a person does rehab a house and exceeds 50% of value, they then would have to remodel it to address noise/vibration. This would have an economic incentive that could adversely affect historic structures and building code issues because addressing these issues in accordance with historic standards costs a lot of money – i.e., a line of indirect effects. Mr. Zipp suggested that they provide accommodations in the county so this impact cannot occur. Dr. Brooks suggested the possibility of soundproofing or structurally strengthening for noise/vibration. She indicated there is a discussion of how to help homeowners with this; the Governor is involved, and the Navy should be involved, too.

Ms. Griffin suggested that it could be a programmatic impact to the reserve, meaning that they could lose historic structures. Mayor Stinson suggesting providing noise cancelling headphones to farmers. Ms. Campbell mentioned the potential for discussion of a programmatic approach as an alternative focused on

long term solutions and studies. Ms. Kerr said it was premature to start this discussion, but can table it for now.

In response to a question about the need for a LSO to conduct FCLP, Captain Moore explained the LSO – landing signals officer – who stands on the edge of runway is in control of the aircraft as it comes in and provides changes to help land accurately.

Mr. Zipp noted a tool that NPS brings to the table – scenic easements. He articulated that the purpose is to try to harmonize the REPI programs easements with the language that is used to protect historic integrity to protect areas where it can be done. Ms. Griffin noted that every year the trust makes recommendations to the NPS for the priorities that reinforce the reserve. The question was asked if the Navy can purchase land and then keep under another’s ownership. Captain Moore responded the Navy committed to reviewing its authorities to purchase easements that would protect landscapes.

Ms. Griffin noted that the funding of an intern to help inventory is no longer needed. Ms. Campbell suggested that this also could be used to help organize the data.

Involvement of Others - Ms. Griffin asked how the public is being involved. Ms. Campbell explained that the 106 information was announced in a press release in June, was posted online, and is available on the EIS website. She noted that the public can comment on that the determination draft at any time. In addition, the public will have the opportunity to comment on the MOA once parties agreed to draft stipulations. There is no timeline for receiving comments on the 106 consultation and comments are accepted until the consultation effort concludes with the signing of the MOA. Ms. Griffin asked Dr. Brooks if she felt the Navy’s public involvement proposed was adequate. Dr. Brooks indicated that the Navy could determine how to meet the requirement for public involvement and posting documents online is one way to involve the public, but the State prefers how Washington State Department of Transportation conducts their public meetings where they typically have big whiteboards to allow the public to write out ideas.

Ms. Campbell asked Dr. Brooks to share the SHPO’s response and suggested strategies to resolve the adverse effect to historic properties with the consulting parties. Dr. Brooks responded that she has already made the Navy aware of what the state was proposing. Dr. Brooks further noted that the WA Governor will be speaking with Assistant Secretary of the Navy, Phyllis Bayer regarding mitigation. She noted that Jim Baumgart expressed that the Navy needs to work with the aircraft to reduce the jet engine noise. She also noted that the state has talked about operating schedules (weekends/school hrs.), funding to rehabilitate historic homes with soundproofing, and a barn program. She said the Navy is aware of these, and said she can write this in a formal letter if the Navy required something more formal.

Next Steps – Ms. Campbell noted that she will write-up a draft of the MOA, which will include the administrative stipulations and some ideas about what can be done to address resolution of adverse effects. She explained that the timeline was aggressive. Therefore, the Navy hoped to have a draft by next week and then at that point in time. Dr. Brooks asked that the Navy avoid the word “kiosk” and noted that Jim Baumgart is clear about measures the SHPO wants, and the Navy needs to make sure it is in the MOA.

Ms. Kerr indicated that at this point in the process the consulting parties are not ready to draft a MOA even a week from now as there needs to be more brainstorming and discussion on ideas. She would like to see a synopsis of the meeting in order to be clear that the minutes capture what was said and the expressed the intentions. She also needs a clear list of the ideas introduced and when the Navy can respond with alternatives that may be feasible and explain why they can or cannot take certain steps. All parties need a

greater understanding of ideas and feasibility and then the parties can get to the next step of preparing an agreement document and provide it for review.

Ms. Campbell asked if it would be helpful to do an excel spreadsheet regarding the feasibility of the ideas generated at this meeting, for which Ms. Kerr indicated “yes.” Ms. Kerr said that they may need other meetings scheduled to either discuss more input on the ideas or see if further discussion of alternatives are needed. Ms. Kerr suggested setting up a routine call every two to three weeks with the consulting parties to continue discussion. Ms. Campbell will provide notes and then the spreadsheet. Another meeting will be scheduled for mid-August to discuss the spreadsheet.

The meeting adjourned, and the conference call ended at about 11:00 AM PST.

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Moore, Geoffrey C CAPT CO NAS Whidbey Is., N00](#); [Arny, Matthew L CAPT NAS Whidbey Is., N00](#); [Welding, Mike T CIV NAS Whidbey Is., N01P](#); [Brown, Theodore C CIV USFF, N01P](#); [Padgett, Lisa M CIV USFF, N46](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#); [Malik, Joan M CDR USFF N01L](#); [Manley, William R CIV NAVFAC HO, EV](#); [Cook, Darrell E CIV NAVFAC LANT, EV](#); [Larson, Bruce J CIV NAVFAC LANT, EV](#); [Ellis, Lyz A CIV NAVFAC NW, PRW4](#); [Montague, Michael G LCDR USFF HQ, N01L](#); [Hall, Amberly CIV NAVFAC LANT, Counsel](#); [Rankin, James F CDR NAS Whidbey Is., N01](#); [Henkel, Juliana P CIV OPNAV, N45](#)
Cc: [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#); [Bengtson, Melanie L CIV NAVFAC NW, PRW4](#)
Subject: FW: Citizens of Ebey's Reserve Comments Section 106 Determination of Effect for Growler Operations at NASWI August 15, 2018
Date: Thursday, August 16, 2018 12:47:33 PM
Attachments: [Section 106 June 2018 letter & Comments by COER11.pdf](#)

I received comments from COER on the section 106 determination document. I am still working through the document, but gave it a quick review and have yet to see anything unexpected.

We can discuss at our Monday meeting prior to the next consultation meeting.

Best,
Kendall

-----Original Message-----

From: maryon [REDACTED]
Sent: Thursday, August 16, 2018 9:12 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Helen Price Johnson [REDACTED]; Mayor@townofcoupeville.org; Roy Zipp [REDACTED]; Brooks, Allyson (DAHP) [REDACTED]; dstinson@cityofpt.us; Katharine R. Kerr [REDACTED]
Subject: [Non-DoD Source] Citizens of Ebey's Reserve Comments Section 106 Determination of Effect for Growler Operations at NASWI August 15, 2018

Kendall, on behalf of my organization, I am submitting this letter and comments to you and to the other participating parties as part of the public comment process.
Please acknowledge receipt.

Thank you, Maryon Attwood

Maryon Attwood, COER, President
citizensofebaysreserve.com [REDACTED]
[REDACTED]
Coupeville, WA 98239
[REDACTED]

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

August 15, 2018

Kendall Campbell
NASWI Cultural Resources Program Manager and Archaeologist

[REDACTED]
Oak Harbor, WA 98239

Dear Kendall,

The community group, Citizens of Ebey's Reserve (COER) is the only citizens group participating in the consultation on the development of a memorandum of agreement to address adverse effects from the Navy's Growler expansion pursuant to the Section 106 Process of the National Historical Preservation Act.

We appreciate the invitation to participate and having read the Determination, we have several serious concerns and comments. The Section 106 process was not conducted in a timely manner alongside the Navy's EIS Growler Expansion process and, as a result, has produced a seriously flawed result. Nor was a public process provided, as intended, to an uninformed public who will bear the impacts of these substantial, and in some areas, new effects.

First, since the magnitude of this Determination is so large and potentially so damaging, we would like to ask that the Governor of our State speak with the Assistant Secretary of the Navy, Phyllis Bayer, to express his concerns and need for someone at the appropriate level for communication and decision making to be working with the State and the community to actually resolve an unsatisfactory Section 106 Determination of Effect for the WA-8 G Growler at the OLF in Coupeville. The United States Navy, not even during the Vietnam War, ever conducted more than 50% of their flight carrier landing practices (FCLP's) at the Outlying field in Coupeville. Conducting 80% of Growler FCLP's (24,700 operations) over Island County's most precious historical properties and Historic Districts is an unacceptable plan and must be revised.

In addition to asking for a Navy decision-maker, our next concern is with The Navy's commitment to public process. The Navy's undertaking and Section 106 Determination of Effect will have significant impacts on the Ebey's Landing National Historical Reserve and the two other Historic Districts in Central Whidbey. The general public is totally unprepared and uninformed about the magnitude of these impacts. We request a public forum that will include Consulting Partners, such as: the Ebey's Landing National Historical Reserve Board of Directors, the National Park Service staff, the Town of Coupeville, Commissioner Helen Price Johnson, the State Office of Historic Preservation, Citizens of Ebey's Reserve, and other sound and historical property experts and professionals. This forum should be organized for a date in September 2018 and the Navy should provide an appropriate meeting location and representatives to

record public comments and concerns. The Navy should consider the public's comments and concerns, as the Section 106 process requires, in their final memorandum of agreement.

None of the measures suggested in the Navy's Determination minimize the Growler's noise effects. They are irrelevant measures that have no impact on avoiding or resolving adverse effects.

The only real solution is to relocate the noise created by Growler flight carrier landing practice (FCLP) operations (see Figure 1) from Whidbey Island to an environmentally suited and community-welcoming location. We appreciate that this may initially be less convenient for the Navy. But moving the FCLP training mission far surpasses the Navy's continued insistence on trying to force carrier training where convenience is measured against real safety issues, as well as, costly infra-structure improvements needed at both Ault Field and OLFC, along with a host of issues related to the community and its stewardship of its cultural and historic heritage.

A brief mention of the Navy's 1998 FEIS completed to determine where F/A-18E/F aircraft on the west coast would be located concluded that Lemoore would be the location. Two installations were considered; NAF El Centro and NAS Lemoore. Ault field was rejected as a finalist because of its crossed runways and its sub-standard OLF in Coupeville. Ault field's crossed runways and lack of physical space should not be the reason today that more operations are being planned over the historic districts of Central Whidbey. The Navy's own planners selected larger installations for their training missions – not NAS Whidbey Island.

Desecration of this nation's first Historic Reserve, a unique partnership that requires property owners to be stewards, is not an acceptable option. This historical heritage must have maximum protections - not maximum impacts from Growler jet noise. Protecting this Reserve is a delicate balance between the community, the people, and the land. If these relationships are broken – the Reserve will be broken.

On September 1, 2016, COER submitted a 22-page comment on your initial Section 106 call for comments. In examining your current 106 DOE, we note that it failed to address nearly all of the concerns COER raised.

We look forward to working with you for a better resolution and outcome for this process and anticipate a result that will better reflect the intentions of the National Historic Preservation Act.

Thank you for the opportunity to comment.

Maryon Attwood, President

Citizens of Ebey's Reserve for a Healthy and Peaceful Environment (COER)

cc: Commanding Officer, NASWI, consulting partners of the Section 106 Process, Governor's Office

Citizens of Ebey’s Reserve Comments
Section 106 Determination of Effect for Growler Operations at NASWI
August 15, 2018

Citizens of Ebey’s Reserve (COER) herein addresses our concerns regarding the June 16, 2018, “Section 106 Determination of Effect for the EA-18G ‘Growler’ Airfield Operations at the Naval Air Station Whidbey Island Complex” (hereafter, 106 DOE), which includes its Outlying Field (OLF) in Coupeville.

The current 106 DOE lists 18 actions to mitigate the impacts of Growler noise on the Ebey’s Landing National Historical Reserve (hereafter, the Reserve) and its visitors. None of the measures suggested, however, minimize the noise. They are irrelevant measures that have no impact on avoiding or resolving adverse effects.

Below, we highlight the most critical failures. They fall into three broad categories: (1) technical errors and shortfalls, (2) impacts of Growler FCLPs on the Reserve, (3) non-validity of the OLF historical paradigm.

1. Technical Errors and Shortfalls

Instead of applying appropriate noise metrics, the 106 DOE ignored the problems and relied on the misleading day-night noise level (DNL).

There are numerous problems with using the DNL metric to evaluate impacts on buildings and on Reserve visitors. We do not dispute that the DNL is a widely used metric, but its purpose was to provide a measure of community annoyance to noise, not to assess the impacts of loud noise on buildings or on the national park visitor experience, which is a rather specialized, almost binary form of annoyance and harassment. The reliance of the 106 DOE on the DNL metric creates a number of misuse issues, examined below.

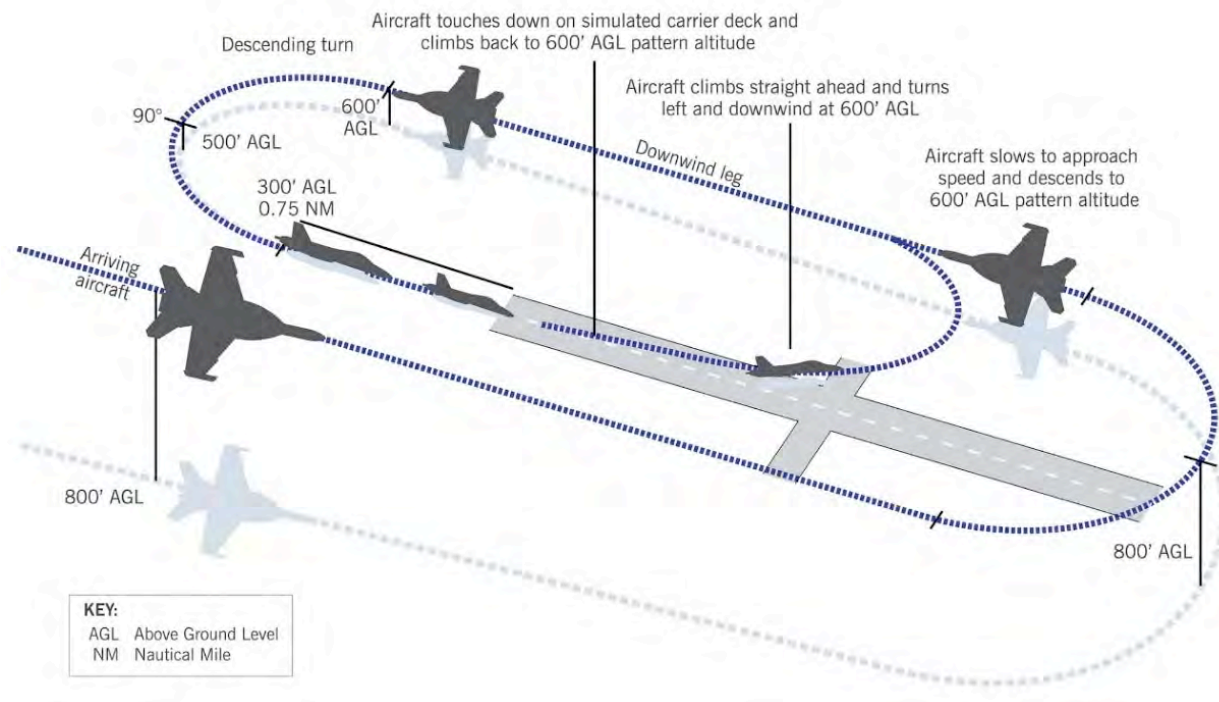


Figure 1: Schematic of an FCLP on the northeaster circuit, Path 14. Note the altitudes above ground (AGL).

(a) **“Substantive Change” not Defined.** —Page 55 of the 106 DOE speaks of areas where *substantive change* in DNL (delta DNL) was estimated via modeling. There is reference to a 5% change, but it is not clear if that was supposed to equate to *substantive*. That is, there was no definition of what constituted “substantive” and whether it was defined before or after the noise modeling was conducted, or whether it is just a subjective call of some sort. The basis and rationale for “substantive” should have been decided and justified prior to conducting any analysis to determine delta DNA. That is established expectation that precludes post-results fudging and, hence, is normal scientific protocol.

(b) **Modeled DNL Contours without Verification:** Studies have revealed that modeled noise has significantly underestimated noise measurements taken on-site. A study of 36 sites around Raleigh–Durham airport found the modeled noise contours consistently underestimated the actual on-site contours by 5-15 decibels; that means actual noise levels were about 50% to 150% louder than NOISEMAP (1991–1998) and INM (1999–2002) models had projected.¹

¹ Technical Report on Preparation of Day-Night Sound Level (DNL) Contours of Aircraft Noise During 2003 Raleigh-Durham International Airport North Carolina. March 2005. HMMH Report 295097.001 . Harris Harris Miller & Hanson, Inc., 15 New England Executive Park, Burlington, MA 01803
< http://198.1.119.239/~flyrduco/rduaircraftnoise/noiseinfo/downloads/RDU_2003_DNL.pdf >

Modeled data does need to be verified with on-site data. The mere fact that “*the latest software*” was used, does not establish reliability without actual on-site validation, as stated by the World Health Organization²:

While estimates of noise emissions are needed to develop exposure maps, measurements should be undertaken to confirm the veracity of the assumptions used in the estimates...as indicated in Chapter 2 modeling is a powerful tool for the interpolation, prediction and optimization of control strategies. However, models need to be validated by monitoring data...the accuracy of the various models available depends on many factors, including the accuracy of the source emissions data...

The 106 DOE modeled noise contours, however, are not validated by on-site measurements, so the contours cannot be reliably upheld. The Navy continues to refuse on-site noise monitoring, although they have been asked to do so by the State of Washington and the Environmental Protection Agency, among many others.

(c) The 65-dBA DNL Now Invalidated.—The military proclaims that it uses the best recent science available when conducting environmental assessments. This bold statement seems to conflict with its continued reliance on the now-defunct 65-dBA DNL as having some sort of scientific, yet unspecified function. The 106 DOE insufficiently attempts to justify its use simply because it has been widely used in the past.

The 65-dBA DNL was developed for only one purpose: To provide an index to assess community annoyance to noise. In 1992 the Federal Aviation Administration (FAA), based on a synthesis of 1978 studies, established in Regulation Part 150 that a maximum average DNL of 65 dBA or above is incompatible with residential communities. That 65 DNL was derived by the Federal Interagency Committee on Noise (FICON) based on a dose/response curve—the Schultz Curve—showing that 12.3% of the population is highly annoyed by aircraft noise at a 65 DNL. Accepting that, the FAA and Congress subsequently adopted 12.3% as the *annoyance threshold that should not be exceeded*, and 65 DNL subsequently became the standard.

The international scientific community, however, has recently found that the 1978 studies and Schultz dose/response curve were flawed, invalidating the 65 DNL threshold standard. On March 9, 2016, the International Organization for Standardization (ISO)—an independent, non-governmental organization of 162 national standards bodies, including the U.S.—published a revision of ISO standard on measurement and assessment of environmental noise. The revised ISO standard reflects 5 years of analysis by an ISO technical committee, which produced the new dose/response curve based on 21st century research. The American National Standards Institute (ANSI) version of the ISO standard followed and mirrored the ISO findings. Hence, there is ubiquitous concurrence of worldwide noise experts. Consequently, to be consistent with

² Berglund, B., Lindvall, T. and Schwela, D.H (Eds.). 1999. HWO. Guidelines for community noise. World Health Organization, Geneva. < <http://www.bvsde.paho.org/bvsci/i/fulltext/noise/noise.pdf> >

12.3% annoyance standard, the correct high annoyance threshold level is actually 55 DNL. At 65 DNL approximately 25% are highly annoyed or double the allowable congressional standard.

It is entirely proper and to be expected that the Navy use “the best available science,” but it cannot claim to honor and uphold science and concurrently rely on an undefendable, 40-year-old, scientifically discredited 65-dBA DNL.

(d) Wrong DNL Averaging Method. —Even though the 106 DOE should have used the 55 DNL, it is not really clear what use was intended for the 65 DNL. Presumably it was to provide insight on Reserve visitor experience and potential structural damage. Both those uses for the DNL are actually misuses. Exacerbating that misuse, even the DNL calculation method used was inappropriate and inconsistent with standard procedure.

There are two DNL types, one uses all 365 days as an average (called Average Annual Day or AAD) and the other is based on just the days of flying (Average Busy Day or ABD).

Which of those two well-established standards is used therefore depends on airport use. Airports used daily use AAD; those used intermittently should use ABD (busy days only). For example, if airport use is just 50 days per year, the DNL should be averaged over just those busy 50 days, not all 365 days. That is, to analyze noise annoyance, the evaluation must focus on the days when the noise is occurring. For example, to properly evaluate noise annoyance related to fireworks on the 4th of July, it makes no sense whatsoever to calculate the average DNL for the year by averaging the 4th in with other 364 other “quiet days.” Those 364 days are not pertinent to understanding fireworks annoyance levels. It is the difference between the two that creates annoyance.

Because, the DNL relevant to evaluating jet noise annoyance can only be determined for days when the jets are flying, the use of the 365-day AAD averaging understates Growler FCLP noise annoyance and reduces the acreage within the 55 and 65 DNLs contours.

As explained by noise internationally prominent noise expert Sandy Fidell (Fidell Associates, Inc.)³, “DNL is, by definition, a 24 hour noise measure. Thus, DNL contours are intended to

³ President, Fidell Associates; positions held at Bolt Beranek and Newman and successor organizations: Director, Environmental Technologies Department; Manager, Environmental Research and Data Systems Department; Senior Manager; Lead Scientist; Senior Scientist; Manager, Los Angeles Computer Laboratory. [Note: BBN Technologies (originally Bolt, Beranek and Newman) is an American high-technology company that provides research and development services. Based in Cambridge, Massachusetts, it is a military contractor, primarily for DARPA, and also known for its 1978 acoustical analysis for the House Select Committee on the assassination of John F. Kennedy. BBN of the 1950s and 1960s has been referred to by two of its alumni as the “third university” of Cambridge, after MIT and Harvard. In 1966, the Franklin Institute awarded the firm the Frank P. Brown Medal. BBN became a wholly owned subsidiary of Raytheon in 2009. On February 1, 2013, BBN Technologies was awarded the National Medal of Technology and Innovation.] . Fidell’s Honors, Societies, and Advisory positions include: Acoustical Society of America (Fellow); Associate Editor, Journal of the Acoustical Society of America; U.S. Representative to International Standards Organization Technical Advisory Group on Community Response Questionnaire Standardization (ISO/TC43/SC1/WG49), and to ISO Working Group 45 on Community Response to Noise; Acoustical Society of America Representative to I-INCE Technical

represent the aircraft noise exposure during a hypothetical, but "typical" or otherwise representative day."

So, the 106 DOE use of the 365-day AAD artificially lowered the DNLs. As Fidell explains, *"averaging the exposure created on one night per month over a year is a pretty big stretch: $10 \cdot \log(12/365)$ is about a 15 dB underestimate of exposure on nights when FCLP operations are conducted.* Note that +15 dB equates to being about 1.5 times louder, or a misrepresentation of 150%,

Correct use of busy-day averaging is affirmed in a 2013 noise study conducted by Wyle (the Navy's exclusive noise expert) for the Avon Park Air Force Range Complex.⁴ Because flight operations occurred, on average, 260 days of the year, Wyle appropriately used busy day (ABD) averaging: *"For noise modeling, total annual flight operations were converted to Average Busy Day (ABD) flight operations by dividing annual flight operations by the number of airfield operating [busy] days in a year..."*

And still another study, this one for NAS Whidbey Island,⁵ provided this proper application of ABD averaging.

Noise contours for Naval air facilities are based on either the Annual Average Day or the Average Busy Day. The Navy document that addresses noise and land use compatibility around Naval facilities, OPNAVINST 11010.36A, Air Installation Compatible Use Zones (AICUZ), states: Noise exposure contours will be developed using either the Annual Average Day, or Average Busy Day where analysis indicates that the Annual Average Day would not properly reflect the noise environment. For example, at air installations, which are closed on weekends or where weekend operations are substantially less than weekday operations, the use of Average Busy Day is appropriate. Because public attitudes toward an intermittent noise environment are most probably related to the days with higher noise exposure, **noise contours for a "busy day" of flying activity would be expected to relate more closely to public attitudes than contours for average annual daily activity.** (emphasis added)

Study of "Metrics for Environmental Noise Assessment and Control"; Acoustical Society of America, Technical Committee; National Research Council Committee on Hearing, Bioacoustics and Biomechanics; Current or past member of the American National Standards Institute, Committee on Bioacoustics, Working Groups on Environmental Noise Measurement and Assessment and Auditory Magnitudes, and Community Response to Noise Levels; American Helicopter Society, Committee on Acoustics; IEEE Power Engineering Society, Audible Sound and Vibration Subcommittee; Design Review Group for FAA's Integrated Noise Model software; BBN Outstanding Publications Awards in 1989, 1991, 1996.

⁴ Revised FINAL Noise Study for the Avon Park Air Force Range, Florida. 2013. Wyle Report WR 13-05.

⁵ Page 4-24 of the U.S. Navy's 1993 DEIS entitled "Management of Air Operations at Naval Air Station Whidbey Island." (Attributed to the Department of the Navy's Western Division Naval Facilities Engineering Command Engineering Field Activity Northwest for The Proposed Modification of Air Operations Management at Naval Air Station Whidbey).

The 2005 AICUZ and related 2004 Wyle report for the NAS Whidbey Island likewise explain, “*For some military airbases, where operations are not necessarily consistent from day to day, a common practice is to compute a 24-hour DNL or CNEL based on an average busy day, so that the calculated noise is not diluted by periods of low activity.*” (emphasis added)

Nevertheless, the 2016 NASWI draft EIS opted to use AAD with this rather strange explanation refuting its own 2005 AICUZ (pages 3-12 to 3-13); presumably this weak non-explanation applies to the 106 DOE use of AAD as well.

The intent of this EIS is not to directly support the AICUZ program [which calls for ABD], but to use best available science as required under NEPA to develop an accurate analysis of potential noise impacts from the Proposed Action. Thus, while related, the AICUZ standard is not necessarily an appropriate NEPA standard. Using ABD would greatly overstate the nature of the noise impacts at OLF Coupeville, thus providing decision makers and the public with an inaccurate analysis.

Actually, just the opposite: The AAD method the Navy used is “*providing decision makers and the public with an [inaccurate] analysis*” because it “*greatly [understates] the nature of the noise impacts.*” The motive is fully apparent and inconsistent with NEPA, and it blatantly contradicts the assertion that the Navy uses only the best available science.

(e) Misuse of the Decibel A-Scale. —Growlers produce far more low-frequency noise (LFN) than their Prowler predecessor. The “Growler” name is a reflection of its LFN. The decibel A-scale (dBA), however, filters out LFN, and hence, use of dBA produces lower decibel readings for Growlers than would the C-scale (dBC). LFN also travels further than higher frequencies because its attenuation rate is less. Hence, it is measurable at greater distances than are higher frequencies. And, noise contours for Growlers based on the A-scale will include less landmass than if the C-scale were used. Said another way, if the C-scale had been used, the noise maps supplied by the Navy would include much more landmass than the ones they have provided and these would be a truer reflection new areas that will be affected by noise from the Growlers.

In addition, LFN travels through walls, and other relative hard surfaces because its reflection rate is far less than higher frequencies. Hence, LFN produces more noise-induced vibration, and that is problematic not only for structures but also for humans and wildlife exposed to LFN.

According to Mireille Oud, a medical physicist, “*There is no shielding against LFN. Since LFN propagation is mainly structure-borne, closing doors and windows is not effective. Earplugs are of no use, because LFN bypasses the eardrum.*”⁶

So here again, a metric seems to have been selected that does not objectively inform, but rather has been selected to distort and hide the real effects and impacts of noise generated by the Growler aircraft.

⁶ Mireille Oud, Low-frequency Noise: a biophysical phenomenon, Presented at Congress “Noise, Vibrations, Air Quality, Field & Building”, 6 November 2012, Nieuwegein, The Netherlands.

2. Impacts of Growler FCLPs on the Reserve

The impacts of Growler FCLPs on Ebey’s Landing National Historical Reserve fall primarily into two categories: (1) effects on historic structures, and (2) effects on visitor experience.

(a) Assessment of Growler FCLPs on Historic Structures. —The 106 DOE asserts that, “*The DNL metric is the current standard for assessing potential effects to historic properties because it factors the number, frequency, and energy (loudness) of noise events. The DNL metric is a cumulative measure and represents long-term noise exposure rather than a sound level heard at any given time, which makes it appropriate for assessing long-term direct and indirect auditory, visual, and atmospheric effects to historic properties* (page 25).” The Navy contradicts itself in making that assertion. As discussed below, the 106 DOE concludes that 130 dBC is the approximate threshold for vibrational noise damage. Hence, by selecting the A-scale DNL average as the metric to evaluate noise damage to buildings, there can be no damage because the DNL says nothing about how long or how often that 130 dB is approached or exceeded. That is, the DNL hides the damaging component of noise in the same way that the average New Orleans wind speed in 2005 provides no insight whatsoever about the damage caused by 150 mph winds of Hurricane Katrina.

Pressure is the damaging component of sound that can cause solid surfaces to vibrate. The greater the noise, especially LFN, the more intense the pressure and the greater the vibration. There are a number of other metrics that could be used that would quantify the amount of damaging noise exposure (e.g., sound equivalent level, maximum un-weighted Z-scale). So again, why has a misleading metric been used instead of an informative one?

Pages 59-61 of the 106 DOE, briefly discuss the only studies done on historical structures from jet (the supersonic Concord) noise, but there is no data or information to indicate what the dBC noise levels were at the buildings studied. Nor does the 106 DOE describe structural aspects of the historic buildings evaluated and how they may differ or be similar to the Reserve’s structures. Absent that critical information, the two cited studies cannot be credibly related to the Reserve’s structures and are of little value or pertinence.

The 106 DOE, however, goes on to reference a 2012 study at NAS Whidbey Island that “*suggested that sounds lasting more than 1 second above a sound level of 130 C-weighted decibels (dBC) are potentially damaging to structural components (Kester and Czech, 2012),” but that none of the conditions evaluated for the study caused C-weighted sound levels to exceed 130 dBC...[albeit] takeoff conditions had C-weighted sound levels greater than 110 dBC for both types of aircraft, creating an environment conducive to noise-induced vibration (Kester and Czech, 2012).*” This does not inform what the dBC levels were during takeoff but if they were conducive to noise-induced vibration, presumably they were at or near 130 dBC. Importantly, the type of Ault Field area structures examined in that 2012 study are not described to permit their comparison to historic structures on the Reserve. That is, were the structures contemporary to-

code buildings or older historic ones? We also noted that the Kester and Czech 2012 is not included in the literature-cited section, i.e., is it a peer-reviewed publication in the formal literature? Nevertheless, the 106 DOE does seem to waffle on the applicability question:

Because of a wide range of variations in building code and aircraft types, the U.S. has yet to develop a precise threshold for adverse effects to the integrity of buildings and structures. Therefore, this study [the 106 DOE] applies the same standards used in the 2012 noise study for the assessment of noise and vibration from Navy airfield operations to historic properties within the APE.

So, presumably the 130 dBC for >1 second is the Navy's accepted standard.

In 2016, the National Park Service (NPS) conducted a 31-day noise monitoring study at two historic buildings in the Reserve: the Reuble Farmstead [approximately under Path 32] and the Ferry House [further away]. The highest recorded sound pressure level was 113 dBA during FCLP activity over the Reuble Farmstead (note, that was the A-scale, not the C-scale, which will always be greater).

The NPS study evaluated the A-scale that affects human reactions, and not C-scale, which manifests the potential for vibrational damage. The 106 DOE, however, concluded that *“it is unlikely that sound pressures would approach a peak unweighted sound level greater than or equal to 130 dBC, which is the level that would be considered potentially damaging to structures at those locations.”*

It may well be that 130 dBC is a realistic threshold for structural damage, or the damage threshold could be less for ancient structures, but we are willing to accept that 1 second at ≥ 130 dBC is perhaps a general threshold to induce noise damage.

However, we reiterate that noise levels have to be measured on site. So why has the Navy strenuously resisted any on-site evaluations of Growler noise in spite of the fact they know that several credible published studies have shown modeled noise to significantly underestimate on-site monitoring.

Because the Navy provided no on-site monitoring, COER hired noise expert, JGL Acoustics, to examine noise under OLF path 32 in June 2013 and again in February 2016⁷. Among other metrics, JGL recorded maximum un-weighted peak noise levels of 131 to 134 dB at five separate recording locations under the Path 32 flight path. Two of those stations were less than a mile from the Crocket Barn and the Reuble Farmstead.

NOTE: the maximum un-weighted noise levels JGL recorded equaled or exceeded Navy's 130 dBC threshold for noise damage.

⁷ <http://citizensofebeysreserve.com/Files/Lilly%20Report%202016.pdf>

As a result, the JGL findings, the only un-weighted peak levels recorded on site and on two separate occasions, strongly indicate a potential for vibrational damage to historic structures. The A-scale data for both the 2016 NPS sound study and the two JGL sets of recordings are quite similar, supporting the veracity of each.

So, whereas the 106 DOE concludes that it is “*unlikely that sound pressures [in the Reserve] would approach a **peak unweighted sound level** greater than or equal to 130 dBC,*” the information presented above shows that peak unweighted sound level is over 130 dB on nearly every fly-over. While the 106 DOE dismisses any likelihood of Growler damage to Reserve structures, the information here indicates the Navy’s conclusion is not supported with reliable data. In contrast, mutually supportive on-site recordings (JGL and NPS) strongly indicate that structural damage is actually quite likely.

(2) Effects on Visitors and the Three Designated Historic Districts. —The 106 DOE use of the 65 dB DNL to assess impacts on Reserve visitors is not acceptable because it white-washes and converts extremely loud noise into some sort of constant hum, a 65 dBA white noise that is always there. Of course Growler noise is not an ever-present ambient noise. Rather it is an extremely loud noise superposed on a very quiet ambient noise. And it is that horrific noise, the sudden dramatic increase in noise over the quiet solitude of the ambient level that upsets and disturbs and denigrates visitor experience. The DNL is worthless to assess that because it suffocates the Growler noise with the ambient quietness noise.

In addition, even if the DNL had some utility to assess visitor experience, which it does not, as discussed in section 2 (d) the scientifically now valid DNL threshold is 55 dB, not 65 dB, regardless of whether the Navy uses it or chooses, instead, to play games with science. Knowing the Navy prides itself on applying the most current and accepted scientific information, the 65-dB contours need to be revised to 55 dB, which will greatly increase the land mass and understanding of noise harassment impacts within the new contours.

Instead of the negligible application potential for DNLs to assess Growler noise impacts on Reserve visitors, one valid metric is a measure of how often and how long in a given year will Growlers be in the air over or near to the Reserve. Under the Navy’s recently proclaimed preferred option for the OLF there are to be about 24,000 operations annually over the Reserve. If there were 100 days of carrier landing practice (busy days), there would be about 3 sessions per busy day (assumes 297 practice sessions/year⁸ divided by 100 busy days). That amounts to about 120 min or 2 hours of noise each fly day, most of that (95%) occurring between noon and 10:00 PM. If practice were confined to 60 busy days, there would be about 5 sessions per fly-day (297 sessions/year divided by 60 busy days) amounting about 200 min or 3.3 hours of noise each fly day.

⁸ That is, 23,700 operations per year divided by 80 ops/session or 4 jets each conducting 20 operations (1 landing + 1 takeoff = 2 operations) or 10 circuits of the OLF.

COER does not agree that 60 to 100 days of a Reserve visitor experience significantly impacted by Growler noise harassment is trivial or discountable. That, however, is what the 106 DOE implied from its “DNL analysis,” albeit the Navy has admitted elsewhere to generic impacts, yet provided no real solutions.

On page 54, the 106 DOE argues that Growlers overhead do not impact the visual or atmospheric aspects of the District: “[The] temporary introduction of a visual and atmospheric elements in the sky does not indirectly alter the characteristics of the district that make it eligible for listing in the NRHP.” The reasoning seems to be attended to the fact that there are ships and vehicles within sight. COER disagrees with that reasoning. The atmospheric conditions may be affected; at least no information was presented to indicate there are no impacts, and to conclude *no impact* is cavalier without substantiation. Ships produce very little noise and are miles distant, and hence, easily unnoticed or out of view, and an occasional vehicle in view or heard is hardly likely to induce much attention. Growlers, however, screaming out 130 dB at 600 feet over a visitor’s head every 45 seconds are sure to degrade and divert and command the visitor’s “*visual elements*,” severely interrupting and shifting visual attention and auditory escape from historic appreciation to a dramatic visual image of war.

Island County and Whidbey Island citizens have a long-term investment and commitment to the Reserve. The County’s Comprehensive Plan has deemed the Reserve as a priority in the stated goals and policies. The intrusion of the Navy’s Growler jet noise into the Reserve’s soundscape has considerable impact on the County’s ability to achieve the protection and pro-active preservation goals published in its Comprehensive Plan.

The three historic districts within the Reserve should be assessed for the effects of noise individually and in relationship to each other. These include the Coupeville Business District, the Town of Coupeville and the Reserve environs.

There is no doubt that absence of noise and the presence of sound contribute to the sense of place or setting of many heritage assets. For example, churchyards, burial mounds, ruined buildings can all have a very distinct sense of place which is at least partially the result of the absence, or at least recession, of the invasive sounds of jet noise. Soundscape is an important factor in the Reserve and the other historic districts.

A variety of laws, executive orders, and regulations clearly charge the National Park Service (NPS), a partner in the Reserve, with preserving cultural resources and providing for their enjoyment "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Parks offer special opportunities for people to experience their cultural inheritance by offering special protection for cultural resources.

The NPS Management Policies recognize five broad categories of cultural resources, with many resources often classified into multiple categories.

1. Archeological resources are organized bodies of scientific evidence providing clues to the mystery of past events, primarily objects in context, ranging from household debris in a site from a past culture, to foundations of buildings, to pottery and tools, to paintings or writings.

2. Cultural landscapes are settings humans have created in the natural world showing fundamental ties between people and the land, ranging from formal gardens to cattle ranches, and from cemeteries or battlefields to village squares.

3. Structures are large, mechanical constructions that fundamentally change the nature of human capabilities, ranging from Anasazi cliff dwellings to statues, and from locomotives to temple mounds.

4. Museum objects are manifestations and records of behavior and ideas that span the breadth of human experience and depth of natural history, and may include archeological resources removed from the context where they were found.

5. Ethnographic resources are the foundation of traditional societies and the basis for cultural continuity, ranging from traditional arts and native languages, spiritual concepts and subsistence activities which are supported by special places in the natural world, structures with historic associations, and natural materials.

An important aspect of cultural resources is their non-renewability: If they lose significant material aspect, context, associations, and integrity, they are lost forever. The responsibility of the NPS is to minimize loss of pre-historic and historic material. Closely related but secondary responsibilities include maximizing the expression of historic character, integrating site development with natural processes, sustaining the lifeways of ethnic groups, increasing our knowledge of past human behavior, and supporting the interpretation of park resources.

Possible adverse aircraft overflight impacts on cultural resources entrusted to the NPS include physical impacts from vibrations, loss of historical or cultural context or setting, and interference with visitors' park experience, and impacting the owners and stewards of the buildings and properties. The term "adverse effect" has special meaning when used in association with historical properties. The definition put forth in The National Historic Preservation Act of 1966 states: *"An undertaking is considered to have an adverse effect when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."*

While physical impacts can permanently harm objects, impacts to context or setting, such as when aircraft fly over an 1800's reenactment or an ancient religious ceremony, can significantly reduce the associations and integrity of the objects, and the enjoyment and understanding of the cultural heritage. A Growler jet flying at 500 feet above Crockett Barn in Coupeville diminishes that cultural experience in a visual, audible, physical, and emotional way.

Growler noise is both extremely loud and includes low-frequency vibrational noise. This adversely impacts and stands in the way of the National Park Service and the Ebey's National Historical Reserve Board fulfilling their mission and directives of protecting this non-renewable cultural resource of National importance.

Based on the research presented in this analysis, including the Navy's own research of low-frequency sound, there is cause for real concern. The Navy's current operations, not to mention proposed operation increases at OLFC, represent adverse effects on the fragile historic properties the Reserve, as well as the cultural and historical heritage, soundscape, and visitor appreciation of the Reserve.

The jet noise degrades and negatively impacts the rural character and the economically important diverse heritage resources within our agricultural, recreation and tourism industries -- so important to the community and to the thousands of visitors who visit the Reserve annually.

Minimizing effects should be considered instead of maximizing jet operations over these three historic districts in Central Whidbey. If reducing jet noise is not possible, then the noise should be moved to a site where less destruction will occur.

3. Non-Validity of the OLF Historical Paradigm

The 106 DOE presents a lengthy historical operations explanation as well as charts depicting the FCLP activity at the OLF. The no-so-subtle suggestion is that the OLF history, which began as an emergency landing strip in WW II, gives it "*grandfather rights*" to continue to use the OLF as long as it sees fit and in a manner to be construed as somehow consistent with history. The inference is that since there has been a lot of noise in the past, continuation of that noise is grandfathered, and the community and the Reserve and its visitors will just have to make do. The current proposal that suggests 80% of Growler FCLP operations occur over the most historic sites and most worthy of preservation in Island County is the first time that the Navy has ever suggested more than 50% of FCLP's be done at the OLFC. Neither this WWII runway nor the former land use planning suggested the currently proposed intensity and expansion of Naval operations in an area that has been preserved and nurtured by the local community. Millions of federal and private dollars have gone into making this unique National Historical Reserve work as it does. Development rights have been given up by multi-generational families who have lived and worked here to fulfill the intent of the Historical Reserve.

How can one reasonably quantify allowable historic noise rights? Should it be an average of annual noise across time since the Town of Coupeville's incorporation? Or perhaps from day the OLF opened in 1943? Should it be from the start of Prowler FCLPs or maybe from the 2015 full Growler transition? There simply is no intuitive and logical starting point. Nor are yesterday's problems and abuses reason to continue them today and into tomorrow.

In that regard, it is interesting that the 106 DOE's historical analysis made no mention of the citizen group that formed in the 1990s to curtail the Prowler FCLPs at the OLF. They reached a settlement of sorts; it did not last long unfortunately and is now almost forgotten. So, this is an old problem that has grown worse with time and grown worse because of a noisier jet creating multi-county distress ---even reaching into the Okanogan Valley. This is a massive encroachment of Navy noise over public and private properties.

The country is no longer uninformed or dismissive about detrimental noise. We understand the noise/health and safety risks: risks to fetuses of pregnant women, to school-age children's learning and hearing, and to a wide variety of health and life issues. And we know about the investment and economic drags, including how tourists and park visitors react to noise. And we know how Growler noise drags and cripples the sanctity of our national-interest historic reserve, the first such in our country.

So, history is important, and it absolutely should transcend a misconceived and self-assigned military grandfather non-right.

What is relevant is how to resolve the Growler FCLP impacts of today, not how we lived with Prowlers yesterday. We are no longer myopically conditioned to accept that jet noise trumps thoughtful and penetrating analyses to realistically balance national security and effective military training with the rights and uses of public lands, Reserves, Historic Districts and the rights of private land owners to support historic and cultural heritage through local land use planning and zoning. This is not an issue of national security. These trainings can and do take place in other military reservations throughout the United States.

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Army, Matthew L CAPT NAS Whidbey Is., N00](#); [Welding, Mike T CIV NAS Whidbey Is, N01P](#); [Brown, Theodore C CIV USFF, N01P](#); [Padgett, Lisa M CIV USFF, N46](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#); [Malik, Joan M CDR USFF N01L](#); [Manley, William R CIV NAVFAC HO, EV](#); [Cook, Darrell E CIV NAVFAC LANT, EV](#); [Larson, Bruce J CIV NAVFAC LANT, EV](#); [Ellis, Lyz A CIV NAVFAC NW, PRW4](#); [Montague, Michael G LCDR USFF HQ, N01L](#); [Hall, Amberly CIV NAVFAC LANT, Counsel](#); [Rankin, James F CDR NAS Whidbey Is., N01](#); [Henkel, Juliana P CIV OPNAV, N45](#)
Cc: [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#); [Bengtson, Melanie L CIV NAVFAC NW, PRW4](#)
Subject: FW: Section 106 Response
Date: Thursday, August 16, 2018 5:40:14 PM
Attachments: [SKM_364e18081516460.pdf](#)

Good Afternoon,

Busy day. Please find the town of Coupeville's response to the section 106 determination. Mayor Hughes offers some alternatives for consideration at the end of the document. Some are already addressed in the spreadsheet being worked. I recommend we include these options in the spreadsheet.

Best,
Kendall

-----Original Message-----

From: Molly Hughes [REDACTED]
Sent: Thursday, August 16, 2018 2:06 PM
To: Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00 [REDACTED]; Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Meders, Laura E CIV NAS Whidbey Is, N00S [REDACTED]
Subject: [Non-DoD Source] Section 106 Response

Captain Moore and Kendall,

Attached is the Town of Coupeville's response to the Section 106. I am sending you a hard copy, but am already getting public records requests for the letter and wanted you to have it before the general public.

Laura,

Will you please get this to Captain Army?

Thanks for the opportunity to be involved in the Section 106 process.

Molly

Molly Hughes, Mayor



Town of Coupeville

4 NE Seventh ▪ PO Box 725 ▪ Coupeville WA 98239
360.678.4461 ▪ 360.678.3299 Fax ▪ www.townofcoupeville.org

August 16, 2018

Naval Air Station Whidbey Island
Attn: Captain Geoff Moore & Captain Matthew Army
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Subject: Continuing Section 106 consultation on the finding of adverse effect to historic properties for the proposed increase in EA-18G Growler operations at Naval Air Station Whidbey Island, Island County, WA

Dear Captain Moore and Captain Army,

The Coupeville Town Council and I thank you for the opportunity to consult on the mitigation proposal for the adverse effects to the Central Whidbey Island Historic District due to the increased operations of Growler aircraft. As much as any part of the Navy's environmental review for the current proposal, the potential for impacts to historic properties is central to this community's concerns.

Ebey's Landing National Historical Reserve/Central Whidbey Island Historic District

The Town of Coupeville is a proud and integral part of the Central Whidbey Island Historic District (District) and Ebey's Landing National Historical Reserve (Reserve). Protection of the cultural landscape that defines and describes the District, and that gained greater recognition with Congress's creation of the Reserve, is a guiding principle for the Town and its citizens. The District and the Reserve are, according to their descriptions in the National Register and Public Law 95-625, whole systems rather than collections of individual elements. Together, these elements, within the natural and built context of the District, establish a cohesive identity that is inseparable from the parts. It is this context, this cultural landscape, this encompassing historic property that is under threat from the proposed action. No portion of the District and Reserve is severable or expendable. Harm to one portion is harm to the whole.

The Reserve was established by Congress in 1978 to "preserve and protect a rural community which provides an unbroken historical record from nineteenth century exploration and settlement in Puget Sound to the present time..." The Reserve includes prairies, woodlands, uplands, Penn Cove, a rural town, agricultural land, historic buildings, the night sky, and rural soundscapes.

A significant and considered part of the District and Reserve is preservation of agricultural areas in active use. Loss of ongoing farming activities would result in a material change to the cultural landscape and understanding of the Reserve and would compromise its very foundation. Within the Reserve, these cultivated areas are primarily under the flight path of aircraft conducting Field Carrier Landing Practice (FCLP). Immediate, not averaged, impacts to farmers and their employees working outdoors are not merely a distraction but a potential health issue. This issue has led some current small farmers to conclude that they cannot continue to maintain their farms and till the soil if the frequency of flights increases as expected under the preferred alternative.

Preservation of the 'historical record' has been actively pursued for 40 years, sometimes at great personal sacrifice to the residents of the Reserve. As a community, we encourage the adaptive re-use of historic resources. We protect the night sky. We conscientiously steward rural land use and limit growth and development. It is deeply troubling that the historic attributes and character we have worked so hard to protect are now the justification the Department of the Navy uses as reasons to increase flights and the associated detrimental impacts at OLF Coupeville and over Ebey's Landing National Historical Reserve.

Section 106

We understand this Section 106 consultation process and the corresponding 'areas of substantive change in noise exposure' (figure 11, page 45) were based on Alternative 2, Scenario A, or 80% of all FCLP operations taking place at OLF Coupeville. While the Department of the Navy has acknowledged this is their preferred alternative, the EIS has not yet been finalized. As subpart A of the National Historic Preservation Act states, conducting project planning activities prior to completing Section 106 compliance is not prohibited "provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse impacts on historic properties." The Town of Coupeville is concerned that the Navy's planning for use of OLF has reached a point of no return past which full consideration of all alternatives for compliance with the Act cannot be reasonably considered.

Critical to the Section 106 process is the direction to resolve adverse effects by avoiding and/or minimizing the adverse effects and, where these preferred approaches are not determined feasible, providing compensatory mitigation measures to offset the adverse effects. It is our fervent hope that more emphasis can be placed on the direction to **avoid** and **minimize** the adverse effects by reducing the planned number of FCLP's at OLF Coupeville.

The Secretary of the Interior's Standards for the treatment of Historic Properties (36 CFR 800.5(a)(1)) describes the criteria of adverse effect. *An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association....Adverse effects may include reasonable foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.* Introduction of visual, atmospheric or audible

elements will diminish the integrity of the District's significant historic features. No buildings may be harmed through the proposed action. Clearly, however, those elements of setting and feeling have been impaired to some degree by the FCLP flights that currently occur and will only be more impaired by increases in low-altitude jet traffic over the Reserve. Further, the ability of the American public to enjoy what Congress created and what the past and present residents, farmers, property owners, and business owners have fostered and maintained will be impaired.

Again, we would strongly recommend *avoiding* and *minimizing* the adverse effect of noise in the Central Whidbey Island Historic District by decreasing the proposed number of FCLP operations at OLF Coupeville.

Current Mitigation from Navy

While we are appreciative of the Navy's current policies to minimize adverse effects in our community as listed on page two of the Section 106 Executive Summary, continued practice of these policies will do nothing to mitigate the substantive change (increase) to noise exposure in new areas of the Reserve caused by a 288% increase in FCLP's over current levels.

One of your current policies of "publishing flight operations on a weekly basis to assist the general public in making decisions about their daily activities," does not provide mitigation to the owners of historic properties and buildings who have chosen adaptive reuse as event venues to accept long-term reservations in good faith or to those in the Reserve continuing the historic trade of small farm agriculture and who must work outside year-round.

The stated current policy of "restricting high-power jet aircraft turns prior to noon on Sundays and daily between the hours of 10:00 p.m. and 7:30 a.m." is a bit confusing as, even now, FCLP's are often conducted past 10:00 p.m. especially on longer summer days. We have also enjoyed an informal agreement to not fly Friday nights thru Sunday. We are concerned that the proposed four-fold increase in FCLP's will no longer allow for noise mitigation on the weekend. Noise free weekends are crucial to tourism in Ebey's Landing National Historical Reserve and to businesses in the Historic Commercial District in the Town of Coupeville.

Proposed Mitigation from Navy

The installation of informational kiosks is not commensurate or relevant mitigation to the adverse effects of a substantive increase to noise exposure in Central Whidbey. Updating historic property inventories/databases is not a proportional or relevant mitigation action to the adverse effects of a substantive increase to noise exposure in Central Whidbey.

While we applaud your long standing practice of purchasing the development rights of land as a preventative tactic to avoid inappropriate land uses around OLF Coupeville, continuing this practice does nothing to mitigate the adverse effects of a substantive noise increases for *the existing* residential and economic land uses that comprise Ebey's Landing National Historical Reserve or for the experiential qualities for visitors.

Possible Mitigation Measures

More proportionate and relevant mitigation measures might include:

- A significant reduction in the proposed 288% increase in FCLP's at OLF Coupeville so a smaller area experiences a substantive increase in noise exposure in the Central Whidbey Historic District.
- A significant decrease in the proposed four-fold increase in FCLP's at OLF Coupeville so APZ land use restrictions do not become a restricting factor in the slow evolution of the District.
- A formal agreement for "no-fly weekends" to protect the tourism industry in the Central Whidbey Island Historic District.
- Ongoing emphasis and funding for technology like MAGIC CARPET that assures safe training for pilots while requiring fewer FCLP's.
- A commitment from the Department of Defense and the Department of the Navy to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in the Central Whidbey Historic District.
- A similar commitment for mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey Historic District because of the significant noise increases.

We look forward to the opportunity to work with the Department of the Navy on future mitigation commitments to off-set the adverse effects of substantive increases in noise exposure in Ebey's Landing National Historical Reserve, the Central Whidbey Historic District and the Town of Coupeville.

Sincerely,



Molly Hughes
Mayor

Cc: Kendall Campbell, NASWI Cultural Resources Program Manager
Kristen Griffin, Manager Ebey's Landing National Historical Reserve
Helen Price Johnson, Island County Commissioner
Jay Inslee, Washington State Governor
Maria Cantwell, United States Senator
Patty Murray, United States Senator
Rick Larsen, United States Congressman



EBEY'S LANDING
NATIONAL HISTORICAL RESERVE



EBEY'S LANDING 1978 - 2018
NATIONAL HISTORICAL RESERVE
Celebrating 40 Years of Community Partnership

Trust Board Members

Wilbur Bishop, Chair

Harry Anderson, Vice-Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Rip Robbins

Jon Crimmins

David Louter

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

National Park Service

Washington State Parks

Island County

Town of Coupeville

Post Office Box 774
Coupeville, WA 98239
Phone (360) 678-6084
www.nps.gov/ebla

August 17, 2018

Naval Air Station Whidbey Island
Attn: Captain Geoff Moore & Captain Matthew Army
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Subject: Continuing Section 106 Consultation – Finding of Adverse Effect to Historic Properties for the Proposed Increase in EA-18G Growler Operations at NASWI (letter of June 25, 2018; SER N442096).

The Trust Board of Ebey's Landing has reviewed the Determination of Adverse Effect document and finds that it does not adequately convey the full adverse effect that this undertaking will have on this working cultural landscape and National Register historic district, which is our Nation's first National Historical Reserve. In addition, by shifting (for the first time in history) the majority of this undertaking's greatest impact (FCLP jet noise) to the district, the proposed undertaking maximizes harm to the district. As part of resolving adverse impact, the Trust Board asks that alternatives that avoid or minimize the adverse effects be considered and presented.

Ebey's Landing National Historical Reserve (the Reserve) is an area of nationally significant historic resources with boundaries defined by the Central Whidbey Island Historic District. The Trust Board of Ebey's Landing National Historical Reserve (Trust Board) coordinates management and administration of the Reserve, as provided by the 1978 National Parks and Recreation Act, P.L. 95-625, and an Interlocal Agreement of July 26, 1988 between Island County, the Town of Coupeville, The Washington State Parks and Recreation Commission, and the National Park Service.

The following comments are provided on behalf of the Trust Board, in response to a request for comment. These comments are provided to help further our discussion of ways to avoid, minimize or mitigate adverse impacts to the Central Whidbey Island Historic District.

Clarifying Adverse Effect: The Adverse Effect is broader than conveyed by the determination of adverse effect document. This undertaking will alter characteristics of the historic district that qualify it for inclusion in the National Register by diminishing its integrity. The discussion should not be limited to properties and views experiencing maximum increased noise.

Resolving Adverse Effect: Because it has been determined that historic properties will be adversely affected by this undertaking, our efforts must focus on ways to resolve the adverse effects. The Determination of Adverse Effect document must provide a clearer discussion of the most important types of resolution: avoiding and minimizing the effects of the undertaking. The most important means of avoiding and minimizing this adverse effect, which is caused by an increase in jet noise, would be to reduce jet noise exposure.

Public Involvement in Section 106: Public involvement is a key part of Section 106 review and the public must be involved in the conclusion of this review. The public showed extraordinary interest in the EIS associated with this undertaking, and there is a

perception that many locally generated comments (not available for review) expressed concern about impacts to the district/Ebey's Landing National Historical Reserve. The public must be allowed to provide comment on the Navy's findings, and the ways Adverse Effect can be avoided, minimized or mitigated.

Historic Property Inventory Data: Several points relating to the numbers of historic properties and contributing/non-contributing structures in the district need clarification. This includes conflicting data presented in figures 7, 8, 9 and elsewhere (pages 33-65).

NPS GMP and Jet Noise: The 2003/2005 GMP Volume II study mentioned on page 65 did not measure or analyze concerns about jet noise and is not relevant to impacts of jet noise in the district/Reserve.

Preserving the Historic District: Rehabilitation and adaptive reuse are the preferred means of preserving historic properties in the district. This Section 106 review fails to consider the impact that will occur when adaptive reuse is no longer an option for an unknown number of historic properties in the district. This would occur with the imposition of new, never-evaluated APZs and AICUZ zoning, subsequent land use regulations restricting the rehabilitation and adaptive use of historic properties, and the imposition of regulations and noise mitigation measures that would withdraw options to retain features like historic single pane windows, original cladding, and traditional construction techniques.

Direct vs. Indirect effects: In contrast to the discussion of potential direct impacts to the district (the physical impacts of jet noise, vibration, or demolition on tangible resources like structures), the document does not give equally specific treatment to the discussion of indirect effects. Especially for an area intended to be worked, viewed, experienced, and accessed while outdoors, this needs more discussion. How will these levels of extreme jet noise affect setting, feeling or association with the rural cultural landscape? How will it affect farmer's ability to continue traditional land use patterns (which is what sustains the working rural cultural landscape)? Under this undertaking, extreme noise will be concentrated in the district for hours at a time, at levels not suitable for exposure. What areas, events and experiences within the Reserve will become inaccessible to residents and visitors because of extreme noise? The adverse impact extends to central Whidbey Island's specialized "place based" economy that is sustained by the integrity of the local environment and local character. This economy represents decades of collaboration, planning and choices in which citizens and government consciously protected the district and local character, at the expense of potential growth and development. It should not be impacted without consideration by a federal undertaking.

Mitigating Adverse Effect: The Determination of Adverse Effect document concludes with a preliminary discussion of possible ways to mitigate the adverse effect. These mitigations are not appropriate for the level of adverse effect. In most cases they are policies and actions that do not address the adverse effect or contribute to preservation or protection of historic properties in the district. In some cases they support or continue Navy policies or actions that may be beneficial to the operation but should not be considered mitigation.

The Trust Board looks forward to participating in discussions about mitigating adverse effects, and will provide further input. An initial suggestion is to require monitoring of jet operation noise in the Reserve. The Trust Board is concerned that the noise modeling technique used by the Navy does not fully characterize noise exposure and impacts to the Reserve's resources, values and visitor experience. Actual

ground measurement of noise level, intensity, frequency, and vibration as they are experienced by Reserve users, historic structures and other resources would benefit preservation and management objectives and should occur at a wide range of locations within the Reserve.

In conclusion and as outlined above, the Trust Board is concerned that the Determination of Adverse Effect document does not convey the full adverse effect that this expansion of jet noise will have on this working cultural landscape and National Register historic district, which is our Nation's first National Historical Reserve. In addition, by choosing to shift the majority (80%) of the most impactful jet noise (FCLP operations) to the district, the proposed undertaking maximizes harm to the district. As part of resolving adverse impact, the Trust Board asks that this alternative be rejected in favor of alternatives that avoid or minimize the adverse effects of jet noise.

Thank you for the opportunity to summarize these concerns that we propose to explore further through consultation.

Sincerely,



Wilbur Bishop, Chair
Trust Board of Ebey's Landing National Historical Reserve

*Cc Trust Board of Ebey's Landing National Historical Reserve
Congressman Rick Larsen, Washington
Senator Patty Murray, Washington
Senator Maria Cantwell, Washington
Governor Jay Inslee, Washington
Allyson Brooks, SHPO, Department of Archaeology and Historic Preservation
Commissioner Helen Price Johnson, Board of Island County Commissioners
Mayor Molly Hughes, Town of Coupeville
Eric Watilo, Washington State Parks
Roy Zipp, NPS
Rob Smith, NPCA
file*

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Manley, William R CIV NAVFAC HQ, EV](#); [Arny, Matthew L CAPT NAS Whidbey Is., N00](#); [Malik, Joan M CDR USFF N01L](#); [Padgett, Lisa M CIV USFF, N46](#); [Montague, Michael G LCDR USFF HQ, N01L](#); [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Larson, Bruce J CIV NAVFAC LANT, EV](#); [Cook, Darrell E CIV NAVFAC LANT, EV](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#); [Hall, Amberly CIV NAVFAC LANT, Counsel](#); [Shurling, Cynthia](#); [Johnson, Cara M CIV OGC, NLO](#); [Callan, Katherine R LCDR JAG, OPNAV N4](#); [Kirchler-Owen, Leslie](#); [Kondak, Tegan](#); [Clancy, Justin B CAPT OPNAV, N4](#); [Rankin, James F CDR NAS Whidbey Is., N01](#); [Hantson, Katherine G CIV OASN \(EI&E\), EI&E](#); [Loomis, Deborah M CDR OPNAV, N4](#); [Henkel, Juliana P CIV OPNAV, N45](#)
Subject: FW: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting
Date: Monday, August 20, 2018 7:48:25 PM

And one more from Dr. Brooks.

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Monday, August 20, 2018 4:35 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: kkerr@achp.gov; Baumgart, Jim (GOV) [REDACTED]; Modaff, Pete (Cantwell) [REDACTED]; Terlinchamp, Julia (GOV) [REDACTED]; Brooks, David (Energy) [REDACTED]; Hale, Jonathan (Cantwell) [REDACTED] >
Subject: [Non-DoD Source] RE: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting

Great! If we could get a timeline and some explanation on how the public will be able to participate in discussing appropriate mitigation under NEPA it will be helpful. Again, a lot of issues coming up are because many people aren't understanding the divide between NHPA mitigation and NEPA mitigation.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director Department of Archaeology and Historic Preservation
[REDACTED]

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Sent: Monday, August 20, 2018 3:32 PM
To: Brooks, Allyson (DAHP) [REDACTED]
Cc: kkerr@achp.gov; Baumgart, Jim (GOV) [REDACTED]; Modaff, Pete (Cantwell) [REDACTED]; Terlinchamp, Julia (GOV) [REDACTED]
Subject: RE: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting

Dr. Brooks,

I have asked the NEPA team to provide an overview and update on the NEPA process at the start of our call tomorrow morning. They will also address any NEPA process questions at that time.

Best,
Kendall

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Monday, August 20, 2018 12:45 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: kkerr@achp.gov; Baumgart, Jim (GOV) [REDACTED]; Modaff, Pete (Cantwell) [REDACTED]; Terlinchamp, Julia (GOV) [REDACTED]
Subject: [Non-DoD Source] RE: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting

Kendall - When will there be the opportunity for NEPA consultation and input?

All the best

Allyson

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Sent: Monday, August 20, 2018 11:36 AM
To: Brooks, Allyson (DAHP) [REDACTED]
Cc: kkerr@achp.gov; Baumgart, Jim (GOV) [REDACTED]; Modaff, Pete (Cantwell) [REDACTED]; Terlinchamp, Julia (GOV) [REDACTED]
Subject: RE: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting

Dr. Brooks,

Your timing is impeccable and thank you for your insight. I agree with your conclusion. Our goal tomorrow will be to address this confusion and allow parties to voice concerns and ask questions, and to clearly identify of next steps necessary to move the NHPA consultation forward.

Thank you!

All My Best,
Kendall

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Monday, August 20, 2018 10:43 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: kkerr@achp.gov; Baumgart, Jim (GOV) [REDACTED]; Modaff, Pete (Cantwell) [REDACTED]; Terlinchamp, Julia (GOV) [REDACTED]
Subject: [Non-DoD Source] RE: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting

Kendall - One thing I learned from my meeting with the community on Friday is that they are confused between NHPA mitigation and NEPA mitigation. When will the agency have a public meeting on NEPA mitigation? Don't you need to have a public meeting before issuing the FEIS and ROD? The community conversation on NEPA impacts should have happened even before the DEIS was released. A large project such as this should really have both written comments AND a public meeting (my opinion in working in this arena for years). It is a project of significance under NEPA.

The confusion between the two laws is why we are having difficulties with these conversations. The Navy needs to clarify which law they are working under and what mitigation they are proposing for historic resources under NHPA and what they are proposing for mitigating effects to non-historic resources under NEPA.

Thank you.

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]
[REDACTED]

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Sent: Friday, August 10, 2018 4:50 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: Navy DRAFT Consultation Minutes and Invitation to Follow Up 106 Meeting

Good Afternoon,

I would like to thank all who were able to attend in person or on the telephone for their participation in our August 2 consultation meeting. Please find attached a copy of the DRAFT minutes from that meeting. For those who participated, we request that you please review the attached minutes for accuracy to ensure the notes appropriately capture the discussion and provide edits and corrections where needed in track changes. The goal of the minutes is to make sure we capture the sentiments and concerns of all participants and any response or explanation provided by any individual. Please send any corrections and changes back to me by Friday Aug. 17 and I will generate final minutes for circulation before our next meeting for review and approval.

I ask that in reviewing the minutes please avoid adding any commentary or explanations that were not expressed in the meeting. If you would like to add to your discussion, introduce new discussion topics, or offer ideas for resolving adverse effects that were not discussed at the meeting, we would gladly accept these in a separate document. Any additional or new discussion points can be included in the agenda for our next meeting.

Per Katharine Kerr's suggestion at the end of the Aug 2 meeting, I would like to invite all consulting parties to participate in a follow-up phone conference on Tuesday, August 21 from 9:00-10:30am. The Call in number will be the same as the last meeting : 1-800-747-5150 Participant code: 9465240#.

I will circulate a draft agenda next week. Please feel free to email if you have a requested topic you would like discussed. In general, the meeting will cover approval of the last meeting minutes and continued discussion of ideas to resolve adverse effects. Prior to the meeting I will send a spreadsheet capturing some of the questions and ideas generated in our August 2 meeting and the Navy's response. For those who participated in the OLF Security Enhancements MOA, this will be similar to the feasibility spreadsheets generated after each of our meetings and draft reviews.

If you have any questions before the next meeting please contact me.

All My Best,

Kendall

Kendall Campbell

Archaeologist and Cultural Resources Program Manager

NAS Whidbey Island

[REDACTED]

Oak Harbor, WA 98278

[REDACTED]

[REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: NASWI Section 106 Consultation Agenda and Draft NHPA Resolution Options Spreadsheet
Date: Monday, August 20, 2018 7:45:31 PM
Attachments: [Growler MOA Agenda 20 Aug 18.docx](#)
[2Aug2018 Growler106ConsultationMinutes_Ammended.docx](#)
[Section 106 Resolution Options 20 Aug 18.docx](#)

Good Afternoon,

We are looking forward to our next consultation meeting tomorrow morning at 9:00am. For convenience the Call in Number: 1-800-747-5150, Participant code: 9465240#.

I have attached an agenda and the amended meeting minutes from August 2, 2018. Two changes were requested in the meeting minutes: 1. Change of title from Town of Port Townsend, to City of Port Townsend, and 2. Mayor Hughes requested a clarification to her statement on Page 4, second paragraph. The requested changes are italicized.

Finally I have included a Draft NHPA Resolutions Options Spreadsheet as requested by ACHP. This draft is meant to provide a brief capture of the resolution options to address adverse effects to historic properties discussed in the August 2 consultation meeting and includes those resolution options that have been submitted by consultation parties since that meeting. If we have missed anything please make sure to let us know and we welcome a robust discussion of further resolution options for consideration and discussion.

I look forward to our consultation tomorrow. Please contact me if you have any questions.

All My Best,
Kendall

Kendall Campbell
Archaeologist and Cultural Resources Program Manager
NAS Whidbey Island
[REDACTED]
Oak Harbor, WA 98278
[REDACTED]
[REDACTED]

Consultation for the Resolution of Adverse Effects to Historic Properties and Development of a Section 106 Memorandum of Agreement (MOA) for the Proposed Growler Airfield Operations Increase at Naval Air Station Whidbey Island

AGENDA

20 August 2018

- I. Introductions and Approval of Minutes**
- II. Discussion of Navy's Decision Making Process**
 - a. Analysis under NEPA
 - b. Consultation under NHPA
- III. Clarification on Scale and Scope of Undertaking**
- IV. Recap of Resolution Options**
 - a. Options discussed during Aug 2, 2018 consultation meeting
 - b. Options submitted in consultation comments since Aug 2.
- V. Schedule Follow Up Discussion of Resolution Options.**
 - a. August 30 (?) Teleconference

2 August 2018, 0900 – 1100 AM

Growler Section 106 Consultation Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Moore – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
Commander Malik (telephone) - JAGC, USN Fleet Environmental Counsel U.S. Fleet Forces Command
Commander Thedwall (telephone) – Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
Lisa Padgett (telephone) – Home Basing NEPA Program Manager, USFF
Bill Manley (telephone) – DFPO, NAVFAC Headquarters
Sarah Stallings (telephone) - Environmental Planning, NAVFAC Atlantic
Lieutenant Commander Parr (telephone) – Regional Legal Service Office, NAVFAC Northwest

Advisory Council on Historic Preservation

Katharine (Kate) Kerr (telephone) – Program Analyst, Office of Federal Agency Programs
Dr. Tom McCulloch (telephone) – Assistant Director, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks (telephone) – Washington State Historic Preservation Officer (SHPO)
Dr. Robert Whitlam (telephone)- Washington State Archaeologist

Washington State Governor’s Office

Jim Baumgart (telephone) – Washington State Governor’s Office Policy Advisor, Human Services Division

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Port Townsend

Mayor Deborah Stinson – *City of Port Townsend*

Coupeville

Mayor Molly Hughes – Town of Coupeville

Citizens of Ebey’s Reserve

Maryon Atwood - President

Island County

Commissioner Helen Price Johnson – Island County Commissioner

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR

Environmental Impact Statement Team

Cindy Shurling (telephone) – Consultant team

Introduction –

Captain Moore thanked everyone for participating and discussed how the 106 process has been going on for years and that he is excited to participate in this; Captain Moore noted that the draft analysis was released about six weeks ago, and that this will be an opportunity to discuss that and then lead into that discussion about the mitigation. He noted the importance for everyone to listen to each other and to give each other a chance to talk. Captain Moore thanked everyone for attending, and then turned the meeting over to Ms. Campbell.

Ms. Campbell noted that the purpose of the meeting is to discuss mitigating the adverse effect to historic properties identified in the Navy's determination and come up with communally generated ideas/options; the goal is open conversation and to allow everyone a chance to provide input.

Meeting attendees acknowledged receipt of a copy of the agenda and the Consultation Plan for Resolution of Adverse Effects to Historic Properties and Development of a Section 106 Memorandum of Agreement for the Proposed Growler Airfield Operations Increase at Naval Air Station Whidbey Island.

Discussion and Clarifications of the Meeting Agenda and Memorandum of Agreement (MOA) –

Commissioner Price Johnson noted that the security enhancements were on the agenda. Ms. Campbell clarified that this is a typo, as she had built the agenda from the memorandum of agreement (MOA) for the Outlying Field (OLF) security enhancements, which is in the process of being finalized and signed. In January and February, the Navy had final comments and were ready to move to signature on the OLF security enhancements. It was signed by the Regional Admiral and Captain Moore. The Navy will next send this to Dr. Brooks, to the Advisory Council on Historic Preservation (ACHP), and then will send around to others.

For this MOA (Proposed Growler Airfield Operations), the signatories will be Admiral Gray (Regional Admiral) and the Commanding Officer of NASWI Capt. Army, who takes over on August 17th.

Commissioner Price Johnson asked for clarification of what it means to be a signatory. Ms. Campbell provided the following background. Additional information can be found in the MOA Consultation Plan sent to all consulting parties on July 24, 2018 via email:

- *Signatories* - those individuals/parties that can change the MOA, end it, etc. Typically, this includes the proponents, the SHPO, the ACHP (when they are participating), and tribes (if involved).
- *Invited Signatories* – these individuals/groups would have the similar authorities; typically, the Navy asks people who have a responsibility within the MOA (could be financial). [For the OLF Security Enhancements– the Navy did not invite any other signatories.]
- *Concurring parties* –those that can sign to show that they participated; this provides an opportunity to say consulting parties agree with the developed mitigation strategy.

Commissioner Price Johnson then asked about the Accident Potential Zones (APZs) and if they (the county) would be required to take action. The Navy noted that the mitigation for this undertaking is to meet our obligations under section 106 of the National Historic Preservation Act and is not tied to the APZs.

Section 106 Process and Determinations Document - Ms. Griffin noted her concern with the 106 process for this undertaking. She indicated her feeling that the 106 consultation effort had not been coordinated with the NEPA document. In particular Ms. Griffin pointed out that the determination of effects was not completed when the public was provided opportunity to comment on the Draft EIS. She noted that this was a hindrance for her. Ms. Griffin indicated that the disclosure of adverse effect is acknowledged, but feels that there is no time to comment, which procedurally is difficult.

Ms. Griffin expressed she would have preferred that the 106 findings be included in the Draft EIS. Ms. Kerr from ACHP explained the difference between NEPA and NHPA processes and that impacts under NEPA are not the same as NHPA effects to cultural resources and historic properties. The National Environmental Policy Act (NEPA) analysis is for an overall cultural resources evaluation, while Section 106 specifically focuses on effects to historic properties (i.e., listed or determined eligible to the National Register of Historic Places [NRHP]).

Ms. Griffin also requested clarification on the determinations document finding of impacts to what she referenced as viewsheds. Ms. Campbell suggested moving into the discussion of generating mitigation ideas as a way to address Ms. Griffin's concerns. Ms. Griffin added that if we have moved to the mitigation then we are not allowing discussion of avoidance and minimization. Ms. Campbell suggested that since the Navy determined that there is an adverse effect, they are looking at how to minimize and avoid effects and that this discussion is included in the 106 determination document. She also noted that there is some confusion in the document that may be a result of the copy/edit process, as the editor deleted formatting, so there is not a heading for Sections.

Ms. Griffin asked how the findings related to the viewpoints identified in the document and how these were chosen over all other things. Commissioner Price Johnson also asked for explanation of the adverse effect to the "viewshed". Dr. Brooks stated the SHPO's perspective is that the adverse effect is to the NRHP property and the harm is no to the viewshed. As such her perspective is that there is one finding per project, and this was evaluated on setting, feeling, and association to Coupeville (Central Whidbey Island Historic District) and the Ebey's Landing National Historical Reserve.

Ms. Campbell explained that in looking at the Central Whidbey Island Historic District, the Navy reviewed how the undertaking could potentially diminish the integrity of all historic properties within the Area of Potential Effect (APE). The landscapes are character-defining; they contribute to the Central Whidbey Island Historic District. The landscape components are made-up of views, traffic flow, cluster arrangements, etc. A quiet soundscape is not a part of the character defining qualities of the landscape because a quiet soundscape is not a characteristic that contributes to the historic significance of the Central Whidbey Island Historic District. However, with regard to the perceptual quality of the views, qualities such as noise, smells, views, etc. characterize the landscapes that contribute to the historic significance of the District and as such the integrity of the setting and feeling are diminished in certain areas by increased noise. This is directly connected to the character defining features. Dr. Brooks further indicated the seven elements of integrity (location, design, setting, materials, workmanship, feeling, and association), which are related to the regulations guiding the National Historic Preservation Act.

Commissioner Price Johnson asked if the actions could have an indirect adverse effect to working farms and if not, are the things that are listed at the end of the document on page 71 are the only ones that have an adverse effect. Ms. Campbell explained that the evaluation is confined to the NHPA and the evaluation of historic properties; the agricultural economy is not a historic property type and not evaluated as part of the section 106 consultation. Commissioner Price Johnson asked how the Navy separates out the people from the District and asked Dr. Brooks to explain the health and well-being of the Reserve vs. Section 106.

Dr. Brooks explained that issues to farm workers need to be discussed under NEPA, whereas 106 looks at how the undertaking is diminishing the integrity of eligible or potentially eligible historic properties. It was noted that landscapes are not a property type, but are contributing historic components of a historic district.

Mayor Hughes asked whether the consultation is focusing on districts or buildings, which are critical parts of the reserve as a district (and with the intentional preservation of small farms and rural agricultural lifestyle), and voiced concern for potential loss of small farming, which occurs in the historic district. Dr. Brooks offered her opinion that Rural agriculture must be addressed as part of the mitigation. Mayor Hughes noted the three mitigation proposals offered by the Navy, although in her opinion may be ridiculous, are a place to start; *but the increased use at OLF should be proportional to the increase in total FCLP's on the base. If the total number FCLP operations is increasing by 20%, then Coupeville should not get more than a 20% increase from our current numbers.*

Discussion of Mitigation, Operations, and Potential Minimization – Discussion of mitigation began with the group noting that the preferred alternative in the EIS proposes a change to the proportion of operations between Ault Field and OLF Coupeville that represents a historic change. Several consulting parties stated that there is no record that the proportion of FCLP's at OLF Coupeville has ever been greater than Ault Field. As such these attendees observed that if this historic level of change cannot be avoided that they desired to see it minimized.

Ms. Griffin noted that the purpose of 106 was to look at how the Navy's proposed actions may affect historic resources, but she believes that something has gone awry in the process when the identified impacts of the undertaking are focused on the area that is most worthy of protection. Ms. Griffin expressed concern that the preferred alternative appears to impact the Reserve disproportionately and wondered why there was no further discussion to look at minimizing impacts through selection of other alternatives to the action.

Dr. Brooks noted that she was with Jim Baumgart, the Governor's policy aide; the discussion was that the Navy needs to evaluate how to diminish the nose and whether that means alternative means of carrying out the operations. Ms. Campbell explained that for the section 106 consultation the proposed undertaking has always been the maximum level of change at both airfields so that it considers the maximum potential effect to historic properties from all alternatives and scenarios. Further she explained that since the 106 analysis presented in the determinations document was based on the aggregate of proposed change at each airfield the methodology for analyzing adverse effects was consistent across the entirety of the APE and applied consistently regardless of historic property type or location.

[Mayor Hughes needed to step out and was joined by Commissioner Price Johnson, who noted she would be contacting Dr. Brooks for a separate conversation for further explanation of the 106 process.]

Ms. Griffin observed that this would be the first time in history with OLF, where they would be shifting a great majority of the Field Carrier Landing Practices (FLCPs) away from the base and to the OLF, which she believed was never intended to be the main location. Captain Moore said that OLF Coupeville existed for this purpose in 1960's and 1970's. During the late 1990's, the base did take some measures to reduce flights at OLF and stopped mining practice in Admiralty Bay using aircraft. Before the Navy was constrained to 6120 operations, there were at times anywhere from 5,000 to 10,000 operations. He noted a number of factors influence the distribution of FLCPs at each airfield. He also clarified that the total number of FCLPs proposed are not historically higher, even if the percentage (distribution) is shifting to a great total number of FCLPs being performed at OLF.

Ms. Atwood noted that the community could not tolerate the noise at the points in history Captain Moore was referencing. Ms. Atwood pointed out that the Commander of NAS Whidbey Island came down to Coupeville at that time and people were not pleased with the level of operations in the 1960' and 1970's. She said that people are angry with the 80/20 preferred alternative and prefer it to not go over the 50/50. She felt this came late in the discussion; the public was not able to see a preferred alternative, and now it is too late to comment on this. Ms. Campbell explained that for the section 106 consultation the Navy has looked at maximum change at both airfields from the start of the consultation process so that the full effects from conducting the majority of FCLP's are considered in the analysis.

Ms. Atwood provided a comment on efforts to find solutions that minimize noise effects noting that the measures suggested by Navy in the section 106 determination document, like advertising, do not mitigate the noise. She also offered that the Whidbey Camano Land trust is no longer taking Navy money for the creation of conservation easements. Captain Moore indicated that the Navy has not been made aware of this and is always looking for conservation partners.

Ms. Griffin raised the issue of the landscape pattern, which includes scenic easements that allow for very limited development rights and are structured so agricultural activities could continue. The easements are meant to allow some economic activity, and they still preserve the landscape and further discussed the Ebey's Landing National Historical Reserve's use of easements.

Ms. Campbell noted that the Navy worked through the Readiness and Environmental Protection Integration (REPI) program. The most current actions relate to natural resources. The Navy is looking at possibilities of adjusting the language to include reference to historic preservation ideals as well. Ms. Campbell also raised the possibility of updating the National Park Service Land Use Change and Cultural Landscape Integrity study from 2003 as a potential mitigation. An updated study may provide a necessary baseline for assessing and monitoring how the final proposed mitigation and minimization efforts are successful in resolving the adverse effects to the integrity of the landscape.

Ms. Griffin noted that a landscape study would not be of interest to the Reserve as they are currently updating their land protection plan, and therefore, it is not the one that is being used for the REPI plan.

Mr. Zipp asked about chevrons, which are devices that can be added to jet engines to reduce noise, whether this was presented in the 106 determination. Captain Moore noted that the Navy is still investigating the use of chevrons on jet engines, which has shown promise, but is not yet advanced enough to deploy to the fleet.

Captain Moore noted his regret that the Navy was not invited to the table 40 years ago during the creation of the Reserve. The Navy is also a property owner in the Reserve as well as a part of the history of the Reserve. As the Navy is getting ready to celebrate the 75th Anniversary of OLF, is there a way of integrating the Navy into the Reserve's plan. The Navy is also looking at cumulative impacts, too.

Ms. Campbell put in reminder for the meeting purpose to look at mitigation measures due to the current undertaking, which is the increase in aircraft, squadron distribution, and increase in operations. Although the Navy does want to capture information about the community concerns as a whole (neighbor roles), this consultation was not about Navy presence on Whidbey Island and Growler noise in general.

Mapping in the 106 Document and Integration of Flight Patterns - Ms. Griffin asked for clarification on the +5 metric and how mapping worked in the Section 106 evaluation. Ms. Campbell first noted that she attempted to address Ms. Griffin's earlier concern that she could not see street names or distinguishing land forms on the maps in the document by making the shading lighter so that the base map was easier to distinguish. The group then looked at the large map (pg. 59) within the determination

document. Data was shared between NEPA analysis and this 106 determination; the Navy looked at the maximum amount of change in proposed operations at both airfields and looked at where the change in operations was going to substantively change the frequentness of noise exposure. For OLF, there are more areas where a substantive change in frequentness of noise exposure occurs. Specifically, the Navy looked at areas where a 5 dB DNL (decibels Day-Night Sound Level) or more change occurred. At Ault Field no area in the APE showed a dB DNL change of 5 or greater using the maximum amount of change in operations. At OLF Coupeville the maximum amount of change proposed in operations resulted in several areas where the data indicated the area would experience a change of 5 or greater dB DNL.

In response to some questions, Captain Moore indicated the Growler aircraft have a tighter turn radius which reflects some of the change in noise exposure at OLF represented in the section 106 maps. The tighter turn radius will reduce the frequency of noise exposure in some places and expose new places to increased frequency of noise. In addition, the undertaking proposes greater use of runway 14, than in the past. Captain Moore also stated that operations at OLF Coupeville are dynamic; there may be more operations during the winter when the winds are better. The Navy manages both natural and man-made constraints that effect how operations are conducted.

Ms. Atwood noted that the community is not necessarily expecting change in turning radius and use of runway 14 at OLF Coupeville and would want to know this. In addition, Ms. Atwood asked if there was truth to the rumor that the only reason why the Navy needs OLF is because we lack parallel runways at Ault Field. She further asked why the Navy does not just build a new parallel runway at Ault Field. Captain Moore indicated that the parallel runway solution is not an accurate statement of the variables that reflect airfield management and operations. First, there are fiscal constraints to being able to build another runway at Ault Field due to the Navy's need to support shipbuilding and maintenance and other aviation maintenance backlog as well as that Ault Field creates less realistic conditions for practicing landing on an aircraft carrier. For example, Ault Field is in a valley, so there is a limitation on flight patterns and operations that can be performed. In addition, the pilots would not get ideal training; resulting in more risk because the training is not as effective for preparing the pilots for what really happens when landing on a carrier. Ms. Griffin asked for clarification on whether the OLF is an approved runway adequate for the type of operations proposed. Captain Moore explained that OLF is sufficient to the proposed requirements because we do not do full-stop landings at OLF; they could do these if they reduced weight/fuel, but that would only happen in an emergency situation.

Ms. Griffin noted that with regard to the landscape areas, they need to see other information on the maps to get a sense of where things are located. Ms. Campbell noted that the Navy did include that information on the maps and had brought to the meeting larger copies of the maps with lighter shading to better see the landscape feature.

Potential Solutions – Programmatic View, REPI, and Scenic Easements - Mr. Zipp noted that if a person does rehab a house and exceeds 50% of value, they then would have to remodel it to address noise/vibration. This would have an economic incentive that could adversely affect historic structures and building code issues because addressing these issues in accordance with historic standards costs a lot of money – i.e., a line of indirect effects. Mr. Zipp suggested that they provide accommodations in the county so this impact cannot occur. Dr. Brooks suggested the possibility of soundproofing or structurally strengthening for noise/vibration. She indicated there is a discussion of how to help homeowners with this; the Governor is involved, and the Navy should be involved, too.

Ms. Griffin suggested that it could be a programmatic impact to the reserve, meaning that they could lose historic structures. Mayor Stinson suggesting providing noise cancelling headphones to farmers. Ms. Campbell mentioned the potential for discussion of a programmatic approach as an alternative focused on

long term solutions and studies. Ms. Kerr said it was premature to start this discussion, but can table it for now.

In response to a question about the need for a LSO to conduct FCLP, Captain Moore explained the LSO – landing signals officer – who stands on the edge of runway is in control of the aircraft as it comes in and provides changes to help land accurately.

Mr. Zipp noted a tool that NPS brings to the table – scenic easements. He articulated that the purpose is to try to harmonize the REPI programs easements with the language that is used to protect historic integrity to protect areas where it can be done. Ms. Griffin noted that every year the trust makes recommendations to the NPS for the priorities that reinforce the reserve. The question was asked if the Navy can purchase land and then keep under another’s ownership. Captain Moore responded the Navy committed to reviewing its authorities to purchase easements that would protect landscapes.

Ms. Griffin noted that the funding of an intern to help inventory is no longer needed. Ms. Campbell suggested that this also could be used to help organize the data.

Involvement of Others - Ms. Griffin asked how the public is being involved. Ms. Campbell explained that the 106 information was announced in a press release in June, was posted online, and is available on the EIS website. She noted that the public can comment on that the determination draft at any time. In addition, the public will have the opportunity to comment on the MOA once parties agreed to draft stipulations. There is no timeline for receiving comments on the 106 consultation and comments are accepted until the consultation effort concludes with the signing of the MOA. Ms. Griffin asked Dr. Brooks if she felt the Navy’s public involvement proposed was adequate. Dr. Brooks indicated that the Navy could determine how to meet the requirement for public involvement and posting documents online is one way to involve the public, but the State prefers how Washington State Department of Transportation conducts their public meetings where they typically have big whiteboards to allow the public to write out ideas.

Ms. Campbell asked Dr. Brooks to share the SHPO’s response and suggested strategies to resolve the adverse effect to historic properties with the consulting parties. Dr. Brooks responded that she has already made the Navy aware of what the state was proposing. Dr. Brooks further noted that the WA Governor will be speaking with Assistant Secretary of the Navy, Phyllis Bayer regarding mitigation. She noted that Jim Baumgart expressed that the Navy needs to work with the aircraft to reduce the jet engine noise. She also noted that the state has talked about operating schedules (weekends/school hrs.), funding to rehabilitate historic homes with soundproofing, and a barn program. She said the Navy is aware of these, and said she can write this in a formal letter if the Navy required something more formal.

Next Steps – Ms. Campbell noted that she will write-up a draft of the MOA, which will include the administrative stipulations and some ideas about what can be done to address resolution of adverse effects. She explained that the timeline was aggressive. Therefore, the Navy hoped to have a draft by next week and then at that point in time. Dr. Brooks asked that the Navy avoid the word “kiosk” and noted that Jim Baumgart is clear about measures the SHPO wants, and the Navy needs to make sure it is in the MOA.

Ms. Kerr indicated that at this point in the process the consulting parties are not ready to draft a MOA even a week from now as there needs to be more brainstorming and discussion on ideas. She would like to see a synopsis of the meeting in order to be clear that the minutes capture what was said and the expressed the intentions. She also needs a clear list of the ideas introduced and when the Navy can respond with alternatives that may be feasible and explain why they can or cannot take certain steps. All parties need a

greater understanding of ideas and feasibility and then the parties can get to the next step of preparing an agreement document and provide it for review.

Ms. Campbell asked if it would be helpful to do an excel spreadsheet regarding the feasibility of the ideas generated at this meeting, for which Ms. Kerr indicated “yes.” Ms. Kerr said that they may need other meetings scheduled to either discuss more input on the ideas or see if further discussion of alternatives are needed. Ms. Kerr suggested setting up a routine call every two to three weeks with the consulting parties to continue discussion. Ms. Campbell will provide notes and then the spreadsheet. Another meeting will be scheduled for mid-August to discuss the spreadsheet.

The meeting adjourned, and the conference call ended at about 11:00 AM PST.

Comment number	Comment
1	Clarification: Scale and Scope of the undertaking
2	Minimization: Install Chevrons in aircraft engines
3	Minimization: Avoidance of operations during community events, on weekends, during school hours, selection of alternative where FCLP operations equitably divided between both airfields, OLF Coupeville and Ault Field
4	Mitigation: Navy provides funding for schools
5	Mitigation: Navy provides funding for a Grant Program to rehabilitate historic barns
6	Mitigation: Navy provides funding to purchase sound-cancelling headphones
7	Mitigation: Navy purchases easements to retain the current use (and thereby historical character) of nearby land (to include through the National Park Service existing process)
8	Mitigation: Navy funds an internship within ELNHR to update and make functional historic property inventory databases.
9	Mitigation: Navy installs information kiosks
10	Mitigation: Consider a study to assess the landscape integrity and preserve its character.
11	Mitigation: Navy funds study to examine the impact of noise vibrations on historic properties.
12	Mitigation: Navy funds sound-proofing projects in historic homes
13	Mitigation: Navy funds a program to support rehabilitation of structures in the reserve when remodeling that includes sound proofing of home results in potential loss of integrity to an individually eligible or contributing home to the historic district
14	Mitigation: Integrate considerations regarding historic resources in Navy AICUZ Update recommendations to Island County
15	Mitigation: A significant reduction in the proposed 288% increase in FCLPs at OLF Coupeville, so a smaller area experiences a substantive increase in noise exposure in the Central Whidbey Historic District.
16	Mitigation: a significant decrease in the proposed four-fold increase in FCLP's at OLF Coupeville so APZ land use restrictions do not become a restricting factor in the slow evolution of the District.
	Mitigation: A formal agreement for "no-fly weekends" to protect the tourism industry in the Central Whidbey Island Historic District.
18	Mitigation: Ongoing emphasis and funding for technology like MAGIC CARPET that assures safe training for pilots while requiring fewer FCLPs.
19	Mitigation: A commitment from the Department of Defense and the Department of the Navy to Work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in the Central Whidbey Island Historic District.
20	Mitigation: a similar commitment for mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey Island Historic District because of the significant noise increase.

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Manley, William R CIV NAVFAC HQ, EV](#); [Arny, Matthew L CAPT NAS Whidbey Is., N00](#); [Malik, Joan M CDR USFF N01L](#); [Padgett, Lisa M CIV USFF, N46](#); [Montague, Michael G LCDR USFF HQ, N01L](#); [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Larson, Bruce J CIV NAVFAC LANT, EV](#); [Cook, Darrell E CIV NAVFAC LANT, EV](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#); [Hall, Amberly CIV NAVFAC LANT, Counsel](#); [Shurling, Cynthia](#); [Johnson, Cara M CIV OGC, NLO](#); [Callan, Katherine R LCDR JAG, OPNAV N4](#); [Kirchler-Owen, Leslie](#); [Kondak, Tegan](#); [Clancy, Justin B CAPT OPNAV, N4](#); [Rankin, James F CDR NAS Whidbey Is., N01](#); [Hantson, Katherine G CIV OASN \(EI&E\), EI&E](#); [Loomis, Deborah M CDR OPNAV, N4](#); [Henkel, Juliana P CIV OPNAV, N45](#)
Subject: FW: [Non-DoD Source] Findings of Adverse Effect
Date: Monday, August 20, 2018 8:00:26 PM
Attachments: [TB to Navy Gowler Section 106 Comment Letter 8-16-2018.pdf](#)

Forwarding the Ebey's Reserve Trust Boards response to the Section 106 determination of effects letter.

V/R,
Kendall

-----Original Message-----

From: Griffin, Kristen [REDACTED]
Sent: Monday, August 20, 2018 2:05 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] Findings of Adverse Effect

Kendall a hard copy will be in the mail later today but attached is some initial feedback from the Trust Board on the Section 106 Finding of Adverse Effect.

I'll be on the call tomorrow.

--

Kristen P. Griffin
Reserve Manager
Ebey's Landing National Historical Reserve [REDACTED] Coupeville, WA 98239
[REDACTED]



EBEY'S LANDING
NATIONAL HISTORICAL RESERVE



EBEY'S LANDING 1978 - 2018
NATIONAL HISTORICAL RESERVE
Celebrating 40 Years of Community Partnership

Trust Board Members

Wilbur Bishop, Chair

Harry Anderson, Vice-Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Rip Robbins

Jon Crimmins

David Louter

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

National Park Service

Washington State Parks

Island County

Town of Coupeville

Post Office Box 774
Coupeville, WA 98239
Phone (360) 678-6084
www.nps.gov/ebla

August 17, 2018

Naval Air Station Whidbey Island
Attn: Captain Geoff Moore & Captain Matthew Army
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Subject: Continuing Section 106 Consultation – Finding of Adverse Effect to Historic Properties for the Proposed Increase in EA-18G Growler Operations at NASWI (letter of June 25, 2018; SER N442096).

The Trust Board of Ebey's Landing has reviewed the Determination of Adverse Effect document and finds that it does not adequately convey the full adverse effect that this undertaking will have on this working cultural landscape and National Register historic district, which is our Nation's first National Historical Reserve. In addition, by shifting (for the first time in history) the majority of this undertaking's greatest impact (FCLP jet noise) to the district, the proposed undertaking maximizes harm to the district. As part of resolving adverse impact, the Trust Board asks that alternatives that avoid or minimize the adverse effects be considered and presented.

Ebey's Landing National Historical Reserve (the Reserve) is an area of nationally significant historic resources with boundaries defined by the Central Whidbey Island Historic District. The Trust Board of Ebey's Landing National Historical Reserve (Trust Board) coordinates management and administration of the Reserve, as provided by the 1978 National Parks and Recreation Act, P.L. 95-625, and an Interlocal Agreement of July 26, 1988 between Island County, the Town of Coupeville, The Washington State Parks and Recreation Commission, and the National Park Service.

The following comments are provided on behalf of the Trust Board, in response to a request for comment. These comments are provided to help further our discussion of ways to avoid, minimize or mitigate adverse impacts to the Central Whidbey Island Historic District.

Clarifying Adverse Effect: The Adverse Effect is broader than conveyed by the determination of adverse effect document. This undertaking will alter characteristics of the historic district that qualify it for inclusion in the National Register by diminishing its integrity. The discussion should not be limited to properties and views experiencing maximum increased noise.

Resolving Adverse Effect: Because it has been determined that historic properties will be adversely affected by this undertaking, our efforts must focus on ways to resolve the adverse effects. The Determination of Adverse Effect document must provide a clearer discussion of the most important types of resolution: avoiding and minimizing the effects of the undertaking. The most important means of avoiding and minimizing this adverse effect, which is caused by an increase in jet noise, would be to reduce jet noise exposure.

Public Involvement in Section 106: Public involvement is a key part of Section 106 review and the public must be involved in the conclusion of this review. The public showed extraordinary interest in the EIS associated with this undertaking, and there is a

perception that many locally generated comments (not available for review) expressed concern about impacts to the district/Ebey's Landing National Historical Reserve. The public must be allowed to provide comment on the Navy's findings, and the ways Adverse Effect can be avoided, minimized or mitigated.

Historic Property Inventory Data: Several points relating to the numbers of historic properties and contributing/non-contributing structures in the district need clarification. This includes conflicting data presented in figures 7, 8, 9 and elsewhere (pages 33-65).

NPS GMP and Jet Noise: The 2003/2005 GMP Volume II study mentioned on page 65 did not measure or analyze concerns about jet noise and is not relevant to impacts of jet noise in the district/Reserve.

Preserving the Historic District: Rehabilitation and adaptive reuse are the preferred means of preserving historic properties in the district. This Section 106 review fails to consider the impact that will occur when adaptive reuse is no longer an option for an unknown number of historic properties in the district. This would occur with the imposition of new, never-evaluated APZs and AICUZ zoning, subsequent land use regulations restricting the rehabilitation and adaptive use of historic properties, and the imposition of regulations and noise mitigation measures that would withdraw options to retain features like historic single pane windows, original cladding, and traditional construction techniques.

Direct vs. Indirect effects: In contrast to the discussion of potential direct impacts to the district (the physical impacts of jet noise, vibration, or demolition on tangible resources like structures), the document does not give equally specific treatment to the discussion of indirect effects. Especially for an area intended to be worked, viewed, experienced, and accessed while outdoors, this needs more discussion. How will these levels of extreme jet noise affect setting, feeling or association with the rural cultural landscape? How will it affect farmer's ability to continue traditional land use patterns (which is what sustains the working rural cultural landscape)? Under this undertaking, extreme noise will be concentrated in the district for hours at a time, at levels not suitable for exposure. What areas, events and experiences within the Reserve will become inaccessible to residents and visitors because of extreme noise? The adverse impact extends to central Whidbey Island's specialized "place based" economy that is sustained by the integrity of the local environment and local character. This economy represents decades of collaboration, planning and choices in which citizens and government consciously protected the district and local character, at the expense of potential growth and development. It should not be impacted without consideration by a federal undertaking.

Mitigating Adverse Effect: The Determination of Adverse Effect document concludes with a preliminary discussion of possible ways to mitigate the adverse effect. These mitigations are not appropriate for the level of adverse effect. In most cases they are policies and actions that do not address the adverse effect or contribute to preservation or protection of historic properties in the district. In some cases they support or continue Navy policies or actions that may be beneficial to the operation but should not be considered mitigation.

The Trust Board looks forward to participating in discussions about mitigating adverse effects, and will provide further input. An initial suggestion is to require monitoring of jet operation noise in the Reserve. The Trust Board is concerned that the noise modeling technique used by the Navy does not fully characterize noise exposure and impacts to the Reserve's resources, values and visitor experience. Actual

ground measurement of noise level, intensity, frequency, and vibration as they are experienced by Reserve users, historic structures and other resources would benefit preservation and management objectives and should occur at a wide range of locations within the Reserve.

In conclusion and as outlined above, the Trust Board is concerned that the Determination of Adverse Effect document does not convey the full adverse effect that this expansion of jet noise will have on this working cultural landscape and National Register historic district, which is our Nation's first National Historical Reserve. In addition, by choosing to shift the majority (80%) of the most impactful jet noise (FCLP operations) to the district, the proposed undertaking maximizes harm to the district. As part of resolving adverse impact, the Trust Board asks that this alternative be rejected in favor of alternatives that avoid or minimize the adverse effects of jet noise.

Thank you for the opportunity to summarize these concerns that we propose to explore further through consultation.

Sincerely,



Wilbur Bishop, Chair
Trust Board of Ebey's Landing National Historical Reserve

*Cc Trust Board of Ebey's Landing National Historical Reserve
Congressman Rick Larsen, Washington
Senator Patty Murray, Washington
Senator Maria Cantwell, Washington
Governor Jay Inslee, Washington
Allyson Brooks, SHPO, Department of Archaeology and Historic Preservation
Commissioner Helen Price Johnson, Board of Island County Commissioners
Mayor Molly Hughes, Town of Coupeville
Eric Watilo, Washington State Parks
Roy Zipp, NPS
Rob Smith, NPCA
file*

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: Section 106 comments
Date: Tuesday, November 13, 2018 5:36:13 PM
Attachments: [2018section106comment.pdf](#)

August 21, 2018 - Email from Ms. Helen Price Johnson, Island County Commissioner

-----Original Message-----

From: Helen Price Johnson [REDACTED]
Sent: Tuesday, August 21, 2018 8:52 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Molly Hughes [REDACTED]; Griffin, Kristen [REDACTED]; Roy Zipp [REDACTED]; Brooks, Allyson (DAHP) [REDACTED]; jim.baumgart@gov.wa.gov; Pam Dill [REDACTED]
Subject: [Non-DoD Source] Section 106 comments

Kendall,

I am sorry to have a meeting conflict during today's Section 106 phone conference. It had been my understanding that there was ample time to submit comments beyond today. However, the posted agenda made me nervous that a conclusion was nearing to that comment window, so I am sending this to you this morning.

Thank you for your consideration of my letter,

Helen Price Johnson

Island County Commissioner, District 1

August 21, 2018

To: Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, WA 98239

From: Commissioner Helen Price Johnson, Island County District 1

Re: Section 106 Consultation on the finding of adverse effect to historic properties from the proposed increase operations of EA-18G Growlers at NASWI, Island County, WA

Thank you for this opportunity to consult on the proposal for mitigation in the matter of adverse effects to Central Whidbey's Historical District of Ebey's Reserve due to the proposed increased operations of EA-18G Growlers at Naval Air Station Whidbey Island. It is with great regard for the Navy personnel and mission that I offer these suggestions.

For forty years, Ebey's Landing National Historical Reserve has been stewarded by private property owners, as a four-way government partnership of the National Parks Service, Washington State Parks, Island County and the Town of Coupeville. The intent of Congress establishing the Reserve in 1978 was to "preserve and protect a rural community which provides an unbroken historical recorded from the n century exploration and settlement in Puget Sound to the present time...". The protection of on-going agricultural and maritime activities, limiting densities, preservation of dark night skies, open space and scenic vistas, and adaptive re-use of historic resources have all been part of this cooperative stewardship effort.

As I understand the Section 106 process, the Secretary of the Interior Standards defines adverse effect to Historic Properties (36 CFR 800.5(a)(1) when "an undertaking may alter, directly or indirectly, any of the characteristics of a historic property...in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." Of these, setting, feeling and association are most applicable here.

To comply with the National Historic Preservation Act of 1960, the adverse effects of the proposed undertaking, should address preservation outcomes which directly respond to:

- the setting (cultural resources, visual and auditory changes)
- the feeling (scenic vistas, auditory/vibration changes)
- the association (historic resources, agricultural and maritime heritage)

Appropriate mitigation is necessary to address "reasonable foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative" to the setting, feeling, or association as a result of the preferred alternative proposed for increased Growler operations. The Navy's current proposed mitigation of publishing flight operations, restricting aircraft turns prior to noon on Sundays, and between the hours of 10 pm to 7:30 am, or building kiosks do not proportionately address the actual or cumulative adverse effects to the historical district, or to existing properties within the District. For example, the current 6,100 annual Growler operations have created unsafe conditions for some agricultural workers during flight times. Increasing to 24,600 operations will further restrict ongoing agricultural activities under the flight path and thus threaten economic sustainability of this local industry, and reduce the historic setting of farmers in the field.

The most effective strategy for mitigation would be to manage operations in a way that minimizes the adverse effects identified, as has been done in the past.

This mitigation may include:

- Substantial reduction in the 288% increase in annual operations at OLF to minimize the area of potential impact (APE), and the adverse effects to historic properties within the Historical District subject to substantive increase in noise exposure.
- A formal “no weekend flights” agreement to protect visual impacts to scenic vistas and landscapes during the days when there are the most community activities, local population increases, and visitations to the historic district.
- Funding to retrofit existing buildings for noise attenuation and vibration
- Technical assistance and monetary reimbursement to farmers for investment in auditory protection for their outdoor workers.
- On-going monitoring of noise impacts across the District to ensure that the proposal’s estimates are accurate over time.
- Real time monitoring of flight activities to minimize low level and out of pattern flights, which widen the APE and greatly increase decibel levels below.
- A commitment that additional mitigation will be provided if the noise impacts exceed current estimates.
- Mitigation funding to relocate resources (when possible) from under the flight path

For decades the Central Whidbey community has incorporated Flight Carrier Landing Practice (FCLP) activities into the local landscape. However, the preferred alternative’s FCLP operations proposed for Outlying Field Coupeville exceed all previous historic levels. This new level of activity will have an immediate and cumulative adverse impact to the historical district of Central Whidbey Island. Your consideration for appropriate and proportional mitigation is greatly appreciated.

Cc: Kendall Campbell, NASWI Cultural Resources Program manager and Archaeologist
Mayor Molly Hughes, Town of Coupeville
Kristen Griffin, Manager Ebey’s Landing National Historical Reserve
Governor Jay Inslee, State of Washington
Senator Patty Murray, United States Senate
Senator Maria Cantwell, United States Senate
Congressman Rick Larsen, United States House of Representatives

August 24, 2018

Captain Matthew L. Arny
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, WA 98278

Dear Captain Arny:

As the State Historic Preservation Officer for the State of Washington, I am writing in response to the proposed mitigation measures in the Navy report, dated June 2018, "*Section 106 Determination of Effect for the EA-18 Growler Airfield Operations at the Naval Air Station Whidbey Island Complex.*" Although we have concurred with your Determination of Adverse Effect, we are concerned by your proposed mitigation measures, which are woefully inadequate and fail to meet the Navy's obligation to mitigate or resolve adverse effects on historic properties and cultural landscapes in Central Whidbey Island Historic District, Coupeville Historic District, and Ebey's Landing National Historic Reserve (ELNHR). Until such time as the Navy reaches a resolution with my office and meets its obligations under Section 106 and implementing regulations 36 CFR 800, I request to continue consultation on suitable mitigation measures.

On June 27, 2018, we wrote to you in concurrence that the substantial increases in noise and vibration will result in an adverse effect that will diminish the integrity and characteristics that qualify these historic properties and cultural landscapes for inclusion in, or eligibility for, the National Register of Historic Places (NRHP). Specifically, the Navy's actions are expected to diminish the properties and landscapes' setting, feeling, and association. As you are aware, the historic significance of Ebey's Reserve and the Coupeville Historic District are rooted in early settlement patterns, architecture, and the agricultural landscape that existed long before the arrival of Naval Air Station (NAS) Whidbey Island.

Below is a paragraph from the NRHP nomination that describes the historic importance of Ebey's Reserve as a cultural landscape and agricultural region of significance in Washington:

"Ebey's Landing National Historical Reserve (the Reserve) is comprised of 17,400 acres of natural and cultural features that reflect human use and occupation of the landscape over several generations. Historic land use patterns, the mix of farm and forest, coastal shorelines and historic town of Coupeville all contribute to defining the cultural character of a nineteenth century rural community with an unbroken record of use up to the present. The Reserve is located in the central portion of Whidbey Island, one of over 170 individual islands comprising the San Juan archipelago to the Strait of Juan de Fuca, in Washington State. The island is irregular in shape with natural prairies, high bluffs and rugged beaches, protected coves, rolling hills, and forests dotting its 40 mile length. The boundaries of the Reserve coincide with those established in the 1973 nomination of the Central Whidbey Island Historic District to the National Register of Historic Places. The 1973 nomination focused primarily on the architectural resources which are notable as one of the largest intact collections of 19th century residential and

commercial structures in rural Washington State. This documentation supplements and amends that nomination to fully reflect the resources of the Reserve, including a number of significant twentieth century structures. This amendment also takes into account key cultural landscape components and characteristics such as historic land use patterns, circulation systems, landscape organization, vegetation, and farm complexes that illustrate functional and cultural relationships through several generations.”

Although NAS Whidbey Island has been in place since 1942, with corresponding noise increases affecting the rural qualities of the area since that time, there is no question that the Navy’s plan to dramatically increase the volume and kind of flights across Ebey’s and Coupeville — even to Port Townsend and the San Juan Islands — will have a substantial, harmful effect on the elements that have made these places historically significant. That’s why we appreciate the opportunity to work with the Navy to determine measures that appropriately address the adverse effect on historic properties and cultural landscapes in Washington State.

My office has reviewed the proposed mitigation measures in your June 2018 report, which you describe as a “starting point to consultation,” and find them inadequate. None of these measures comes close to meeting the Navy’s obligation under Section 106 and its implementing regulations. Our feedback on each of these proposals is as follows:

- Installation of informational kiosks. Not only are informational kiosks not commensurate with the level of impact to the historic properties, but they also do nothing to mitigate or resolve the adverse impact to the properties’ setting, feeling, and association, which are substantially diminished by the increases in noise and vibration of the Navy’s action.
- Increased support to the REPI and encroachment management programs. Although our state believes increased support at NAS Whidbey Island for acquiring conservation easements is a positive step, these programs serve as mitigation for natural resource impacts and have no relationship to cultural resource mitigation. Again, this measure — while a commendable and welcome step — does nothing to mitigate or resolve the adverse impact to historic properties in the area and should be reserved for discussions of mitigation under the broader Environmental Impact Statement.
- Online inventory of ELNHR historic properties. Our agency has already accomplished a complete inventory of historic properties within the ELHR in our Geographic Information System (GIS) platform that the Navy can access. We have no need for further partnership in this regard.

It is clear that our offices have substantial work ahead to determine appropriate mitigation measures that are commensurate with the level of impact to properties and landscapes.

As you may be aware, under Section 106, a federal agency may look beyond mitigation of direct impacts to creative mitigation strategies when direct disturbance to historic properties cannot be avoided. Therefore, we propose the following measures as an alternative starting point to our consultation on mitigation of the adverse effect under the National Historic Preservation Act:

1. **Establishment of Grant Program for Heritage Barns.** We propose the Navy establish a grant program to restore and stabilize heritage barns located both within Ebey’s Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation

with the Washington State Department of Archaeology and Historic Preservation (DAHP).

2. **Establishment of Grant Program for Historic Structures.** We propose the Navy establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.
3. **Continuation of Operations Mitigation.** We propose the Navy commit to continue working with the local community and the Trust Board of ELNHR on operations mitigation to ensure the scheduling of training flights is effectively managed in close coordination with community needs and activities.

I appreciate your consideration of these proposals and look forward to discussing them in further detail with you. The Navy has worked closely with Washington's environmental community on land conservation efforts through the purchase of property that has resulted in the preservation of thousands of acres of critical resources. We merely ask that historic properties and cultural landscapes be granted the same consideration, pursuant to Section 106 and its implementing regulations. Substantial mitigation is appropriate for the significant adverse impacts excepted from increased Growler operations in the area.

While I fully recognize the hard work of NAS Whidbey Island in protecting America's interests at home and abroad, it is also essential to ensure the historical and cultural integrity of our communities, and the quality of life of our residents, is properly acknowledged and maintained.

Sincerely,



Dr. Allyson Brooks
State Historic Preservation Officer
Washington

CC: Rear Admiral Christopher Gray
Vice Admiral Dixon R. Smith
Deputy Assistant Secretary Karnig H. Ohannessian
Assistant Secretary Phyllis L. Bayer
John Fowler, Executive Director, ACHP

Consultation for the Resolution of Adverse Effects to Historic Properties and Development of a
Section 106 Memorandum of Agreement (MOA) for the Proposed Growler Airfield Operations
Increase at Naval Air Station Whidbey Island

AGENDA

4 September 2018

- I. Introductions and Approval of Aug 21 Meeting Summary**
- II. Clarification on Scale and Scope of Undertaking**
- III. Discussion of Resolution Options**
- IV. Schedule Next Meeting and Action Items.**

21 August 2018, 0900 – 1030 AM

Growler Section 106 Consultation Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Army – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
Commander Malik (telephone) - JAGC, USN Fleet Environmental Counsel U.S. Fleet Forces Command
Commander Thedwall (telephone) – Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
Lisa Padgett (telephone) – Home Basing NEPA Program Manager, USFF
Bill Manley (telephone) – DFPO, NAVFAC Headquarters
Sarah Stallings (telephone) - Environmental Planning, NAVFAC Atlantic
Lieutenant Commander Parr (telephone) – Regional Legal Service Office, NAVFAC Northwest

Advisory Council on Historic Preservation

Katharine (Kate) Kerr (telephone) – Program Analyst, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks (telephone) – Washington State Historic Preservation Officer (SHPO)

Washington State Governor’s Office

Jim Baumgart (telephone) – Washington State Governor’s Office Policy Advisor, Human Services Division

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Coupeville

Mayor Molly Hughes – Town of Coupeville

Citizens of Ebey’s Reserve

Maryon Atwood - President

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR

Environmental Impact Statement Team

Cindy Shurling (telephone) – Consultant team

Citizen

David Day

Introductions and Opening Remarks

Ms. Campbell began the call and confirmed receipt of agenda and minutes from the 02 August meeting which reflected suggested changes from Mayor Stinson and Mayor Hughes. She asked for approval from those present on the call; no questions/comments were received. Minutes were deemed approved, without objection.

Captain Army introduced himself as the incoming CO of NAS Whidbey Island (NASWI) by saying that he values being an integral part of the community. NASWI is committed to the NHPA consultation process, due to law and because the Navy is committed to being good neighbors and stewards. This includes understanding concerns for the adverse effects to historic properties. He welcomes these conversations to balance community concerns, the legal requirements, and the needs of the mission. Captain Army suggested opening the call first for any opening remarks from the consulting parties.

Ms. Atwood expressed her concerns that the public process has been truncated. She would like a public forum or hearing made up of consulting parties and public – both for the environmental review and historic properties as the public is not adequately informed about what is happening and this is a major undertaking. She suggested the maps presented in the historic properties consultation should be presented at this forum as they were not part of the Draft EIS review. She feels the public is unaware and believes a forum would be a great opportunity for Capt. Army to introduce himself, present updated project information, and allow for public comment.

Dr. Brooks requested that we use full terms (not acronyms) when describing the review processes such as “environmental review process” and “historic properties process” to be as clear as possible for the group and avoid confusion.

Ms. Griffin indicated she wished they were meeting in person. She would like to take Capt. Army on a tour of the Reserve to allow him an opportunity to see the history of it. She is experienced in this process, but she is confused as to where we are in the process.

Clarification on the Navy Decision-Making Process and How Meet Environmental Stewardship Responsibilities under NEPA and NHPA

Ms. Campbell noted the Navy recognizes that confusion is present between the environmental review and historic properties review processes, so the meeting was opened with clarifying remarks and an opportunity for questions. She invited conversation and turned the meeting over to the NEPA team to provide an overview of the environmental review process that has occurred to date for the Growler EIS and how information is being used to help the decision maker.

Ms. Padgett provided an overview of the Navy decision-making process. The Navy’s decision is influenced by many factors. The decision must meet national policy objectives and Department of Defense and Department of Navy needs for operational readiness, training, maintenance, logistics support, facilities, personnel support, operational costs, and adhere to fiscal authorizations. The decision is informed by environmental review and historic properties considerations regarding informed planning and understanding of the consequences on the propose action or undertaking.

NEPA is a procedural, not a prescriptive law. The law and federal regulations require consideration of environmental consequences and a range of viable alternatives to avoid, minimize, or mitigate the environmental impacts to assist with agency decision making. NEPA does not require the agency to select the environmentally preferred alternative. Commenting on a proposed action informs decisions, but is not equivalent to a vote that would drive an agency’s decision. Nonetheless, the information and

comments gathered during the EIS process necessarily weigh significantly for decision makers. Accordingly, the Navy takes seriously its responsibility to provide information about the proposed increase in Growler operations and is taking all the views expressed into consideration.

Public involvement in reviewing this proposed action has helped the Navy understand community specific issues and concerns regarding the proposed action, and to more fully analyze those concerns using the best available science. This is the reason the Navy considered alternatives and sub-alternatives in order to understand how the force structure and distribution of FCLPs would affect the community and the resources involved. The Navy has considered how to balance usage of Ault Field and OLF Coupeville to meet the purpose and need of providing the aircrews' mission readiness requirements. Further, the Navy prepared a literature review in response to scoping comments and solicited additional public comments on the Draft EIS, reviewed an additional 256 non-auditory health articles suggested by the public in the Draft EIS public comments, and is using this information to support the preparation of the Final EIS.

Comments received both in the scoping phase at the beginning and the Draft EIS during 2013 and 2014 and again in 2016 during the Draft EIS public review have been a central part of the consideration as the Final EIS has been prepared. The Navy held two rounds of scoping comments (over 3,600 comments received) that were used to inform and shape the content and analysis of the Draft EIS. The Draft EIS discusses how scoping comments were received and reviewed and includes discussion of topics such as options to relocate squadrons and training suggested by the public in order to avoid/minimize noise impacts; the potential benefits of precision landing mode (PLM) also known as MAGIC CARPET and Chevrons to avoid/minimize impacts; and it discusses all available mitigations for aircraft operations that would allow the purpose and need to be met.

When the Draft EIS was released in fall 2016, the Navy invited public comment and received 4,335 public comments. The comments on the Draft EIS were used to expand and refine the analysis in the Final EIS. All public comments received on the Draft, will be addressed and responded to in the Final EIS. Navy responses will be provided according to comment themes, such as noise, air quality, cultural resources, etc., and contained in a new appendix, Appendix M/Draft EIS Public Comments and Responses. These comment themes are discussed in the first chapter of the Final EIS as well providing an upfront summary of the responses that follow in more detail.

Regulators and consulting agencies have reviewed the Draft EIS and provided comments and recommendations to the Navy as part of the agency review process. Those comments will be responded to in the Final EIS. For easy reference, the Final EIS will contain a new appendix, Appendix H, which summarizes all current and proposed mitigations for aircraft noise for which the Navy is committed.

Public comments ensure that the Navy has a complete analysis that addresses topics important to the public. The Navy understands that aircraft noise is a big concern and that aircraft operations are loud. The Navy took steps in September 2017 to delay the release of the Final EIS to consider the latest test results of PLM/MAGIC CARPET and the latest operational requirements because it knew these would be important factors for addressing the public's noise concerns. Inclusion of PLM and the reduction in pilots into the Final EIS analysis resulted in a 30% decrease of FCLPs between the Draft EIS and the Final EIS operations and offers the greatest potential for avoidance, minimization and mitigation of aircraft noise.

Regarding the Preferred Alternative, the Navy has taken all 8,000+ public and agency comments received to date into consideration when selecting the Preferred Alternative (Alternative 2, Scenario A). No final decision has been made, rather there has been an announcement of a preferred alternative. Additional briefings to Secretariat leadership are needed before the release of the Final EIS and before a final

decision can be made. The ultimate decision with respect to force structure and FCLP distribution will be made by the Secretary of the Navy or his representative.

A Record of Decision (ROD) will be announced no earlier than 30 days following the public release of the Final EIS. The ROD will explain the Navy's decision, describe the alternatives the agency considered, and discuss the agency's plans for mitigation and monitoring. The Council on Environmental Quality regulations provide for a 30-day waiting and public review period after notice of availability is published that the Final EIS has been filed with the U.S. Environmental Protection Agency before the Navy may take final action. Although this is not a comment period under regulations, any questions or comments received would be reviewed. Typically, this is a time to address any outstanding regulatory agency concerns. Concurrent with the publication in the Federal Register, the Navy will notify elected leaders, issue a press release, mail letters and postcards to public stakeholders using the project mailing list, update the project website, and publicize the decision with paid newspaper advertisements and social media.

The bottom line is that the Navy is listening. This is why the Navy took steps September 2017 to delay the release of the Final EIS in order to consider the latest test results of MAGIC CARPET and the latest operational requirements. The Navy realized that these were important factors for addressing the public's noise concerns and resulted in a 30% reduction in FCLP operations.

The new Appendix MH/Mitigation, and the ROD when ultimately signed, will explain measures which the Navy can commit to and why other mitigation proposals are not able to be implemented. We heard the 18 proposals presented during the first NHPA resolution of effects meeting. We are mindful that while some proposals may not be related to adverse effects to historic properties, they may be relevant to consideration regarding other impacts, so we are considering those proposals in the context of the environmental review process and impacts across other resource areas. All comments will be considered carefully by the Navy to determine whether any new information not already considered should be factored into the Final EIS.

In closing, Ms. Padgett thanked everyone for their continued participation in both the environmental review and historic properties review processes.

Ms. Campbell noted that in August 2016 all consulting parties received information about the environmental review process and how the historic properties/Section 106 complements that process. She offered to provide this information again, as needed. She also noted the environmental review process helps to provide information to the historic properties review process and in turn, we in this consultation, help to feed information into the EIS analysis. This provides the most effective information for the decision makers. The historic properties discussion helps to support the overall discussion of cultural resources. These two processes run concurrently; but in the end, they are separate laws with different requirements. The outcomes help guide each other.

Mayor Hughes asked if the two are separate processes, will the Final EIS also have mitigation in it for the non-historical resources and will the ROD capture this information? It was confirmed the Final EIS and the ROD will cover impacts and mitigation as they relate to non-historical resources. Dr. Brooks asked about the public's ability to input information on mitigation to non-historic resources.

Ms. Padgett explained that many mitigations (e.g. chevrons) are discussed in the Draft EIS and were commented on during the public review periods. The Navy paused the EIS process in 2017 to include additional mitigation into the analysis, PLM and a commensurate 30% lower increase in operations between the Draft EIS and the Final EIS, and a decrease in pilots per squadron. Additionally, the Navy already implements many mitigations, e.g. FLCP schedule publishing, operational considerations like not

flying over population centers and avoiding flying during festivals and other community events, a robust AICUZ process in place with the community. When the Final EIS is published, all existing mitigation and any new mitigation will be packaged in Appendix H. Discussion will note where mitigations are continuing to be reviewed and considered but are not able to be implemented due to operational limitations or are not mature-enough at this time (e.g. chevrons).

Mr. Manley asked Ms. Padgett to explain how the Final EIS will address the public's mitigation concerns.

Ms. Padgett clarified there is an expanded discussion in Chapter 1 of the Final EIS to address public comments received, new Appendix M provides a written response to public comment themes received on the Draft EIS, and new Appendix H to address noise mitigations. As mentioned previously, the literature review has been updated based on a review of additional 256 published articles suggested by the public, and reviewed by medical, scientific and noise experts. Thirteen public meetings were held for the Growler EIS to review all of the project related information and for the public to ask questions to Navy experts. The changes from Draft EIS to the Final EIS are noted as an itemized list. The Final EIS reflects an expanded analysis in direct response to public comments and new information. Capt. Army noted that the ROD and/or Final EIS will articulate the measures taken to address all comments, including NHPA issues regarding adverse effects to historic properties.

Ms. Atwood expressed concern between the historic properties/Section 106 consultation process and the public's ability to continue to comment on the environmental review process. If public comments address the environmental document and the historic properties analysis jointly, would it not be appropriate for the Navy to open up a forum (e.g. public meeting), so the public has an opportunity to comment on the EIS. She understands that it is not typical to allow public comment during the 30-day review period, but since this project is so large and negative impacts are expected could public commenting be opened up.

Ms. Campbell responded that the Navy is aware of the interest in this EIS/environmental review process and the Section 106 consultation/historic properties review. Ms. Campbell confirmed that while each process provides information to one another and for analysis they are not tied together.

Ms. Campbell clarified that NHPA requires a different analysis from the environmental analysis in the EIS. The analysis of adverse effects to historic properties follows regulatory requirements and the Secretary of the Interior Standards. The focus of the historic properties review is to avoid, minimize, or mitigate specific adverse effects to historic properties, which in this case is the indirect adverse effect to the perceptual qualities of the landscape.

Ms. Atwood asked how the Navy is finalizing the environmental document and if we are still working within this process. Ms. Campbell explained that the analysis that led to the identification of historic properties and the current consultation on resolution of effects has informed and will inform the Final EIS.

Dr. Brooks asked to revisit the EIS/environmental review process and to reexamine the 30% less increase in operations over the original proposal. She sought to confirm that the 30% operational reduction is between the proposed increase in the Draft EIS and the Final EIS; while there is a decrease in operations between the Draft and Final EIS it is still an increase over existing conditions. Ms. Padgett confirmed this is correct, at the draft stage, the Navy was proposing approximately 42,000 FLCP (total) between the two airfields. With the implementation of PLM and the reduction in pilots, the analysis has reduced this number to approximately 30,000 FLCP. The Navy is conducting approximately 24,000 FLCP operations currently. The Navy has proposed an increase in operations since the proposed action was announced five years ago.

Dr. Brooks reiterated that the Navy is not addressing the public request for more noise mitigation in the environmental review process/EIS. Mayor Hughes concurred that she would like to further discuss impacts and mitigation for the Final EIS. The Mayor said the communities do not accept that the reduction in proposed operations between the Draft and Final EIS due to PLM constitutes mitigation as there is still an overall increase in operations occurring. The increase in operations that could occur at OLF is a 288% increase over existing conditions. She still wants to see avoid and minimize options provided for consideration – they understand that the entire operation has been reduced, but the increase is not proportional. She wants this to be minimized even further.

CAPT Army said he would like to meet with each interested party separately to better understand their concerns, especially in relation to historic properties and noise impacts. Mayor Hughes commented that the true mitigation for adverse effects to historic properties is to reduce the number of flights over the historic district.

Ms. Padgett said the Navy has considered other mitigations as detailed in the environmental review analysis/EIS and already does extensive mitigations. There are not significant new operational mitigations for noise available. The Navy has already moved operations out over the water where possible, already works with the schools to avoid flying during testing periods, already works with the community to avoid flying during special events, and the commanding officer conducts monthly meetings and participates in the community leaders' forum, etc. to hear and respond to concerns. The Navy remains committed to continuing these measures. CAPT Army confirmed he will remain committed to these operational measures. He looks forward to working with the Mayors and sustaining these commitments.

Mayor Hughes said that she feels that the preferred alternative is driving the 106 discussion, because the two are so intertwined that you cannot consider one without the other. She expressed her frustration that the EIS was “done” without further input.

Dr. Brooks stated that her office and the State of Washington are not “done” with the EIS and plan to continue efforts to pursue additional mitigation discussions with respect to the environmental review process/EIS. Dr. Brooks encouraged CAPT Army to come to their offices and bring a decision maker for discussions related to mitigations.

At this point in the meeting, due to the length of time spent discussing the environmental review process/EIS, Ms. Campbell proposed tabling the conversation related to the historic properties review/Section 106 conversation to a next meeting. Based on available schedules, 04 September was identified as the next best opportunity for all parties to consult. Ms. Campbell will schedule a call for two hours.

Ms. Kerr indicated that with the confusion between the environmental review and historic properties review processes, it is difficult for the ACHP to comment. She would like these other issues to be addressed outside this forum, so the discussion can move forward to and focus on historic properties. She reiterated that outside issues are impeding the ACHPs ability to comment under NHPA. She thanked the Navy for this call and looks forward to next discussion.

Ms. Griffin noted the mitigation proposed in the EIS is not proportional to the effects that would occur. She would like to know how to provide comment now to the Secretary of the Navy on the Final EIS and about an awareness of how they feel about the preferred alternative. As her organization works with several units of government, waiting for the 30-day review period will not allow adequate response time. However, Ms. Griffin feels she does not have the information needed to make a thorough comment. She noted her mission to protect and preserve the ongoing rural history of the Reserve, as such, she needs to know why the preferred alternative has been selected.

CAPT Army said he appreciates the request to comment to the Secretary early. He will continue to consider this request and how to get information for Ms. Griffin, so when he comes to meet with her he can provide information on how her comments will be appropriately considered.

Mr. Manley observed that the discussion had been important and acknowledged the value of hearing all the concerns. He noted while the NHPA process is an important part of the Navy decision-making process, it is not the sole, or principal determining factor in the final operational decision. Rather, the NHPA process aims to address effects to historic properties, to identify opportunities to lessen the effects, and to fully inform the operational decision.

Dr. Brooks indicated she appreciated the discussion about the environmental review process/EIS but does not agree the mitigation discussion with respect to the environmental analysis is complete. She will put in writing what the SHPO would like to see with regard to historic properties. She noted that while the decision about operations is a policy decision it can include mitigation to historic properties.

Ms. Campbell thanked everyone for their time and noted minutes will be sent out for review and comment. The Navy will schedule the next meeting for 04 September 2018.

CAPT Army thanked everyone. He noted he will plan to schedule meetings with Mayor Hughes and Ms. Griffin, as well as make time to visit Dr. Brooks at her office. He does not want to delay any opportunities for internal feedback. He understands the concerns of the interested parties and the community and looks to be an avenue for the consultation.

The meeting adjourned, and the conference call ended at about 10:30 AM PST.

Comment number	Alternatives proposed in consultation process to resolve adverse effects to historic properties	NHPA focus with nexus to adverse effect	NHPA focus, for further discussion	Outside NHPA
1	Establish a grant program to restore and stabilize heritage barns located both within Ebey's Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP).		X	
2	Establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.		X	
3	Continue operations mitigations.		X	
4	Fund an internship within ELNHR to update and make functional historic property inventory databases.		X	
5	Fund a study to examine the impact of noise vibrations on historic properties.		X	
6	Integrate considerations regarding historic resources in Navy AICUZ and further update recommendations to Island County		X	
7	Purchase easements to retain the current use (and thereby historical character) land in the Reserve (to include through the National Park Service existing process using Scenic Easements)	X		
8	Install information kiosks related to the affected landscape viewpoints	X		
9	Conduct a study to assess the landscape integrity and inform multi-agency efforts to preserve its character.	X		
10	Select an alternative where FCLP operations equitably divided between both airfields, OLF Coupeville and Ault Field			X
11	Provide funding for schools			X
12	Provide funding to purchase sound-cancelling headphones for farmworkers			X
13	Reduce the proposed 288% increase in FCLPs at OLF Coupeville, so a smaller area experiences a substantive increase in noise exposure in the Central Whidbey Historic District.			X
14	Decrease the proposed four-fold increase in FCLP's at OLF Coupeville so APZ land use restrictions do not become a restricting factor in the slow evolution of the District.			X
15	Maintain emphasis and funding for technology like MAGIC CARPET that assures safe training for pilots while requiring fewer FCLPs.			X
16	Commit to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in the Central Whidbey Island Historic District.			X
17	Commit to mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey Island Historic District because of the significant noise increase.			X

August 24, 2018

Captain Matthew L. Arny
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, WA 98278

Dear Captain Arny:

As the State Historic Preservation Officer for the State of Washington, I am writing in response to the proposed mitigation measures in the Navy report, dated June 2018, "*Section 106 Determination of Effect for the EA-18 Growler Airfield Operations at the Naval Air Station Whidbey Island Complex.*" Although we have concurred with your Determination of Adverse Effect, we are concerned by your proposed mitigation measures, which are woefully inadequate and fail to meet the Navy's obligation to mitigate or resolve adverse effects on historic properties and cultural landscapes in Central Whidbey Island Historic District, Coupeville Historic District, and Ebey's Landing National Historic Reserve (ELNHR). Until such time as the Navy reaches a resolution with my office and meets its obligations under Section 106 and implementing regulations 36 CFR 800, I request to continue consultation on suitable mitigation measures.

On June 27, 2018, we wrote to you in concurrence that the substantial increases in noise and vibration will result in an adverse effect that will diminish the integrity and characteristics that qualify these historic properties and cultural landscapes for inclusion in, or eligibility for, the National Register of Historic Places (NRHP). Specifically, the Navy's actions are expected to diminish the properties and landscapes' setting, feeling, and association. As you are aware, the historic significance of Ebey's Reserve and the Coupeville Historic District are rooted in early settlement patterns, architecture, and the agricultural landscape that existed long before the arrival of Naval Air Station (NAS) Whidbey Island.

Below is a paragraph from the NRHP nomination that describes the historic importance of Ebey's Reserve as a cultural landscape and agricultural region of significance in Washington:

"Ebey's Landing National Historical Reserve (the Reserve) is comprised of 17,400 acres of natural and cultural features that reflect human use and occupation of the landscape over several generations. Historic land use patterns, the mix of farm and forest, coastal shorelines and historic town of Coupeville all contribute to defining the cultural character of a nineteenth century rural community with an unbroken record of use up to the present. The Reserve is located in the central portion of Whidbey Island, one of over 170 individual islands comprising the San Juan archipelago to the Strait of Juan de Fuca, in Washington State. The island is irregular in shape with natural prairies, high bluffs and rugged beaches, protected coves, rolling hills, and forests dotting its 40 mile length. The boundaries of the Reserve coincide with those established in the 1973 nomination of the Central Whidbey Island Historic District to the National Register of Historic Places. The 1973 nomination focused primarily on the architectural resources which are notable as one of the largest intact collections of 19th century residential and

commercial structures in rural Washington State. This documentation supplements and amends that nomination to fully reflect the resources of the Reserve, including a number of significant twentieth century structures. This amendment also takes into account key cultural landscape components and characteristics such as historic land use patterns, circulation systems, landscape organization, vegetation, and farm complexes that illustrate functional and cultural relationships through several generations.”

Although NAS Whidbey Island has been in place since 1942, with corresponding noise increases affecting the rural qualities of the area since that time, there is no question that the Navy’s plan to dramatically increase the volume and kind of flights across Ebey’s and Coupeville — even to Port Townsend and the San Juan Islands — will have a substantial, harmful effect on the elements that have made these places historically significant. That’s why we appreciate the opportunity to work with the Navy to determine measures that appropriately address the adverse effect on historic properties and cultural landscapes in Washington State.

My office has reviewed the proposed mitigation measures in your June 2018 report, which you describe as a “starting point to consultation,” and find them inadequate. None of these measures comes close to meeting the Navy’s obligation under Section 106 and its implementing regulations. Our feedback on each of these proposals is as follows:

- Installation of informational kiosks. Not only are informational kiosks not commensurate with the level of impact to the historic properties, but they also do nothing to mitigate or resolve the adverse impact to the properties’ setting, feeling, and association, which are substantially diminished by the increases in noise and vibration of the Navy’s action.
- Increased support to the REPI and encroachment management programs. Although our state believes increased support at NAS Whidbey Island for acquiring conservation easements is a positive step, these programs serve as mitigation for natural resource impacts and have no relationship to cultural resource mitigation. Again, this measure — while a commendable and welcome step — does nothing to mitigate or resolve the adverse impact to historic properties in the area and should be reserved for discussions of mitigation under the broader Environmental Impact Statement.
- Online inventory of ELNHR historic properties. Our agency has already accomplished a complete inventory of historic properties within the ELHR in our Geographic Information System (GIS) platform that the Navy can access. We have no need for further partnership in this regard.

It is clear that our offices have substantial work ahead to determine appropriate mitigation measures that are commensurate with the level of impact to properties and landscapes.

As you may be aware, under Section 106, a federal agency may look beyond mitigation of direct impacts to creative mitigation strategies when direct disturbance to historic properties cannot be avoided. Therefore, we propose the following measures as an alternative starting point to our consultation on mitigation of the adverse effect under the National Historic Preservation Act:

1. **Establishment of Grant Program for Heritage Barns.** We propose the Navy establish a grant program to restore and stabilize heritage barns located both within Ebey’s Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation

with the Washington State Department of Archaeology and Historic Preservation (DAHP).

2. **Establishment of Grant Program for Historic Structures.** We propose the Navy establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.
3. **Continuation of Operations Mitigation.** We propose the Navy commit to continue working with the local community and the Trust Board of ELNHR on operations mitigation to ensure the scheduling of training flights is effectively managed in close coordination with community needs and activities.

I appreciate your consideration of these proposals and look forward to discussing them in further detail with you. The Navy has worked closely with Washington's environmental community on land conservation efforts through the purchase of property that has resulted in the preservation of thousands of acres of critical resources. We merely ask that historic properties and cultural landscapes be granted the same consideration, pursuant to Section 106 and its implementing regulations. Substantial mitigation is appropriate for the significant adverse impacts excepted from increased Growler operations in the area.

While I fully recognize the hard work of NAS Whidbey Island in protecting America's interests at home and abroad, it is also essential to ensure the historical and cultural integrity of our communities, and the quality of life of our residents, is properly acknowledged and maintained.

Sincerely,



Dr. Allyson Brooks
State Historic Preservation Officer
Washington

CC: Rear Admiral Christopher Gray
Vice Admiral Dixon R. Smith
Deputy Assistant Secretary Karnig H. Ohannessian
Assistant Secretary Phyllis L. Bayer
John Fowler, Executive Director, ACHP

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: [Non-DoD Source] EIS preferred alternative
Date: Tuesday, November 13, 2018 5:36:57 PM
Attachments: [TB to Secy of Navy 08-28-2018 EIS Preferred Aleternative.pdf](#)
[TB to Navy 02-17-2017 Draft EIS Comments FINAL.pdf](#)
[Growler Operations Graphic.pdf](#)

September 7, 2018 – Email from Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve

-----Original Message-----

From: Griffin, Kristen [REDACTED]
Sent: Friday, September 7, 2018 2:22 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] EIS preferred alternative

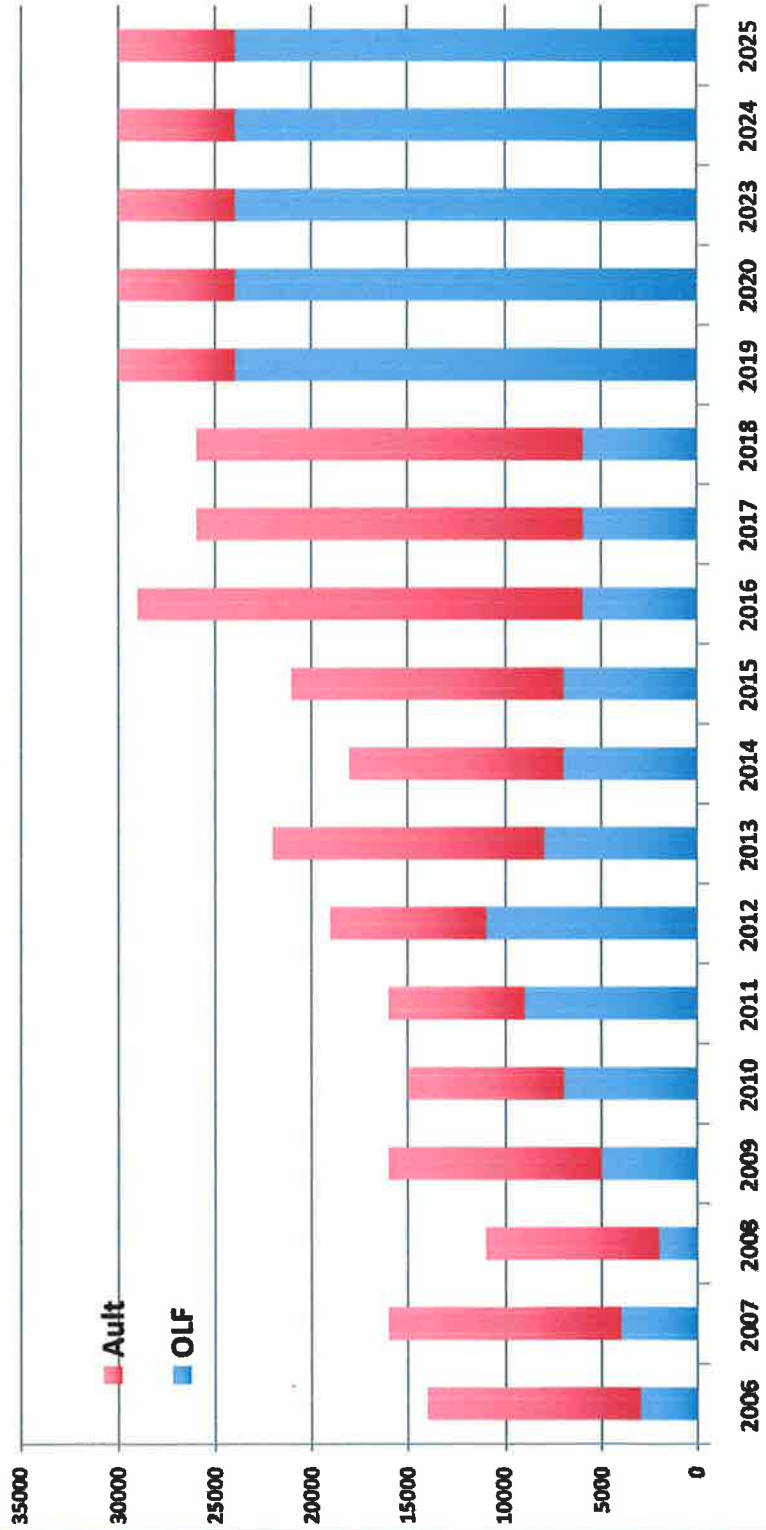
Hi Kendall. Apologies - my mistake - this ended up parked in my drafts. You probably already have it but this completes the loop.

Attached is the Trust Board letter regarding the EIS preferred alternative. Captain Arny should receive a hard copy shortly. The referenced attachments are also also attached to this email.

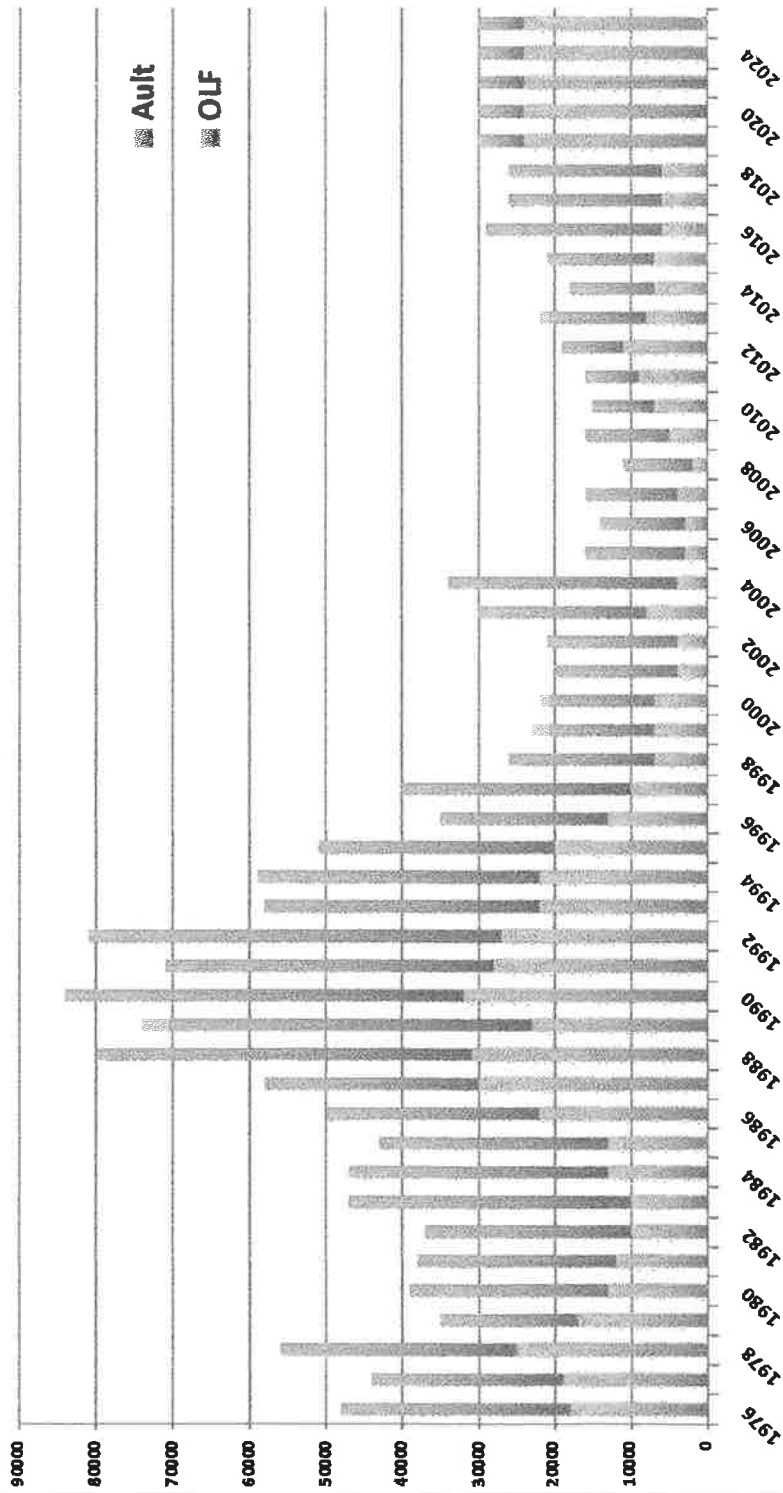
--

Kristen P. Griffin
Reserve Manager
Ebey's Landing National Historical Reserve [REDACTED] Coupeville, WA 98239
[REDACTED]

FCLP Airfield Operations - Ault Field & OLF Coupeville
Since Growler Introduction
2006 - 2018, Projected Thru 2025



FCLP Airfield Operations - Ault Field & OLF Coupeville 1976 - 2018, Projected thru 2025





EBEY'S LANDING
NATIONAL HISTORICAL RESERVE

Trust Board Members

Wilbur Bishop, Chair

Mark Sheehan, Vice Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Lisa Meserole

Harry Anderson

Jon Crimmins

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

National Park Service

Washington State Parks

Island County

Town of Coupeville

Post Office Box 774
Coupeville, WA 98239
Phone (360) 678-6084
www.nps.gov/ebla

EA-18G Growler EIS Project Manager
Naval Facilities Engineering Command Atlantic
Attn: Code EV21/SS
6506 Hampton Boulevard
Norfolk, VA 23508

Date: February 17, 2017

RE: Response to Draft Environmental Impact Statement (Draft EIS) for the continued and increased EA-18G Growler Operation at Naval Air Station Whidbey Island (NASWI).

Dear EA-18G Growler EIS Project Manager:

Established by Congress in 1978 (National Parks and Recreation Act, P.L. 95-625), Ebey's Landing National Historical Reserve (the Reserve) is a 17,572 acre area of nationally significant historic resources with boundaries defined by the Central Whidbey Island Historic District. As stated in its enabling legislation, the Reserve was established "to preserve and protect a rural community which provides an unbroken historical record from nineteenth century exploration and settlement in Puget Sound to the present time."

The Trust Board of Ebey's Landing National Historical Reserve coordinates administration and management of the Reserve according to the mandates of an Interlocal Agreement between the National Park Service, Island County, the Town of Coupeville, and the Washington State Parks and Recreation Commission.

For almost 40 years, the Navy and the Reserve have been neighbors, sharing a precious historic and cultural environment. The Trust Board, in commenting on this Draft EIS, has carefully considered the importance of the Navy to our region and nation. Although we support the Navy and its mission, we conclude that the action proposed in this Draft EIS, which would increase OLF Growler operations by as much as five fold, is not consistent with the preservation mission of the Reserve and would have long term and cumulative effects on the Reserve we are charged with protecting.

The Navy has the means to develop a viable "everybody wins" scenario in which NASWI supports the Growler operation, pilots are effectively trained, and surrounding communities avoid significant adverse impact.

The Trust Board responded previously to this EIS by providing comments during scoping in 2013 and 2014, and as a consulting party in the Section 106 review initiated in accordance with the National Historic Preservation Act. These comments requested that the EIS address concerns about noise measurement methods, definition of the affected area, and the operation's overall impact on Reserve residents, visitors and nationally significant resources.

The Trust Board finds that the Draft EIS lacks key information and analysis needed to evaluate impacts to the Reserve and prepare the Navy for making a well informed decision. Especially concerning is the lack of noise measurement data and analysis requested during scoping, because this data informs every impact and analysis that is relevant to the protection, preservation and interpretation of the Reserve and our community.

The Trust Board urges the Navy to reject the proposed alternatives and consider a No Action Alternative that reflects no increase over current (2016) operations, with viable compromise alternative scenarios that use strategies such as detachment training spread across multiple locations to diffuse, and not increase, the most impactful aspects of the Growler operations to the Reserve and community.

The Trust Board appreciates the opportunity to comment on this Draft EIS and looks forward to an expanding collaboration with the Navy as this analysis and decision are concluded. Specific comments on the draft are attached.

Respectfully,



Wilbur Bishop, Chair
Trust Board of Ebey's Landing NHR

Cc *Senator Patty Murray*
 Senator Maria Cantwell
 Congressman Rick Larsen
 Congressman Derek Kilmer
 Governor Jay Inslee
 Mayor Molly Hughes
 Commissioner Helen Price-Johnson
 Eric Watilo, Washington State Parks & Recreation
 Capt. Geoff Moore, Naval Air Station, Whidbey Island
 Charles Arndt, Friends of Ebey's
 Allyson Brooks, WA St. Dept. of Archeology & Historic Preservation
 Palmer Jenkins, Deputy Regional Director, National Park Service
 Karen Taylor-Goodrich, Superintendent, North Cascades National Park
 Judith Rocchio, PWR, Air Quality, Natural Sounds, Night Skies Coordinator, NPS
 Roy Zipp, Operations Manager, NPS
 Trust Board Members
 file

SPECIFIC POINTS NEEDING CORRECTION OR RESPONSE

GENERAL:

1. With local support, Congress established Ebey's Landing National Historical Reserve as an area to be protected and preserved for the public, in perpetuity. Although the proposed action could undermine that intent, the Draft EIS does not fully consider how extreme noise and other changes will impact the Reserve's resources, values and visitor experience. Environmental Impact Statements are intended to provide a full and clear discussion that informs decision-makers and the public, and include alternatives that could avoid or minimize adverse impacts. By excluding alternatives that could meet the Navy's need without impacting the Reserve, this Draft EIS seems instead to justify decisions and plans that have already been set in motion. As a result, the Draft EIS does not provide what is needed for the public or the Navy to understand the proposed action's long term and cumulative effects on the Reserve or the community that supports it.
2. The Draft EIS states that noise and vibration from Growler operations should not be regarded as detracting from the historic nature or character of historic properties or the Reserve because there has been consistent military presence in the Reserve. The Final EIS should clarify that the proposed Growler expansion is not linked historically or thematically to the Reserve's cultural landscape or 426 contributing structures.

AREA OF POTENTIAL EFFECT (APE):

3. The Draft EIS defines APE based on a 65 DNL sound contour mapped with modeled Day-Night Average Sound Level data. The Trust Board restates its concern that this method does not fully characterize noise exposure and impacts to the Reserve's resources, values and visitor experience, which are primary concerns of the Trust Board. In addition, public perceptions and a sound monitoring study in the Reserve question the accuracy of the 65 DNL contour mapped through Day-Night Average Sound Level. These concerns are extremely important because the APE informs every analysis of impact in the Draft EIS.

ALTERNATIVES AND SCENARIOS:

4. All of the scenarios in the Draft EIS sharply increase FCLP operations at OLF over current levels (6,100 operations in 2016), introducing to the Reserve more of the loudest planes, more of the loudest operations, and more area exposed to significant noise. No evidence is presented showing that the Navy has evaluated whether the people who live in, or use, the Reserve or surrounding community can tolerate the extreme noise impacts from as many as 35,100 operations per year. If consistent with current OLF FCLP scheduling, this could result in as many as 135 incidents of significant, disruptive noise every weekday. The Final EIS should note that the Reserve and Coupeville community experienced operations near these levels in the 1980s and 1990s and the community was not able to tolerate the noise. Public outcry was so intense operations

were reduced. Planning to reintroduce this level of noise impact will create significant conflict between the Navy and a growing number of communities.

5. The Draft EIS arbitrarily proposes percentages (up to 80%) of FCLP operations (the most extreme noise impacts) assigned to OLF. The EIS should explain the need, data or rationale responsible for these percentages. In addition, it is not equitable for risks and impact from a proposed action centered in one community to be shifted to another community. Scenarios that concentrate FCLP operations (and the most extreme noise and risk) at OLF pose an unfair impact to Coupeville and the Reserve. The Reserve and surrounding community represent a longstanding, collaborative effort to protect rural character and a way of life. Less dense development in this area is the result of planning and investment and should not be sacrificed because the Navy regards it as a superior training environment.

POPULATION COUNTS:

6. The Draft EIS understates the numbers of people (and children) who could be impacted by noise or exposed to risk in the Reserve. Population estimates should go beyond census block data, and consider the millions of people who use, travel and recreate within the Reserve each year. These include people using the three Washington State parks in the Reserve (1,057,439 in 2016); people using the Washington State Ferry at Coupeville (over 819,000 riders in 2016); and a busy Scenic state highway (2015 average daily total 8492, over 3 million annually, based on a WSDOT traffic recorder in the Reserve). Camp Casey is another example of a location within the Reserve that attracts tens of thousands of visitors each year (especially children) who would not be reflected in a census count. Visitation figures from festivals should also be considered.

NOISE AND NOISE MEASUREMENT:

7. The Draft EIS does not respond to requests during scoping and consultation that the EIS incorporate noise measurement methods that fully characterize noise exposure and impacts to the Reserve's resources, values and visitor experience, and meet NEPA's requirements to characterize environmental impacts according to intensity, context and duration. Instead of relying solely on Day-Night Average Sound Level, this would require the use of metrics such as "time audible" and "time above," maximum A-weighted sound level, sound exposure level, equivalent sound level, and number-of-events-above a specified sound level. The Trust Board recognizes that the Day-Night Average Sound Level metric is the baseline measurement of aircraft noise for the Department of Defense (DOD), but DOD sources, such as the Defense Noise Working Group (DNWG) also recognize that supplemental noise metrics and analysis tools may be necessary to fully inform the public and support analysis and decision making in processes like this EIS (2009 DNWG Technical Bulletin "Using Supplemental Noise Metrics and Analysis Tools"). For this Draft EIS, appropriate noise assessment and analysis should include actual ground measurement of noise intensity, frequency, and vibration as they are

experienced by Reserve users, historic structures and other resources and these measurements should occur at a wide range of locations within the Reserve.

8. The additional POIs (Point of Interest) locations noted in the Draft EIS have increased the number of noise data collection points in the Reserve, but they use the same Day-Night Average Sound Level noted above and therefore do not respond to scoping comments requesting actual ground measurement of noise intensity, frequency, and vibration as they are experienced by Reserve users, historic structures and other resources.
9. The Final EIS should expand its discussion of a 2016 National Park Service sound monitoring report for the Reserve that offers a highly credible, on the ground measurement to compare to the Navy's Day-Night Average Sound Level modeling method (Draft EIS page 1-23). One of the monitoring locations suggests that areas outside the Navy's 65 DNL noise contour may be experiencing noise that is louder and more impactful than modeled. This is important because it challenges the modeling data on which all of the Draft EIS estimates of impact from noise are generated.

CULTURAL RESOURCES:

10. According to 36 CFR 800.8(a), NEPA and NHPA (Section 106) reviews of cultural resources should be coordinated. The Draft EIS was routed for comment without a complete Section 106 review (no defined APE or identification of historic properties), making it difficult for reviewers to understand and comment on impacts to cultural resources. This is especially a problem for a federal undertaking with an affected environment that includes a large National Historic District and a 17,572 acre Reserve with 426 contributing structures and an intact, nationally significant cultural landscape.
11. Analysis of cultural resources in the Environmental Consequences chapter concludes that noise and vibration from Growler operations would not detract from the historic nature or character of historic properties or the Reserve because there has been consistent military presence in the Reserve, and because the Reserve's interpretive themes include aspects of military history (page 4-195). These are not valid criteria for considering adverse impact under NEPA or NHPA.
12. Several comments and conclusions about Cultural Resources in the Affected Environment and Environmental Consequences chapters need correction in the Final EIS. These especially include statements that imply Section 106 review is completed; discussion of adverse impacts under Section 106; discussion of noise and vibration impacts without identification of specific historic properties; and inadequate discussion of impact to the defining features of the historic district's cultural landscape, which include setting and soundscape.

13. The Draft EIS does not consider ways that a new APZ for OLF would impact preservation of historic character in the Reserve. Required by Navy regulations for each of the proposed scenarios, the APZ would trigger expanded land use regulations restricting the rehabilitation and adaptive use of historic properties, and expand the reach of regulations and noise mitigation measures that affect the preservation of features like historic single pane windows, original cladding, and traditional construction techniques. These impacts would primarily be experienced by local government and private property owners.

VISITOR EXPERIENCE:

14. Although the affected area includes an intensively used outdoor recreation network and a National Historical Reserve established to preserve, protect and share a rural landscape with the public, the Draft EIS does not adequately analyze how expanded Growler operations will impact the ability of residents and visitors to use and enjoy these areas as intended. The Draft EIS (page ES-5 and elsewhere) reports that, according to Department of Defense data, about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 dB DNL (data from FICUN - Federal Interagency Committee on Urban Noise, 1980). The Draft EIS should recognize that the FICUN data regards noise that exceeds 65 dB as "Significant Exposure" and the threshold at which land use controls are needed. This means that the proposed Growler expansion results in significantly more land, residents and visitors subjected to "Significant Exposure" sufficient to require land use controls. Given the importance of public use and outdoor recreation to the Reserve, the Final EIS should compare and supplement the nearly 40 year old FICUN data with sources that are more recent (such as Fidell, 2005), and more relevant to the type of outdoor experiences people seek and value in the Reserve.
15. The Draft EIS (page 4-195) describes noise and vibration from the expansion of the Growler operation as "a potential annoyance to visitors in the reserve," but concludes that because noise and vibration are temporary and occur "outside the airfield," the result would be a minimal to moderate annoyance. This might be true where noise is minor, but it is unlikely to be true for the expanded areas and instances where residents and visitors experience extreme or "Significant Exposure" as described above. It is also unlikely to be true for people seeking the Reserve's rural character and opportunities for outdoor recreation, especially under a scenario resulting in as many as 135 incidents of extreme noise from FCLP operations every weekday.

GROUNDWATER CONTAMINATION:

16. Because aspects of the Growler operation, including aviation mishaps, could result in contamination of groundwater, the Final EIS should analyze this as a potential adverse impact, including an analysis of risk to the public and the Reserve's resources. Wherever

potential impacts are considered or analyzed, impacts to agriculture and economy should be considered along with human health.

APZ IMPACTS:

17. All nine of the proposed scenarios increase operations at OLF to levels requiring the designation of an Accident Potential Zone (APZ). Although an OLF APZ would cover large areas of the Reserve and possibly Coupeville, the configuration will not be disclosed until after the EIS is completed and a decision rendered. The APZ would have an undisclosed effect on land use regulation, and most likely a negative impact on property values. The resulting shortfall caused by lower property values will likely increase property taxes paid by all other property owners in Island County. This information should be disclosed to the public and local government so they can gauge how they will be impacted.

RUNWAY EXPANSION:

18. Appendix H (Airfield Analysis) in the Draft EIS acknowledges that the OLF runway does not meet Navy FCLP requirements, but the Draft EIS does not describe how this will be corrected. If corrective actions include runway or other expansion into the Reserve, this should be discussed in the Affected Environment and Environmental Consequences chapters. Associated costs should be included in estimates of overall cost to accomplish the proposed action.

SOCIOECONOMIC ANALYSIS:

19. The Draft EIS fails to fully consider socioeconomic impacts to a unique community that is sustained by a long and remarkable tradition of recreation and collaborative preservation. The Reserve, and the community that supports it, are part of a “place based” economy, defined as a place in which a significant part of the economy comes from businesses and spending that depend upon the local environment and local character. This includes economic activity from land preservation, historic preservation, strong property values, specialized agriculture, parks and outdoor recreation, eco-tourism, cultural tourism, and businesses that include retail, visitor services, overnight accommodations, special events (such as festivals and the wedding industry) as well as local art, crafts and local foods. Extreme noise from an expanded Growler operation would disproportionately impact this economy. Socioeconomic analysis should recognize that the Reserve represents a longstanding pattern of investment in the community. Loss of integrity of the landscape and diminished outdoor recreation opportunities due to noise threaten this pattern of investment. Examples include:
 - **Continued Voluntary Participation in Land Protection:** Hundreds of residents in Ebey’s Reserve have committed to preserving the Reserve’s character and environment by voluntarily limiting their ability to develop their own property, and reducing their own property values, by placing easements or other restrictions on their property. The benefits from preservation are shared by the entire community.

- **Continued Financial Investment in Protecting the Reserve:** Federal agencies, Land Trust organizations, non-profit preservation organizations and thousands of citizens (local and otherwise) have invested many millions of dollars to secure conservation easements for the express purpose of protecting and preserving the Reserve’s scenic beauty, natural and cultural resources, recreational opportunities, heritage, rural character and way of life.
- **Continued Citizen Participation:** Because the Reserve is valued within a broad community, it attracts an extensive network of volunteers and in-kind donations, centered on protecting and preserving the Reserve’s resources, heritage, rural character and way of life.
- **Local Government Participation and Commitment:** Because the Reserve is valued by their citizens, local government partners help it succeed with official support.
 - Island County, the Town of Coupeville, Washington State Parks and the National Park Service share responsibility and collaborate in the management and administration of the Reserve;
 - Island County supports the Reserve by incorporating the Reserve’s strategic plan into its own Comprehensive Plan;
 - Island County and the Town of Coupeville protect the Reserve’s historic character with a joint design review process;
 - State and federal agencies regularly contribute special support for the Reserve because of its recognized state and national significance.
 - The Growth Management Act (GMA) guides local government planning across Washington State and requires communities to identify “Urban Growth Areas” for future expansion. The only community to seek an exception to identifying an Urban Growth Area is the Town of Coupeville. This demonstrates the Town of Coupeville’s commitment to protecting the rural character of the Reserve that shares its boundaries, and its determination to protect its own local character and way of life, even at the at the expense of financial gain through growth.



EBEY'S LANDING
NATIONAL HISTORICAL RESERVE



EBEY'S LANDING 1978 - 2018
NATIONAL HISTORICAL RESERVE
Celebrating 40 Years of Community Partnership

Trust Board Members

Wilbur Bishop, Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Harry Anderson

Rip Robbins

Jon Crimmins

David Louter

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

National Park Service

Washington State Parks

Island County

Town of Coupeville

*P.O. Box 774
162 Cemetery Rd.
Coupeville, WA 98239
360.678.6084*

August 28, 2018

Richard V. Spencer, Secretary of the Navy
Office of the Secretary of the Navy
1000 Navy Pentagon, Room 4D652
Washington, DC 20350

Dear Mr. Secretary:

The Trust Board of Ebey's Landing National Historical Reserve (Trust Board) urges the Secretary of the Navy to reject the initial preferred alternative (Alternative 2) for the final Environmental Impact Statement (EIS) analyzing EA-18G Growler Operations at NAS Whidbey Island and Outlying Landing Field. This request reflects the Trust Board's great concern for significant impact to Ebey's Landing National Historical Reserve and our community.

Established by Congress in 1978 (National Parks and Recreation Act, P.L. 95-625), Ebey's Landing National Historical Reserve (the Reserve) is a 17,572 acre area of nationally significant historic resources with boundaries defined by the Central Whidbey Island Historic District. As stated in its enabling legislation, the Reserve was established "to preserve and protect a rural community which provides an unbroken historical record from nineteenth century exploration and settlement in Puget Sound to the present time."

The Trust Board coordinates administration and management of the Reserve according to the provisions of an Interlocal Agreement between the National Park Service, Island County, the Town of Coupeville, and the Washington State Parks and Recreation Commission.

The Trust Board strongly requests that the Secretary instead approve a No Action Alternative that reflects no increase over current (2016) operations, or any viable compromise alternative scenario that use strategies to diffuse, and not increase, the most impactful aspects of the Growler operations to the Reserve and community.

Of the 15 scenarios and alternatives presented in the Draft EIS, the Navy has selected the alternative that proposes the greatest harm to the Reserve and our community (refer to attached Draft EIS comment). Under this alternative, the most impactful flight operations (FCLPs) will occur at levels that the community experienced in the late 1980s/early 1990s and could not tolerate. Instead of choosing an alternative that works at compromise, these numbers maximize impact and actually represent the first time in history that the Naval Air Station has chosen to shift the majority (80%) of its FCLPs away from the Air Station and onto the Reserve and our community (refer to attached graphic). This is not a sustainable plan for operations.

Not adequately considered in the Draft EIS was the socioeconomic harm this alternative will have on Central Whidbey Island's specialized "place based" economy, which has been intentionally built upon activities conducted outdoors (agriculture and recreation), the integrity of our cultural landscape, rural setting, preserved environment and local historical character. This economy represents decades of investment, collaboration, planning and choices in which citizens and government have consciously chosen to protect the Reserve, the historic district and local character and traditions, at the expense of potential growth and development. It is difficult to accept that the Draft EIS finds these conditions expendable because they provide a desirable training environment when compared to the Naval Air Station.

We also request to be involved in developing mitigation for the alternative that eventually is approved. We feel the mitigation measures discussed in the Draft EIS and the associated National Historic Preservation Act Section 106 Determination of Adverse Effect, are not appropriate for the scale of the adverse impact. The Trust Board looks forward to participating in discussions about mitigation and will provide further input.

One mitigation measure that we feel should be included is to require monitoring of jet operation noise in the Reserve. The Trust Board is concerned that the noise modeling technique used by the Navy does not fully characterize noise exposure and impacts to the Reserve's resources, values and visitor experience. Actual ground measurement of noise level, intensity, frequency, and vibration as they are experienced by Reserve users, historic structures and other resources would benefit preservation and management objectives and should occur at a wide range of locations within the Reserve.

In conclusion, the Trust Board asks that the Navy's preferred alternative be rejected in favor of alternatives that avoid or minimize the adverse effects of jet noise. The Draft EIS included scenarios and alternatives for providing safe and effective training for its pilots without causing this degree of impact. We encourage you to approve the less harmful and more sustainable alternative we have identified, allowing us to continue our 40 year relationship as neighbors working together.

Sincerely,



Wilbur Bishop, Chair
Trust Board of Ebey's Landing National Historical Reserve

Attachment Draft EIS comments
Attachment Operations Graphic

Cc *Trust Board of Ebey's Landing National Historical Reserve*
Under Secretary of the Navy, Thomas B. Modly
Assistant Secretary of the Navy (Energy, Installations & Environment), Phyllis L. Bayer
Senator Patty Murray, Washington
Senator Maria Cantwell, Washington
Congressman Rick Larsen, Washington
Governor Jay Inslee, Washington
Captain Matt Arny, NAS Whidbey Island
Allyson Brooks, SHPO, Department of Archaeology and Historic Preservation
Commissioner Helen Price Johnson, Board of Island County Commissioners
Mayor Molly Hughes, Town of Coupeville
Eric Watilo, Washington State Parks
Roy Zipp, National Park Service
Rob Smith, National Parks Conservation Association
file

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Manley, William R CIV NAVFAC HO, EV](#); [Padgett, Lisa M CIV USFF, N46](#); [Malik, Joan M CDR USFF N01L](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
Subject: FW: Navy Growler Section 106 MOA Consultation
Date: Tuesday, September 11, 2018 11:56:11 AM
Attachments: [Section 106, Operation mitigations.pdf](#)

Good Morning,

Attached is another response letter from COER, although the subject heading is section 106 the letter reiterates the groups environmental planning concerns.

Please forward as appropriate.

Best,
Kendall

-----Original Message-----

From: maryon [REDACTED]
Sent: Tuesday, September 11, 2018 3:12 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]; district1@co.island.wa.us; Brooks, Allyson (DAHP) [REDACTED]
Subject: [Non-DoD Source] Re: Navy Growler Section 106 MOA Consultation

Kendall, I am submitting additional comments.

Thank you. Maryon Attwood

Maryon Attwood
COER, President
[REDACTED]
Coupeville, WA 98239
[REDACTED]

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

September 3, 2018

Naval Air Station Whidbey Island
Attn: Captain Matthew Arny
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

RE: Section 106

Dear Captain Arny,

Thank you for taking leadership in our recent meetings regarding the Section 106 Growler Expansion. We understand your role in this and appreciate your new added clarity to the challenging conversations. We respectfully add these new comments to comments we have already sent to you.

For decades, the communities of NW Washington State have been a partner with the Military in protecting our national security. Now, our communities are collateral damage of the Growler Jet program because of the incredible noise, pollution, and economic impacts. The latest proposal by the Department of Defense dramatically increases the number of Growler jets and flights - putting us all at risk. Central Whidbey and Ebey's Landing National Historical Reserve should not have to be collateral damage for a Washington D.C.-based military plan that magnifies insufficient past planning.

Desecration of this nation's first Historic Reserve, a unique partnership that requires property owners to be stewards, is not an acceptable option as an end result of a flawed Section 106 process. This historical heritage must have maximum protections - not maximum impacts from Growler jet noise. Protecting this Reserve is a delicate balance between the community, the people, and the land. If these relationships are broken – the Reserve will be broken.

The determination of adverse effect document must provide a clear discussion of the most important types of resolution: avoiding and minimizing the effects of the undertaking. The best way to avoid and minimize the adverse effect, which is increased jet noise, is to reduce or eliminate jet noise exposure.

COER has written extensively about the methodology, technical failure and shortfalls of the noise analysis used to inform this Section 106 process including: **(a) "Substantive Change" not Defined; (b) Modeled DNL Contours without Verification; (c) The 65-dBA DNL is now Invalidated; (d) Wrong DNL Averaging Method was used; and (e) Misuse of the Decibel A-Scale.** The result is that the Navy has grossly under-estimated the area of effect in substantial ways that understate the magnitude of the effect of the noise on the Ebey's Landing National Historical Reserve and of the landmass being impacted. This is why noise monitoring throughout the Reserve must be a part of any future mitigation plan to be discussed. Actual noise testing on the ground should have been conducted to test all of the modeled numbers that informed the outcomes of this Section 106 process.

As the only citizens group participating in the consultation on the development of a memorandum of agreement to address adverse effects from the Navy's Growler expansion pursuant to the Section 106 Process of the National Historical Preservation Act. – we take our

participation seriously. We continue to express our deep concern with The Navy's commitment to public process. The Navy's undertaking and Section 106 Determination of Effect will have significant impacts on the Ebey's Landing National Historical Reserve and the other Historic Districts in Central Whidbey. Additionally, the general public is totally unprepared and uninformed about the magnitude of these proposed impacts.

We understand it is late in the process, yet we continue to request a public forum that will include Consulting Partners, such as: the Ebey's Landing National Historical Reserve Board of Directors, the National Park Service staff, the Town of Coupeville, Commissioner Helen Price Johnson, the State Office of Historic Preservation, Citizens of Ebey's Reserve, and other sound and historical property experts and professionals. This forum should be organized for a date in September 2018 and the Navy should provide an appropriate meeting location and representatives to record public comments and concerns. The Navy should consider the public's comments and concerns, as the Section 106 process requires, in their final MOA.

At the advise of Dr. Allyson Brooks, we are including suggestions for operational avoidance and minimization mitigations. Since the Navy's Preferred Alternative puts most of the noise disproportionately over the most historically fragile part of the Island – and the only part of the Island that has been designated for preservation by the United States Congress, we view the best way to avoid and minimize noise effect is to reduce the jet noise by moving the noise to less fragile locations.

We suggest that operational avoidance and minimization will allow the Navy to accomplish its mission while not destroying the Ebey's Landing National Historical Reserve and the community that stewards it. We further believe this is in the best interest of the Navy, the Base and national security, as well as, the mission of the Ebey's Landing National Historical Reserve.

Operational Avoidance Mitigations

Avoid Harmful effects in the Area of Proposed Effect by reducing the number of Growlers and Growler operations at NASWI that are proposed to fly FCLP operations at the OLFC over Central Whidbey and the Ebey's Landing National Historical Reserve.

Pursuant to NEPA, Section 106, regulations, the Navy will consult with SHPO on new undertakings involving the management of air operations as identified in the EIS, and Pursuant to NEPA regulations, the Navy will notify the public of any changes in the management of air operations that have the potential to significantly affect the human environment.

Avoidance Actions

- No increase in the number of operations or the number of EA-18Growler jets and no new (36) jets.
- Minimize local FCLP training, concomitant safety risks and economic/environmental impacts over the Ebey's Landing National Historical Reserve
 - Maintain 6,120 operations annually at OLF Coupeville per the 2005 AICUZ study, with a 50/50 split between runways, obviating the need for further Accident Potential Zones on Whidbey and in accordance with the 2005 AICUZ planning.
 - No local FCLPs on Friday, Saturday or Sunday.
 - Because of carbon emissions over the Reserve's tourist destinations, no local FCLP's on days that are declared Clean Air Hazard Alerts for Island County.

- Temporarily deploy remainder of FCLP operations at other Navy bases as is currently occurring.
- Navy provides regular ground monitoring of altitude of aircraft in FCLP pattern to ensure that pilots observe the 600-foot minimum altitude.
- Monthly publication of OLF Coupeville FCLP operations, runways and time of day.
- Place sound monitors throughout the Reserve, in historic districts, and under all flight paths. Monitoring results should include only the days of flying (Average Busy Day or ABD) not 365 days per year.
- Growlers produce more low-frequency noise (LFN) than their Prowler predecessor and monitoring equipment should be measuring the C-scale as well as the A-scale for noise effects data.
- Report all monitoring results to the public and consulting partners at an annual public forum, not an open house.
- Install NOISE warning signs around OLFC and close any locations that may be accessible to the public to view Growler FCLPs, as the public may be injured or permanently impaired by the noise.

Reduce noise effects, duration, and intensity.

- Site Growlers at 1 or 2 additional locations nationally, starting with carrier-based squadrons, which require the most FCLP training.
 - Move 5 carrier-based Growler squadrons (35 aircraft) to other location(s); perhaps MCAS Cherry Point, which retains training infrastructure. 83 Growler aircraft remain at NASWI.
 - Move remaining 4 carrier-based Growler squadrons (28 aircraft) to 1 or 2 other locations. 55 Growler aircraft remain at NASWI.

Re-site Growler Mission

Growler mission moves to more appropriate sites that are larger, meet Navy standards, and are not as densely populated and environmentally fragile.

- Move the training command (25 aircraft) to 1 or 2 other locations. 5 Growler aircraft (reserve squadron) and expeditionary squadrons remain at NASWI.
- Return Ebey’s Landing National Historical Reserve to historic agricultural heritage pre-dating anything but fixed wing aircraft that would have been appropriate in 1945.

Mitigations under NEPA should include operations management including timing, placement and management during the course of each year.

Sincerely,

Maryon Attwood, COER, President

cc: Captain Army, NASWI – [REDACTED]
 Helen Price Johnson, Island County Commissioner – [REDACTED]
 Jay Inslee, Governor for the State of Washington - Baumgart, Jim (GOV),
 [REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Manley, William R CIV NAVFAC HQ, EV](#); [Arny, Matthew L CAPT NAS Whidbey Is., N00](#); [Padgett, Lisa M CIV USFF, N46](#); [Stallings, Sarah CIV NAVFAC Atlantic](#); [Shurling, Cynthia](#); [Malik, Joan M CDR USFF N01L](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#)
Subject: FW: [Non-DoD Source] Re: [EXTERNAL] Agenda for September 4th Navy Growler Section 106 MOA Consultation
Date: Thursday, September 13, 2018 8:45:34 PM
Attachments: [Attachment A Section 106 Resolution Options 28 Aug 2018.pdf](#)
[Attachment B NPS Director letter to GSA OLF Reserve Gateway parcel acquisition.pdf](#)
[NPS mitigation comment letter to NASWI \(RZ 13Sep2018\).pdf](#)

Please forward as appropriate.

V/R,
Kendall

-----Original Message-----

From: Zipp, Roy [REDACTED]
Sent: Thursday, September 13, 2018 4:21 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Griffin, Kristen [REDACTED]; Helen Price Johnson [REDACTED]
Molly Hughes [REDACTED] Allyson.Brooks@[REDACTED]
Louter, David [REDACTED]
Subject: [Non-DoD Source] Re: [EXTERNAL] Agenda for September 4th Navy Growler Section 106 MOA Consultation

RE: Section 106 Consultations, EA-18G "Growler" Airfield Operations

Kendall,

Please see attached letter, with two attachments. This letter is intended to further the mitigation conversation.

Please share as needed with all appropriate parties to the process. I don't have everyone's emails.

Roy

<[http://](#)>

Roy M. Zipp
Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

[REDACTED]
Coupeville, Washington 98239
[REDACTED]

[REDACTED]
www.nps.gov/ebla [REDACTED]

<<http://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

On Thu, Aug 30, 2018 at 4:25 PM, Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED] wrote:

Consulting Parties,

Please find attached the Draft agenda for our telephone consultation scheduled for Tuesday, September 4, 2018 from 11:00 am to 1:00 pm.

For convenience the call in number is 1-800-747-5150 Participant code: 9465240#.

Please contact me if you have any questions or concerns. I look forward to our discussion on Tuesday.

Best,

Kendall

Kendall Campbell

Archaeologist and Cultural Resources Program Manager

NAS Whidbey Island

[REDACTED]

Oak Harbor, WA 98278

[REDACTED]

[REDACTED]

Comment number	Alternatives proposed in consultation process to resolve adverse effects to historic properties	NHPA focus with nexus to adverse effect	NHPA focus, for further discussion	Outside NHPA
1	Establish a grant program to restore and stabilize heritage barns located both within Ebey's Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP).		X	
2	Establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.		X	
3	Continue operations mitigations.		X	
4	Fund an internship within ELNHR to update and make functional historic property inventory databases.		X	
5	Fund a study to examine the impact of noise vibrations on historic properties.		X	
6	Integrate considerations regarding historic resources in Navy AICUZ and further update recommendations to Island County		X	
7	Purchase easements to retain the current use (and thereby historical character) land in the Reserve (to include through the National Park Service existing process using Scenic Easements)	X		
8	Install information kiosks related to the affected landscape viewpoints	X		
9	Conduct a study to assess the landscape integrity and inform multi-agency efforts to preserve its character.	X		
10	Select an alternative where FCLP operations equitably divided between both airfields, OLF Coupeville and Ault Field			X
11	Provide funding for schools			X
12	Provide funding to purchase sound-cancelling headphones for farmworkers			X
13	Reduce the proposed 288% increase in FCLPs at OLF Coupeville, so a smaller area experiences a substantive increase in noise exposure in the Central Whidbey Historic District.			X
14	Decrease the proposed four-fold increase in FCLP's at OLF Coupeville so APZ land use restrictions do not become a restricting factor in the slow evolution of the District.			X
15	Maintain emphasis and funding for technology like MAGIC CARPET that assures safe training for pilots while requiring fewer FCLPs.			X
16	Commit to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in the Central Whidbey Island Historic District.			X
17	Commit to mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey Island Historic District because of the significant noise increase.			X



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

L1425(2540)

JUL 22 2011

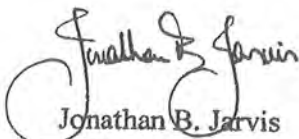
Mr. Blaine Hastings, Manager
General Services Administration
Real Property Disposal (9PZF-10)
400 15th Street, SW
Auburn, Washington 98001

Dear Mr. Hastings:

The purpose of this letter is to request that administrative jurisdiction over a one-acre parcel of excess Federal land located on Whidbey Island in the State of Washington be transferred, without reimbursement, to the National Park Service (NPS). The parcel, referenced as GSA Control No. 9-N-WA-1251-AA (Outlying Landing Field, Coupeville), is located within the boundary of Ebey's Landing National Historical Reserve, a unit of the National Park System. The NPS' 2006 General Management Plan for the reserve identified a need for locating a southern gateway entry sign for the reserve along U.S. Highway 20. The subject parcel is suitable for locating such a sign. I have therefore signed and enclosed GSA Form 1334, Request for Transfer of Excess Real and Related Personal Property.

Your consideration of this request is appreciated. Please continue to work with Mr. Rick Wagner of the NPS Columbia Cascades Land Resources Program Center located in Seattle. He may be reached, at [REDACTED] or you may contact Ms. Barbara Holyoke, at [REDACTED]

Sincerely,


Jonathan B. Jarvis
Director

Enclosure



United States Department of the Interior

NATIONAL PARK SERVICE
Ebey's Landing National Historical Reserve
Reuble Farmstead
593 Fort Casey Road
Coupeville, Washington 98239

EMAIL CORRESPONDENCE

September 11, 2018

Naval Air Station Whidbey Island
Attention: Captain Army, Commanding Officer
[REDACTED]
Oak Harbor, WA 98278-5000

Subject: Section 106 Consultations, EA-18G "Growler" Airfield Operations

Dear Captain Army:

Thank you for the opportunity to collaborate on mitigations for this undertaking, which will impose extreme noise above residential, commercial, and tourist areas both day and night, and render the Reserve as one of the loudest units within the NPS system. The intent of this letter is to assist you and the other consulting parties in identifying and refining actionable measures to mitigate adverse effects to the greatest extent feasible, recognizing that your agency does not intend at this time to consider measures to avoid and minimize impacts by selecting less impactful alternatives that reduce flights at the Outlying Field (OLF).

These comments address the mitigation options summarized on August 28, 2018 matrix entitled "*Resolution Options for Growler Section 106 Consultation Discussion*," which was provided to the consulting parties by Kendall Campbell via email on August 28, 2018 (Attachment A). This letter re-states each numbered comment in that matrix, then responds with the NPS' perspective.

Comment 1. Establish a grant program to restore and stabilize heritage barns located both within Ebey's Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP).

NPS Response: We concur. The Ebey's Forever Grant program already exists to implement this measure. It is an outstanding program that promotes historic preservation on private land throughout the Reserve, but is woefully underfunded given the long list of historic preservation needs. Providing financial assist to boost this program would yield lasting, tangible benefits.

Comment 2. Establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.

NPS Response. We concur, and also recommend that this measure along with the heritage barn grants be combined for administrative efficiency. These program should receive the highest priority for mitigation, because these measures would have the most direct nexus to mitigating noise. NPS staffs would be available to provide technical assistance with preservation, with funding provided by the navy to support our involvement.

As you know the NPS Operational Base at the historic Reuble Farmstead, which includes workshops and office space, is directly under the flight path during carrier landing practices at the OLF. Soundscapes monitoring

conducted here in 2015 documented sound exposure levels up to 117.2 a-weighted decibels, which is physically painful when working outside without ear protection. Informal decibel measurements indoors indicate levels nearing 100 decibels. These noise intensities make it impossible to use the phone or converse with coworkers when growlers are training. Funding for sound proofing of our offices is specifically requested, but this funding should be separate of funding provided to advance the grant program.

Comment 3. Continue operations mitigations.

NPS Response. We appreciate current mitigations, but also share the concerns conveyed by Mayor Hughes and Commissioner Price-Johnson that these measures need to be formalized to the maximum extent feasible. Moreover, these measures should not be time limited. As long as the growlers are in the sky, these measures should remain in place.

Comment 4. Fund an internship within ELNHR to update and make functional historic property inventory databases.

NPS Response. We support funding an internship to advance knowledge of historic resources, but it is our understanding that the Trust Board has largely completed this inventory. Alternative tasks suitable for an intern abound, and we encourage exploring these possibilities further with Kristen Griffin, Reserve Manager.

Comment 5. Fund a study to examine the impact of noise vibrations on historic properties.

NPS Response. Although there is anecdotal evidence that windows have cracked during training, these are likely isolated incidents involving loose windows rattling in their frames. It seems unlikely that the extreme noise generated by growlers imposes sufficient kinetic energy to harm structural integrity of the predominately wood-framed structures in the Reserve, especially relative to natural events such as the high winds that routinely buffet the island.

Comment 6. Integrate considerations regarding historic resources in Navy AICUZ and further update recommendations to Island County.

NPS Response. We support ensuring historic resources are considered, but defer to Island County on this matter since local land use decisions are beyond the purview of the NPS' authority.

Comment 7. Purchase easements to retain the current use (and thereby historical character) of land in the Reserve (to include through the National Park Service existing process using Scenic Easements).

NPS Response. Scenic easements are an important tool for preservation in the Reserve, and we support exploring this topic further with the navy. We normally rely on Land and Water conservation funds, which are difficult to obtain. Expanding funding options would be very helpful, and harmonizing our scenic easement provisions with yours makes obvious sense as a practical matter.

Comment 8. Install information kiosks related to the affected landscape viewpoints.

NPS Response. Funding educational kiosks was recently used in the Reserve to mitigate adverse effects of realigning Parker Road. The Washington State Department of Transportation provided \$100,000 to the Trust Board for design, construction, and installation of waysides throughout the Reserve, which is being implemented now. This case study merits repeating.

In 2011, the navy transferred administrative jurisdiction of 1-acre parcel of disjunct OLF land bordering the southern boundary of the Reserve to the NPS. This was done to enable construction of a southern gateway to the Reserve as provided by our General Management Plan (Attachment B). NPS has not been able to advance that project because funding for new construction is difficult to obtain due to higher priorities aimed at addressing the Reserve's \$4.8 million maintenance backlog. We would like to partner with the navy and see this proposal through to completion. In addition to welcoming and orienting visitors with maps and related media, this site would provide an opportunity for the navy to interpret the historical significance of military operations in the Reserve, which is currently being prepared as mitigation for the blocks at the OLF. Interpreting the historical

highlights of this report on site would be a logical next step. Aside from conveying the historic context, media should also be installed to help visitors understand the importance of the OLF for pilot training and military readiness that is driving this adverse undertaking. This would help explain the incongruent context for the adverse effects of growlers in the Reserve. Obviously the extreme noise would be an issue when jets are flying, but that should not preclude the project because jets will not always be flying, especially on weekends. The design could provide for visitors to remain in their vehicles to reduce noise exposure when growlers are flying, at least to obtain baseline information. This project would reach tens if not hundreds of thousands of visitors each year.

Comment 9. Conduct a study to assess the landscape integrity and inform multi-agency efforts to preserve its character.

NPS Response. We support ongoing analyses of landscape integrity.

New Comments

Having responded to the comments in the working mitigation matrix (Attachment A), we have one additional mitigation recommendation. Notwithstanding the concerns driving this consultation, we believe the navy should play a more formal role in helping to further the Reserve idea, which at its core depends upon close cooperation at the federal, state and local level. The navy is clearly part of the historic fabric of Whidbey Island, and developing a more formal partnership between our agencies is a logical way to affirm this fact in a manner that respects the Reserve and advances our mutual interests.

In recent years the navy has fielded volunteers for trails maintenance and historic preservation projects. Navy staffs are exceptional volunteers, and this assistance has been very helpful in addressing our maintenance backlog and the needs of our partners. We would like to establish a more formal partnership to support our Volunteer in Parks program. This program would include navy staffs, their families and veterans, supported with funding and in-kind support from the navy. Design and installation of the southern gateway could be the first initiative pursued under this partnership.

Please contact me if you have any questions: [REDACTED]

Sincerely,

Roy Zipp
Superintendent, NPS Operations

Attachments (2): A. 29Aug18 Mitigation Matrix; B. NPS Director Letter OLF parcel

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Arny, Matthew L CAPT NAS Whidbey Is., N00](#); [Padgett, Lisa M CIV USFF, N46](#); [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#); [Malik, Joan M CDR USFF N01L](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Manley, William R CIV NAVFAC HQ, EV](#)
Subject: FW: Meeting Summary and Agenda for September 17 Navy Growler Section 106 MOA Consultation
Date: Monday, September 17, 2018 12:33:33 PM
Attachments: [Section 106 9-14, Operational Mitigations.docx](#)

Forward as appropriate.

-----Original Message-----

From: maryon [REDACTED]
Sent: Friday, September 14, 2018 12:51 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] Re: Meeting Summary and Agenda for September 17 Navy Growler Section 106 MOA Consultation

Kendall, I added another item.
Than you, Maryon

Maryon Attwood
Sound Defense Alliance, Chair
sounddefensealliance.org [REDACTED]
[REDACTED]
Coupeville, WA 98239
[REDACTED]

<https://facebook.com/SoundDefenseAlliance>

From: "Campbell, Kendall D CIV NAVFAC NW, PRW4" [REDACTED]
[REDACTED]
Date: Thursday, September 13, 2018 at 5:31 PM
To: "Campbell, Kendall D CIV NAVFAC NW, PRW4" [REDACTED]
[REDACTED]
Subject: Meeting Summary and Agenda for September 17 Navy Growler Section 106 MOA Consultation

Good Afternoon,

I want to thank all of our consulting parties for your continued participation and efforts in this section 106 consultation.

Please find attached a DRAFT copy of the September 4th consultation meeting summary. As with the previous DRAFT meeting summaries, for those who participated we request that you review the attached summary for

accuracy to ensure the notes appropriately capture the discussion and provide edits and corrections where needed in track changes. The goal of the summary is to make sure we capture the sentiments and concerns of all participants and any response or explanation provided by any individual. Again, I ask that in reviewing the summary please avoid adding any commentary or explanations that were not expressed in the meeting. If you would like to add to your discussion, introduce new discussion topics, or offer ideas for resolving adverse effects that were not discussed at the meeting, we would gladly accept these in a separate document. Any additional or new discussion points can also be included in the agenda for our next meeting on Sept. 4th.

In addition, please find attached the Draft agenda for our telephone consultation scheduled for Monday, September 17, 2018 from 11:00 am to 1:00 pm.

For convenience the call in number is 1-800-747-5150 Participant code: 9465240#.

We look forward to continued productive discussion.

All My Best,

Kendall

Kendall Campbell

Archaeologist and Cultural Resources Program Manager

NAS Whidbey Island

[REDACTED]

Oak Harbor, WA 98278

[REDACTED]

[REDACTED]

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

September 14, 2018

Naval Air Station Whidbey Island
Attn: Captain Matthew Army
[REDACTED]
Oak Harbor, WA 98278-5000

RE: Section 106

Dear Captain Army,

Thank you for taking leadership in our recent meetings regarding the Section 106 Growler Expansion. We understand your role in this and appreciate your new added clarity to the challenging conversations. We respectfully add these new comments to comments we have already sent to you.

For decades, the communities of NW Washington State have been a partner with the Military in protecting our national security. Now, our communities are collateral damage of the Growler Jet program because of the incredible noise, pollution, and economic impacts. The latest proposal by the Department of Defense dramatically increases the number of Growler jets and flights - putting us all at risk. Central Whidbey and Ebey's Landing National Historical Reserve should not have to be collateral damage for a Washington D.C.-based military plan that magnifies insufficient past planning.

Desecration of this nation's first Historic Reserve, a unique partnership that requires property owners to be stewards, is not an acceptable option as an end result of a flawed Section 106 process. This historical heritage must have maximum protections - not maximum impacts from Growler jet noise. Protecting this Reserve is a delicate balance between the community, the people, and the land. If these relationships are broken – the Reserve will be broken.

The determination of adverse effect document must provide a clear discussion of the most important types of resolution: avoiding and minimizing the effects of the undertaking. The best way to avoid and minimize the adverse effect, which is increased jet noise, is to reduce or eliminate jet noise exposure.

COER has written extensively about the methodology, technical failure and shortfalls of the noise analysis used to inform this Section 106 process including: **(a) "Substantive Change" not Defined; (b) Modeled DNL Contours without Verification; (c) The 65-dBA DNL is now Invalidated; (d) Wrong DNL Averaging Method was used; and (e) Misuse of the Decibel A-Scale.** The result is that the Navy has grossly under-estimated the area of effect in substantial ways that understate the magnitude of the effect of the noise on the Ebey's Landing National Historical Reserve and of the landmass being impacted. This is why noise monitoring throughout the Reserve must be a part of any future mitigation plan to be discussed. Actual noise testing on the ground should have been conducted to test all of the modeled numbers that informed the outcomes of this Section 106 process.

As the only citizens group participating in the consultation on the development of a memorandum of agreement to address adverse effects from the Navy's Growler expansion pursuant to the Section 106 Process of the National Historical Preservation Act. – we take our

participation seriously. We continue to express our deep concern with The Navy's commitment to public process. The Navy's undertaking and Section 106 Determination of Effect will have significant impacts on the Ebey's Landing National Historical Reserve and the other Historic Districts in Central Whidbey. Additionally, the general public is totally unprepared and uninformed about the magnitude of these proposed impacts.

We understand it is late in the process, yet we continue to request a public forum that will include Consulting Partners, such as: the Ebey's Landing National Historical Reserve Board of Directors, the National Park Service staff, the Town of Coupeville, Commissioner Helen Price Johnson, the State Office of Historic Preservation, Citizens of Ebey's Reserve, and other sound and historical property experts and professionals. This forum should be organized for a date in September 2018 and the Navy should provide an appropriate meeting location and representatives to record public comments and concerns. The Navy should consider the public's comments and concerns, as the Section 106 process requires, in their final MOA.

At the advise of Dr. Allyson Brooks, we are including suggestions for operational avoidance and minimization mitigations. Since the Navy's Preferred Alternative puts most of the noise disproportionately over the most historically fragile part of the Island – and the only part of the Island that has been designated for preservation by the United States Congress, we view the best way to avoid and minimize noise effect is to reduce the jet noise by moving the noise to less fragile locations.

We suggest that operational avoidance and minimization will allow the Navy to accomplish its mission while not destroying the Ebey's Landing National Historical Reserve and the community that stewards it. We further believe this is in the best interest of the Navy, the Base and national security, as well as, the mission of the Ebey's Landing National Historical Reserve.

Operational Avoidance Mitigations

Avoid Harmful effects in the Area of Proposed Effect by reducing the number of Growlers and Growler operations at NASWI that are proposed to fly FCLP operations at the OLFC over Central Whidbey and the Ebey's Landing National Historical Reserve.

Pursuant to NEPA, Section 106, regulations, the Navy will consult with SHPO on new undertakings involving the management of air operations as identified in the EIS, and Pursuant to NEPA regulations, the Navy will notify the public of any changes in the management of air operations that have the potential to significantly affect the human environment.

Avoidance Actions

- **Build a third runway at Ault field for Growler FCLP training as proposed by the Navy, so a parallel runway is provided for Growler trainings.**
- No increase in the number of operations or the number of EA-18Growler jets and no new (36) jets.
- Minimize local FCLP training, concomitant safety risks and economic/environmental impacts over the Ebey's Landing National Historical Reserve
 - Maintain 6,120 operations annually at OLF Coupeville per the 2005 AICUZ study, with a 50/50 split between runways, obviating the need for further Accident Potential Zones on Whidbey and in accordance with the 2005 AICUZ planning.
 - No local FCLPs on Friday, Saturday or Sunday.

- Because of carbon emissions over the Reserve's tourist destinations, no local FCLP's on days that are declared Clean Air Hazard Alerts for Island County.
- Temporarily deploy remainder of FCLP operations at other Navy bases as is currently occurring.
- Navy provides regular ground monitoring of altitude of aircraft in FCLP pattern to ensure that pilots observe the 600-foot minimum altitude.
- Monthly publication of OLF Coupeville FCLP operations, runways and time of day.
- Place sound monitors throughout the Reserve, in historic districts, and under all flight paths. Monitoring results should include only the days of flying (Average Busy Day or ABD) not 365 days per year.
- Growlers produce more low-frequency noise (LFN) than their Prowler predecessor and monitoring equipment should be measuring the C-scale as well as the A-scale for noise effects data.
- Report all monitoring results to the public and consulting partners at an annual public forum, not an open house.
- Install NOISE warning signs around OLFC and close any locations that may be accessible to the public to view Growler FCLPs, as the public may be injured or permanently impaired by the noise.

Reduce noise effects, duration, and intensity.

Build a new runway at Ault Field that is parallel to the main runway for use of FCLP Growlers training.

- Site Growlers at 1 or 2 additional locations nationally, starting with carrier-based squadrons, which require the most FCLP training.
 - Move 5 carrier-based Growler squadrons (35 aircraft) to other location(s); perhaps MCAS Cherry Point, which retains training infrastructure. 83 Growler aircraft remain at NASWI.
 - Move remaining 4 carrier-based Growler squadrons (28 aircraft) to 1 or 2 other locations. 55 Growler aircraft remain at NASWI.

Re-site Growler Mission

Growler mission moves to more appropriate sites that are larger, meet Navy standards, and are not as densely populated and environmentally fragile.

- Move the training command (25 aircraft) to 1 or 2 other locations. 5 Growler aircraft (reserve squadron) and expeditionary squadrons remain at NASWI.
- Return Ebey's Landing National Historical Reserve to historic agricultural heritage pre-dating anything but fixed wing aircraft that would have been appropriate in 1945.

Mitigations under NEPA should include operations management including timing, placement and management during the course of each year.

Sincerely, Maryon Attwood, COER, President

cc: Captain Army, NASWI – [REDACTED]

Helen Price Johnson, Island County Commissioner – [REDACTED]

Jay Inslee, Governor for the State of Washington - Baumgart, Jim (GOV), [REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: [Non-DoD Source] Corrected final NPS sec 106 comment letter
Date: Tuesday, November 13, 2018 5:37:25 PM
Attachments: [NPS mitigation comment letter to NASWI \(RZ 13Sep2018\).pdf](#)

September 17, 2018 – Email amending earlier correspondence from Mr. Roy Zipp, Operations Manager, National Park Service

-----Original Message-----

From: Zipp, Roy [REDACTED]
Sent: Monday, September 17, 2018 10:39 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Griffin, Kristen [REDACTED]; Helen Price Johnson [REDACTED]
Molly Hughes [REDACTED]; Allyson.Brooks@[REDACTED]; maryon [REDACTED]
Louter, David [REDACTED]
Subject: [Non-DoD Source] Corrected final NPS sec 106 comment letter

Kendall,

I made an error and sent you a near final draft letter last week, which included several minor errors and no signature. The final, signed version is attached. The two attachments were correct.

Sorry for the error,

Roy

<[http://](#)>

Roy M. Zipp
Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

[REDACTED]
Coupeville, Washington 98239
[REDACTED]

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

On Thu, Sep 13, 2018 at 4:21 PM, Zipp, Roy [REDACTED] > wrote:

RE: Section 106 Consultations, EA-18G "Growler" Airfield Operations

Kendall,

Please see attached letter, with two attachments. This letter is intended to further the mitigation conversation.

Please share as needed with all appropriate parties to the process. I don't have everyone's emails.

Roy

<<http://>>

Roy M. Zipp
Superintendent, National Park Service Operations
Ebey's Landing National Historical Reserve
Reuble Farmstead

[REDACTED]

[REDACTED]

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

On Thu, Aug 30, 2018 at 4:25 PM, Campbell, Kendall D CIV NAVFAC NW, PRW4

[REDACTED] > wrote:

Consulting Parties,

Please find attached the Draft agenda for our telephone consultation scheduled for Tuesday, September 4, 2018 from 11:00 am to 1:00 pm.

For convenience the call in number is 1-800-747-5150 Participant code: 9465240#.

Please contact me if you have any questions or concerns. I look forward to our discussion on Tuesday.

Best,

Kendall

Kendall Campbell

Archaeologist and Cultural Resources Program Manager

NAS Whidbey Island

[REDACTED]

Oak Harbor, WA 98278

[REDACTED]

[REDACTED]



United States Department of the Interior

NATIONAL PARK SERVICE
Ebey's Landing National Historical Reserve
Reuble Farmstead
593 Fort Casey Road
Coupeville, Washington 98239

EMAIL CORRESPONDENCE

September 13, 2018

Naval Air Station Whidbey Island
Attention: Captain Army, Commanding Officer
[REDACTED]
Oak Harbor, WA 98278-5000

Subject: Section 106 Consultations, EA-18G "Growler" Airfield Operations

Dear Captain Army:

Thank you for the opportunity to collaborate on mitigations for this undertaking, which will impose extreme noise above residential, commercial and tourist areas both day and night, and render the Reserve as one of the loudest units within the NPS system. The intent of this letter is to assist you and the other consulting parties in identifying and refining actionable measures to mitigate adverse effects to the greatest extent feasible, recognizing the navy does not intend at this time to consider measures to avoid and minimize impacts by selecting less impactful alternatives that reduce flights at the Outlying Field (OLF).

These comments address the mitigation options summarized on August 28, 2018 matrix entitled "*Resolution Options for Growler Section 106 Consultation Discussion*," which was provided to the consulting parties by Kendall Campbell via email on August 28, 2018 (Attachment A). This letter re-states each numbered comment in that matrix, then responds with the NPS' perspective.

Comment 1. Establish a grant program to restore and stabilize heritage barns located both within Ebey's Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP).

NPS Response: We concur. The Ebey's Forever Grant program already exists to implement this measure. It is an outstanding program that promotes historic preservation on private land throughout the Reserve, but is woefully underfunded given the long list of historic preservation needs. Providing financial assistance to boost this program would yield lasting, tangible benefits.

Comment 2. Establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.

NPS Response. We concur, and also recommend that this measure along with the heritage barn grants be combined for administrative efficiency. These program should receive the highest priority for mitigation, because these measures would have the most direct nexus to mitigating noise. NPS staffs would be available to provide technical assistance with preservation, with funding provided by the navy to support our involvement.

As you know the NPS Operational Base at the historic Reuble Farmstead, which includes workshops and office space, is directly under the flight path during carrier landing practices at the OLF. Soundscapes monitoring

conducted here in 2015 documented sound exposure levels up to 117.2 a-weighted decibels, which is physically painful when working outside without ear protection. Informal decibel measurements indoors indicate levels nearing 100 decibels. These noise intensities make it very difficult to use the phone or converse with coworkers when growlers are training. Funding for sound proofing of our offices is specifically requested, but this funding should be separate of funding provided to advance the grant program.

Comment 3. Continue operations mitigations.

NPS Response. We appreciate current mitigations, but also share the concerns conveyed by Mayor Hughes and Commissioner Price-Johnson that these measures need to be formalized to the maximum extent feasible. Moreover, these measures should not be time limited. As long as the growlers are in the sky, these measures should remain in place.

Comment 4. Fund an internship within ELNHR to update and make functional historic property inventory databases.

NPS Response. We support funding an internship to advance knowledge of historic resources, but it is our understanding that the Trust Board has largely completed this inventory. Alternative tasks suitable for an intern abound, and we encourage exploring these possibilities further with Kristen Griffin, Reserve Manager.

Comment 5. Fund a study to examine the impact of noise vibrations on historic properties.

NPS Response. Although there is anecdotal evidence that windows have cracked during training, these are likely isolated incidents involving loose windows rattling in their frames. It seems unlikely that the extreme noise generated by growlers imposes sufficient kinetic energy to harm the structural integrity of the predominately wood-framed structures in the Reserve, especially relative to natural events such as the high winds that routinely buffet the island.

Comment 6. Integrate considerations regarding historic resources in Navy AICUZ and further update recommendations to Island County.

NPS Response. We support ensuring historic resources are considered, but defer to Island County on this matter since local land use decisions are beyond the purview of the NPS' authority.

Comment 7. Purchase easements to retain the current use (and thereby historical character) of land in the Reserve (to include through the National Park Service existing process using Scenic Easements).

NPS Response. Scenic easements are an important tool for preservation in the Reserve, and we support exploring this topic further with the navy. We normally rely on Land and Water conservation funds, which are difficult to obtain. Expanding funding options would be very helpful, and harmonizing our scenic easement provisions with yours makes obvious sense as a practical matter.

Comment 8. Install information kiosks related to the affected landscape viewpoints.

NPS Response. Funding educational kiosks was recently used in the Reserve to mitigate adverse effects of realigning Parker Road. The Washington State Department of Transportation provided \$100,000 to the Trust Board for design, construction, and installation of waysides throughout the Reserve, which is being implemented now. This case study merits repeating.

In 2011, the navy transferred administrative jurisdiction of 1-acre parcel of disjunct OLF land bordering the southern boundary of the Reserve to the NPS. This was done to enable construction of a southern gateway to the Reserve as provided by our General Management Plan (Attachment B). NPS has not been able to advance that project because funding for new construction is difficult to obtain due to higher priorities aimed at addressing the Reserve's \$4.8 million maintenance backlog. We would like to partner with the navy and see this proposal through to completion. In addition to welcoming and orienting visitors with maps and related media, this site would provide an opportunity for the navy to interpret the historical significance of military operations in the Reserve, which is currently being prepared as mitigation for the blocks at the OLF. Interpreting the historical

highlights of this report on site would be a logical next step. Aside from conveying the historic context, media should also be installed to help visitors understand the importance of the OLF for pilot training and military readiness that is driving this adverse undertaking. This would help explain the incongruent context for the adverse effects of growlers in the Reserve. Obviously the extreme noise would be an issue when jets are flying, but that should not preclude the project because jets will not always be flying, especially on weekends. The design could provide for visitors to remain in their vehicles to reduce noise exposure when growlers are flying, at least to obtain baseline information. This project would reach tens if not hundreds of thousands of visitors each year.

Comment 9. Conduct a study to assess the landscape integrity and inform multi-agency efforts to preserve its character.

NPS Response. We support ongoing analyses of landscape integrity.

New Comments

Having responded to the comments in the working mitigation matrix (Attachment A), we have one additional mitigation recommendation. Notwithstanding the concerns driving this consultation, we believe the navy should play a more formal role in helping to further the Reserve idea, which at its core depends upon close cooperation at the federal, state and local level. The navy is clearly part of the historic fabric of Whidbey Island, and formalizing a partnership between our agencies is a logical way to affirm this fact in a manner that respects the Reserve and advances our mutual interests.

In recent years the navy has fielded volunteers for trails maintenance and historic preservation projects. Navy staffs are exceptional volunteers, and this assistance has been very helpful in addressing our maintenance backlog and the needs of our partners. We would like to establish a more formal partnership to support our Volunteer in Parks program. This program would include navy staffs, their families and veterans, supported with funding and in-kind support from the navy. Design and installation of the southern gateway could be the first initiative pursued under this partnership.

Please contact me if you have any questions: [REDACTED]

Sincerely,



Roy Zipp
Superintendent, NPS Operations

Attachments (2): A. 29Aug18 Mitigation Matrix; B. NPS Director Letter OLF parcel

Consultation for the Resolution of Adverse Effects to Historic Properties and Development of a Section 106 Memorandum of Agreement (MOA) for the Proposed Growler Airfield Operations Increase at Naval Air Station Whidbey Island

AGENDA

17 September 2018

- I. Introductions and Approval of Aug 21 and Sept 4 Meeting Summary**
- II. Brief Discussion of Comments Received on Section 106 MOA Development**
 - a. SHPO
 - b. Reserve
 - c. NPS
 - d. Town of Coupeville
 - e. Coupeville Chamber of Commerce
 - f. COER (two letters)
- III. Development of Resolution Options for MOA Draft**
- IV. Schedule Next Meeting and Action Items.**

Comment number	Alternatives proposed in consultation process to resolve adverse effects to historic properties	NHPA focus with nexus to adverse effect	NHPA focus, for further discussion	Outside NHPA
1	Establish a grant program to restore and stabilize heritage barns located both within Ebey's Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP).		X	
2	Establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.		X	
3	Continue operations mitigations.		X	
4	Fund an internship within ELNHR to update and make functional historic property inventory databases.		X	
5	Fund a study to examine the impact of noise vibrations on historic properties.		X	
6	Integrate considerations regarding historic resources in Navy AICUZ and further update recommendations to Island County		X	
7	Purchase easements to retain the current use (and thereby historical character) land in the Reserve (to include through the National Park Service existing process using Scenic Easements)	X		
8	Install information kiosks related to the affected landscape viewpoints	X		
9	Conduct a study to assess the landscape integrity and inform multi-agency efforts to preserve its character.	X		
10	Select an alternative where FCLP operations equitably divided between both airfields, OLF Coupeville and Ault Field			X
11	Provide funding for schools			X
12	Provide funding to purchase sound-cancelling headphones for farmworkers			X
13	Reduce the proposed 288% increase in FCLPs at OLF Coupeville, so a smaller area experiences a substantive increase in noise exposure in the Central Whidbey Historic District.			X
14	Decrease the proposed four-fold increase in FCLP's at OLF Coupeville so APZ land use restrictions do not become a restricting factor in the slow evolution of the District.			X
15	Maintain emphasis and funding for technology like MAGIC CARPET that assures safe training for pilots while requiring fewer FCLPs.			X
16	Commit to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in the Central Whidbey Island Historic District.			X
17	Commit to mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey Island Historic District because of the significant noise increase.			X

04 September 2018, 1100 – 0100 PM

Growler Section 106 Consultation DRAFT Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Army – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
Commander Malik (telephone) - Fleet Environmental Counsel U.S. Fleet Forces Command
Commander Thedwall (telephone) –Region Environmental Counsel Regional Legal Service Office Northwest
Lisa Padgett (telephone) – Home Basing NEPA Program Manager, USFF
Sarah Stallings (telephone) - Environmental Planning, NAVFAC Atlantic
Kristen Thomasgard-Spence (telephone) – DoD REPI Program
Brian Tyhuis (telephone) – NASWI Community Planning Liaison Officer (CPLO)
Cindy Shurling (telephone) – EIS Consultant team (meeting minutes)

Advisory Council on Historic Preservation

Katharine (Kate) Kerr (telephone) – Program Analyst, Office of Federal Agency Programs

Stillaguamish Tribe of Indians of Washington

Kerry Lyste Tribal Historic Preservation Officer

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks (telephone) – Washington State Historic Preservation Officer (SHPO)
Rob Whitlam (telephone) – Washington State Archaeologist

Washington State Governor’s Office

Jim Baumgart (telephone) – Washington State Governor’s Office Policy Advisor, Human Services Division

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Coupeville

Mayor Molly Hughes (telephone) – Town of Coupeville

Citizens of Ebey’s Reserve

Maryon Atwood - President

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR
Sarah Steen – Preservation Coordinator, ELNHR

Citizen

David Day (telephone)

Introduction –

Captain Army provided an introduction. Since the last meeting, CAPT Army has met with Ms. Griffin and Mr. Zipp; the Navy also has received a letter from Dr. Brooks (with a cover from Mr. Baumgart).

CAPT Army introduced the discussion, saying the proposed increase in operations means the Navy is consulting under NHPA Section 106 to reach agreement on the resolution of adverse effects – in particular, the Navy is looking at the Reserve and how to find resolution for this undertaking. He indicated his appreciation for the inputs thus far and thanked everyone for their participation.

Ms. Campbell then noted that she has not yet received comments on the meeting minutes from the last meeting. She will hold off for this meeting and then the group can approve these minutes (from August 21) at the next meeting.

Ms. Campbell set the stage for the meeting. She noted that as the Navy continues to work through some details on alternatives, she would like to get information from the consulting parties. She noted that the Navy’s goal is to reach agreement on the resolution of adverse effects.

Ms. Campbell noted that the Navy’s express goals are to define resolution measures that respond to and resolve concerns arising from the adverse effects to historic properties. She observed that the Navy mission requires that the Navy and the consulting parties find a way to “make it happen.” She expressed optimism that progress to date in the consultation forms a strong basis for continued progress by improving everyone’s understanding of the issues, constraints, and options to resolve the adverse effects.

Clarification of Scale and Scope

Ms. Campbell addressed the scale and scope of the undertaking. She explained that discussions with the consulting parties had brought to light some misunderstandings about information in the determination of effects document.

- For example, the Navy received a comment suggesting the Navy is proposing fundamental changes to FCLP operations are conducted at OLF Coupeville.
 - o Ms. Campbell had heard the concern that the Navy proposes to begin flying on Sunday at OLF Coupeville. She clarified that this is not part of the proposed action. She explained that the determination document addresses the entirety of the undertaking, which includes a noted continuation of current practices to minimization/avoidance noise impacts to the surrounding communities, such as restricting high-powered turns on Sunday before 12 PM at Ault Field.
 - o Captain Army further clarified that high-powered turns are mechanical testing of EA-18G engines done at Ault field on the airfield.
 - o Ms. Campbell noted that the proposed undertaking is an increase in existing operations and not a change in how operations are conducted.
 - Mayor Hughes indicated that the no-flying on weekends has always been an informal/hand-shake agreement. The concern is that if operations increase that the Navy will not be able to honor this agreement. She would like this agreement to become a more formal part of the decision.
 - CAPT Army indicated that he has read through the comments. He will continue to honor this, but understands his time is not permanent. He will consider ways it can be addressed.

- Also, in analyzing the entirety of the undertaking, the Navy looked at the maximum at both airfields, at Ault Field and OLF Coupeville. In studying the maximum increase, there was very little change in the day-night average sound level (DNL) from the proposed change at Ault Field.
 - When flights are often, the DNL is a good measure to use when looking at change with historic properties. The average noise around Ault Field will not change in its frequentness dramatically, even if a change to maximum level of operations occurs. In this case, no adverse effect would occur to historic properties in and around Ault Field.
 - However, because the Navy does not fly often at OLF Coupeville – around 90 hours the entire year; when the Navy increases this, it does have a change and a change that is perceptible (in the data) showing that what is experienced in the 65 DNL changes which in turn causes an adverse effect to the perceptual quality of the landscape.
 - Even with a maximum change that could amount to four-fold increase in flying activity, there still will be long periods of quiet, interspersed with when the Navy flies. In resolving the adverse effect, the group needs to recognize that the Navy is not flying 24 hours or even every month. With the projected increase it comes out to approximately 360 hours per year.
 - Ms. Atwood asked for clarification of days per year that the analysis is based on. She noted that by doing the analysis on 365 days on a year, it diminishes the effect. She wanted to look at what happened on the days that Growlers are flown.
 - Ms. Campbell noted that Navy calculations include non-flying days because there would be long periods of inaction at OLF, as opposed to civilian airports that fly every single day.
 - Ms. Atwood also asked for the low-frequency (C-scale) – which affects more landmass than the A-scale.
 - Ms. Campbell indicated that the noise data is based on that used in the EIS (A-scale). It includes the new information (data) from the announcement in June. A separate noise analysis for Section 106 was not done.
 - Ms. Atwood stated that there is no ground-truthing to this data. She said some of the data collected from the ground-based data shows a higher noise level.
 - CAPT Army noted the Navy would note this, but he would like to continue on resolving the recognized Section 106 adverse effects.
 - Ms. Atwood suggested that the EPA states that this data should be used. Ms. Atwood stated that she did not accept the Navy's noise data, and Ms. Campbell acknowledged her disagreement before moving on in the agenda.

Discussion of Potential Resolution Options

- 1. The first potential resolution is to establish a grant program to address historic barns.**
- 2. The second potential resolution is the use of the REPI program.**
- 3. The third potential resolution is the continued use of operational mitigation.**

The following summarizes the group discussion on the first three resolution options.

- Ms. Campbell indicated that the Navy is looking at ways to set up a grant with a non-federal administrator. In order to do so, the Navy would like to understand how this connects to the undertaking and what the anticipated outcomes would be. She would like more detail on the intent of the program.
 - o Dr. Brooks indicated that they are looking at creative mitigation. She can assist historic barns and homeowners to soundproof and protect their houses from noise/vibration.
 - Dr. Brooks indicated lack of support for a kiosk and for REPI program funding as REPI is a natural resources program.
 - o CAPT Arny asked Ms. Thomasgard-Spence to explain the REPI program in more detail and how it could apply to cultural resource opportunities. He needs to understand details of the program so he can take it into the Navy team for consideration as a mitigation.
 - Ms. Thomasgard-Spence explained that while there is a strong element of natural resources within the REPI program, that there is a cultural resources component. The program gets funding provided by Congress from a budget line item and then she can apply these funds to requirement; in this case, the ongoing REPI program in Washington State. She also can use the 10 USC § 2684 or 10 USC § 2684(A). This allows the Navy to enter into state and local agreements – which can be on or off-installation. These authorities would be available to the Navy to support natural resources work under 10 USC 2684(a) and to support cultural resources efforts under 10 USC 2684.
 - Ms. Kerr noted a project – Fort A.P. Hill in Virginia – in which there were identified historic properties that benefited from a mitigation strategy incorporating REPI. The actions were taken in lieu of documentation, as outside of the fence line was a National Historic Landmark (NHL), and the property owner was contemplating selling the property. With the REPI program, the Army worked with the landowner to establish a conservation easement, so no development would occur on the property. REPI prevented a loss of a NHL (prehistoric context site) and prevented future encroachment. It is featured as one of the 106 success stories. The use of REPI for potential mitigation is strongly encouraged by the ACHP.
 - Dr. Brooks asked what properties could be purchased at the Reserve if REPI were to be implemented? Or if easements would be purchased to expand the Reserve?
 - Ms. Campbell said it would not necessarily be a purchase of property. She noted the greatest threat to Cultural Landscapes was encroachment of outside/urban development as shown in the NPS Landscape study for the Reserve.
 - o CAPT Arny said he would like to hear from the consulting parties to find a resolution – with the REPI program and within others.
 - o Ms. Griffin is still concerned with the levels of noise and wanted to note that their first priority is to find a resolution that addresses noise. As far as easements, she stated that they are accomplished for a very specific purpose. In this way, any plan that would result in a loss of farming or loss of structures would not work; the easement/lease should not remove land from agricultural purpose. This is the main threat. She noted the study Ms. Campbell referenced is very old and while it has some good data, it is due for a major update. She asked where the REPI

program is used, is it where the Navy would like to not see development?

- Ms. Campbell explained that the easements would be used to create conservation easements to help enhance the historic district and not take anything away. The intent would be to benefit the integrity of the cultural landscape.
- Ms. Griffin asked if the priorities would come from an existing plan and thereby not downgrade or change the land use?
- Ms. Campbell also noted that there is potential opportunity to address the scenic component. Mr. Tyhuis has looked into this – i.e., scenic easements and the potential to contribute to these.
 - Mr. Tyhuis noted that 10 USC 2684(a) is for Natural Resources, but the Navy can create a partnership for cultural, as well. The Navy can look at opportunities similar to existing partnerships.
 - Ms. Griffin indicated that the increase in operations will harm the Reserve. The land use changes that would occur with an APZ/AICUZ and the noise is affecting those who work outside and is not a defined impact in the 106 document. Areas that the public uses will become unusable due to the noise.
- Ms. Atwood addressed concerns about the scenic overviews as well. This would expose the public to severe impacts both from a noise standpoint and to non-audible impacts on health. She would like funding used for signage noting noise and ear protection.
 - CAPT Army said this type of mitigation would be considered within the EIS. He then asked about the grant program and some details on this.
 - Ms. Griffin noted that they run a successful grant program and have staff to do this.
 - Mr. Zipp wanted to point out the National Park Service (NPS) standpoint – he indicated that the NPS uses scenic easements. He noted that the use of Land and Water Conservation Fund (LWCF) is highly competitive to obtain these monies. He thinks there is a compelling idea to use the REPI program to support scenic easements, since it would provide a funding mechanism for this. He would like to learn more about the A.P Hill case study.
- CAPT Army noted that the federal entity could be the NPS for a grant managing entity. He asked the group what the scope of the grant program would be.
 - Ms. Griffin noted that historic structures have many needs. Sound mitigation is important. The only thing that she is trying to stay in front of is maintaining the ability to use the structure due to potential zoning changes or a change in APZ.
 - CAPT Army asked if the increased frequency of hearing aircraft would still allow a use.
 - Dr. Brooks noted that Washington has a state-wide barn program and that people apply to the state. Priority is given to roofs and foundations for the grant. She would like to mirror this.
 - Ms. Griffin noted that they need to find a viable use for the historic structures.
 - Ms. Campbell suggested that if we look at this from a grant perspective – what are the opportunities of a landscape program? Within the adverse

- effect area, there are two properties (heritage barns – Crocket Barn and Pacific Rim Institute).
- Ms. Campbell asked if there was a way to marry the two together (grant programs) – to have a resolution with the landscape and the structures within the viewpoints and landscape indirectly affected from this undertaking.
 - Mr. Day noted that Ebey’s Forever Grant program has been doing this.
 - Ms. Griffin said this would be easy to do; however, she notes it is a concern if they cannot use the building itself as a public gathering space or if an area is no longer suitable for outdoor activities due to noise impacts.
 - CAPT Army acknowledged that concern, but noted that it was outside the scale and scope of the discussion concerning Section 106.
 - CAPT Army noted using the grant program already established or using one similar to the state is an option he can explore further with the Navy team.
 - Ms. Campbell asked if it would be possible to get information about the Ebey’s Forever grant program.
 - Mr. Day echoed similar concerns that noise is the real concern for the Reserve.
 - CAPT Army indicated the Navy team will consider the Ebey’s Forever program and look into information from Ms. Griffin and Mr. Zipp.
 - Mr. Zipp noted the NPS would support the use of funding to support existing grants. He noted there may be a way to help with a three-way partnership. He is offering this as an option if the Navy finds it difficult to work a funding mechanism directly with the Trust Board.
 - CAPT Army summarized this would mean the NPS would help support if a federal partner was needed.
 - Ms. Campbell noted she would need to understand the length of time (e.g., MOA).
 - Dr. Brooks suggested that a grant should be a one-time payment in case of budget constraints or the MOA lapses. She recommended a one-time funding enhancement to the Ebey’s Forever grant program
- Ms. Campbell wrapped up the discussion of the first two resolutions by noting they may be able to combine them. She also noted their commitment to continuing practices to help mitigate/avoid noise impacts. She emphasized their willingness to look at ways to move ahead, but she does not believe that the MOA is the place to agree to operational agreements.
- Mayor Hughes asked why the MOA would not be the best place to formalize noise mitigation measures? She noted that some of the adverse effect from noise is to historic buildings that have adaptive re-uses. In this way, not flying on the weekends does have a huge impact on the historic resources.
 - Ms. Griffin understands this point of view, but stated that some of the operational decisions (e.g., advance notice of schedule) does not mitigate the adverse effect. The effect is still occurring regardless of posting flight schedules.
 - CAPT Army explained one reason the MOA would not be the ideal location to memorialize noise mitigation procedures is that the MOA “sunsets” or expires after a period of time and the intent of operations mitigation practices would be to have them run

long term. CAPT Army will take the request back to the Navy team to see how best to formalize these operational concerns and noise mitigation measures another way.

- Mayor Hughes also asked about mitigation regarding flights staying above 600 feet. Is there a way to report this in real-time so it can be corrected while it is happening? She noted that this is not a Section 106-related issue.
- Mr. Tyhuis noted that this is something the Navy has looked at in the past (real-time reporting), but it hit a number of roadblocks.
- Ms. Atwood asked if there is a way to use the new leadership to mitigate the division of the operations and to investigate other alternatives/options of operating 80% FCLPs at OLF Coupeville?
 - o CAPT Army noted these decisions are made at a level above this team and suggested the parties continue to work with their elected leaders.

4. The fourth potential option is to fund an internship to assist with the Reserve inventory.

- Ms. Campbell discussed the funding of an internship as another option. She noted that an intern was not needed to assist with the database management nor record keeping, but asked if there was another way to use the internship?
 - Ms. Griffin noted she did not have a defined need, but would need to discuss further. She definitely does not need this for the inventory.
 - Mayor Hughes asked Ms. Griffin if there was a seasonal need for a docent training coordinator, maybe someone who works out of the Ebey's House in the summer?
 - Ms. Griffin noted that this is one of many of the seasonal functions, but that she could get back to the group with options.
 - CAPT Army reminded the groups that the MOA will "sunset."
 - Dr. Brooks said that the state will not typically sign a MOA that goes past five years.

5. The fifth potential option is to fund a study to examine the impact of noise and vibration on historic properties.

- Ms. Campbell discussed the next resolution – conducting a study/monitoring. She noted the Navy would need more details on a potential study as an intent of a study/long term monitoring has not been defined.
 - o Mr. Zipp thought this should be discussed within the context of the NEPA document.
 - o Ms. Atwood thought it would be helpful to have baseline data and then use the monitoring to compare. She noted that the buildings are from all different periods. Much of the existing data is old and not helpful to show how vibrations are impacting the buildings. She would like sensors placed throughout the Reserve.
 - o Ms. Kerr asked for clarification of where sensors would be placed? Would they need to be on the foundations of sensitive structures themselves? She indicated they would need to lay out how the study would be done – what age of buildings, would home owners volunteer/submit to use of the sensors, what types of measuring equipment, etc. The Navy would need to understand the goal and what the research parameters would be before a study could be considered.
 - Mr. Zipp noted at his office within the Reserve the windows rattle and the building shakes some times when Navy planes go over. He is not sure that these result in structural impacts though. He offered that a better choice would be to consider the secondary impacts/indirect impacts. He

saw that there is probably incentive to replace windows and other measures.

- CAPT Army would need to understand how this fits into the existing documentation.

6. The sixth potential option involves zoning/land use.

- Ms. Campbell described the sixth item on the list – integrating considerations into AICUZ and Island County zoning/land use. She stated that some consulting parties feel that historic properties are not taken into account when these are made. In the recommendations to Island County, the Navy asked if there was a way to include historic preservation or at least conversations about historic resources to be beneficial to the Reserve.
 - o Ms. Griffin incorporated this idea into her comments to the Navy. The mechanism to protect historic structures in the Reserve are largely grants and incentives, so she wanted to see if there was a programmatic way to ensure adaptive re-use and the continued use of the properties. Her underlying concern is not just the physical qualities, but also the ability to “use” them. So, if something changes to not allow public gatherings, then she fears this will not help them and removes the effectiveness of their tools.
 - Ms. Campbell pointed out that as stated in the determinations document, historic properties are not considered in the creation of land use recommendations, but this does not mean there is not an opportunity in the Navy’s recommendations to the County. There is a fine line between the use and preservation of properties. The Navy can work with the County to address.
 - Mr. Tyhuis noted the Navy can work with those who enforce the zoning codes. The Navy can open the dialogue, but the Navy does not determine the restrictions. He noted the Navy provides information to Island County and the City of Oak Harbor.
 - Ms. Campbell asked how this could be captured in the stipulations in the MOA. Even if it does not, she noted this is something the Navy can incorporate into those processes outside the environmental planning and historic properties review process.
 - Mayor Hughes noted the County is more conservative and proactive than the Navy on protecting historic resources within the County. The Mayor was not certain why zoning/land use protections was being considered as a mitigation when the county/cities already have to respond to the changes the Navy enacts by their operations.
 - Parties and CAPT Army suggested this option be removed as a mitigation.

7. The seventh potential option is the installation of informational kiosks.

- Ms. Campbell noted kiosks was requested as consideration for a possible mitigation though the Navy has received feedback that these are not needed.
 - o Mr. Zipp described that in the Reserve’s general management plan, and with the interpretation going back to 1980, there is a concept of a ‘southern gateway’. He noted there could be an opportunity to describe the military history of the island. The OLF does go back to 1945, and the military has an expansive history in the Reserve. He feels there is a chance to learn about the flying, especially when someone comes on a day that the F-18s are flying. He does believe that kiosks would be important to educate the public as to why they see Navy aircraft. He does not want it summarily removed.

- Ms. Griffin is not against kiosks, but she already has a plan for interpretative aspects at the Reserve. The period of significance is 1300 – 1945, that predates aircraft and is why the theme is not in the current panels. She feels there are other things that make sense other than this tool.
- Dr. Brooks felt that this mitigation should be considered “in addition to” other mitigations – they object to it as a single or standalone item.
- Ms. Atwood is totally opposed to a kiosk at OLF Coupeville. The use of the field is controversial. She feels kiosks will incite the community. There has been controversy over items such as the security blocks around the airfield and the aquifer on Smith Field. A kiosk would not be considered an appropriate mitigation by the community.
- Ms. Campbell summarized that a kiosk is not being dismissed as an option, but the Navy could start with considering some interpretive panels at the ‘southern gateway’. She noted there is an objection to a kiosk at OLF Coupeville.

8. The eighth potential option is an update to the landscape study.

- Ms. Campbell asked if there was any interest in updating the landscape study for the Reserve?
 - Ms. Griffin noted a future need for this study, but is only looking at a portion. This is a data need they identified.
 - Ms. Campbell asked if this could be shared so it could be included as a mitigation stipulation.

9. A ninth potential option presented is to include on the ground noise monitoring.

- Ms. Griffin asked to include a monitoring program for jet noise on the ground – not for historic structures. She wanted to note that noise is affecting people and how they use the Reserve. She put information in the scoping letter for this. She put less detail in the Section 106 letter. She wanted to include this as a mitigation.
 - Ms. Campbell noted this might not be addressed under Section 106, but under the larger planning process.

Closing

- Ms. Campbell is hoping to meet with the ACHP and the SHPO. Due to schedule conflicts, the Navy, ACHP, and SHPO will continue to work through email.
- Ms. Campbell would like to begin preparing MOA stipulations. The next meeting for the parties is scheduled for Monday, September 17th (1100-0100pm PST).
- CAPT Army thanked everyone for making this a productive call and for continuing along the path. Additional mitigation ideas may be sent to the Navy.

The meeting adjourned, and the conference call ended at about 1300pm PDT.

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Manley, William R CIV NAVFAC HQ, EV](#); [Padgett, Lisa M CIV USFF, N46](#); [Malik, Joan M CDR USFF N01L](#); [Parr, Timothy R LCDR RLSO NW, BREMERTON](#); [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
Cc: [Tyhuis, Brian CIV NAVFAC NW, PRW12](#); [Welding, Mike T CIV NAS Whidbey Is, N01P](#)
Subject: FW: COER addendum to previous letters and comments
Date: Thursday, September 20, 2018 4:30:08 PM
Attachments: [Section 106 9-14, Opertional Mitigations.docx](#)
[Section 106 - COER comments Addendum.docx](#)
[AICUZ letter to local politicians - final - 9-9-18 SPINA- BB.docx](#)
Importance: High

Good Afternoon,

I am forwarding a THIRD addendum to comments from COER. Please forward as appropriate. Including Mike and Brian because of the attached COER letter on the AICUZ.

V/R,
Kendall

-----Original Message-----

From: maryor [REDACTED]
Sent: Thursday, September 20, 2018 12:33 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]; district1@co.island.wa.us; Zipp, Roy [REDACTED]; [Campbell, Kendall D CIV NAVFAC NW, PRW4](#) [REDACTED]
Cc: [Brooks, Allyson \(DAHP\)](#) [REDACTED]; [Kristen Griffin](#) [REDACTED]; [Molly Hughes](#) [REDACTED]
Subject: [Non-DoD Source] COER addendum to previous letters and comments
Importance: High

Captain Army and Consulting partners, COER is adding another addendum to our previous comments.

It is our opinion that incremental changes were made at NASWI, beginning in 2005, without anyone paying close attention at the DoD, and that each successive change has made the situation between the communities and the military more difficult. The result is a serious civilian/military crisis caused by DoD's decisions that have allowed military encroachment over civilian life, business and recreation. We believe the recent Commanders of NASWI have done their best to mitigate challenging relationships between military and local civilian leaders. The AICUZ process in 2005 planned for 6100 operations and did not forewarn or forestall such a huge discrepancy between what was planned for by the Navy and what the community is now being asked to accept.

1. C-Scale measurements and impact on historical buildings. (attached)
2. North Island, where the Navy air boss is stationed, used reduction of FCLP's as a mitigation to reduce noise for surrounding communities. (link below)

This could apply to the Growler Section 106 that we are discussing and to the Growler FEIS.

So see last paragraph of page 3-17...

http://www.imperialbeachca.gov/vertical/sites/%7B6283CA4C-E2BD-4DFA-A7F7-8D4ECD543E0F%7D/uploads/AICUZ_Report_FINAL_CNO_Approved.pdf
<[859](http://www.imperialbeachca.gov/vertical/sites/%7B6283CA4C-E2BD-4DFA-A7F7-</p></div><div data-bbox=)

[8D4ECD543E0F%7D/uploads/AICUZ_Report_FINAL_CNO_Approved.pdf](#)>

Other alternatives have been examined and many implemented over the years to reduce noise and other impacts on the surrounding community. Some examples of operational alternatives that were implemented are: limited overhead break approaches, no field carrier landing practice (FCLP), limited touch and go's, designating runway 18 as the main takeoff runway, designating runway 36 as the main landing runway as operations allow, reducing NASNI operating hours on weekends, and limiting the times and location for high power engine run-ups. These alternatives and a host of others minimize aircraft overflights of Coronado residences and greatly reduce noise impacts to the communities surrounding NASNI.

3. Letter to Island County Commissioners regarding the AICUZ process. (attached)

Thank you, Maryon Attwood
COER, President

Last comments regarding operation reductions as noise reduction mitigations:

I am sending along Citizens of Ebey's Reserve's most recent Growler Section 106 letter.

It is our opinion that incremental changes were made at NASWI, beginning in 2005, without anyone paying close attention at the DoD, and that each successive change has made the situation between the communities and the military more difficult. The result is a serious civilian/military crisis caused by DoD's decisions that have allowed military encroachment over civilian life, business and recreation. We believe the recent Commanders of NASWI have done their best to mitigate challenging relationships between military and local civilian leaders. The AICUZ process in 2005 planned for 6100 operations and did not forewarn or forestall such a huge discrepancy between what was planned for by the Navy and what the community is now being asked to accept.

The cumulative problems, years in the making, now require senior military officials to resolve a worsening crisis that may destroy the economic viability of an entire county and involve all of us for many more years and hundreds of thousands of dollars. We are interested in a long-term unraveling of past inattentions. Effects proposed in the 106 process and in the EIS process cannot be mitigated with operational changes. The Navy is proposing more jets and more flights that will make living on Whidbey Island impossible. We can not accept being collateral damage after years of being good neighbors. We have done our part.

The following Abstract from the FEIS to support West Coast basing of F/A-18E/F Aircraft FYI: The file is too large to send but I have provided the cover sheet for your informtion.

This report determined that Growlers would go to Lemoore. NASWI was cut from the list of locations because of the crossed runways at Ault Field and a non-compliant OLF.

How did these jets end up at NASWI instead of Lemoore?

Respectfully, Maryon Attwood

Maryon Attwood
Sound Defense Alliance, Chair
sounddefensealliance.org <<https://sounddefensealliance.org/>>

[REDACTED]
Coupeville, WA 98239
[REDACTED]

<https://facebook.com/SoundDefenseAlliance>

CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

September 18, 2018

To: The Board of Island County Commissioners

Issue: Land use planning misdirection, waste of taxpayer dollars, and loss of public trust resulting from Island County's reliance upon the Navy's 2005 Air Installation Compatible Use Zone (AICUZ) for Naval Air Station Whidbey Island (NASWI).

Explanation: The AICUZ program's mission is to ensure that military bases do not create conflicts with surrounding civilian land uses. That requires the military clearly and forthrightly detail its intended *long-range* plans for activities that could impact communities and thereby enable local governments to plan and facilitate compatible land-uses in affected areas, hence avoiding encroachment problems.

The 2005 AICUZ, along with the 2012 Environmental Assessment, and the 2012 Wyle Noise Study clearly informed land use planners to expect 6120 annual flight carrier landing practice (FCLP) operations at Outlying Field Coupeville (OLFC). Island County government relied in good faith upon that FCLP number for land use planning and related budgetary purposes.

The Navy midsummer 2018 announced its intent now is to conduct 23,700 FCLP operations annually at the OLFC, a 4-fold increase. If implemented, it will nullify the last 13 years of Island County's land use planning for the area. That misdirection from the AICUZ will inflict huge impacts upon property owners and the county budget, as well as residential upheaval and exodus of the area.

In reliance upon the 2005 AICUZ, Island County planning did not need to consider downzoning or implementing accident potential zones (APZs) in the areas around the OLFC. Residential, commercial, and even government development was allowed to continue (e.g., the Island County Transit depot and Ryan's House Hope for Kids).

That Navy's 4-fold explosion to 23,700 FCLPs makes a mockery of the 2005 AICUZ and shows a total disregard for public time and County dollars spent in crafting land uses compatible with that AICUZ. Not surprisingly, this Navy disregard and misdirection has fomented widespread community discord.

On a national scale, it raises serious questions about whether the AICUZ program is constructive or detrimental and demands credible answers from the Navy.

Requests: Citizens of the Ebey's Reserve (COER) has the following questions for Island County's Commissioners:

1. When did Island County government officials first learn that the Navy was abandoning its long range plan as detailed in the 2005 AICUZ?
2. What community planning is being considered by Island County government should the Navy's preferred plan to increase operations at the OLFC be put into place? Will county government seek to downzone properties around the OLFC and seek to implement APZs? How will the county pay for these land use and zoning decisions? What actions have been taken to date to accommodate this increase in operations?

COER believes that **good county government** requires that you demand that the Navy honor its 2005 AICUZ-specified Growler operations numbers (6120) for Outlying Field Coupeville.

Furthermore, COER also believes that you, as the leaders of Island County government, should secure an explanation from the Secretary of the Navy on the following issues which will profoundly impact county planning for decades to come:

- a) Why all Growlers are to be stationed at NASWI (exacerbating regional impacts and contravening DOD policy against single-siting of aircraft) and why this was never addressed in the 2005 AICUZ;
- b) Why the OLFC is acceptable for even 6,120 FCLP operations, let alone 23,700, when the OLFC is approximately 29,000 acres short of the accepted 30,000-acre requirement for an outlying field (i.e., how does ignoring a 29,000-acre deficit thwart encroachment); and
- c) How is the Navy going to compensate Island County and impacted property owners for their losses due to reliance upon the Navy's 2005 AICUZ, or does the Navy intend to stick Island County with the total bill for this expansion?

These are fundamental questions that need to be answered before any operational expansion is considered. As the governing body of Island County, it is up to you to get these questions answered on behalf of all of Island County residents and businesses.

Thank you,

Maryon Atwood
President, Citizens of Ebey's Reserve, COER

cc: Representative Rick Larsen
Senator Patty Murray
Senator Maria Cantwell
Governor Jay Inslee
Coupeville Mayor Molly Hughes
Steering Committee of the Sound Defense Alliance

Attachment A

Within the Navy's projected Accident Protection Zones for Path 32 at OLFC:

- About 500 homes in Admirals Cove development and its newly renovated (about \$1 million) Olympic-size pool heavily used club house at the beginning of the approach (elevations less than 500 feet) [in the APZ 1]
- Ryan's House, a home for homeless Island County teens [in the APZ 1]
- The new multimillion dollar Island County Transit Facility with its above-ground fuel storage tanks [in the APZ 1]
- A heavily used recycle center, public campground, dog park, and kids' ball park [in the APZ 1]
- Heavily trafficked SR 20, shared with SR 525, the only route up/down and on/off the island [in the APZ 1]
- About 300 residences interspersed within the APZ takeoff and downwind legs of Path 32 [in the APZ 2]
- The well-used meeting hall, the Nordic Lodge [in the APZ 2]

Within 2000 feet of the Navy's projected Accident Protection Zones for Path 32 at OLFC:

- Coupeville's elementary, middle and high schools, and a major daycare facility
- Several popular restaurants and food store
- 100s of homes in Crockett Lake Estates
- A professional center (medical and banking)
- Fort Ebey that caters to large youth camps and religious functions, and its well-used outdoor pool, the historic well-visited fort and adjacent campground and boat launch
- Ebey's Landing recreational area, heavily used in the summer
- Portions of the Ebey's Landing Historic Reserve,
- Thousands of acres of farmland with largely minority workers tending the fields.

Within the Navy's projected Noise Zones 2 & 3 for OLFC:

- All of the above and many more

Addendum to section 2(a) of COER's comments on Section 106

We recently learned that the JGL sound study at position 1, included C-weighted decibel recordings and requested that information from JGL because it was not included in the 2013 and 2016 JGL reports. The C-weighted data was taken only at Position 1 in Admirals Cove, where noise measurements were similar to Positions 2 and 3, which are just north and south of the Reuble farmstead.

The JGL C- measurements attached show the peaks for the C-weighted recording are about 3 dB greater than the A-weighted. The peaks run consistently from about 115 to 120 dBC. This certainly is a red-flag level for vibration and potential damage.

As mentioned in COER's comments:

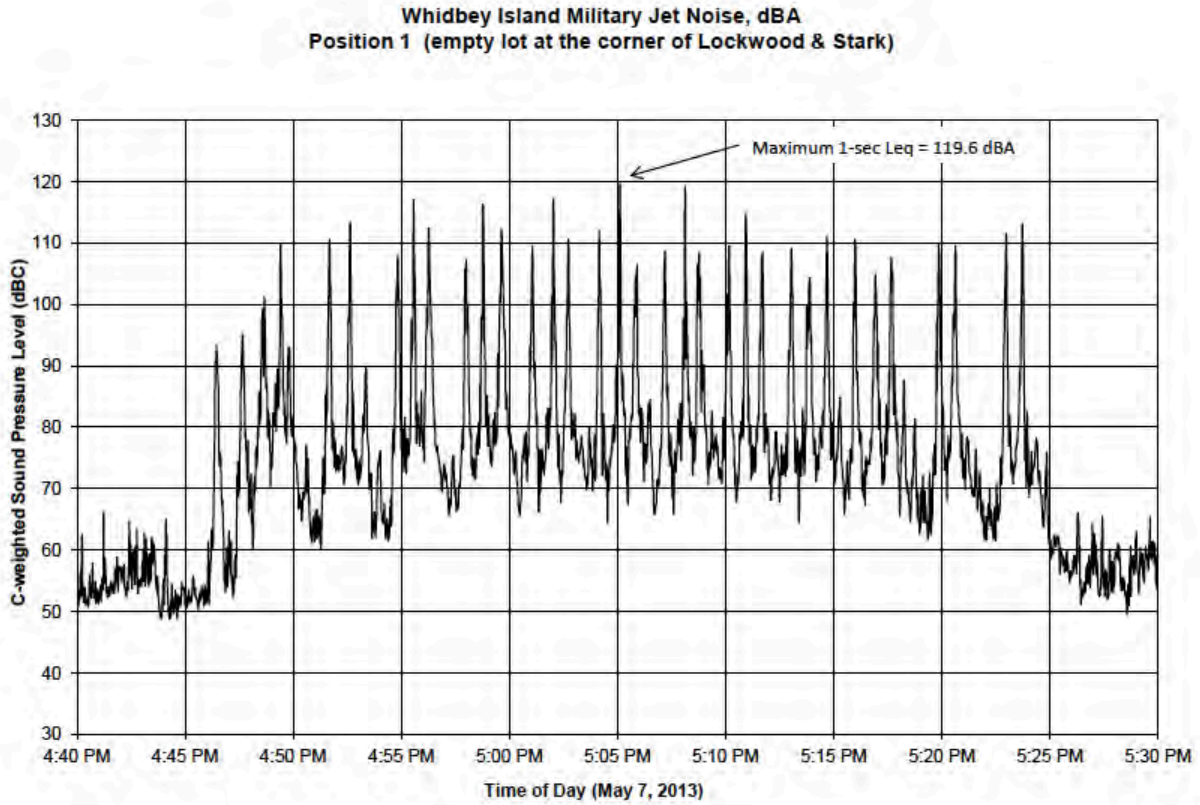
“We also noted that the Kester and Czech 2012 is not included in the literature cited section, i.e., is it a peer-reviewed publication in the formal literature? Nevertheless, the 106 DOE does seem to waffle on the applicability question:

Because of a wide range of variations in building code and aircraft types, the U.S. has yet to develop a precise threshold for adverse effects to the integrity of buildings and structures. Therefore, this study [the 106 DOE] applies the same standards used in the 2012 noise study for the assessment of noise and vibration from Navy airfield operations to historic properties within the APE.

So, presumably the 130 dBC for >1 second is the Navy's accepted standard.”

Because the threshold for damage to historic structures is critical to assessing impacts on Reserve structures, COER requests a copy of the Kester and Czech 2012 study. Of specific interest are 1) the methods used in determining 130 dBC threshold, 2) whether the structures considered were contemporary to-code buildings or old historic structures, and 3) review to evaluate the overall scientific efficacy of the study. Because it was not included in the literature cited, there is no way to tell if it was published in the formal scientific peer-reviewed literature or is just a report. Depending on our and JGL's assessment

of Kester and Czech 2012, we may further request that structural experts review and comment on validity of this highly important putative threshold for damage.



CITIZENS OF EBHEY'S RESERVE

protecting our land, homes, and health

September 14, 2018

Naval Air Station Whidbey Island
Attn: Captain Matthew Army

[REDACTED]
Oak Harbor, WA 98278-5000

RE: Section 106

Dear Captain Army,

Thank you for taking leadership in our recent meetings regarding the Section 106 Growler Expansion. We understand your role in this and appreciate your new added clarity to the challenging conversations. We respectfully add these new comments to comments we have already sent to you.

For decades, the communities of NW Washington State have been a partner with the Military in protecting our national security. Now, our communities are collateral damage of the Growler Jet program because of the incredible noise, pollution, and economic impacts. The latest proposal by the Department of Defense dramatically increases the number of Growler jets and flights - putting us all at risk. Central Whidbey and Ebey's Landing National Historical Reserve should not have to be collateral damage for a Washington D.C.-based military plan that magnifies insufficient past planning.

Desecration of this nation's first Historic Reserve, a unique partnership that requires property owners to be stewards, is not an acceptable option as an end result of a flawed Section 106 process. This historical heritage must have maximum protections - not maximum impacts from Growler jet noise. Protecting this Reserve is a delicate balance between the community, the people, and the land. If these relationships are broken – the Reserve will be broken.

The determination of adverse effect document must provide a clear discussion of the most important types of resolution: avoiding and minimizing the effects of the undertaking. The best way to avoid and minimize the adverse effect, which is increased jet noise, is to reduce or eliminate jet noise exposure.

COER has written extensively about the methodology, technical failure and shortfalls of the noise analysis used to inform this Section 106 process including: **(a) "Substantive Change" not Defined; (b) Modeled DNL Contours without Verification; (c) The 65-dBA DNL is now Invalidated; (d) Wrong DNL Averaging Method was used; and (e) Misuse of the Decibel A-Scale.** The result is that the Navy has grossly under-estimated the area of effect in substantial ways that understate the magnitude of the effect of the noise on the Ebey's Landing National Historical Reserve and of the landmass being impacted. This is why noise monitoring throughout the Reserve must be a part of any future mitigation plan to be discussed. Actual noise testing on the ground should have been conducted to test all of the modeled numbers that informed the outcomes of this Section 106 process.

As the only citizens group participating in the consultation on the development of a memorandum of agreement to address adverse effects from the Navy's Growler expansion pursuant to the Section 106 Process of the National Historical Preservation Act. – we take our

participation seriously. We continue to express our deep concern with The Navy's commitment to public process. The Navy's undertaking and Section 106 Determination of Effect will have significant impacts on the Ebey's Landing National Historical Reserve and the other Historic Districts in Central Whidbey. Additionally, the general public is totally unprepared and uninformed about the magnitude of these proposed impacts.

We understand it is late in the process, yet we continue to request a public forum that will include Consulting Partners, such as: the Ebey's Landing National Historical Reserve Board of Directors, the National Park Service staff, the Town of Coupeville, Commissioner Helen Price Johnson, the State Office of Historic Preservation, Citizens of Ebey's Reserve, and other sound and historical property experts and professionals. This forum should be organized for a date in September 2018 and the Navy should provide an appropriate meeting location and representatives to record public comments and concerns. The Navy should consider the public's comments and concerns, as the Section 106 process requires, in their final MOA.

At the advise of Dr. Allyson Brooks, we are including suggestions for operational avoidance and minimization mitigations. Since the Navy's Preferred Alternative puts most of the noise disproportionately over the most historically fragile part of the Island – and the only part of the Island that has been designated for preservation by the United States Congress, we view the best way to avoid and minimize noise effect is to reduce the jet noise by moving the noise to less fragile locations.

We suggest that operational avoidance and minimization will allow the Navy to accomplish its mission while not destroying the Ebey's Landing National Historical Reserve and the community that stewards it. We further believe this is in the best interest of the Navy, the Base and national security, as well as, the mission of the Ebey's Landing National Historical Reserve.

Operational Avoidance Mitigations

Avoid Harmful effects in the Area of Proposed Effect by reducing the number of Growlers and Growler operations at NASWI that are proposed to fly FCLP operations at the OLFC over Central Whidbey and the Ebey's Landing National Historical Reserve.

Pursuant to NEPA, Section 106, regulations, the Navy will consult with SHPO on new undertakings involving the management of air operations as identified in the EIS, and Pursuant to NEPA regulations, the Navy will notify the public of any changes in the management of air operations that have the potential to significantly affect the human environment.

Avoidance Actions

- **Build a third runway at Ault field for Growler FCLP training as proposed by the Navy, so a parallel runway is provided for Growler trainings.**
- No increase in the number of operations or the number of EA-18Growler jets and no new (36) jets.
- Minimize local FCLP training, concomitant safety risks and economic/environmental impacts over the Ebey's Landing National Historical Reserve
 - Maintain 6,120 operations annually at OLF Coupeville per the 2005 AICUZ study, with a 50/50 split between runways, obviating the need for further Accident Potential Zones on Whidbey and in accordance with the 2005 AICUZ planning.
 - No local FCLPs on Friday, Saturday or Sunday.

- Because of carbon emissions over the Reserve’s tourist destinations, no local FCLP’s on days that are declared Clean Air Hazard Alerts for Island County.
- Temporarily deploy remainder of FCLP operations at other Navy bases as is currently occurring.
- Navy provides regular ground monitoring of altitude of aircraft in FCLP pattern to ensure that pilots observe the 600-foot minimum altitude.
- Monthly publication of OLF Coupeville FCLP operations, runways and time of day.
- Place sound monitors throughout the Reserve, in historic districts, and under all flight paths. Monitoring results should include only the days of flying (Average Busy Day or ABD) not 365 days per year.
- Growlers produce more low-frequency noise (LFN) than their Prowler predecessor and monitoring equipment should be measuring the C-scale as well as the A-scale for noise effects data.
- Report all monitoring results to the public and consulting partners at an annual public forum, not an open house.
- Install NOISE warning signs around OLFC and close any locations that may be accessible to the public to view Growler FCLPs, as the public may be injured or permanently impaired by the noise.

Reduce noise effects, duration, and intensity.

Build a new runway at Ault Field that is parallel to the main runway for use of FCLP Growlers training.

- Site Growlers at 1 or 2 additional locations nationally, starting with carrier-based squadrons, which require the most FCLP training.
 - Move 5 carrier-based Growler squadrons (35 aircraft) to other location(s); perhaps MCAS Cherry Point, which retains training infrastructure. 83 Growler aircraft remain at NASWI.
 - Move remaining 4 carrier-based Growler squadrons (28 aircraft) to 1 or 2 other locations. 55 Growler aircraft remain at NASWI.

Re-site Growler Mission

Growler mission moves to more appropriate sites that are larger, meet Navy standards, and are not as densely populated and environmentally fragile.

- Move the training command (25 aircraft) to 1 or 2 other locations. 5 Growler aircraft (reserve squadron) and expeditionary squadrons remain at NASWI.
- Return Ebey’s Landing National Historical Reserve to historic agricultural heritage pre-dating anything but fixed wing aircraft that would have been appropriate in 1945.

Mitigations under NEPA should include operations management including timing, placement and management during the course of each year.

Sincerely, Maryon Attwood, COER, President

cc: Captain Army, NASWI – [REDACTED]

Helen Price Johnson, Island County Commissioner – [REDACTED]

Jay Inslee, Governor for the State of Washington - Baumgart, Jim (GOV), [REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: Growler MOA
Date: Tuesday, November 13, 2018 7:14:16 PM

September 26, 2018 - Email from Dr. Allyson Brooks, Washington SHPO

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Wednesday, September 26, 2018 5:11 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED];
Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] Growler MOA

Kendall - Could you please provide me with the legal authority/legislation that allows the Navy to transfer funds to a Land Trust. I need that before our next meeting.

Thank you!

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]

[REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: Agenda for September 27 Navy Growler Section 106 MOA Consultation
Date: Tuesday, November 13, 2018 5:56:47 PM

September 26, 2018 - Email from Commissioner Helen Price-Johnson, Island County, WA

-----Original Message-----

From: Helen Price Johnson [REDACTED]
Sent: Wednesday, September 26, 2018 9:27 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Griffin, Kristen [REDACTED]; Molly Hughes [REDACTED]; Brooks, Allyson (DAHP) [REDACTED]; jim.baumgart@[REDACTED]; Roy Zipp [REDACTED]; Pam Dill [REDACTED]
Subject: [Non-DoD Source] RE: Agenda for September 27 Navy Growler Section 106 MOA Consultation

Greetings Kendall,

I am not able to participate in tomorrow's consultation meeting due to a previous commitment. Please accept this note in my absence. The document you shared references "Commissioners", as if there are multiple Island County Commissioner inputs to this process. Could you clarify this for me, please?

The draft document's suggested mitigation measures do not include noise monitoring within the Reserve as requested by multiple parties. Could you share the reason for this omission? It is concerning that the draft mitigations do not reflect the entirety of the Reserve District, but appear to focus on a handful of viewpoints, increasing visitor information and volunteers. Mitigation is defined as "the action of reducing the severity, seriousness, or painfulness of something". How will the measures noted fulfill their purpose to "reduce the severity, seriousness or painfulness" of the Navy's impacts to the Central Whidbey community? It is unclear to me the connection between the impacts of the proposed increased Growler activity to historic resources and the proposed mitigation measures.

I truly appreciate the opportunity to learning more.

Thank you for your assistance,

Helen Price Johnson

Island County Commissioner, District 1

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Sent: Wednesday, September 26, 2018 4:55 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: Agenda for September 27 Navy Growler Section 106 MOA Consultation

Good Afternoon Consulting Parties,

We have been working to get some DRAFT language on paper in support of the consultation efforts to develop resolutions stipulations for this MOA. Attached you will find a proposed agenda for our next consultation meeting tomorrow morning and DRAFT MOA language that includes DRAFT Preamble, proposed stipulations, and administrative clauses. We are providing this DRAFT MOA language to facilitate further discussion and development of resolution options. In addition, we hope the DRAFT language will clarify or provide opportunity for further clarification of resolution feasibility and mechanisms.

Since we were working to get the DRAFT MOA language prepared, we will circulate both the Sept. 17 consultation meeting summary and the summary for tomorrow's meeting for review early next week.

The consultation tomorrow, Thursday, September 27, 2018 is scheduled from 10:00am to 12:00pm. The conference call number is the same: 1-800-747-5150 Participant code: 9465240#.

We look forward to a productive discussion to further develop the DRAFT MOA language.

All My Best,

Kendall Campbell

Archaeologist and Cultural Resources Program Manager

NAS Whidbey Island

[REDACTED]

Oak Harbor, WA 98278

[REDACTED]

[REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: Agenda for September 27 Navy Growler Section 106 MOA Consultation
Date: Wednesday, September 26, 2018 7:55:43 PM
Attachments: [Growler MOA Agenda 27 Sept 18.docx](#)
[Growler Consultation DRAFT.docx](#)

Good Afternoon Consulting Parties,

We have been working to get some DRAFT language on paper in support of the consultation efforts to develop resolutions stipulations for this MOA. Attached you will find a proposed agenda for our next consultation meeting tomorrow morning and DRAFT MOA language that includes DRAFT Preamble, proposed stipulations, and administrative clauses. We are providing this DRAFT MOA language to facilitate further discussion and development of resolution options. In addition, we hope the DRAFT language will clarify or provide opportunity for further clarification of resolution feasibility and mechanisms.

Since we were working to get the DRAFT MOA language prepared, we will circulate both the Sept. 17 consultation meeting summary and the summary for tomorrow's meeting for review early next week.

The consultation tomorrow, Thursday, September 27, 2018 is scheduled from 10:00am to 12:00pm. The conference call number is the same: 1-800-747-5150 Participant code: 9465240#.

We look forward to a productive discussion to further develop the DRAFT MOA language.

All My Best,
Kendall Campbell
Archaeologist and Cultural Resources Program Manager
NAS Whidbey Island
[REDACTED]
Oak Harbor, WA 98278

[REDACTED]
[REDACTED]

Consultation for the Resolution of Adverse Effects to Historic Properties and Development of a
Section 106 Memorandum of Agreement (MOA) for the Proposed Growler Airfield Operations
Increase at Naval Air Station Whidbey Island

AGENDA

27 September 2018

- I. Introductions**
- II. Discussion of DRAFT MOA language**
- III. Schedule Next Meeting and Action Items.**

1 **MEMORANDUM OF AGREEMENT**
2 **AMONG**
3 **COMMANDER, NAVY REGION NORTHWEST,**
4 **AND**
5 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
6 **AND THE**
7 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
8 **REGARDING THE EA-18G “GROWLER” AIRFIELD OPERATIONS,**
9 **NAVAL AIR STATION WHIDBEY ISLAND,**
10 **ISLAND COUNTY, WASHINGTON**
11 **2018**

12
13 WHEREAS, Commander, Navy Region Northwest (hereinafter “Navy”) proposes to increase the
14 number of aircraft stationed at Naval Air Station (NAS) Whidbey Island and the number airfield
15 operations at both Ault Field and Outlying Field (OLF) Coupeville (Undertaking); and

16
17 WHEREAS, Navy will continue to implement its current operational mitigation practices to
18 avoid and minimize noise impacts on the surrounding communities as feasible; and

19
20 WHEREAS, Navy has determined that the proposed Undertaking has the potential to cause
21 effects on historic properties subject to review under section 106 of the National Historic
22 Preservation Act (hereinafter “NHPA”) 54 U.S.C. § 306108, and its implementing regulations,
23 36 C.F.R. § 800; and

24
25 WHEREAS, Navy invited the Advisory Council on Historic Properties (ACHP) to participate in
26 the entire section 106 process under Subpart B of 36 CFR § 800 and the ACHP agreed to
27 participate in the entire process; and

28
29 WHEREAS, Navy established the Area of Potential Effect (APE) for the Undertaking consistent
30 with 36 C.F.R. § 800.16(d), by taking into consideration the following three components of the
31 Undertaking:

- 32 • On-installation Direct Effect Area: Areas on the installation where historic properties
33 could be directly affected (e.g., by ground disturbance, demolition, or alteration).
- 34 • On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB
35 Day Night Sound Level (DNL) noise contours where historic properties could be disturbed
36 by the introduction of visual, atmospheric, or audible elements.
- 37 • Off-installation Indirect Effect Area: Areas off installation but within operational areas
38 bounded by the 65 DNL noise contours (i.e. introduction of visual, atmospheric, or audible
39 elements), including the Central Whidbey Island Historic District; and

40
41 WHEREAS, the Central Whidbey Island Historic was determined eligible for listing in the
42 National Register of Historic Places (NRHP) in 1973, and the 1978 National Parks and
43 Recreation Act designated the area of the historic district the Ebey’s Landing National Historic
44 Reserve (ELNHR) for the purposes of protecting a rural community and its significant history

46 WHEREAS, the ELNHR is the first historical reserve in the National Park System and is
47 managed by a Trust Board through coordination of the four land managing partners who have a
48 preservation and/or management interest in the Reserve: The National Park Service (hereinafter
49 “NPS”), Washington State Parks and Recreation Commission, the Town of Coupeville
50 (hereinafter “Coupeville”), and Island County; and

51

52 WHEREAS, Navy determined that the Undertaking will result in indirect adverse effects to the
53 Central Whidbey Island Historic District, as a result of more frequent aircraft operations
54 affecting certain landscape components of the historic district, specifically perceptual qualities
55 that currently make the Historic District eligible for the NRHP; and

56

57 WHEREAS, Navy has consulted with the Washington State Historic Preservation Officer
58 (SHPO) on the determination of effect, and SHPO concurred on June 27, 2018; and

59

60 WHEREAS, Navy has consulted with Swinomish Indian Tribal Community, Upper Skagit
61 Indian Tribe, Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the
62 Tulalip Tribes of Washington, and the Jamestown S’Klallam Tribe who expressed no concerns
63 about the Undertaking; and

64

65 WHEREAS, Navy has consulted with Trust Board of Ebey’s Landing National Historical
66 Reserve (hereinafter “Trust Board”), NPS, Island County Commissioners (hereinafter
67 “Commissioners”), Coupeville, City of Port Townsend (hereinafter “Port Townsend”),
68 Washington State Parks, Seattle Pacific University, the Citizens of Ebey’s Reserve (hereinafter
69 “COER”), and Mr. David Day; and

70

71 WHEREAS, Navy has made information about its NHPA section 106 review of the Undertaking
72 available to the public during NEPA public meetings, as well as on the EIS website, and provided
73 opportunity for comments per 36 C.F.R. §800.5(d) and §800.8; and

74

75 WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), Navy notified the ACHP of the adverse
76 effect determination, providing the specified documentation, and the ACHP has chosen to
77 continue to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

78

79 WHEREAS, Navy invited Swinomish Indian Tribal Community, Upper Skagit Indian Tribe,
80 Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the Tulalip Tribes of
81 Washington, and the Jamestown S’Klallam Tribe to participate in the development of this MOA;
82 and

83

84 WHEREAS, Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, Samish Indian
85 Nation, Stillaguamish Tribe of Indians, and the Jamestown S’Klallam Tribe did not express an
86 interest to actively participate, but request review of final MOA and the Lummi Nation and the
87 Tulalip Tribes of Washington did not respond to Navy’s invitation to consult on the development
88 of this MOA; and

89

90 WHEREAS, Navy invited the Trust Board, NPS, Commissioners, Coupeville, Port Townsend,
91 Washington State Parks, Seattle Pacific University, COER, and Mr. David Day to participate in
92 the development of this MOA; and

93
94 WHEREAS, the Trust Board, NPS, Commissioners, Coupeville, Port Townsend, COER, and Mr.
95 David Day agreed to participate; and

96
97 NOW, THEREFORE, Navy, SHPO, ACHP, and NPS, as the signatory parties, agree that the
98 following stipulations resolve Adverse Effects to Historic Properties caused by the undertaking
99 in compliance with the NHPA and that the stipulations govern all aspects of the Undertaking
100 unless this MOA expires or is terminated.

101 102 STIPULATIONS

103
104 Navy will ensure that the following stipulations are implemented and carried out under the
105 supervision of a cultural resource professional(s) meeting the Secretary of the Interior (SOI)
106 Professional Qualifications as defined in 36 C.F.R. Part 61.

107 108 I) MITIGATION OF ADVERSE EFFECTS OF THE UNDERTAKING

109 A) **Landscape Preservation**

110
111 Navy will provide NPS with funds, not to exceed \$250,000, to support preservation of
112 landscape components in the five identified contributing landscapes of the Central Whidbey
113 Island Historic District where an indirect adverse effect was identified within the area of
114 substantive change in noise exposure, as defined in the consensus determination of adverse
115 effect dated June 26, 2018.

- 116
117 1) Preservation projects that enhance landscape integrity in proximity to the five
118 contributing views identified as being adversely affected in the determination of
119 effect will be eligible for preservation funding under this provision.
- 120 2) Preservation projects must comply with the eligibility criteria of the Ebey's Forever
121 Heritage Grant Program.
- 122 3) Prior to transfer of funds a plan for meeting funding requirements under this MOA
123 will be provided to the Navy for review to ensure legal requirements for transfer of
124 funds are met including:
- 125 i. Providing specific and certain information about landscape eligibility components
126 for preservation projects under Ebey's Forever Heritage Grant Program, the
127 location of the components, and details on the preservation services to be
128 performed.
- 129 ii. Plan for funds transferred to be obligated within the same fiscal year. Funds
130 which are unexpended at the conclusion of the fiscal year shall be returned to the
131 Navy.
- 132 4) When preservation funds are transferred, Navy will fund a Navy staff member to
133 support preservation projects planned, not to exceed the equivalent of a GS-9, step 1
134 federal pay grade.

136 **B) Cultural Landscape Inventory**

137
138 Within four years of the execution of this agreement Navy will provide NPS with funds, not
139 to exceed \$125,000, to complete a professional cultural landscape inventory and assessment
140 of the condition of cultural landscape resources and integrity of the ten landscape character
141 areas defined in the Central Whidbey Island Historic District 1997 Nomination Addendum.

- 142 1) Prior to transfer of funds NPS will coordinate with the Reserve to develop a scope of
143 work and execution plan for project goals and with the Navy to ensure legal
144 requirements for transfer of funds are met.
145 2) All funds transferred will be obligated within the same fiscal year.
146 3) The results of this inventory will serve as a baseline for future inventories and
147 evaluations.

148
149 **C) Southern Gateway**

150
151 Within four years of the execution of the agreement Navy will provide NPS with funds, not
152 to exceed \$75,000, to complete the design, construction, and installation of a southern
153 gateway entry sign to the ELNHR.

- 154 1) Prior to transfer of funds NPS will coordinate with the Reserve to develop a scope of
155 work and execution plan on project goals and with the Navy to ensure legal
156 requirements for transfer of funds are met.
157 2) NPS will provide Navy opportunity to participate in the development of the portion of
158 the gateway exhibit referencing Navy history and/or current aviation use at Outlying
159 Field Coupeville with the goal to provide context to visitors explaining the presence
160 of Navy lands and aircraft in the ELNHR.
161 3) All funds transferred will be obligated within the same fiscal year.

162
163 **D) Historic Preservation Easements**

164
165 In fiscal year 2020, Navy will seek partnership opportunities through the Readiness and
166 Environmental Protection Integration (REPI) Program to support the creation of scenic
167 easements. Navy will communicate its support for appropriate conservation easements to
168 DoD officials, but cannot guarantee the outcome of the REPI process.

169
170 **E) Navy Volunteer Collaboration**

171
172 Navy will communicate to NASWI personnel that volunteer opportunities exist in ELNHR
173 for Sailors to take part in the restoration and care of the reserve.

- 174 1) Sailors seeking to improve their communities often volunteer their time and energy to
175 projects and causes. The Navy does not mandate volunteerism, but does
176 communicate community needs to interested Sailors.
177 2) NASWI will connect interested volunteers with the needs of the reserve through the
178 NASWI Command Master Chief, who will communicate directly with NPS and
179 ELNHR to understand the Reserve's schedule and needs and match those needs with
180 volunteer Sailors.

182 **ADMINISTRATIVE PROVISIONS**

183
184 I) **DISPUTE RESOLUTIONS**

185
186 A) Should any signatory party to this MOA object at any time to any actions proposed or the
187 manner in which the terms of this MOA are implemented, the party shall notify Navy in
188 writing, and Navy shall consult with the parties to the PA to resolve the objection. If
189 Navy determines that such objection cannot be resolved, Navy will:

190
191 1) Forward all documentation relevant to the dispute, including Navy’s proposed
192 resolution, to the ACHP. The ACHP shall provide Navy with its advice on the
193 resolution of the objection within thirty (30) calendar days of receiving adequate
194 documentation.

195 (i) Prior to reaching a final decision on the dispute, Navy shall prepare a written
196 response that takes into account any timely advice or comments regarding the
197 dispute from the ACHP and/or signatories, and provide them with a copy of this
198 written response. Navy will then proceed according to its final decision.
199

200 2) If the ACHP does not provide its advice regarding the dispute within the thirty (30)
201 calendar day time period, Navy may make a final decision on the dispute and proceed
202 accordingly.

203 (i) Prior to reaching such a final decision, Navy shall prepare a written response that
204 takes into account any timely comments regarding the dispute from the
205 signatories to the MOA, and provide them and the ACHP with a copy of such
206 written response.
207

208 B) Navy's ability and responsibility to carry out all other components of the Undertaking not
209 subject to the dispute shall remain unchanged.
210

211
212 II) **ANTI-DEFICIENCY ACT**

213
214 A) The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits federal agencies from incurring an
215 obligation of funds in advance of or in excess of available appropriations. Accordingly,
216 the Signatory Parties agree that any requirement for the obligation of funds arising from
217 the terms of this MOA will be subject to the availability of appropriated funds for that
218 purpose. The Stipulations contained in this MOA will not be interpreted as requiring the
219 obligation or expenditure of funds in violation of the Anti-Deficiency Act.
220

221 B) If compliance with the Anti-Deficiency Act impairs Navy's ability to implement the
222 Stipulations of this MOA, Navy will consult with the Signatory Parties to determine if an
223 amendment is necessary to fully satisfy the stipulation herein.
224

225 III) **AMENDMENTS**

227 This MOA may be amended when such an amendment is agreed to in writing by all
228 signatories. The amendment will be effective on the date a copy signed by all of the
229 signatories is filed with the ACHP.

230
231 IV) TERMINATION

232
233 A) If any signatory to this MOA determines that its terms will not or cannot be carried out,
234 that party shall immediately consult with the other parties to attempt to develop an
235 amendment per Stipulation IV, above. If within thirty (30) calendar days (or another time
236 period agreed to by all signatories) an amendment cannot be reached, any signatory may
237 terminate the MOA upon written notification to the other signatories.

238
239 B) Once the MOA is terminated, and prior to work continuing on the undertaking, Navy
240 must either (a) execute an MOA pursuant to 36 C.F.R. § 800.6 or (b) request, take into
241 account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Navy shall
242 notify the signatories as to the course of action it will pursue.

243
244 V) COORDINATION

245
246 Navy will ensure that each Signatory and Concurring Party is provided a copy of the fully
247 executed MOA within thirty (30) calendar days of executing the MOA.

248
249 VI) POST REVIEW DISCOVERY

250
251 If during the performance of the undertaking or in the course performance of the
252 stipulations in this MOA previously unknown historic properties are discovered or
253 unanticipated effects on historic properties found, Navy shall immediately implement the
254 Inadvertent Discovery Plan (Appendix B).

255
256 VII) DURATION

257
258 This MOA will expire if its terms are not carried out within five (5) years from the date
259 of its execution. Prior to such time, Navy may consult with the other signatories to
260 reconsider the terms of the MOA and amend it in accordance with Stipulation IV above.

261
262 Execution of this MOA by Navy, SHPO, and the ACHP and implementation of its terms
263 evidence that Navy has taken into account the effects of this undertaking on historic properties
264 and afforded the ACHP an opportunity to comment.

265

266 **MEMORANDUM OF AGREEMENT**
267 **AMONG**
268 **COMMANDER, NAVY REGION NORTHWEST,**
269 **AND**
270 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
271 **AND THE**
272 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
273 **REGARDING THE SECURITY ENHANCEMENTS AT**
274 **OUTLYING LANDING FIELD COUPEVILLE,**
275 **NAVAL AIR STATION WHIDBEY ISLAND,**
276 **ISLAND COUNTY, WASHINGTON**
277 **2018**

278
279
280 **SIGNATORIES:**

281 DEPARTMENT OF THE NAVY

282
283
284
285 By: _____ Date: _____
286 CHRISTOPHER GRAY, Rear Admiral, U.S. Navy
287 Commander, Navy Region Northwest
288

289
290 By: _____ Date: _____
291 MATHEW ARNY, Captain, U.S. Navy
292 Commander, Naval Air Station Whidbey Island
293

294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

SIGNATORIES:

WASHINGTON STATE HISTORIC PRESERVATION OFFICE

By: _____ Date: _____
DR. ALLYSON BROOKS
Washington State Historic Preservation Officer

318 **MEMORANDUM OF AGREEMENT**
319 **AMONG**
320 **COMMANDER, NAVY REGION NORTHWEST,**
321 **AND**
322 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
323 **AND THE**
324 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
325 **REGARDING THE SECURITY ENHANCEMENTS AT**
326 **OUTLYING LANDING FIELD COUPEVILLE,**
327 **NAVAL AIR STATION WHIDBEY ISLAND,**
328 **ISLAND COUNTY, WASHINGTON**
329 **2018**

330
331
332 **SIGNATORIES:**

333
334
335 **ADVISORY COUNCIL ON HISTORIC PRESERVATION**

336
337
338 By: _____ Date: _____
339 JOHN M. FOWLER
340 Executive Director, Advisory Council on Historic Preservation
341

342 **MEMORANDUM OF AGREEMENT**
343 **AMONG**
344 **COMMANDER, NAVY REGION NORTHWEST,**
345 **AND**
346 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
347 **AND THE**
348 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
349 **REGARDING THE SECURITY ENHANCEMENTS AT**
350 **OUTLYING LANDING FIELD COUPEVILLE,**
351 **NAVAL AIR STATION WHIDBEY ISLAND,**
352 **ISLAND COUNTY, WASHINGTON**
353 **2018**

354
355 **CONCURRING PARTIES:**

356
357 **NATIONAL PARK SERVICE AT EBEBY'S LANDING NATIONAL HISTORICAL RESERVE**
358

359
360 By: _____ Date: _____

361 **ROY ZIPP**

362 **Operations Manager, National Park Service at Ebey's National Historical Reserve**
363

364 **MEMORANDUM OF AGREEMENT**
365 **AMONG**
366 **COMMANDER, NAVY REGION NORTHWEST,**
367 **AND**
368 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
369 **AND THE**
370 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
371 **REGARDING THE SECURITY ENHANCEMENTS AT**
372 **OUTLYING LANDING FIELD COUPEVILLE,**
373 **NAVAL AIR STATION WHIDBEY ISLAND,**
374 **ISLAND COUNTY, WASHINGTON**
375 **2018**

376
377 **CONCURRING PARTIES:**

378
379
380 **TRUST BOARD OF EBEBY'S LANDING NATIONAL HISTORICAL RESERVE**

381
382
383 By: _____ Date: _____
384 KRISTEN GRIFFIN
385 General Manager, Ebey's Landing National Historical Reserve
386

387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

ISLAND COUNTY COMMISSIONERS

By: _____ Date: _____
NAME
District XX

410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

TOWN OF COUPEVILLE

By: _____ Date: _____
MOLLY HUGHES
Mayor, Town of Coupeville

433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CITY OF PORT TOWNSEND

By: _____ Date: _____
DEBRAH STINSON
Mayor, City of Port Townsend

456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CONCERNED CITIZEN OF COUPEVILLE

By: _____ Date: _____
DAVID DAY

478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CITIZENS OF EBEBY'S RESERVE

By: _____ Date: _____
[NAME]

17 September 2018, 1100 – 0100 PM

Growler Section 106 Consultation DRAFT Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Army – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
Commander Malik (telephone) – Fleet Environmental Counsel U.S. Fleet Forces Command
Commander Thedwall (telephone) – Region Environmental Counsel Regional Legal Service Office Northwest
Lisa Padgett (telephone) – Home Basing NEPA Program Manager, USFF
Sarah Stallings (telephone) – Environmental Planning, NAVFAC Atlantic
Kristen Thomasgard-Spence (telephone) – DoD REPI Program
Brian Tyhuis (telephone) – NASWI Community Planning Liaison Officer (CPLO)
Cindy Shurling (telephone) – EIS Consultant team (meeting minutes)

Department of Navy

William R. (Bill) Manley (telephone) – Deputy Federal Preservation Officer

Advisory Council on Historic Preservation

Katharine (Kate) Kerr (telephone) – Program Analyst, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks (telephone) – Washington State Historic Preservation Officer (SHPO)

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Coupeville

Mayor Molly Hughes (telephone) – Town of Coupeville

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR

Introduction –

Captain Army provided introductory comments. Since the last meeting, the Navy has collected the resolutions suggested by consulting parties, talked to consulting parties, and taken consulting parties’ proposed resolutions back to Navy to discuss their feasibility. CAPT Army indicated that today’s discussion will focus on those resolutions that the Navy has determined are feasible and obtaining consulting party comments on these resolutions.

CAPT Army indicated that the Navy considered the consulting parties’ proposed resolutions and identified which resolutions are feasible based on the Navy’s legal authority to implement them. The Navy

reviewed the letters from consulting parties, including from NPS and Maryon Atwood (Citizens of Ebey's Reserve), and considered comments received from consulting parties since the last meeting.

CAPT Army noted that concerns related to environmental planning are being discussed with the environmental planning team. The concerns related to historic properties are being discussed to see how these concerns can be addressed through existing preservation resolutions proposed by Navy. He noted the door is not closed to other ideas or options for addressing concerns for historic properties. However, the Navy is hoping that the consulting parties will provide details that can be included in the MOA.

Ms. Campbell noted she had not received any comments on the minutes from the last meeting (04 Sept 2018) and was considering them approved; although because consultation is ongoing, she would make any revisions to those minutes if consulting parties had any. She summarized CAPT Army's introductory comments, noting the Navy has received letters from consulting parties and has reviewed each letter and the information received during meetings with consulting parties to make sure all comments have been addressed.

Today's meeting is to discuss the resolutions previously provided, including any additional resolution ideas consulting parties may identify during this meeting.

Additional Resolutions from Consulting Parties –

Ms. Griffin noted the Trust Board held a workshop regarding ideas for resolutions, but won't have the list of resolutions they identified until after the next Trust Board meeting (25 Sept 2018). However, she identified two resolutions that were an outcome of the workshop:

- Sound retrofitting of equipment (e.g., tractors) and non-historic buildings in the Reserve to minimize adverse effects related to noise; and,
- Addressing weekend noise through scheduling coordination or agreements with the Navy, so that the Navy would not fly during times when the Reserve is most likely to be visited, citing an agreement such as the one the Navy negotiated for Guam.

Ms. Campbell asked if addressing weekend noise would go beyond when weekly flights are being determined, noting there are already measures for such notification in place and these measures would be followed for this undertaking.

Ms. Griffin confirmed that such scheduling needs would go beyond the weekly notification, and would be specifically for planning heritage tourism purposes and would allow visitors to schedule trips months in advance.

Ms. Kerr noted the agreement for Naval Base Guam is specific to a historic property on Navy land that is located within an active training area, and the Navy developed a public access plan specifically to allow access by the public to this historic property at specific times. It is not a plan that addresses historic properties that are privately held and are on private land.

CAPT Army summarized the Trust Board's proposed resolution as follows: the Trust Board would identify weekends, peak visitor times, special events, etc... and the Navy would take these times into consideration when planning flight operations. Ms. Griffin agreed that this accurately summarized the Trust Board's resolution.

CAPT Army identified another idea based on acknowledgement of the Navy's participation through volunteer work at the ELNHR. He noted many active duty, civilian and retired Navy personnel volunteer regularly to assist with maintenance needs at the ELNHR.

CAPT Army asked if there were any other resolutions from consulting parties. None were identified.

Ms. Campbell noted that this was not the end to all discussions for resolution options, but for the purposes of moving forward with the meeting, the Navy wanted to discuss four categories of resolution options that the Navy evaluated to determine whether they met the Navy's legal and financial obligations. The Navy is hoping that resolutions presented in the MOA can be implemented under these various categories.

CAPT Army identified these four categories as follows:

- Southern Gateway Concept
- Lands Inventory Study
- Grant Program
- Easements.

Southern Gateway Concept –

Previously proposed was a resolution to install information kiosks related to the affected landscape viewpoints. The Navy has evaluated this resolution for feasibility and determined that it would be possible for Navy to implement under its legal and financial obligations, noting also that it would not have to be a stand-alone resolution.

Ms. Campbell noted the NPS, in a letter dated 11 Sept 2018 and shared with all consulting parties, indicated there is federal property at the southern end of the Reserve. The Navy is proposing to develop a Southern Gateway for visitors to the Reserve, which could use this property and which could include kiosks or other information display panels. The Navy noted the NPS did not indicate it had to be kiosks, but the Navy noted it could be anything the consulting parties identified as appropriate for establishing the Southern Gateway.

Ms. Campbell indicated the Navy is proposing to provide funds for creating a southern entrance point for the Reserve. The actual components of the southern entrance point would be determined by the NPS and the ELNHR and it would not have to be on Reserve property. The stipulation that is developed for this resolution would indicate broadly what the funds are for and would include Navy input into any displays or information that explains Navy activities at or affecting the Reserve, but the rest of the information that is presented at this southern entrance point would be up to NPS and ELNHR.

Consulting parties discussed issues or concerns regarding the Southern Gateway Concept:

- Ms. Griffin noted the following concerns that the Trust Board would have for the Southern Gateway Concept:
 - The management of the Reserve is a partnership between the four entities with jurisdiction over the Reserve (the Town of Coupeville, Island County, NPS [although the 600 acres owned by NPS is now proposed for transfer out of federal ownership], and Washington State Parks). The Trust Board, which manages the Reserve on behalf of these four partners according to the Reserve's General Management Plan, is comprised of one representative from each partner; therefore, all members of the Trust

- Board must agree on any activity that affects the Reserve. Each partner has its own jurisdiction and owns their own land within the Reserve.
- The biggest problem for the Trust Board is that the Reserve has established facilities on the Reserve that the Trust Board is responsible for caring for, but there is not enough funding to provide this care. Therefore, the Trust Board would find it problematic to accept a resolution for one-time funding for a new facility on federal land for which the Trust Board has no funding to maintain.
 - Additionally, the Southern Gateway would not be the Trust Board's first choice as a resolution. The Southern Gateway was once a priority for the Reserve but it is not a priority now. The Trust Board has identified a number of priorities for the Reserve and establishing a Southern Gateway is a low priority for the Reserve.
 - Mayor Hughes identified a number of concerns:
 - It is not clear whether the federal property proposed for the Southern Gateway Concept is actually to be at the southern end of the Reserve;
 - NPS was correct in that the Southern Gateway was once a priority but with the development of Island Transit, the reconfiguration of Parker Road, and with the APZs, it is not only not a priority, but it may not be wise to encourage visitors to come to this proposed location given the APZs present in this area.
 - Mr. Zipp clarified that the parcel under discussion is not part of the Parker Triangle. It is a small triangular parcel by the current entrance to the Reserve, which was transferred by Navy to the Reserve in 2011.
 - Mayor Hughes indicated she still sees the need to discuss this resolution with all four Trust Board partners to determine its appropriateness.
 - Mr. Zipp noted the parcel was originally obtained by the Reserve for an entrance and the NPS already maintains it, whether it is being used for an entrance or not. His concept for this parcel would be as a place for orienting visitors to the southern part of the Reserve. His rationale is that the parcel is available for use to the benefit of the community and the reserve. Currently, the park service staff has to routinely pick up trash and old mattresses dumped at this unused location.
 - CAPT Army indicated the Navy can continue to maintain this as a resolution and the MOA can stipulate that the Southern Gateway Concept continue to be looked at. The measure should stay in the draft for now, and the Trust Board can alert us later if it decides that it is not wanted.
 - Ms. Campbell noted the resolution will be developed for consulting parties to consider.

Landscape Inventory Study –

The Navy is proposing to update the existing landscape inventory. The Navy has evaluated this resolution for feasibility and determined it would be possible for Navy to implement under its legal and financial obligations, noting also that it would not have to be a stand-alone resolution.

Ms. Campbell indicated the Navy would develop a scope of work with the Trust Board and the NPS. The Navy would provide funding for the inventory update through the NPS, but the Scope of Work for the inventory update would be an outcome of working with the Trust Board and the NPS.

Consulting parties discussed issues or concerns regarding the Landscape Inventory Study:

- Dr. Brooks asked if this would be a historic building inventory.
- Ms. Campbell provided the following clarifications and information:

- The study would not be a building survey – it would be a landscape inventory and would serve to update the contracted study conducted in 2003. It would be a study of landscape changes and the effects of these changes on the historic integrity of the landscape.
- The Navy has determined that this is a direct nexus with the impacts of the undertaking.
- The 2003 study addressed how changes affected integrity; updating this study would identify where changes occurred, how integrity was affected, and how to address future impacts.
- Ms. Griffin identified several issues or concerns:
 - She is familiar with the 2003 study.
 - This would be a different type of analysis from the typical landscape studies conducted by NPS and its value is not clear.
 - The Reserve is not an area managed by a single governmental entity; it is 85% private property overseen by four entities.
 - The Trust Board has identified needed studies by all four partners and this type of study is not a priority for the Reserve.
 - The Trust Board is concerned with the impacts of the undertaking on those qualities that affect the economy of the Reserve, the tourist base of the Reserve, and the resources of the Reserve.
- Dr. Brooks expressed the following concerns:
 - The SHPO is concerned the landscape study is not addressing the central issue of how the Navy can give back to the quality of life of the community considering the impacts of its undertaking.
 - In her opinion, the test for determining whether a resolution addresses the impacts of an undertaking is as follows:
 - If a federal undertaking is taking something away from the citizenry then the federal agency has to give something back to the citizenry.
 - Updating the landscape study does not meet this test.
- CAPT Army indicated the Navy appreciated the feedback from consulting parties on this resolution, and it is on the list of proposed resolutions because it would be of some value in particular to the grant program.

Grant Program –

The Navy looked at how the Navy can offer funding to private citizens to achieve community benefits to the historic Reserve, not just one building, but to the Reserve as a whole. The Navy noted that providing funding to NPS is a potential way because the Navy has not identified a mechanism to legally distribute the money to state or private parties to support this consultation. The Navy potentially could transfer funds to the NPS to mitigate the adverse effect, then the NPS can distribute via its position on the Trust Board for the Reserve.

Consulting parties discussed issues or concerns regarding a Grants Program:

- **Funding** –
 - Dr. Brooks asked how the Navy funds its grant program at Guam.
 - Bill Manley indicated the funding provided for the Guam museum was the subject of special Congressional authorization and appropriation under a program administered by DoD's Office of Economic Adjustment. That funding provided is outside the fiscal authorities of the Navy.

- Ms. Campbell noted there are issues associated with funding. For example, can Navy give money to NPS for the creation of scenic easements?
- Transfer of federal monies –
 - Dr. Brooks asked if the Navy is only allowed to transfer monies to federal agencies, or can it also go to state or local governmental agencies. “Can the Navy pass money to me?”
 - CDR Malik provided the following clarification:
 - The only legal mechanism for the transfer of monies would be under the conditions of the Economy Act, with allows the transfer of funding between federal agencies.
 - There is no similar legislation that would allow for the transfer of funding between a federal agency and a state or local governmental agency.
 - The Navy is looking at 10 United States Code Section 2684, where there may be a possibility for federal (Navy) funds to transfer to non-federal governmental agencies, but the Navy is still looking at this.
- Private Land Trusts –
 - Mayor Hughes asked if the Navy can give money to a private land trust. NPS has different fiscal authorities, so it can do it. The Navy’s fiscal authorities are much more restrictive and may necessitate stipulations for how the money is to be used.
 - CAPT Army noted the REPI program is one potential mechanism for doing this. Navy is still looking at the REPI program internally. He noted that monies released through the REPI program are based on other legal processes, but they are not applicable to the NHPA. The issue is calling it a grant process when it is really a funding process.
- Cooperative Agreements –
 - Ms. Griffin indicated her experience with NPS is that federal money can easily be transferred between agencies through a cooperative agreement.
 - Ms. Campbell confirmed the use of cooperative agreements can allow for the transfer of federal moneys from federal agencies. The Navy recognizes that the NPS and the Navy as part of the DoD are sister agencies. However, they operate under different legal processes. For example, the NPS manages public lands while the DoD manages withdrawn lands. This legal difference guides what can be done as far as how federal monies could be transferred.
- Economy Act of 1933 –
 - Dr. Brooks asked if the legislation the Navy is looking at is the Economy Act of 1933. If so, one federal agency can contract with another federal agency to transfer federal monies.
 - CDR Malik confirmed that Navy is looking at the Economy Act of 1933.
 - There are a couple of issues under this act:
 - The Navy needs to describe specific tasks and services about what is being done with the transferred funds; and
 - There is an issue on the Navy’s side because its funding is tied to the fiscal year.
 - However, the Navy could devise a scope of work that is like the Ebey’s Forever Grant Program, but meets Navy fiscal responsibilities.
 - Mr. Zipp indicated that if NPS can facilitate the conveyance of monies, acting as a bridge, it would be happy to do this. However, if there is a more direct way to get federal monies to the Reserve or the Trust Board, the NPS would prefer this.
- Internships –
 - Ms. Campbell noted that one way to convey funding in an easier fashion would be by funding an internship position.

- CAPT Army noted that considering NPS' preference for a more direct way to get federal monies for the Reserve or Trust Board, this would be a way to provide direct financial assistance to the Reserve.
- Ms. Griffin noted several concerns with funding an internship:
 - An internship position is not really needed for the Reserve; funds are needed.
 - It is not clear how a NPS internship position would meet the needs of the Reserve.
- Ms. Campbell clarified that if the Navy provides funds through the Economy Act to NPS for services needed; and the services needed are to achieve the preservation needs of the Reserve, then an NPS internship position could be used to address the Reserve's preservation needs.
- Mr. Zipp noted that NPS can see a need for additional assistance to assist the Trust Board with ramping up their preservation programs and reviewing grant application packages.
- CAPT Army indicated that he understood that an internship position may not be of interested and would take this mitigation off the list, if that was the parties desire.
- Current Reserve Grant Program/Funding –
 - Ms. Griffin noted that the Trust Board is already using a current grant program to keep manpower in their offices.
 - This grant program provides \$50K a year to applicants, which is already not enough money to fund all the requests for grant monies.
 - The Trust Board would rather get additional funding for a grant program that would help them fund more requests, because the grant money acts as leverage for achieving economic advantages through local spending.
 - She does not understand how funding an internship at NPS, which may take Trust Board staff away, would be a good resolution.
 - Dr. Brooks asked Ms. Griffin how much additional funding would be requested if it were possible for Navy to find a way to provide it.
 - Ms. Griffin indicated that the Trust Board gets enough grant applications to double the current \$50K that is available.
 - Ms. Campbell asked if in addition to existing grant money, would matching grant money be of interest to the Trust Board.
 - Ms. Griffin indicated the Trust Board's current grant program is a matching program, requiring a 100% match by landowners. She noted that this leverages a 3-to-1 economic advantage, and wants Navy funds placed directly into the program.
- Landscape Perspective (vs. Barn Program) –
 - Ms. Campbell asked if grant money could be used to address the landscape perspective, so not just individual structures per the Barns Program, but individual structures as they contribute to the landscape.
 - Dr. Brooks confirmed that funding from the Navy could be used like the Ebey's Forever Grant program to address contributing resources to the landscape.
- Next steps for Grant Program as a potential resolution –
 - CAPT Army indicated the Navy needs more detail to support the legal avenue of funding via the Economy Act.
 - Dr. Brooks noted the needs of all four partners comprising the Trust Board should be considered. The Trust Board can provide the details of the existing grant program to the Navy to help them continue considering this resolution.
 - CAPT Army expressed his appreciation of this information, so that a funding resolution from the Navy would help meet the principles of the Trust Board.
 - Ms. Campbell indicated that per this discussion:
 - It is time for the Navy to write a resolution so consulting parties can provide additional details and comments.

- With regard to a grant program, Navy understands that while it would be easiest to just pay into Ebey's Forever, the Navy is still investigating if it can do this legally.
- So Navy will try to do this through NPS; a written resolution will present how this might be done.

Conservation Easements –

The Navy looked at how a resolution similar to conservation easements could be developed. Ms. Campbell indicated that the conservation easements would be intended to preserve cultural landscapes within the Reserve.

The Navy talked to NPS and looked at the success of scenic easements. The Navy can do something similar via its REPI Program, but done in a way that the Navy would not have control over establishing easements.

The Navy looked at how they could achieve a similar goal for conservation easements.

- One option would be to identify areas of concerns and where the Trust Board sees needs for such easements.
- Additionally, the Trust for Public Lands is an avenue that can be used.

The Navy asked NPS and the Trust Board what their experience is with easements and consulting parties discussed issues or concerns regarding conservation easements:

- Mr. Zipp noted the Trust for Public Lands can effect a land transfer for an easement very easily. Additionally, they came to the Reserve this past summer and toured the Reserve with the NPS. TPS moves with more speed and agility than the federal government, and makes a good partner.
- Ms. Griffin agreed with Mr. Zipp, but noted the following:
 - The Reserve already has a Land Protection Plan that identifies the priorities for the Reserve.
 - Going back to the REPI Program and considering easements, the Trust Board would want to know what rights property owners would have to give up when establishing such easements.
- CAPT Army noted the Navy would want to make sure that getting easements would align with the Trust Board's priorities to protect the agricultural and economic aspects of a cultural landscape. The Navy doesn't want such easements to diminish these aspects of the cultural landscape but they do want them to protect the historic integrity of the landscape.
- Ms. Campbell noted that Trust for Public Lands could be brought in to do a study on how to implement the Reserve's plan.
- Ms. Atwood asked how the Navy would work with the Trust for Public Lands.
 - Ms. Campbell indicated the Navy would partner with the Trust for Public Lands to work with the Reserve in a way comparable to the Navy's other easements with other third parties like the Whidbey Camino Land Trust. The Trust for Public Lands would be a way to get resolutions that meet Reserve priorities.
- Mr. Zipp noted that NPS's experience is that the problem with easements is finding willing landowners.
 - A lot would need to be done to find willing landowners and the Trust for Public Lands emphasizes its experience with community involvement when developing easements.

- The NPS encourages the Navy to work with the Trust for Public Lands when developing a conservation easement resolution.
- He will forward the local contacts for the Trust for Public Lands to CAPT Army.

Other Issues or Concerns –

- Dr. Brooks expressed her continued concern with understanding how the Navy is giving back to the public; she is not seeing this in these resolutions.
 - CAPT Army requested Dr. Brooks identify specific measures she feels would be needed for these resolutions. Dr. Brooks asked for a noise monitoring program, and CAPT Army responded that this was outside the scope of Section 106. He also explained that this request was sent to Navy’s NEPA team for examination under NEPA.
- Ms. Griffin noted that Jim Baumgart requested noise monitoring as a resolution and has not seen or heard anything to address this proposed resolution.
 - Ms. Campbell indicated the Navy considers noise monitoring is not an option for a resolution of adverse effects.
 - Dr. Brooks requested clarification from the Navy on a ‘no’ to noise monitoring as a resolution.
 - CAPT Army confirmed that this is a ‘no.’ Noise is a concern on the environmental side of the analysis of impacts, but the Navy does not feel noise is an effect on a historic property that requires resolution.
 - Ms. Griffin questioned how a noise study could not be required – not on buildings or structures, but on the Reserve itself and how the lands, visitors, and staff of the Reserve are being affected.
 - Ms. Campbell provided the following explanation for why noise monitoring is not a historic properties resolution:
 - The NHPA undertaking is not the introduction of Growler noise to the Reserve; that was considered by the Navy in 2004/2005. The noise level is not changing; the undertaking is increasing the frequency of hearing the same the noise level. It is not new noise; it is an increase in the frequency of existing noise.
 - Thus, the Navy’s position is that noise monitoring will not resolve the adverse effects of the frequency of experiencing the same level of noise.
 - Dr. Brooks indicated she will forward this information to the Governor’s office.

Ms. Griffin indicated she still does not understand how noise monitoring is not an appropriate resolution.

Summary of Resolution Discussions –

- Ms. Campbell noted the discussions today covered the following resolutions:
 - A grant program to support the preservation of historic landscapes
 - Updating a cultural landscape study
 - A Southern Gateway to the Reserve
 - Several new ideas, consisting of:
 - Looking beyond structures when considering noise abatement measures
 - Long term preservation of the historic landscape of the Reserve
 - Formalizing the Navy’s current volunteer relationship with the Reserve
- Ms. Campbell asked if there were any other comments on these resolutions for continued discussion for the remainder of the meeting (approximately 20 minutes).
- Noise Monitoring –

- Ms. Campbell noted that with regard to noise monitoring, the Navy does not see the fit between noise monitoring and resolution of adverse effects to historic properties, so this is ‘no’ under this action.
 - Ms. Griffin noted that mitigation doesn’t have to be just for historic preservation. There can be other mitigation options if all consulting parties agree.
 - Ms. Campbell acknowledged this, but noted the Navy does have to show a link between the mitigation and the resolution of adverse effects on historic properties.
- Ms. Griffin noted monitoring is not a new idea, it has been mentioned since scoping as a resolution measure and the Trust Board would like to see it considered.
- Mayor Hughes stated that she wanted to be on record saying that noise monitoring will help indicate how the cultural landscape is being affected.
 - She is still confused as to how the Navy can say noise will not be louder, but only the frequency of the same noise is changing
 - She is concerned that the Navy’s noise modelling has diluted the noise that will actually be experienced and noise monitoring as a mitigation measure will document the actual effects
 - Ms. Campbell clarified that the Navy’s modelling does already show the effects of the frequency of noise exposure.
- Ms. Griffin is still concerned about the effects of noise.
 - Ms. Campbell acknowledges that a ‘no’ to a noise monitoring resolution is not ignoring the feelings of the community. Noise modelling does capture this information. However, the historic properties effects analysis is not the avenue to address these concerns.
- Formalization of Volunteer Relationship –
 - Ms. Griffin likes the idea of formalizing the Navy’s volunteer relationship with the Reserve. Funding for 5 years for a volunteer coordinator would be great (the Reserve recently lost funding for this position).
- Retrofitting Non-historic Structures for Noise
 - Ms. Griffin would like to see a resolution that addresses Helen Price Johnson’s suggestion to retrofit non-historic structures for noise abatement.
 - Dr. Brooks would like to see any ideas for retrofitting tractors and other non-historic structures which contribute to the cultural landscape of the Reserve.

Closing –

CAPT Army asked if there were any other comments. There were none.

The next meeting for the consulting parties is scheduled for Thursday, September 27th (1000-1200 pm PST).

CAPT Army thanked everyone for their time and looks forward to individual meetings with various consulting parties.

Ms. Campbell indicated the Navy will generate draft stipulations. This will hopefully clear up any confusion and allow for a more narrowed conversation on the proposed resolutions.

- Dr. Brooks noted that if kiosks are included, she will not be interested without additional measures.

The meeting ended at about 1300 PST.

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: Growler MOA
Date: Tuesday, November 13, 2018 7:14:44 PM

September 27, 2018 - Email from Dr. Allyson Brooks, Washington SHPO

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Thursday, September 27, 2018 10:00 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED];
Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]; Griffin, Kristen
[REDACTED]
Subject: [Non-DoD Source] RE: Growler MOA

Thank you. I am specifically looking for the legislation that provides you the authority to pass funding to local Land Trusts.

I cannot find a prohibition against transferring funds to at state government for a specific purpose. I couldn't find anything that prevents federal-state transfer. Also see below: you have authority your DOD Financial Management Regulations in Section E which states "such as"....

Also, I read through your regulations which state:

E. Transfer Accounts. Various Appropriation and Authorization Acts have included language making funds available or transfer authority available for accounts such as Environmental Restoration, Defense; Drug Interdiction and Counter-Drug Activities, Defense; Foreign Currency Fluctuations, Defense; Foreign Currency Fluctuations, Construction, Defense; Iraq Freedom Fund; and Mine Resistant Ambush Protected Vehicle Fund.

And:

030405. Processing of Non-Expenditure Transfer (NET) A. Except as stated below, NET documents transferring funds between DoD appropriation and fund accounts should not be processed prior to the receipt of an OUSD(C) memorandum directing that such action be taken. The following types of transfers may be made without prior approval of the OUSD(C):

1. Transfers of funds for functional transfers between government agencies (31 U.S.C. 1531) - when the request is initiated by a government agency other than the Department of Defense.
2. Transfers of obligational authority from one agency to a transfer appropriation account that is established in another agency to carry out the purposes of the parent appropriation or fund. Such transfers are not adjustments to budget authority or balances of budget authority.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director Department of Archaeology and Historic Preservation
[REDACTED]

-----Original Message-----

From: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]

Sent: Thursday, September 27, 2018 9:36 AM

To: Brooks, Allyson (DAHP) [REDACTED]

Cc: Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED];

Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]

Subject: RE: Growler MOA

Good Morning Dr. Brooks,

I believe you are referring to the REPI program. I cannot find any of the lawyers or our REPI Program Coordinator this morning. I will make sure we have an answer for you by the time of the call.

Best,

Kendall

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]

Sent: Wednesday, September 26, 2018 5:11 PM

To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]

Cc: Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED]

Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]

Subject: [Non-DoD Source] Growler MOA

Kendall - Could you please provide me with the legal authority/legislation that allows the Navy to transfer funds to a Land Trust. I need that before our next meeting.

Thank you!

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]

[REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: COER Comments 9-27, Navy Growler Section 106 MOA Consultation
Date: Tuesday, November 13, 2018 6:08:43 PM
Attachments: [Section 106 9-27, MOA Mitigations .pdf](#)
Importance: High

September 27, 2018 - Email from Ms. Maryon Attwood, Citizens of Ebey's Reserve

-----Original Message-----

From: maryon [REDACTED]
Sent: Thursday, September 27, 2018 12:20 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] Re: COER Comments 9-27, Navy Growler Section 106 MOA Consultation
Importance: High

Kendall, see if this opens.
Thank you. Maryon
Maryon Attwood
Sound Defense Alliance, Chair
sounddefensealliance.org <<https://sounddefensealliance.org/>>
[REDACTED]
Coupeville, WA 98239
[REDACTED]

<https://facebook.com/SoundDefenseAlliance>

On 9/27/18, 9:26 AM, "Campbell, Kendall D CIV NAVFAC NW, PRW4"
[REDACTED] wrote:

>Maryon,
>
>Thank you for the quick response. Please join us for as long as you
>can on the call today.
>
>I tried to open the document you attached and my computer tells me it
>cannot translate the font in the document. Could you send the document
>again? If the same computer translation problem occurs maybe try a
>different font.
>
>Thank you again.
>
>Best,
>Kendall
>

>-----Original Message-----

>From: maryon [REDACTED]

>Sent: Thursday, September 27, 2018 5:38 AM

>To: Campbell, Kendall D CIV NAVFAC NW, PRW4

[REDACTED]; Arny, Matthew L CAPT NAS Whidbey Is., N00

>

>Cc: Brooks, Allyson (DAHP) [REDACTED]; Helen Price

>Johnson [REDACTED]; Kristen Griffin

[REDACTED]; Zipp, Roy [REDACTED]

>jim.baumgart@gov.wa.gov; Molly Hughes [REDACTED]

>Subject: [Non-DoD Source] Re: Agenda for September 27 Navy Growler

>Section 106 MOA Consultation

>Importance: High

>

>Kendall, I don't know if I will be able to attend for the entire

>length of the meeting on the 27th.

>I am adding comments for discussion and for the record.

>

>Thank you, Maryon

>

>Maryon Attwood

>Sound Defense Alliance, Chair

>sounddefensealliance.org <<https://sounddefensealliance.org/>>

[REDACTED]
>Coupeville, WA 98239

[REDACTED]

>

>

><https://facebook.com/SoundDefenseAlliance>

>

>

>

>

>

>

>

>From: "Campbell, Kendall D CIV NAVFAC NW, PRW4"

[REDACTED] >

>Date: Wednesday, September 26, 2018 at 4:55 PM

>To: "Campbell, Kendall D CIV NAVFAC NW, PRW4"

[REDACTED] >

>Subject: Agenda for September 27 Navy Growler Section 106 MOA

>Consultation

>

>

>

>

>

>

>

>

>We have been working to get some DRAFT language on paper in support of

>the consultation efforts to develop resolutions stipulations for this

>MOA. Attached you will find a proposed agenda for our next

>consultation meeting tomorrow morning and DRAFT MOA language that

>includes DRAFT Preamble, proposed stipulations, and administrative

>clauses. We are providing this DRAFT MOA language to facilitate

>further discussion and development of resolution options. In addition,

>we hope the DRAFT language will clarify or provide opportunity for

>further clarification of resolution feasibility and mechanisms.
>
>
>
>Since we were working to get the DRAFT MOA language prepared, we will
>circulate both the Sept. 17 consultation meeting summary and the
>summary for tomorrow's meeting for review early next week.
>
>
>
>The consultation tomorrow, Thursday, September 27, 2018 is scheduled
>from 10:00am to 12:00pm. The conference call number is the same:
>1-800-747-5150 Participant code: 9465240#.
>
>
>
>We look forward to a productive discussion to further develop the DRAFT
>MOA language.
>
>
>
>All My Best,
>
>Kendall Campbell
>
>Archaeologist and Cultural Resources Program Manager
>
>NAS Whidbey Island
>
>[REDACTED].
>
>Oak Harbor, WA 98278
>
>[REDACTED]
>
>
>

CITIZENS OF EBEBY'S RESERVE

protecting our land, homes, and health

September 27, 2018

Naval Air Station Whidbey Island
Attn: Captain Matthew Arny
[REDACTED]
Oak Harbor, WA 98278-5000

RE: Section 106

Dear Captain Arny,

As a consulting partner, my organization respectfully adds these new comments and suggestions to those already submitted.

The determination of adverse effect document must provide a clear discussion of the most important types of resolution: avoiding and minimizing the effects of the undertaking. The best way to avoid and minimize the adverse effect, which is increased jet noise, is to reduce or eliminate jet noise exposure.

The draft MOA document currently suggests mitigation measures that do not include noise monitoring within the Reserve as requested by multiple parties. Could you share the reason for this omission? It is concerning that the draft mitigations do not reflect the entirety of the Reserve District, but appear to focus on a handful of viewpoints, increasing visitor information and volunteers. Mitigation is defined as "the action of reducing the severity, seriousness, or painfulness of something". How will the measures noted by the Navy fulfill their purpose to "reduce the severity, seriousness or painfulness" of the Navy's impacts to the Central Whidbey community?

COER has written extensively about the noise analysis used to inform this Section 106 process including: **(a) "Substantive Change" not Defined; (b) Modeled DNL Contours without Verification; (c) The 65-dBA DNL is now Invalidated; (d) Wrong DNL Averaging Method was used; and (e) Misuse of the Decibel A-Scale.** We continue to repeat this because the result is that the Navy has under-estimated the area of effect in substantial ways that understate the magnitude of the effect of the noise on the Ebey's Landing National Historical Reserve and of the landmass being impacted.

1. Noise monitoring in the Reserve should be included in the MOA. Noise monitoring throughout the Reserve must be a part of any future mitigation plan to be discussed. Actual noise testing on the ground should have been conducted to test all of the modeled numbers that informed the outcomes of this Section 106 process.

If the Navy is unwilling to monitor noise, then they should provide funding in the MOA so the consulting parties can hire third party professionals to monitor sound in areas where the public may be especially endangered by Growler noise. These would include at the minimum, the Bluff Trail, all trail heads, location near the High school, Ebey's Landing, Prairie Center, and the Front Street Historic District.

As the only citizens group participating in the consultation on the development of a memorandum of agreement to address adverse effects from the Navy's Growler expansion pursuant to the Section 106 Process of the National Historical Preservation Act. – We continue to express our deep concern with The Navy's commitment to public process. We find the one sentence referring to the Section 106 Process in the release of the Navy's preferred alternative in June – insufficient.

According the Federal Regulation 36 CFR part 800:

(4) Involve the public. The agency official shall provide as opportunity for members of the public to express their views on resolving adverse effects of the undertaking. The agency official should use appropriate mechanisms, taking into account the magnitude of the undertaking and the nature of its effects upon historic properties, the likely effects on historic properties, and the relationship of the Federal involvement to the undertaking to ensure that the public's views are considered in the consultation. The agency official should also consider the extent of notice and information concerning historic preservation issues afforded the public at earlier steps in the section 106 process to determine the appropriate level of public involvement when resolving adverse effects so that the standards of section 800.2(d) are met.

2. We continue to request a public meeting to inform the public. The Navy should consider the public's comments and concerns, as the Section 106 process requires. We do not believe the Navy has fulfilled this requirement of the Section 106 process.

Additionally, new information and new maps were included in the section 106 that did not appear in the Draft EIS for the Growler expansion. The general public is totally unprepared and uninformed about the magnitude of these proposed impacts.

3. Eliminate the waiver at OLFC. The Navy's waiver for OLFC, perhaps debatably sufficient for 6,100 operations, has not been proven sufficient for the increase of 23,700 operations, and the current level of 6,100 operations should be maintained until that is proven; or the OLFC should be improved to meet current Navy outlying field standards. The original Navy waiver was made in the late 1980's for a lighter and more aerodynamic aircraft than the Growler, which requires larger more powerful engines that have a louder and more complex low-level sound profile.

4. The MOA should include warning signs about high levels of noise and that ear protection is required for observation of FCLP's at the OLFC.; or Funding could be given to the local authority to make and install these warning signs at hazardous locations around the OLC. Who is liable for personal injury if the public is injured by hazardous noise – especially near Route 20, where cars with families stop and watch FCLP's.

Since the Navy's Preferred Alternative puts most of the Growler noise disproportionately over the most historically fragile part of the Island – and the only part of the Island that has been designated for preservation by the United States Congress, we view the best way to avoid and minimize noise effect is to reduce the jet noise by moving the noise to less fragile locations - especially the Growler Flight Carrier Landing practices being conducted at the OLFC.

5. We maintain that to reduce Growler noise -- operational avoidance and minimization must occur. We believe that this is in the best interest of the Navy, the Base and national security, as well as, the mission of the Ebey's Landing National Historical Reserve.

Avoid Harmful effects in the Area of Proposed Effect by reducing the number of Growlers and Growler operations at NASWI that are proposed to fly FCLP operations at the OLFC over Central Whidbey and the Ebey's Landing National Historical Reserve.

Pursuant to NEPA, Section 106, regulations, the Navy will consult with SHPO on new undertakings involving the management of air operations as identified in the EIS, and Pursuant to NEPA regulations, the Navy will notify the public of any changes in the management of air operations that have the potential to significantly affect the human environment.

5a. Avoidance Actions

- No increase in the number of operations or the number of EA-18Growler jets and no new (36) jets.
- Minimize local FCLP training, concomitant safety risks and economic/environmental impacts over the Ebey's Landing National Historical Reserve
 - Maintain 6,120 operations annually at OLF Coupeville per the 2005 AICUZ study, with a 50/50 split between runways, obviating the need for further Accident Potential Zones on Whidbey and in accordance with the 2005 AICUZ planning.
 - No local FCLPs on Friday, Saturday or Sunday.
 - Because of carbon emissions over the Reserve's tourist destinations, no local FCLP's on days that are declared Clean Air Hazard Alerts for Island County.
 - Temporarily deploy remainder of FCLP operations at other Navy bases as is currently occurring.
 - Navy provides regular ground monitoring of altitude of aircraft in FCLP pattern to ensure that pilots observe the 600-foot minimum altitude.
 - Monthly publication of OLF Coupeville FCLP operations, runways and time of day.
 - Place sound monitors throughout the Reserve, in historic districts, and under all flight paths. Monitoring results should include only the days of flying (Average Busy Day or ABD) not 365 days per year.
 - Growlers produce more low-frequency noise (LFN) than their Prowler predecessor and monitoring equipment should be measuring the C-scale as well as the A-scale for noise effects data.
 - Report all monitoring results to the public and consulting partners at an annual public forum, not an open house.
 - Install NOISE warning signs around OLFC and close any locations that may be accessible to the public to view Growler FCLPs, as the public may be injured or permanently impaired by the noise.

5b. Reduce noise effects, duration, and intensity.

- **Build a new runway at Ault Field that is parallel to the main runway for use of FCLP Growlers training.**
- Site Growlers at 1 or 2 additional locations nationally, starting with carrier-based squadrons, which require the most FCLP training.

- Move 5 carrier-based Growler squadrons (35 aircraft) to other location(s); perhaps MCAS Cherry Point, which retains training infrastructure. 83 Growler aircraft remain at NASWI.
- Move remaining 4 carrier-based Growler squadrons (28 aircraft) to 1 or 2 other locations. 55 Growler aircraft remain at NASWI.

5c. Re-site Growler Mission

Growler mission moves to more appropriate sites that are larger, meet Navy standards, and are not as densely populated and environmentally fragile.

- Move the training command (25 aircraft) to 1 or 2 other locations. 5 Growler aircraft (reserve squadron) and expeditionary squadrons remain at NASWI.
- Return Ebey’s Landing National Historical Reserve to historic agricultural heritage pre-dating anything but fixed wing aircraft that would have been appropriate in 1945.

5d. Mitigations under NEPA should include operations management including timing, placement and management during the course of each year.

6. The MOA should include fair market compensation to landowners and businesses for the impacts of the Navy’s proposed undertaking. Neither individuals nor the local civilian authority should have to pay for the impacts of the Navy’s four-fold expansion, not anticipated by the AICUZ planning process - based upon 6100 operations at OLF. The MOA should reflect the Navy’s financial and constitutional responsibility for their agreed upon adverse ‘taking’ effects.

7. Consulting partners should propose with our Congressional delegation new legislation that would include the DoD in the PILOT program. Currently, agencies that manage lands eligible for PILT payments do not include the DoD. This would make a substantial difference to communities where the DoD owns and/or manages waterfront property. The payments would be \$1.5 million per year in Island County due to the amount waterfront properties and improvements on DoD occupied land. (I.e. if NAS-WI were a private company, that would be the annual property tax bill on assessed value in excess of \$200 Million.)

Sincerely,

Maryon Attwood, COER, President

cc:

- Captain Army, NASWI – [REDACTED]
- Helen Price Johnson, Island County Commissioner – [REDACTED]
- Jay Inslee, Governor for the State of Washington - Baumgart, Jim (GOV), [REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Padgett, Lisa M CIV USFF, N46](#); [Malik, Joan M CDR USFF N01L](#); [Montague, Michael G LCDR USFF HQ, N01L](#)
Cc: [Stallings, Sarah CIV NAVFAC Atlantic](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Subject: FW: [Non-DoD Source] Time sensitive: Revised concept for Section 106 mitigation
Date: Monday, October 1, 2018 6:09:44 PM

FYSA. The Reserve's updated MOA response.

-----Original Message-----

From: Griffin, Krister [REDACTED]
Sent: Friday, September 28, 2018 4:02 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Helen Price-Johnson [REDACTED]; Molly Hughes [REDACTED]; Jon Crimmins [REDACTED]; Wilbur Bishop [REDACTED]; David Louter [REDACTED]
Subject: [Non-DoD Source] Time sensitive: Revised concept for Section 106 mitigation

Hello Captain Army (with cc to Kendall). I just came from a very focused and productive meeting of Trust Board government partners: Helen Price Johnson (County Commissioner), Molly Hughes (Coupeville Mayor), Jon Crimmins (Washington State Parks) and Wilbur Bishop (Trust Board chair). We did not have our NPS participant here today (David Louter, our NPS partner, works in Seattle).

I want to talk with you regarding a new approach to Section 106 mitigation that we feel has major advantages over the mitigation actions we have been discussing. I am hoping that you can listen to this concept and maybe we can make a change in direction that will benefit the district/Reserve and leave the local consulting parties feeling good about the outcome. This is a concept at this point, but one that all of us left the meeting feeling very favorable toward. Having said that, and as you know, we each need to work through our organizations for approval.

As we reviewed the mitigation actions in the current draft MOA, we all feel that they all have very weak connections to preservation of major components of the district/landscape, and they don't leave us with a lasting public benefit. Instead, we discussed a new plan in which four different historic preservation projects involving truly iconic public aspects of the district/Reserve, directly benefiting well-vetted projects or programs of the four partners of the Reserve's Interlocal Agreement:

- * Provide financial support for specific landscape and historic rehabilitation projects within Fort Casey and Fort Ebey State Parks (public properties that preserve and interpret the military history aspect of the Reserve's history);
- * Historic rehabilitation project for the Coupeville Wharf (owned by Port of Coupeville, an iconic historic structure in the Reserve and Coupeville (it is part of the Town's logo), key local economic asset, suffering from serious deterioration and deferred maintenance);
- * Historic rehabilitation project for the Ferry House (owned by NPS, the Reserve's most iconic historic structure, suffering from deterioration and deferred maintenance, very high priority of TB and NPS for rehabilitation);
- * Provide financial support to Island County's Conservation Futures program, to support and or match local funds for land and landscape acquisition, easements and restoration projects in the district/Reserve.

We would hope that this funding could be made directly to these agencies, or the State, per Allyson Brook's interpretation of federal legislation (I know you are still checking into this); another option might be that these projects could be funded through a one time congressional appropriation (perhaps the fact that the Reserve was established by Congress and has federal legislation that facilitates congressional appropriations, might help with this). We also may be able to find a way to use the federal LWCF (Land and Water Conservation Fund) to divert funds for these projects through the component of their program that provides funding to local communities for conservation and preservation projects.

It would also be beneficial if this could include funding for overhead costs to help defray administrative costs, paid

to the Trust Board, in recognition of their coordination role among partners. This role could include developing an expanded and improved volunteer program benefiting the district/Reserve far into the future. This could include welcoming the Navy community to participate in preservation projects.

Would you be available to talk about this asap? I will be travelling as of Oct 2nd but I wanted to get this information to you asap. This is a quickly stated sketch of a concept, but because it helps all the partners, reflects already vetted priorities, makes use of existing programs, and provides such tangible, clear and lasting benefits to the public, we all feel this is a much better mitigation concept for our community and Reserve.

--

Kristen P. Griffin
Reserve Manager
Ebey's Landing National Historical Reserve [REDACTED] Coupeville, WA 98239
[REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: [Non-DoD Source] Military overflights: mitigating visitor annoyance via interpretive media
Date: Tuesday, November 13, 2018 6:13:00 PM
Attachments: [Taff_dissertation.pdf](#)
[Father Crowley Vista-Park Orientation.pdf](#)

September 28, 2018 – Email from Roy Zipp, Operations Manager, National Park Service

-----Original Message-----

From: Zipp, Roy [REDACTED]
Sent: Friday, September 28, 2018 1:41 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Griffin, Kristen [REDACTED]
Subject: [Non-DoD Source] Military overflights: mitigating visitor annoyance via interpretive media

FYI I haven't read the details yet but in principle these case studies inform how we might mitigate annoyance via interpretive media at the southern gateway and perhaps elsewhere. Its not the same as reducing noise of course, but is worth pursuing.

Kendall I'll have some more specific information (scope of design and class C cost estimates) about the southern gateway later next week once I'm back in the office and have a chance to get input from NPS regional facility management staffs and Island County engineer.

<<http://>>

Roy M. Zipp
Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

[REDACTED]
Coupeville, Washington 98239

[REDACTED]
www.nps.gov/ebla <<http://www.nps.gov/ebla>>

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

----- Forwarded message -----

From: Melena, Sara [REDACTED] >
Date: Mon, Sep 24, 2018 at 2:33 PM
Subject: Fwd: Seeking research-informed basis for proposed mitigation measure
To: Roy Zipp [REDACTED] >
Cc: Vicki Ward [REDACTED]

Hi Roy, Vicki Ward sent me the attached files and left a report <<http://www.dtic.mil/docs/citations/ADA379467>> on the effects of military overflights on park users (1999) at White Sands National Monument. Both the report and the dissertation looked at the use of communication to effect visitor attitudes towards overflights. The 1999 report used a very basic message, "Military aircraft can regularly be seen or heard on this trail" (Miller et al., p. 6).

"Annoyance" with the noise decreased by approximately 10%.

In the report from Sequoia-Kings Canyon, the researchers considered message design, creating and testing a message considered variables thought to enhance and motivate understanding (e.g., personal relevance, personal responsibility, the number of messages, and message sources (Petty & Cacioppo, 1986)). They tested the messages with students at CSU and select this one to test with visitors at the park: Military aircraft are allowed to conduct training flights over Sequoia National Park in an effort to help keep the United States of America safe. Consequently, visitors hiking in this area of the park can sometimes hear/and or see military aircraft flying overhead'. They found that visitors that read the message before listening to the 2 loudest sound clips that included aircraft noise rated the acceptability of the military aircraft sound clips as 15% more acceptable than respondents that didn't read the message.

Also attached is a park orientation wayside from Death Valley that includes a statement about overflights.

Attitudes about issues like aircraft overflights are evaluations of the event/information--is it good or bad. There is a large body of literature about persuasive communication that describes elements to include in messaging. The Sequoia King-Canyon study used a theoretical framework the suggests managers should do the following when developing persuasive messages:

- * target beliefs--e.g., military aircraft don't belong in the preserve,
- * develop the structure of the message so the arguments are supported by factual evidence--e.g., the navy has had a base in the area since before Ebey's Landing became in NPS unit in 1978(?). Innovation in the military technology that protects our country has advanced. Are other advancements that have changed the park, visitor experience?
- * consider the specific characteristics of the audience--e.g., where are they coming from, what is their experience with the military, what is the experience they are expecting at the park.

We are lucky enough to have Vicki point us to literature looking directly at overflights. I can look around for other supporting work, but this appears to be as close to the same situation as we are likely to find.



Let me know if there is any other way I can help.
Sara

Sara Melena

Communication Specialist
Office of Education and Outreach <<http://www1.nrintra.nps.gov/oco/>>

Natural Resource Stewardship & Science

National Park Service


Fort Collins, CO 80525


<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

----- Forwarded message -----

From: Ward, Vicki [REDACTED]
Date: Fri, Sep 21, 2018 at 2:39 PM
Subject: Re: Seeking research-informed basis for proposed mitigation measure
To: Melena, Sara [REDACTED]

Hi Sara,

Here's the study that was part of Derrick Taff's dissertation that includes a chapter about messaging on the acceptability of military aircraft in SEKI. Attached is a pdf of a wayside exhibit from DEVA that mentions the fighter jet training that happens over the park. I will bring you a paper copy of a visitor survey too.

Vicki L. Ward
Overflights Program Manager
Natural Sounds and Night Skies Division <<http://www.nps.gov/orgs/1050/index.htm>>

Natural Resource Stewardship and Science Directorate
National Park Service
[REDACTED]
Fort Collins, CO 80525
[REDACTED]

"Listening to the silence is probably one of the most profound experiences we can have in our everyday life." Anne Wilson Schaef

On Fri, Sep 21, 2018 at 9:24 AM Melena, Sara [REDACTED] >> wrote:

FYI. I am going to see what I can find about how communication can influence perceptions of an issue. I just wanted to let you know that they reached out.

Sara

Sara Melena

Communication Specialist
Office of Education and Outreach <<http://www1.nrintra.nps.gov/oeo/>>

Natural Resource Stewardship & Science

National Park Service

[REDACTED]
Fort Collins, CO 80525
[REDACTED]

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

----- Forwarded message -----

From: Zipp, Roy [REDACTED] >
Date: Thu, Sep 20, 2018 at 12:20 PM
Subject: Seeking research-informed basis for proposed mitigation measure
To: Sara Melena [REDACTED] > >

Hi Sara,

Charles Beall suggested you might be able to help.

The Reserve is working with the navy to find ways to mitigate extreme noise from naval overflights as summarized in the attached briefing statement and covered further in the attached letter.

One idea is to install interpretive media to explain why the navy is training here so the public understands why they are experiencing extreme noise in a rural, bucolic unit of the NPS.

The mitigation presumption is that if we provide education about an adverse issue, it may make perception of the issue less adverse for visitors and thus improve their experience. Are you aware of any scholarly articles or related literature that might inform this presumption?

Thanks, Roy

<<http://>>

Roy M. Zipp
Superintendent, National Park Service Operations
Ebey's Landing National Historical Reserve
Reuble Farmstead

[REDACTED]
Coupeville, Washington 98239
[REDACTED]

[REDACTED]
www.nps.gov/ebla <<http://www.nps.gov/ebla>>

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>



Death Valley National Park

Further east on Highway 190 is the dramatic sweep of the Panamint Valley and the Panamint Range. The 50-mile long Panamint Valley is part of a series of alternating and parallel north-south trending valleys and mountain ranges, known to geologists as the Basin and Range Geologic Province. Panamint Valley was part of 1.2 million acres added to Death Valley National Park in 1994.

SAFETY INFORMATION

- Do not rely on cell phone service in Death Valley. The coverage is extremely limited.
- Backcountry travelers are encouraged to stop at the visitor center for the latest weather and safety information, and to obtain a backcountry permit.
- Stay with your vehicle in the event of a breakdown.
- Carry plenty of water, especially during summer months.
- Stay on the established roads.
- Maintain at least a half tank of gasoline.
- Check your spare tire and tire-changing equipment.
- Flash floods can occur when heavy rain falls over higher elevations. It is best to stay out of canyon washes when thunderstorms threaten.
- No collecting, removing or disturbing natural features or historic artifacts.

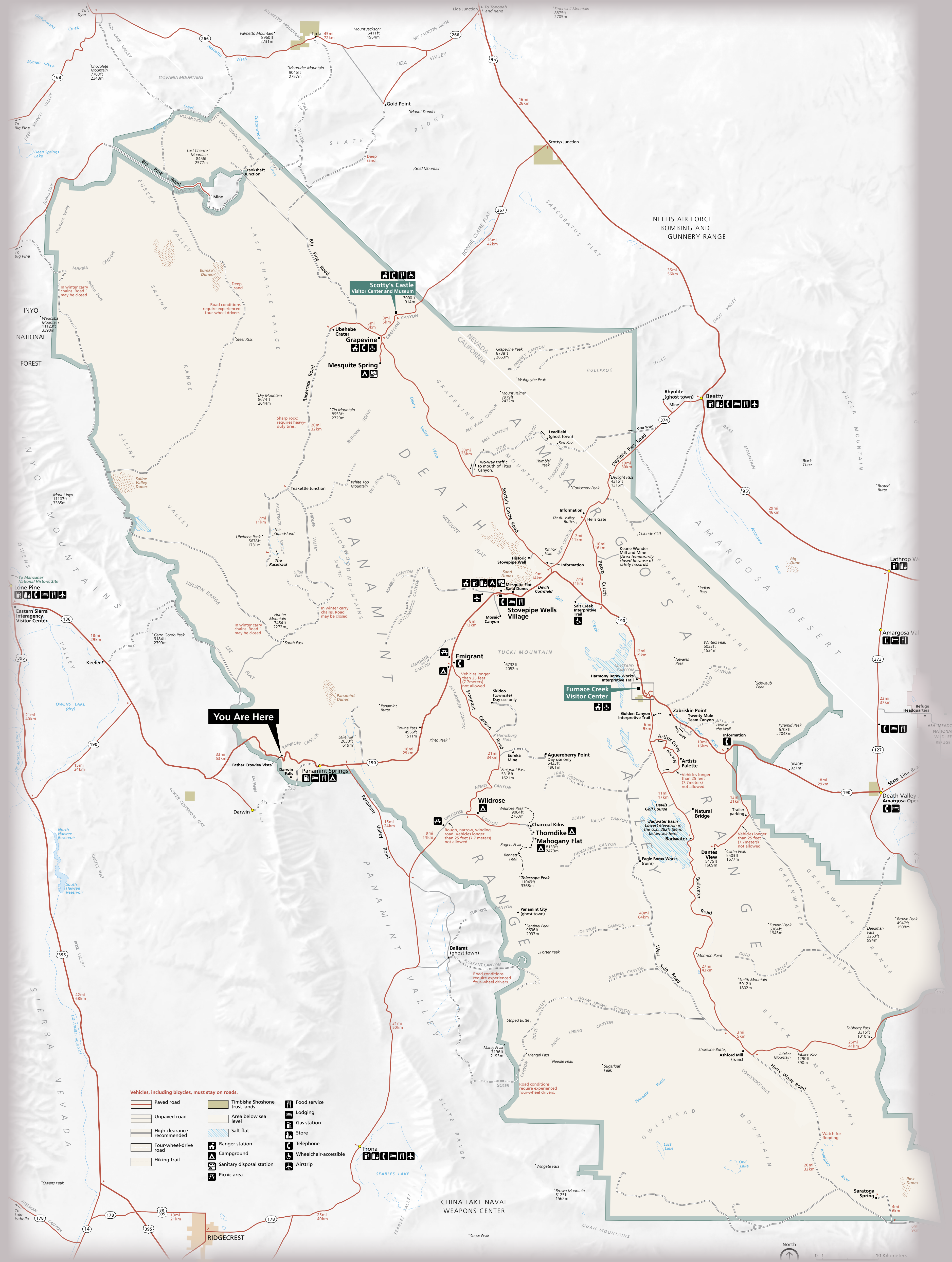


Darwin Falls—10.4 miles from here. Under an arbor of willow trees, the spring-fed creek in Darwin Canyon supports many flowering plants, including stream orchids. Darwin Falls, in the narrow portion of the canyon, is a favorite among hikers.

©GARY CRABBE/ENLIGHTENED IMAGES PHOTOGRAPHY



Lee Flat—14 miles from here. The deep layer of soil in Lee Flat hosts a forest of Joshua trees, marking the northern extension of the Mojave Desert. ©NPS



Do not be surprised to see low-flying military aircraft. The Panamint, Saline, and Eureka Valley portions of Death Valley National Park remain military training areas, continuing a historic use of the region for low-level flight training. Low-level flights are not allowed in other areas of the park.

©U.S. AIR FORCE/TECH. SGT. DEBBIE HERNANDEZ

DISSERTATION

MESSAGING AND NATIONAL PARK VISITOR ATTITUDES

Submitted by

Brendan Derrick Taff

Department of Human Dimensions of Natural Resources

In partial fulfillment of the requirements

For the Degree of Doctor of Philosophy

Colorado State University

Fort Collins, Colorado

Spring 2012

Doctoral Committee:

Advisor: Peter Newman

Alan Bright
William Timpson
Wade Vagias

Copyright by Brendan Derrick Taff 2012

All Rights Reserved

ABSTRACT

MESSAGING AND NATIONAL PARK VISITOR ATTITUDES

National Park Service annual visitation is approaching 300 million, and managers must balance internal stress, such as visitor use, and external stress, such as noise from aircraft overflights, while protecting resource and social conditions. Attitudes affect visitor perceptions of these influences, and largely determine behaviors via behavioral intentions. The purpose of this dissertation is to evaluate national park visitor attitudes, specifically in regard to Leave No Trace minimum impact practices, alternative transportation, and soundscapes, and to increase understanding of effective strategies, such as educational messaging, which can alter visitor attitudes, perceptions and behaviors.

This dissertation summarizes three studies and is presented as three journal articles suitable for submission to tier one or two journals. It begins by describing the origins of visitor capacity in national parks, and the associated frameworks and theoretical models that assess visitor perceptions and assist with the creation of effective messaging. The Theory of Planned Behavior and the Elaboration Likelihood Model are introduced as pertinent frameworks to the development of effective messaging which can alter visitor attitudes and perceptions. Chapters two and three present studies which evaluated visitor attitudes in NPS units, and chapter four builds upon this understanding by testing theoretically-based messaging with park visitors to determine if messaging can alter perceptions. Chapter five connects these studies by discussing how messaging can be applied in parks to alter visitor attitudes, perceptions and behaviors, while suggesting implications of the results and recommendations for future research.

Study one investigates day-user and backcountry-overnight visitor attitudes concerning Leave No Trace at Rocky Mountain and Olympic National Parks. Leave No Trace is the most prominent educational message used to influence behaviors of protected-areas visitors with the end-goal of sustaining or improving resource conditions. The majority of previous research regarding Leave No Trace has focused on backcountry-overnight visitors. However, day-users are by far the largest user group of protected areas, and yet, research focused on this large and growing segment of users has been neglected. The purpose of this study was to enhance understanding of day-user knowledge, awareness and perceptions, and attitudes regarding Leave No Trace and compare them with those of overnight users. Greater understanding of the similarities and differences between these two user-groups is essential so that management can improve efficacy and create effective messaging strategies that alter behaviors and curb depreciative actions.

Study two examines visitor attitudes toward alternative transportation systems in Rocky Mountain and Yosemite National Parks. The National Park Service is increasingly using alternative transportation to accommodate escalating visitation, while reducing the reliance upon personal vehicles that have attributed to resource and social condition impacts. Understanding of visitor perceptions of alternative transportation is vital for managers so that they may develop effective management strategies, frameworks, and messaging concerning alternative transportation use, yet little is known about visitor attitudes toward these systems. The purpose of this study was to examine visitor attitudes toward the alternative transportation experience and to determine salient

variables that can be applied to user capacity frameworks, communication strategies, and park planning.

Study three explores the role of educational messaging on visitor perceptions of military aircraft sounds in Sequoia National Park. Mandates require that the National Park Service protect natural soundscape, and research suggests that opportunities to experience natural sounds are among the most important reasons for visiting parks. Aircraft overflights are a significant source of anthropogenic noise intrusion in parks, and studies suggest that visitors frequently find these events annoying and unacceptable. The National Park Service must integrate methods to mitigate these impacts, and the purpose of this study was to evaluate the role of educational messaging and to determine if this information can significantly affect visitor acceptability of military aircraft sounds by altering visitor expectations.

ACKNOWLEDGMENTS

I would like to thank my advisor, Peter Newman, and committee members, Alan Bright, William Timpson, and Wade Vagias for their guidance and support throughout this process. Your assistance with ideas, analyses, implications, and word-smithing were invaluable. Peter, I thank you for the innovative and exciting projects of which you have allowed me to be a part. Despite living only one block from me, and responding to my questions via phone and email at all hours of the day, you have remained patient and light-hearted throughout the past three years. Thank you for that, as I needed it. I would also like to thank my colleagues within the Natural Resources College, and those graduate students under the guidance of Peter Newman. The friendships I have developed over the past three years have meant as much to me as completing this dissertation. Thank you for the camaraderie developed through countless hours spent in the classrooms, computer labs, study sessions, and general therapeutic discussions about life. I would also like to acknowledge the staff at Rocky Mountain and Sequoia National Parks for the assistance with logistics and housing throughout four seasons of field research. I also thank the staff at the Leave No Trace Center for Outdoor Ethics for the tremendous advice and enthusiasm that excited and encouraged me to conduct this research. A tremendous thank you goes to Jim Caretti for inspiring me, and challenging me to explore our natural world. Without his passion for national parks, I would never have found mine. I owe the greatest thanks of all to my family, to whom I dedicate this dissertation.

DEDICATION

I would like to dedicate this dissertation to my family. My wife, Patricia, my dog, Yoshi, and my parents, have supported me with this endeavor through both the good and bad days and nights, and I want you to know that I could not have done this without you. Patricia, your patience, love, compassion, and of course, monetary support have been vital to my success. I know you are as relieved for me to have finished this process as I am, and I appreciate all of the sacrifices you have made to contribute to my success. I love you. Mom and Dad, both of you are teachers, and I believe you instilled that passion for learning and teaching in me. You've made countless trips across the country to see us and support me, while I worked to complete this process. I cannot thank you enough for your love, encouragement and general life-decision suggestions and discussions. I am proud to be your son, and proud to have you as my parents. I love and appreciate you more than you'll ever know. My loving family, I honestly feel as if we have completed this dissertation together.

TABLE OF CONTENTS

ABSTRACT..... **ii**

ACKNOWLEDGMENTS **v**

DEDICATION **vi**

CHAPTER 1 **1**

Informing Park Management with Social Science..... **1**

Introduction..... **1**

User Capacity **2**

Figure 1.1: VERP User Capacity Decision-Making Framework..... 4

Indicators and Standards..... **4**

Figure 1.2: Hypothetical Social Norm Curve (concept adapted from Manning, 2007) 6

Direct and Indirect Management..... **6**

Theory **7**

Theories of Reasoned Action and Planned Behavior **7**

Figure 1.3: The Theory of Planned Behavior (Ajzen, 1991) 9

Elaboration Likelihood Model..... **10**

Figure 1.4: Elaboration Likelihood Model (Petty & Cacioppo, 1986) 11

Leave No Trace **14**

Figure 1.5: Leave No Trace Principles 16

LNT-Related Social Science Research..... **16**

Alternative Transportation Systems **21**

ATS-related Social Science Research **23**

Soundscape Management..... **25**

CHAPTER II..... **31**

Comparing Day-users’ and Overnight Visitors’ Attitudes Concerning Leave No Trace..... **31**

Introduction..... **31**

Leave No Trace **32**

Theoretical Basis **33**

Previous Research, Knowledge, Awareness, and Attitudes **33**

Methods..... **35**

Study Areas **35**

Survey Administration..... **35**

Item Measurement..... **36**

Data Analyses **37**

Results **37**

Visitor Characteristics **37**

Perceived Knowledge of LNT **38**

 Table 2.1 38

 Self-Perceived Knowledge of LNT Practices – ONP (Backcountry-overnight visitors) and RMNP (Day-users) 38

<i>Awareness and Global Perceptions of LNT</i>	38
Table 2.2	40
Comparison of ONP (Backcountry-overnight visitors) and RMNP (Day-users)	
Awareness and Global Support of LNT.....	40
<i>Attitudes Regarding LNT Principles</i>	40
Table 2.3	42
Comparison of ONP (Backcountry-overnight visitors) and RMNP (Day-users)	
Attitudes Regarding LNT Practices	42
Discussion	42
<i>Study Limitations and Future Research</i>	45
Conclusion	46
CHAPTER III	48
Attitudes toward Alternative Transportation Systems in Yosemite and Rocky	
Mountain National Parks	48
Introduction	48
<i>National Parks' History with Personal Automobiles</i>	50
Theoretical Basis	51
<i>Visitor Attitudes toward ATS</i>	51
<i>ATS Management Frameworks</i>	53
<i>YOSE and RMNP ATS</i>	53
Methods	56
<i>Study Areas and Survey Administration</i>	56
<i>Item Measurement</i>	57
Table 3.1	58
YOSE and RMNP ATS-Related Attitude Variables	58
<i>Data Analyses</i>	58
Results	61
<i>Visitor Characteristics</i>	61
<i>Exploratory Factor Analysis Results</i>	61
Table 3.2	62
Exploratory Factor Analysis Demonstrating Similar Factor Loadings between YOSE	
and RMNP	62
<i>Confirmatory Factor Analysis Results</i>	62
<i>Figure 3.1: YOSE Confirmatory Factor Analysis Model</i>	63
<i>Figure 3.2: RMNP Confirmatory Factor Analysis Model</i>	64
<i>Figure 3.3: YOSE and RMNP Configural Invariance Model</i>	65
<i>Figure 3.4: YOSE and RMNP Metric Invariance Model</i>	66
Table 3.3	66
Chi-square Difference Test between Configural and Metric Invariance Models	66
Discussion	67
<i>Figure 3.5: Example ATS Park Report Card</i>	69
<i>Study Limitations and Future Research</i>	71
Conclusion	73
CHAPTER IV	75

The Role of Messaging on Acceptability of Military Aircraft in Sequoia National Park	75
Introduction.....	75
<i>Soundscape Management – Indicators and Standards</i>	<i>76</i>
<i>Soundscape Management – Educational Messaging.....</i>	<i>78</i>
Theoretical Basis	81
<i>Elaboration Likelihood Model.....</i>	<i>81</i>
<i>Argument Strength</i>	<i>82</i>
Methods.....	83
<i>Elicitation Study.....</i>	<i>84</i>
<i>Study Area.....</i>	<i>84</i>
<i>Survey Administration.....</i>	<i>85</i>
<i>Item Measurement.....</i>	<i>85</i>
<i>Military Aircraft Soundclips</i>	<i>86</i>
<i>Data Analyses</i>	<i>86</i>
Results	87
<i>Primed versus Unprimed</i>	<i>87</i>
Table 4.1	88
Comparison of Primed (Respondents notified of military aircraft presence through messaging) and Unprimed (Respondents not informed of military aircraft presence) visitors at Sequoia National Park.....	88
<i>Soundclip Acceptability</i>	<i>88</i>
<i>Figure 4.1: Plotted trend comparing primed and unprimed respondent acceptability of military aircraft soundclips</i>	<i>89</i>
Discussion	89
<i>Limitations and Future Research.....</i>	<i>91</i>
Conclusion	93
CHAPTER V	95
The Value of Messaging for Park Management.....	95
Summary of Findings	95
<i>LNT Results Summary.....</i>	<i>95</i>
<i>LNT Implications</i>	<i>96</i>
<i>ATS Results Summary</i>	<i>98</i>
<i>ATS Implications</i>	<i>98</i>
Table 5.1	99
Potential ATS Messaging Incorporating Variables Pertaining to “Ease,” “Freedom,” and “Stress”.....	99
<i>Soundscape Messaging Results Summary</i>	<i>101</i>
<i>Soundscape Messaging Implications</i>	<i>101</i>
<i>Limitations and Future Research.....</i>	<i>102</i>
Management Principles	104
· Managing visitor use, requires that we understand visitors.	105
· Visitor attitudes inform messaging strategies.	105
· Messaging can alter visitor perspectives to align with management objectives.	105
· Messaging can improve the quality of visitor experiences.	106

REFERENCES.....	107
APPENDIX A.....	125
APPENDIX B.....	130
APPENDIX C.....	137
APPENDIX D.....	140
APPENDIX E.....	147

CHAPTER 1

Informing Park Management with Social Science

Introduction

National Park Service (NPS) must adhere to dual mandates that require the protection of natural and cultural resources, as well as preserving the enjoyment of those resources (NPS Organic Act, 1919), while accommodating increasing visitation. This balancing act requires the NPS to manage internal factors, such as escalating visitor use, and external influences, such as noise from aircraft overflights, while maintaining resource and social conditions. Visitor use is often managed under the premise of user capacity, and relies upon finding symmetry between visitor use and resource protection. User capacities rely on frameworks, which set in motion efforts to monitor changes to resource and social conditions, and take management actions as needed to mitigate impacts. Capacities can change depending upon how visitors behave, and behaviors are largely guided by visitor attitudes toward the action in question. Managers apply either direct or indirect management to alter visitor behaviors. Direct management relies upon enforcement of rules and regulations, while indirect management applies information, education, and persuasion techniques to influence visitor behavior. Indirect management in the form of educational messaging is one approach that can be implemented to change visitor attitudes, perceptions and evaluations. The purpose of this dissertation is to evaluate visitor attitudes toward a number of variables (each one addressed by different studies) and to increase understanding of the potential for managing visitor perceptions with educational messaging. This chapter introduces the concept of user capacity, and

the frameworks and theories that assist park managers in protecting and preserving park resources and visitor experiences.

The Theory of Planned Behavior and the Elaboration Likelihood Model are introduced as pertinent frameworks to the development of effective messaging which can alter visitor attitudes and perceptions. Finally, background information and relevant research concerning Leave No Trace, alternative transportation systems, and soundscape management in parks are introduced, which will be discussed through individual studies within chapters two, three and four.

User Capacity

Parks and protected areas have experienced rapid increases in visitation since the end of World War II. While this trend has moderated over the past decade, statistics suggest that visitation is again elevating, with nearly 300 million visitors to National Park Service (NPS) units alone within the past couple of years (NPS Statistics 2011). It is recognized that with even low-levels of use, resource degradation occurs (Hammit & Cole, 1998; Leung & Marion, 2000), and intensive park visitation can cause severe ecological impacts like soil compaction and erosion, water pollution, and wildlife disturbances, and can produce social impacts like crowding, conflict and aesthetic degradation, as well as changes to the managerial environment (Manning, 2007). These issues have been examined within the fields of recreation ecology and natural resource social science through the concept of carrying, or user capacity. There are three dimensions of user capacity that must be considered including the features of the resource (e.g., the ecological characteristics), the managerial components of the resource (e.g., the directives and policies that determine infrastructure), and the experiential factors

associated with visitors (e.g., the social aspects such as motivations, expectations and the amounts of use) (Manning, 2007).

The NPS defines user capacity as “the type and extent of use that can be accommodated while sustaining the quality of park resources and visitor opportunities consistent with the purposes of the park” and suggests that this is accomplished by following a capacity framework (NPS Planning Sourcebook – Visitor Use, 2006). A total of ten user-capacity frameworks were created and implemented in the 1980s and 1990s to address user capacity in parks and protected areas (Haas, 2004). Manning (2007) provides several examples including the Visitor Impact Management (VIM) (Graefe, Kuss, & Vaske, 1990), the Outdoor Recreation Management Framework (Manning, 1999), the Carrying Capacity Assessment Process (C-CAP) (Shelby & Heberlein, 1986), and the Visitor Activity Management Process (VAMP) (Environment Canada and Park Service, 1991), all of which vary slightly depending upon the governing agency, and are considered to have similar foundations and guiding principles (Whittaker, Shelby, Manning, Cole, & Haas, 2011). Limits of Acceptable Change (LAC) and Visitor Experience and Resource Protection (VERP), which was an adaptation of the LAC process, (National Park Service, 1997) are two of the most widely-applied frameworks and have very similar steps and elements (Manning, 2007). LAC (Stankey et al., 1985) was implemented in the Bob Marshall Wilderness in the late 1980s in an effort to curb resource impacts and meet user-capacity mandates set forth by the 1976 National Forest Management Act (NFMA) (Cole & Stankey, 1997). VERP (Manning, 2001; National Park Service, 1997) was applied in NPS units, the first of which was Arches National Park, and is still used to guide user capacity processes in park units today. The VERP

framework relies upon the identification of specific indicators and standards, the development of an ensuing monitoring strategy, and the identification of an appropriate management action if standards are reached or exceeded (Figure 1.1) (Manning, 2001; National Park Service, 1997). This process relies heavily upon science to assist in appropriately identifying indicators and standards.

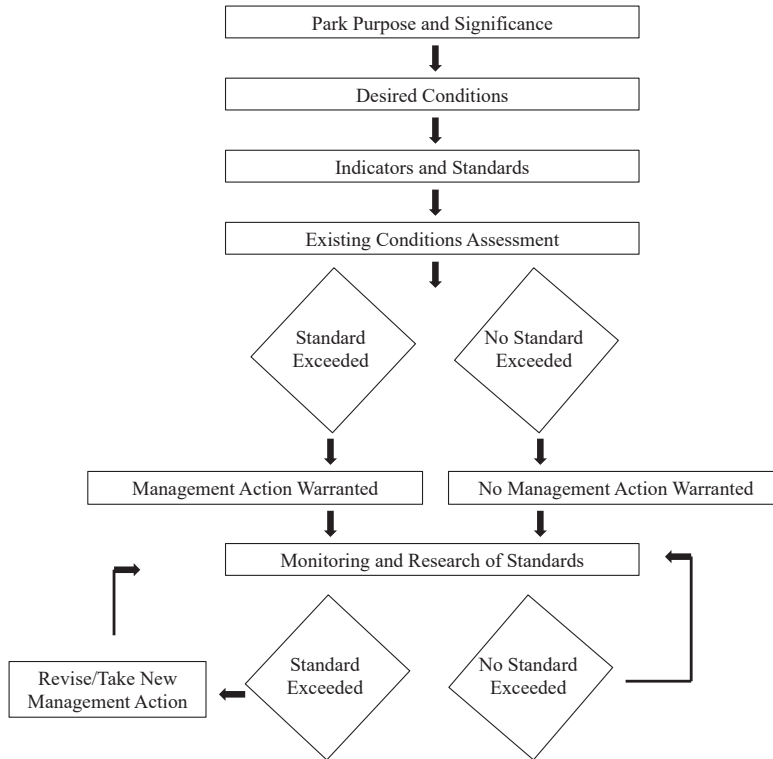


Figure 1.1: VERP User Capacity Decision-Making Framework

Indicators and Standards

The user capacity process requires that managers determine how much change should be allowed within the environmental resources, recreation experiences and the resulting management actions. The social aspects of user capacity rely upon the concept of quality, as it pertains to the condition of the visitor experience. The level of quality is based on the identification of specific indicators and standards, the development of an ensuing monitoring strategy, and the identification of appropriate management actions if

standards are reached or exceeded. This process is determined by evaluating descriptive (focusing exclusively on unbiased data) and evaluative (subjective measure) components of visitor experiences, so that management objectives (desired conditions) and ensuing indicators and standards of quality can be established (Manning, 2007). Indicators are “quantifiable proxies or measures of management objectives” while standards, “define the minimum acceptable condition of indicator variables” (Manning, 2007, p. 23). For example, if an indicator was determined to be the number of social trails experienced per mile, and the number of encounters exceeded the established standard, 3 trails per mile for instance, the quality of a visitor’s experience may be depreciated.

Standards are typically evaluated in user capacity research by addressing visitors’ norms concerning a given issue. Norms are useful for establishing management goals by defining the attributes in a preferred recreation area (Shelby, Vaske, Donnelly, 1996). This can be evaluated through the social norm curve (Figure 1.2), which is frequently examined by determining “acceptability” of a given issue, (e.g. social trails), based on a 9-point acceptability scale. The highest point on the curve represents the preferred condition, and the amplitude of the curve indicates the salience of the norm (Manning, 2007). The point at which the curve of any given normative measure (e.g., visitor behaviors, ecological impact, people at one time, natural and anthropogenic sound levels) drops below the 0 point on the y-axis, it is perceived as unacceptable. While managers may not care about each individual’s standard, crystallization can inform managers about the level of agreement or consensus about the norm (Manning, 2007).

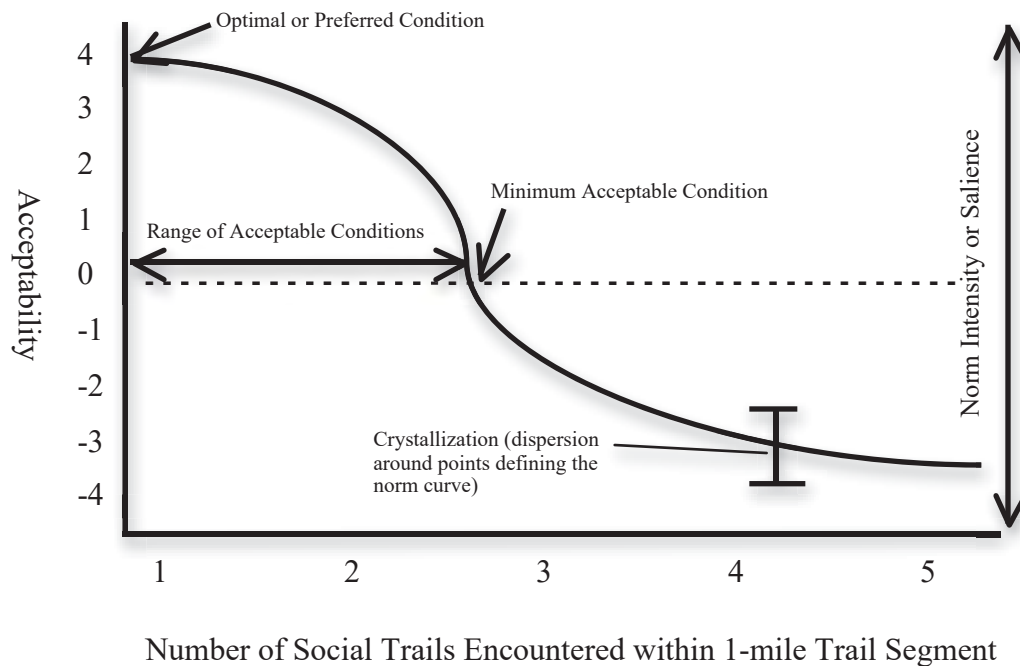


Figure 1.2: Hypothetical Social Norm Curve (concept adapted from Manning, 2007)

If standards are reached or exceeded, adaptive management actions may need to be implemented to maximize visitor experiences while minimizing resource impacts. Recreational user capacity processes have evolved and developed due to environmental planning, legal proceedings, management practices, and recreation research related to visitor capacities (Whittaker et al., 2011), and rely heavily upon indirect and direct management strategies to preserve and protect resource and social conditions.

Direct and Indirect Management

As part of the user capacity framework, monitoring and management actions are implemented if standards are reached or exceeded. Park managers can apply either direct or indirect management to address impacts. Direct management relies upon enforcement of rules and regulations, while indirect management applies information, education, and persuasion techniques to influence visitor behavior. While both forms of management

can be beneficial, indirect management is often preferred because it allows visitors the freedom to choose their actions (Lucas, 1982, 1983; Hammit & Cole, 1998; Hende & Dawson, 2002; Manning, 2007; Marion & Reid, 2007). Educational messaging is a prominent form of indirect management that can affect visitor perceptions and actions in various ways (Manning, 2003), from curbing depreciative behaviors to influencing visitor attitudes and evaluations of park settings. However, educational messaging cannot be effective without determining how visitors perceive the attributes of their experience.

Theory

Theory aids in understanding cognitive behavioral processing and provides foundations for structuring research which assists in formulating messaging that can influence attitudes, perceptions and behaviors.

The research described within this dissertation applied the Theory of Planned Behavior (TPB) (Ajzen, 1985; 1991) and the Elaboration Likelihood Model (ELM) (Petty & Cacioppo, 1981; 1986) in order to better understand visitor attitudes pertaining to Leave No Trace, alternative transportation systems, and military aircraft sounds. Ultimately, the goal is to improve understanding of effective messaging strategies that could be applied within a national park setting.

Theories of Reasoned Action and Planned Behavior

The Theory of Planned Behavior (TPB) (Ajzen, 1985; 1991) can be considered as a continuation of its predecessor, the Theory of Reasoned Action (TRA) (Fishbein & Ajzen, 1975). The TPB and TRA suggest that an individual's behavior is largely predicated upon the individual's intention to engage in that behavior. The TRA posits that behavioral intention is dependent upon an individual's attitude and subjective norms

concerning the behavior in question (Ajzen & Fishbein, 1980). An ‘attitude’ is the “psychological tendency that is expressed by evaluating a particular entity with some degree of favor or disfavor” (Eagly & Chaiken, 1993, p. 1). Subjective norms refer to an individual’s perception of how others feel about the behavior in question. The TRA suggests that attitudes are predicated upon an individual’s behavioral beliefs (i.e., salient beliefs relevant to the behavior) and evaluations of the outcome of a given behavior, while subjective norms are determined by an individual’s normative beliefs (i.e., perceptions of how others feel about the behavior) and the motivation to comply with the perceived evaluations of others. Ham (2007) clarifies that “attitudes are not the same as beliefs” because a “belief describes what ‘is’, an attitude describes what a person feels about it, whether it’s good or bad, right or wrong, positive or negative” (2007, p. 2).

The TPB was developed as an extension to TRA “made necessary by the original model’s limitations in dealing with behaviors over which people have incomplete volitional control” (Ajzen, 1991, p. 181). Building upon TRA, in addition to an individual’s attitudes and subjective norms, TPB adds the element of perceived behavioral control as another determinant of behavioral intention (Figure 1.3). Perceived behavioral control is an individual’s perception concerning their ability to perform a given behavior (Ajzen, 1991). Perceived behavioral control can also be thought of as an individual’s perception of ease or difficulty with regard to a particular behavior (Eagly & Chaiken, 1993). To provide applicable understanding of TPB, to assess a visitor’s attitude, a social scientist may ask a park visitor how appropriate or inappropriate it would be to approach wildlife to take a photo. Evaluation of a visitor’s subjective norm may be determined by asking what a visitor feels others would think if they were to

approach wildlife to take a photo. Perceived behavioral control may be evaluated by asking a visitor the level of control they have over their actions while hiking in a park.

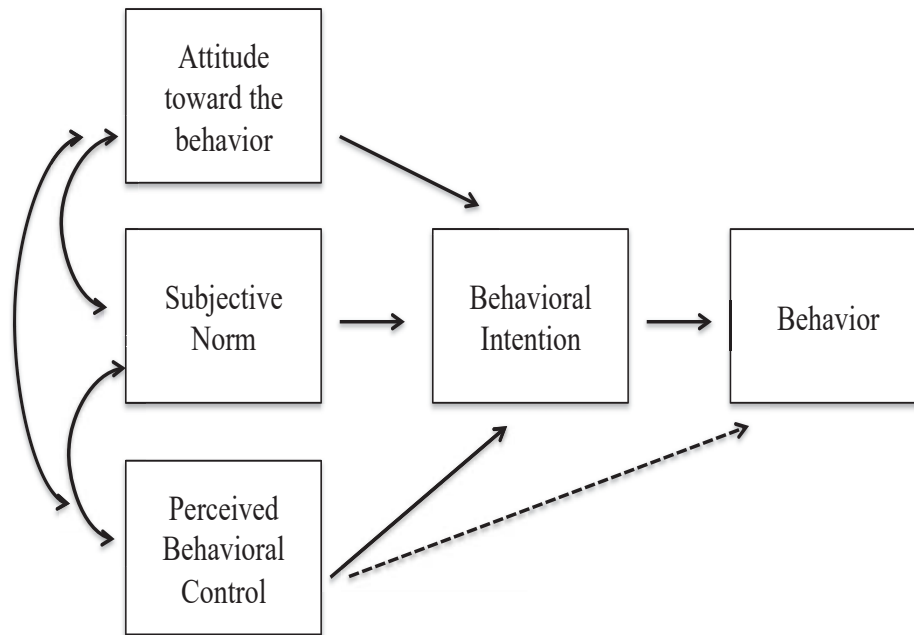


Figure 1.3: *The Theory of Planned Behavior (Ajzen, 1991)*

While the TPB has been useful for numerous recreation-related studies, critics of the theory have pointed out its inability to consistently predict and explain behaviors, and suggest that perceived behavioral control is only causal to intentions when behaviors are perceived positively (Hale, Householder, & Greene, 2002). That is, if an individual negatively perceives a behavior, yet still feels as though they have control over it, they may not intend to follow through with the behavior in question. For the purposes of this dissertation, the strength of the TPB lies in its ability to target an individual's beliefs and attitudes, with which persuasive messages can be formulated that are aimed at changing behavioral intent (Ham & Krumpal, 1996).

Elaboration Likelihood Model

The Elaboration Likelihood Model (ELM) (Petty & Cacioppo, 1981; 1986) is one of the most prominent theoretical models applied to influence visitors in parks and protected areas (Absher & Bright, 2004), and has been applied to evaluate the effect of information on attitudes in numerous natural resources-based studies (Bright, Teel, Manfredo, & Brooks, 2003; Manfredo & Bright, 1991; Tarrant, Bright, & Cordell, 1996; Teel, Bright, Manfredo, & Brooks, 2006). The model postulates that there are two routes to persuasion: the central, which likely occurs through thoughtful, motivated consideration of information, and the peripheral, which induces change without perusal of information (Petty & Cacioppo, 1986). The model focuses upon the processes by which message features influence attitudes (Booth-Butterfield & Welbourne, 2002) by better understanding the level of elaboration (i.e., extent to which a message is scrutinized) that a particular communication strategy has upon an individual (Petty & Cacioppo, 1986). Perhaps most importantly, altered attitudes stemming mostly from “processing-issue-relevant arguments (central route) will show greater temporal persistence, greater prediction of behavior, and greater resistance to counter-persuasion than attitude changes that result mostly from peripheral cues” (Petty & Cacioppo, p. 21, 1986). Figure 1.4 demonstrates the potential persuasion processes that can occur after exposure to messaging.

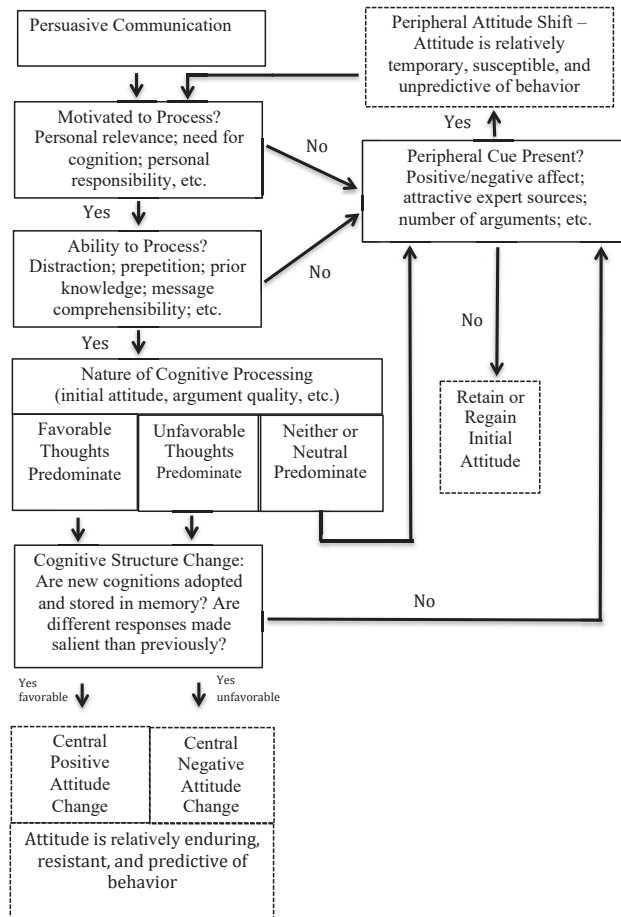


Figure 1.4: Elaboration Likelihood Model (Petty & Cacioppo, 1986)

The model suggests that there are several factors that influence persuasion, and over the past three decades, numerous studies have advanced understanding of these postulates. These factors involve the recipient and the argument or message, and include a) motivation, b) variations in elaboration, c) how variable variation affects attitudes, d) relatively objective message processing, e) relatively biased message processing, f) elaboration versus peripheral cues, and g) consequences of elaboration (Petty & Cacioppo, 1986). Variable variation can influence attitudes through strong or persuasive arguments, which target an individual’s intuitive feeling toward a particular position through peripheral cues, subsidiary signals, and through actual elaboration, which affects

motivation (Eagly & Chaiken, 1993; Petty & Cacioppo, 1986). If a recipient is processing through central route, either objective reasoning or biased processing takes place, which can be affected by cognitive factors. Through objective reasoning, an individual considers the message in an impartial or unbiased manner (Petty & Cacioppo, 1986), while biased processing, which can result in purposeful counter-persuasion, is most likely to occur when an individual has vested interest in the information topic (Booth-Butterfield & Welbourne, 2002; Perloff, 2003; Petty & Wegener, 1999).

Educational communication strategies in parks often rely on central route processing (Marion & Reid, 2007), but situational and personal variables like motivation, message relevancy, potential distractions, ability, previous experiences, and knowledge all affect the level of elaboration, and determine whether central or peripheral processes occur (Booth-Butterfield & Welbourne, 2002; Perloff, 2003; Petty & Cacioppo, 1986). It is unrealistic to motivate central processing within every visitor, because it is “inevitable that people will rely on mental shortcuts” and instead process through peripheral route (Perloff, 2003, p. 129). Therefore, effective messaging design requires consideration of variables that are thought to enhance and motivate understanding such as personal relevance, personal responsibility, the number of messages, and message sources (Petty & Cacioppo, 1986), while also considering factors that may inhibit attitude change. For example, Manfreda & Bright (1991) found that elaboration was affected by source credibility (i.e., information from the United States Forest Service) and also determined that respondent’s prior knowledge had a strong effect on elaboration and acquisition of new beliefs. While interpretive strategists cannot always reach visitors due to situational and personal variables, developing messages that are strong and impactful, by making

them relevant to the visitor (Ham, 2007; Ham et al., 2009), may lead to more central route processing.

Strong messages, or messages that contain substantial argument quality, can stimulate and enhance elaboration (Petty & Cacioppo, 1986; Petty & Wegener, 1998; Wood, 2000). Strong messages provide relevant, reasonable, quality information that can be used to influence attitudes. Alternatively, weak messages lack argument strength and therefore are not as effective in triggering elaboration or altering attitudes (Petty and Cacioppo, 1986; Petty & Wegener, 2008). Attitudes that align or *match* with presented information are thought to be strengthened with strong arguments, while recipient attitudes that *mismatch* may not change if the message does not have the strength to stimulate elaboration (Petty & Wegener, 2008; Lavine & Snyder, 1996; Wood, 2000; Ziegler, Dobre, & Diehl, 2007). Furthermore, framing arguments to trigger recipient values or goals increases elaboration potential, and the likelihood of attitude change (Wood, 2000).

The model has been criticized for not specifying if central and peripheral processing can act concurrently (Eagly & Chaiken, 1993; Todorov, Chaiken, & Henderson, 2002), and for not providing a deeper level of understanding concerning argument construction; instead, the model relies upon the researcher to explore attitudinal arguments based upon argument quality and strength of persuasion (Booth-Butterfield & Welbourne, 2002). For the purposes of this dissertation, ELM imparts a foundational understanding of how messages are received and processed, and therefore provides guidance in message construction. By applying both the TPB and ELM, we can strengthen the effectiveness of a given persuasion strategy (Ham et al., 2009). Use of

TPB can direct us toward the most effective message content (based on salient beliefs and attitudes), while ELM can aid in determining a strategy that will give messages impact.

The following sections of this chapter provide background information concerning Leave No Trace (LNT), alternative transportation systems (ATS) in national parks, and soundscape management. This information can assist park managers with the user capacity process, particularly through indirect management in the form of theoretically-driven educational messaging.

Leave No Trace

Protected areas received dramatic increases in visitation during the 1960s which led to a greater awareness of resource and social impacts, resulting in the development of several indirect management-based educational campaigns such as “Wilderness Manners,” “Pack it in – Pack it out,” “Wilderness Ethics,” “Minimum Impact Camping,” and “No-Trace Camping” (Marion & Reid, 2001). Jim Bradley’s (1979) influential paper further encouraged these efforts by suggesting that a purely regulatory approach in managing recreation impacts antagonized visitors rather than gaining their support, because most impacts were the result of lack of knowledge, not malicious intent. Instead, he advocated that educational approaches would be more effective and appropriate, because regulation could not occur everywhere at all times (Bradley, 1979; Marion & Reid, 2001). This acknowledgement that educational programs would better serve the purpose of reducing impact, led to a more formalized “No-Trace” program in the early 1980s, followed by an interagency collaborative effort in 1987 between the U.S. Forest Service (USFS), the NPS, and the Bureau of Land Management (BLM), to develop and

distribute an educational pamphlet titled “Leave No Trace Land Ethics” (Marion & Reid, 2001).

The USFS formed a partnership with the National Outdoor Leadership School (NOLS) in 1991 and began implementing a science-based approach to evaluating minimum-impact recreation through the field of recreation ecology, which focuses upon the impacts recreational activities have on the ecological aspects of our natural resources (Hammit & Cole, 1998; Cole, 2004; Leung & Marion, 2000; Monz, Cole, Leung & Marion, 2010). This collaboration led to the development of programmatic ethics and experiential training efforts, which increased the effectiveness, and improved awareness of the Leave No Trace (LNT) campaign (Marion & Reid, 2001). In 1994, a new memorandum of understanding was signed between the USFS, NPS, BLM and NOLS with the focused mission of LNT becoming a nationally-recognized minimum-impact educational campaign aimed at educating wildland visitors with science-based materials and courses (Marion & Reid, 2001). Also in 1994, with the support of the partnering federal lands agencies and outdoor retailers, LNT became a registered nonprofit organization, which is now known as the Leave No Trace Center for Outdoor Ethics. The LNT Center now promotes stewardship-based ethics through various educational initiatives in federal, state, city, county and international protected areas. The seven Principles, (Figure 1.5) which the organization promotes, can be seen in most protected areas trailhead signage and promotional materials.



Figure 1.5: Leave No Trace Principles

LNT-Related Social Science Research

The field of recreation ecology is largely responsible for establishing and assisting with the development of the LNT program. This field of study has dominated most minimum-impact research, and reviews suggest that there have been over one thousand recreation ecology articles published within recent decades (Monz, et al., 2010). However, natural resources social science, which focuses on the sociological, psychological, cultural and economic aspects of the recreationists, (Ewert, 1996) is relatively scant with regard to LNT-related research. The majority of social science research related to LNT has evaluated educational efficacy through various communication strategies in an effort to increase knowledge and influence behavioral change (Marion & Reid, 2007).

In order for the LNT Center to successfully instill an ethic of stewardship among visitors, the LNT message must be effectively disseminated. Previous research has applied and evaluated various forms of media for message dissemination (Marion & Reid, 2007), and effectiveness has varied depending upon the message source, audience

and content. Trailhead bulletins, posters, trail-side signs, and signs near the potentially problematic area have been found to be advantageous (Cole, Hammond, & McCool, & 1997; Duncan & Martin, 2002; Hockett, 2000; Hockett & Hall, 2007; Jacobi, 2003; Johnson & Swearington, 1992; Martin, 1992; Stewart et al., 2000; Stubbs, 1991; Thorn, 1995; Widman, 2010; Winder & Roggenbuck, 2000; Winter, 2006), while informational brochures and guidebooks, (Huffman & Williams, 1987; Lackey & Ham, 2003; Manfredo & Bright, 1991; Martin, 1992; McAvoy & Hamborg, 1984; Oliver, Roggenbuck, & Watson, 1985) and interpretive displays or exhibits (Fazio, 1979) have also proven to be effective forms of communication. Personal contact, whether from a park employee, uniformed volunteer, other visitor, or interpretive skit have also proven to be beneficial (Fazio, 1979; Hendricks, 1999; Hendricks, Ramthun, & Chavez, 2001; Kernan & Drogin, 1995; Oliver, et al., 1985; Stewart, et al., 2000; Widner & Roggenbuck, 2000).

Regardless of the approach, it has been suggested that delivery of the message should be clear and concise, occur early in the visitor's planning process, (Cole, et al., 1997; Douchette & Cole, 1993; Lime & Lucas, 1977; Lucas, 1981; Roggenbuck & Berrier, 1982; Stewart et al., 2000) be reinforced and timely near potential problematic areas, (Hockett, 2000; Hockett & Hall, 2007; Widman, 2010; Widner & Roggenbuck, 2000) and not provide so much information that the receiver is overloaded (Cole et al., 1997). Messages should be based on theoretical frameworks (Manning, 2003; Marion Reid, 2007), should target salient beliefs and attitudes by making content relevant (Ham & Krumpke, 1996), and should strive to be contextually specific (Vagias, 2009). Generally, a range of media approaches is thought to be best (Ballantyne & Hughes,

2006; Manning, 2003; Marion & Reid, 2007). Although few studies have explored computer-based dissemination, (Griffin, 2004; Huffman & Williams, 1987; Newman, Lawson, & Monz, 2011; Powell, Wright, & Vagias, 2008; Vagias, 2009) in an age of Facebook, Twitter and other Internet communication forums, this remains a viable option for additional dissemination (Marion & Reid, 2007).

Most previous minimum-impact or LNT research has addressed acquisition of knowledge or current knowledge state (Cole et al., 1997; Confer, Mowen, Graefe, & Absher, 2000; Daniels & Marion, 2005; Dowell & McCool, 1986; Fazio, 1979; Jones, 1999; Jones & Bruyere, 2004; Leung & Attarian, 2003; McAvoy & Hamborg, 1984; McCool & Cole, 2000; Newman, Manning, Bacon, Graefe, & Kyle, 2003; Reuhrwein, 1998; Stewart, et al., 2000; Stubbs, 1991; Thorn, 1995; Vagias & Powell, 2010), behavioral intentions to comply with recommended behaviors, (Christensen & Cole, 2000; Dowell & McCool, 1986; Duncan & Martin, 2002, Hendricks, 1999; Stubbs, 1991; Trafimow & Borrie, 1999) behavioral change, (Ballantyne & Hughes, 2006; Cialdini et al., 2006; Daniels & Marion, 2005; Gramann & Vander Stoep, 1986; Hendricks et al., 2001; Hockett, 2000; Hockett & Hall, 2007; Johnson & Swearingen, 1992; Kernan & Drogin, 1995; Marion, Dvorak, & Manning, 2008; Martin, 1992; Mertz, 2002; Oliver et al., 1985; Park, Manning, Marion, Lawson, & Jacobi, 2008; Schwartzkopf, 1984; Stubbs, 1991; Vagias, 2009; Widman, 2010; Widner & Roggenbuck, 2000; 2003; Winter, 2006) and resource changes following intervention techniques (Jacobi, 2003; Oliver et al., 1985; Reid & Marion, 2004; Widman, 2010). Most previous research has shown that educational strategies have improved knowledge concerning minimum-impact practices, or have positively influenced behavioral intent and behaviors to comply with

recommended conduct. This suggests that LNT-related educational strategies are effective (Marion & Reid, 2007).

Despite numerous studies concerning depreciative behaviors, there is still a lack of understanding regarding the effectiveness of LNT. Very few of these previous studies specifically evaluated LNT, but instead focused upon minimum or low-impact behaviors. Many studies were atheoretical, and most evaluations focused on change in knowledge, without addressing a more systematic evaluation of LNT (Vagias, 2009). Studies that examine factors that limit compliance with recommended LNT practices have been nominal (David Cole, personal communication, 2/16/11; Cole et al., 1997; Harding, Borrie, & Cole, 2000; Marion & Reid, 2001; Miller, Borrie, & Harding, 2001), and most studies have only addressed backcountry wilderness visitors. Of particular concern, is the lack of research concerning day-users, which is currently the largest, and increasingly growing group of visitors (Chavez, 2000; Cole, Watson, & Roggenbuck, 1995; Hendee & Dawson, 2002; Outdoor Foundation Outdoor Participation Report, 2010; Papenfuse, Roggenbuck, & Hall, 2000; Reid, 2000; Roggenbuck & Lucas, 1987; Roggenbuck, Marion & Manning, 1994).

Leave No Trace principles and practices have become the most prominent method to encourage correct behavior and discourage depreciative behavior in these protected areas (Harmon, 1997; Marion & Reid, 2001; 2007; Vagias & Powell, 2010), but research focused on day-users has been largely neglected (Cole, 2001; Papenfuse et al., 2000; Roggenbuck et al., 1994). Studies that have addressed this user-group have either not focused specifically upon LNT, but instead upon minimum-impact practices and regulations for a specific area (Newman et al., 2003), or have evaluated only frontcountry

urban parks or open space visitors (Jones, 1999; Jones & Bruyere, 2004; Leung & Attarian, 2003; Mertz, 2002). The LNT Center and land managers must better understand day-user perceptions of LNT to effectively message and mitigate depreciative behaviors stemming from this growing user-group.

Understanding day-user perceptions of LNT requires determining visitors' level of knowledge and awareness of LNT, because if visitors do not understand or are not aware of recommended practices, they may unintentionally act unskillfully or inappropriately (Manning, 2003; 2007). In addition to these measures, social psychology has advanced understanding of human behavior and suggests attitudes also influence, and in many instances, are the primary determinant of behavioral intentions and actions (Ajzen, 1991; Ajzen & Fishbein, 1980; Fishbein & Manfredo, 1992; Ham, 2007; Ham & Krumpal, 1996). Vagias and Powell (2010) applied attitude theory to examine backcountry-overnight visitors' perceptions and support of LNT and to determine attitudes toward backcountry behaviors that corresponded with LNT Principles at Cumberland Island National Seashore, Glacier and Olympic National Parks. The authors also examined visitors' knowledge, awareness, and global perceptions of LNT. Results indicated that general perceptions of the LNT message were positive, a finding that suggests backcountry-overnight visitors are largely supportive of LNT, and should be supportive of future educational strategies aimed at this user-group. However, backcountry-overnight visitor attitudes toward specific recommended LNT practices varied between suggested behaviors. This incongruity between general perceptions of LNT and specific attitudes of LNT practices suggests that positive 'global' attitudes regarding the program did not necessarily equate to positive attitudes toward specific

LNT practices. These results also suggest that certain LNT practices were either not fully understood by the backcountry-overnight visitors or that there was a level of indifference regarding the recommendations.

The Vagias and Powell (2010) study provided greater understanding of backcountry-overnight visitors, but research concerning day-users with regard to LNT is deficient. Determining day-user knowledge, awareness and global perceptions, and attitudes toward LNT will provide understanding that can be applied to increase efficacy and improve effective messaging strategies, which can alter behaviors and better preserve resource conditions and visitor experiences. Chapter two explores these deficiencies within a manuscript format, by contrasting day-user knowledge, awareness and global perceptions, and attitudes toward LNT with those of backcountry-overnight visitors.

Alternative Transportation Systems

The NPS strives to accommodate high levels of visitor use and accompanying vehicle traffic, while protecting and preserving resource and social conditions. High levels of vehicle traffic have attributed to crowding on roadways and parking areas, resource impacts to vegetation and wildlife, safety issues, and air and noise pollution, which in some units have created an environment that aligns more with an urban setting, rather than the natural environment, and associated experiences prescribed through the NPS mission. However, personal automobiles have historically influenced development of park infrastructure and are an integral part of visitor experiences in national parks. The nearly simultaneous mass production of Henry Ford's Model T and the promotional influence of the National Park Service's first director, Stephen Mather, spawned tourism and construction of park roads and facilities in units across the nation. Most park roads

were designed and constructed to allow visitors to experience panoramic vistas overlooking iconic park features, all by way of personal vehicle, and in many parks today, the quality of the visitor experience relies upon these components (Turnbull, 2003). However, high visitation and the associated impacts personal vehicles inflict upon resource and social conditions have created the need for alternative transportation systems (ATS) to help alleviate the reliance upon the personal automobile (Dunning, 2005; Pettebone et al., 2011; Turnbull, 2003; White, 2007; White, Aquino, Budruk, & Golub, 2011).

Many national parks have implemented shuttle systems to help alleviate the reliance upon personal automobiles and mitigate the resource and social impacts associated with this type of transportation mode. Increased focus on ATS across a substantial number of NPS units has led to a greater need for improving the understanding of visitor perspectives across sites, so similar infrastructure and educational messaging may be applied that would streamline ridership experiences and decrease reliance on personal vehicles. Historically however, personal vehicles have influenced NPS units through infrastructure and development, and for many visitors, are an integral component of their park experience. Given the historical relevance of personal vehicles, there is little understanding of how visitors perceive the shift to ATS in parks. Without understanding how ATS is perceived, management will not be able to effectively message to visitors, improve ridership, and alleviate resource and social impacts associated with personal vehicles in parks.

ATS-related Social Science Research

A visitor's choice to use ATS rather than a personal vehicle largely depends upon visitor attitudes toward transportation modes (Anable, 2005; Anable & Gatersleben, 2005; Bamberg, Ajzen, & Schmidt, 2003; Bamberg, Rolle, & Weber, 2003; Cullinane & Cullinane, 1999), because attitudes are the primary determinant of behavioral intentions and actions (Ajzen, 1991; Ajzen & Fishbein, 1980; Fishbein & Manfredo, 1992). Yet few studies have evaluated visitor attitudes toward ATS in NPS units (Pettebone et al., 2011; White et al., 2011).

Studies addressing visitor attitudes toward ATS have generally suggested that visitors are supportive of free or voluntary ATS options, but are less receptive to fee-based or mandatory ATS in parks (Holly, Hallo, Baldwin, & Mainella, 2010; Sims, Hodges, Fly, & Stephens, 2005; White, 2007), perhaps because of the loss of perceived "freedom" (Dilworth, 2003; Miller & Wright, 1999; Sims et al., 2005). For example, Holly et al., 2010 found that maintaining individual freedom was the most important factor for Acadia National Park visitors when considering whether or not to ride the park shuttle bus. Attitudes toward ATS have also been found to largely depend upon visitor characteristics or demographic features such as age or family situation, suggesting that older visitors (Dilworth, 2003; Moscardo, Pearce, & Morrison, 2001; Pettebone et al., 2011; Prideaux, Wei, & Ruys, 2001) or visitors that are traveling with small children are less likely to use ATS (Middelkoop, Borgers, & Timmermans, 2003; White, 2007; Youngs, White, & Wodrich, 2008). Other studies have found that some visitors perceive an element of safety when participating in ATS, by enabling them to enjoy parks while eliminating the responsibility of operating a personal vehicle (Hallo & Manning, 2009).

These findings suggest that visitors have a perception of “ease” or lack thereof when choosing whether or not to participate in ATS. Other factors such as crowding on the roadways (Manning, Lawson, Valliere, Bacon, Laven, 2002; Park Studies Laboratory, 2002; Pettebone et al., 2011) or parking difficulties (Pettebone et al., 2011; White, 2007; Youngs et al., 2008) have been found to affect visitor attitudes toward ATS, suggesting that elements of “stress” may play a role in visitors’ choice to use ATS.

These previous findings have improved understanding of visitor perceptions of ATS, which can be applied to the development of indicators and standards of quality for visitor use and transportation frameworks. For example, a recent study in Yosemite National Park evaluated visitors’ perceptions of travelling via ATS and personal vehicle in order to identify visitor preferences that would inform park management of transportation-related indicators and standards (White et al., 2011). Results suggested that personal vehicles were the most popular mode of transportation within the park, but visitors were generally satisfied with either transportation experience, personal vehicle or park shuttle. However, perceptions of satisfaction are broad and subject to substantial personal interpretation, and given the ‘self-selected’ nature by which visitors choose recreation opportunities that meet expectations and outcomes, high levels of satisfaction are commonly reported (Manning, 2007, p. 15), which limits the usefulness of these findings. More informative were the results from the attitude dimensions which found that stress, crowding, conflict, freedom, access, and natural experiences were important aspects of the overall transportation experience in Yosemite; this was consistent with previous findings (White, 2007; Youngs et al., 2008) and other transportation-related research in other NPS units (Davenport & Borrie, 2005; Hallo & Manning, 2009; Sims et

al., 2005). Three scales were ultimately created from these dimensions (1. stress and conflict, 2. freedom and access, and 3. nature experience), and the authors recommended that the park transportation-related indicators and standards be based on these elements (White et al., 2011). This study advanced understanding of visitor preferences for transportation modes, and informed managers of potential indicators and standards that could be monitored to achieve desired conditions. However, this study offered little understanding of how these findings could be applied to improve visitor participation in ATS.

Chapter three of this dissertation builds upon the findings of the White et al., 2011 study, by contrasting visitor attitudes toward ATS at Yosemite and Rocky Mountain National Parks, in an effort to determine salient attitudinal variables that are perceived similarly across these units. Determining salient variables advances understanding of potential ATS-related indicators and standards of quality, which increases protection of resource and social conditions, and allows for the development of educational messaging strategies that can be applied to alleviate reliance on personal automobiles and encourage ATS use.

Soundscape Management

Mandates such as the 1972 Noise Control Act, the 1987 National Parks Overflights Act, and recent National Park Service (NPS) policy directives require the protection of the acoustic environment as a resource, similar to that of the flora and fauna present in our national parks, and specifies that parks should integrate monitoring and planning efforts to protect park soundscapes (Newman, Manning, & Trevino, 2010). Accordingly, the NPS Natural Sounds and Night Skies Division, which is dedicated to

the protection of the acoustic environment or soundscape, strives to improve resource and social monitoring and planning efforts within the park units.

Ambrose and Burson (2004) refer to a 'soundscape' as "the total ambient acoustical environment associated with a given area," which "may be natural sounds only, or both natural and human-made sounds" (p. 29). These sounds can be measured through frequency and amplitude, and are 'weighted' to reflect the hearing abilities of a given species (Ambrose & Burson, 2004). 'Frequency' (Hz) reflects the amount of times a sound wave repeats itself per second, and 'amplitude' is the level of sound pressure, which is measured in decibels (dB) (Ambrose & Burson, 2004; NPS Natural Sounds and Night Skies Division Interpretive Handbook, 2010). A-weighted decibel (dBA) scales are commonly used with human subjects. These units are determined by merging sound energy using a weighted function, which adjusts sound pressure levels to allow for human hearing (Ambrose & Burson, 2004; Fahy, 2001; Fristrup, 2010; Stack, Newman, Manning, & Fristrup, 2011). 'Sounds' depict neither a positive or negative connotation; however, 'noise' refers to a negative evaluation of a sound. Human-caused, or anthropogenic noise, such as the sounds produced by loud voices, vehicles, and airplanes, have been linked with negative resource and social impacts (Barber, et al., 2010; Barber, Turina, & Fristrup, 2010; Bell, Mace, & Benfield, 2010; Benfield, Bell, Troup, & Soderstrom, 2009; Krog & Engdahl, 2005; Mace, Bell, Loomis, & Haas, 2003; Miller, 1999; Miller, Anderson, Horonjeff, & Thompon, 1999; Pilcher, Newman, & Manning, 2008; Tarrant, Haas, & Manfredo, 1995).

The majority of Americans consider opportunities to experience the sounds of nature as an important reason for protecting national parks (Haas & Wakefield, 1998),

and research suggests that visitors often retreat to parks to experience the sounds of nature, such as wind, water, and natural quiet (Driver, Tinsley, & Manfredo, 1991; Haas & Wakefield, 1998; Mace et al., 2003; McDonald, Baumgartner, & Iachan, 1995). Yet anthropogenic noise can mask natural sounds, impacting wildlife foraging, mating, and migrating patterns, increasing predation risks (Barber et al., 2010; Barber et al., 2010), and negatively affecting visitor experiences (Bell et al., 2010; Benfield et al., 2009; Krog & Engdahl, 2005; Mace et al., 2004; Miller, 1999; Miller et al., 1999; Pilcher et al., 2008; Tarrant et al., 1995). Policies requiring the NPS to preserve the natural soundscape as a resource demand that managers determine how much change should be allowed to affect the environment and recreational experiences. Maintaining quality recreational experiences requires that managers develop social indicators and standards of quality pertaining to soundscapes.

Recent research has helped inform the NPS concerning effective sound-related indicators and standards of quality that help managers protect, maintain, and restore the natural acoustic environment. Pilcher, Newman, and Manning (2008) conducted a two-phase study in Muir Woods National Monument where sound-related social indicators and standards of quality were established. Phase-one focused upon descriptive evaluations, by asking respondents to listen to the surrounding environment, and then, to determine the degree to which sounds heard were pleasing or annoying. Results suggested that visitor-caused sounds, such as groups talking, were frequently heard and rated as annoying, and would therefore serve as a good indicator of quality. Phase-two focused upon the evaluative component by specifically addressing varying levels of visitor-talking sounds to determine respondents' threshold, and subsequently established

a standard of quality. A series of soundclips were created from the recordings of the area, each containing varying levels of visitor-talking sounds. Respondent evaluations of these soundclips determined that sound pressure stemming from visitors' talking at a level of 38 decibels or greater, was unacceptable. Correlating this established standard with acoustic monitoring data, the researchers suggested that visitor standards were being violated within the study area at least a portion of the time, potentially degrading the quality of the visitor experience.

A subsequent experimental study implemented educational messaging through signs denoting either a 'quiet zone' or a 'quiet day' (Manning, Newman, Frstrup, Stack, Pilcher, 2010; Stack, 2008; Stack et al., 2011), which was found to effectively lower the amount of human-caused noise within the area. Implementation of 'quite zone' messaging decreased visitor noise by 3 (dBA), essentially doubling a visitor's listening area (Stack et al., 2011). The results of this study demonstrate the positive influence that indirect management, such as educational messaging, can have on visitor behaviors and preservation of park soundscapes. However, there has been limited research evaluating the role of messaging in modifying visitor perceptions and evaluations of anthropogenic noise.

Exposure to noise produced by aircraft overflights has been found to negatively detract from visitor experiences (Krog & Engdahl, 2005; Mace et al., 1999; 2004; Mace et al., 2003; Miller, 1999; Miller et al., 1999; Tarrant et al., 1995), and experimental messaging pertaining to aircraft sound evaluations has been limited. Mace, Bell, Loomis, and Haas (2003) began to investigate this deficiency by examining how contextual messaging may change evaluations of helicopter noise within park settings. In a

laboratory, participants were asked to evaluate helicopter sounds after being notified that the noise could be attributed to “tourist overflights,” “backcountry maintenance operations,” and the “rescue of a backcountry hiker.” The researchers determined that regardless which reason was attributed to the sound, amplified helicopter noise resulted in lower evaluations of the park setting and greater levels of annoyance. These findings suggested that park management-related noise disturbances are just as annoying as other aircraft noise sources. This study advanced understanding of how messaging may or may not influence perceptions and evaluations of sounds in parks; however, this research was conducted solely within a laboratory setting, used relatively simplistic messaging approaches, and used only the noise of helicopters, which generally fly lower generating more disturbing sounds (Bell et al., 2010). Miller, Anderson, Horonjeff and Thompon (1999) evaluated whether informing visitors that they may hear or see aircraft would reduce adverse effects of military aircraft sounds at White Sands National Monument. Results suggested that by providing information, respondent annoyance of military aircraft sounds was decreased by approximately 10% (Miller et al., 1999), suggesting that educational messaging could affect perceptions and evaluations of aircraft within this setting.

The results of these studies suggest that educational messaging can be applied as an effective management strategy to decrease anthropogenic noise, and potentially alter perceptions of anthropogenic noise depending upon the context and environment in which sounds are heard. Chapter four of this dissertation builds upon this research within a manuscript format, by designing an informative message based upon theoretical frameworks, to determine if messaging can alter Sequoia National Park visitor attitudes,

perceptions, expectations, and therefore standards of quality in regard to military aircraft sounds.

CHAPTER II

Comparing Day-users' and Overnight Visitors' Attitudes Concerning Leave No Trace

Introduction

The National Park Service (NPS) maintains a delicate balance between use and preservation (NPS Organic Act) amidst annual visitation approaching nearly three hundred million (NPS Statistics, 2010). The vast majority of recreationists are day-users (Outdoor Foundation Outdoor Participation Report, 2010), and previous research suggests that day-use is increasing in protected areas (Chavez, 2000; Cole et al., 1995; Hendee & Dawson, 2002; Papenfuse et al., 2000; Roggenbuck & Lucas, 1987; Roggenbuck et al., 1994). For example, of the nearly three hundred million NPS visitors in 2010, there were only 1,763,541 backcountry overnight visits (NPS Statistics, 2010). Given significant visitation, impacts to both the resource condition and visitor experience, continue to be a primary concern for park managers (Marion & Reid, 2007). Education is one technique used to mitigate visitor impacts (Hammit & Cole, 1998; Hendee & Dawson, 2002; Lucas, 1983; Manning, 2003; 2007; Marion & Reid, 2001; 2007), and the Leave No Trace (LNT) message has become the most prominent method to encourage correct behavior and discourage depreciative behavior in protected areas (Harmon, 1997; Marion & Reid, 2001; 2007; Vagias & Powell, 2010). Leave No Trace was initially developed to curb impacts of backcountry overnight visitors (Marion & Reid, 2001), and correspondingly, most LNT-related research has focused on this user-group (Marion & Reid, 2001; 2007). Despite the growing number of day-users, research focused on this user-group has largely been neglected (Cole, 2001; Papenfuse et al.,

2000; Roggenbuck et al., 1994). Previous research suggests that day-use should be managed similarly to overnight use (Cole, 2001; Papenfuse et al., 2000), but very little, if any, is known about day-users with regard to LNT. The purpose of this study was to gain greater understanding of visitor knowledge and attitudes toward LNT by comparing and contrasting day-users and overnight users, in an effort to improve efficacy and inform management of effective methods that could curb depreciative behaviors among both user-groups.

Leave No Trace

Leave No Trace was derived from minimum-impact educational initiatives employed to supplement direct management measures, in an effort to mitigate overuse of wildlands in the 1960s (Marion & Reid, 2001). Since that time, LNT has continued to grow from an educational program into a registered non-profit organization now known as the Leave No Trace Center for Outdoor Ethics, and has been adopted both nationally by the federal land agencies as well as many state and urban parks, and internationally (Marion & Reid, 2001). The LNT Center promotes stewardship-based ethics through various educational initiatives focused on many types of recreationists (i.e., backcountry-overnight, frontcountry, youth), but all efforts stem from the following 7 LNT Principles:

1. Plan ahead and prepare
2. Travel and camp on durable surfaces
3. Dispose of waste properly
4. Leave what you find
5. Minimize campfire impacts
6. Respect wildlife
7. Be considerate of other visitors

Theoretical Basis

Previous Research, Knowledge, Awareness, and Attitudes

The majority of minimum-impact related research has focused upon backcountry wilderness campers or overnight visitors (Christensen & Cole, 2000; Daniels & Marion, 2005; Fazio, 1979; Huffman & Williams, 1987; Lucas, 1981; Roggenbuck & Berrier, 1982; Stubbs, 1991; Thorn, 1995; Vagias, 2009; Vagias & Powell, 2010), and many studies have addressed education and visitor knowledge of recommended practices (Cole et al., 1997; Confer et al., 2000; Daniels & Marion, 2005; Dowell & McCool, 1986; Fazio, 1979; Jones, 1999; Jones & Bruyere, 2004; Leung & Attarian, 2003; McAvoy & Hamborg, 1984; McCool & Cole, 2000; Newman et al., 2003; Reuhrwein, 1998; Stewart, et al., 2000; Stubbs, 1991; Thorn, 1995). Knowledge and awareness are important components for mitigating depreciative behaviors because, if visitors lack knowledge or awareness, they may unintentionally act unskillfully or inappropriately (Manning, 2003; 2007). In addition to these measures, social psychology has advanced understanding of human behavior and suggests attitudes also influence, and in many instances, are the primary determinant of behavioral intentions and actions (Ajzen, 1991; Ajzen & Fishbein, 1980; Fishbein & Manfredo, 1992; Ham, 2007; Ham & Krumpal, 1996).

Vagias and Powell (2010) applied attitude theory to examine backcountry-overnight visitors' perceptions and support of LNT and their attitudes toward backcountry behaviors that corresponded with LNT Principles at three NPS units. Results indicated that general perceptions of the LNT message were positive, a finding that suggests backcountry-overnight visitors are largely supportive of LNT; however, attitudes toward specific recommended LNT practices varied between suggested

behaviors. This incongruity between general perceptions of LNT and attitudes of specific LNT practices suggest that positive ‘global’ attitudes regarding the program did not necessarily equate to positive attitudes toward specific LNT practices. These results also suggest that certain LNT practices were either not fully understood by the backcountry-overnight visitors or that there was a level of indifference regarding the recommendations.

The Vagias and Powell (2010) study provided greater understanding of backcountry-overnight visitors with regard to LNT by applying attitude theory to explore support, knowledge, and attitudes toward LNT. However, research concerning the majority of recreationists—day-users—has largely been neglected (Cole, 2001; Papenfuse et al., 2000; Roggenbuck et al., 1994). Newman et al. (2003) began to address this deficiency by examining Appalachian Trail (AT) visitors’ knowledge concerning minimum-impact practices through a 10-item quiz. Findings suggested that only a few statistically-significant differences existed between day-hikers, overnight, sectional, and thru-hikers concerning minimum-impact practices. Overall results indicated that day-hikers had similar understanding of minimum-impact practices as the other user-groups. This study helped advance understanding of visitor user-groups and their knowledge of minimum-impact practices, but did not specifically address LNT or other aspects of visitor perceptions, such as awareness or attitudes.

The LNT Center for Outdoor Ethics and land managers must understand day-user perceptions of LNT to effectively mitigate depreciative behaviors. Determining day-user knowledge, awareness and global perceptions, and attitudes toward LNT will provide understanding that can be applied to increase efficacy and to improve effective messaging

strategies, which can alter behaviors and better preserve resource conditions and visitor experiences. No studies have specifically evaluated day-use visitor perceptions of LNT. Therefore, the purpose of this study was to develop a better understanding of day-user knowledge, awareness and global perceptions, and attitudes toward LNT, by contrasting their characteristics with those of overnight users. This study evaluated these perceptions by comparing day-users at Rocky Mountain National Park and backcountry-overnight visitors at Olympic National Park. Contrasting knowledge, awareness, and attitudes of these visitor-groups will allow the LNT Center, and land managers, to better understand the discrepancies that may impede adoption of the ethic of practicing LNT, and therefore, may assist with the development of more effectual educational approaches.

Methods

Study Areas

Backcountry-overnight visitors were sampled at Olympic National Park (ONP), Washington, during the summer of 2007. The park contains nearly one million acres of designated wilderness consisting of rugged coastline, temperate rainforest, and alpine peaks (Vagias, 2009). Day-user visitors were sampled at Rocky Mountain National Park (RMNP), Colorado, during the summer of 2009. The park is within close proximity to the Colorado front-range community of Denver, Colorado, allowing for easy access to day-visitors wishing to experience the park's forests, alpine meadows, lakes and tundra.

Survey Administration

Backcountry-overnight visitors at ONP were intercepted during their permitting processes and asked to provide contact information. Approximately one month after

contact, respondents were sent self-administered mail-back surveys which yielded an overall response rate of 73% with a total $n = 312$.

Day-users at RMNP were intercepted in the Bear Lake corridor at the Glacier Gorge and Bear Lake Trailheads. The corridor is predominantly frequented by day-users, and can reach more than 8,000 visitors daily during peak season (Park, Lawson, Kaliski, Newman, & Gibson, 2010). Respondents were asked to complete an on-site written survey (Appendix A) yielding an overall response rate of 74% with a total $n = 390$.

Item Measurement

Respondents in both samples were asked to describe their “current knowledge of LNT practices” based on a 7-point scale (0 = ‘No Knowledge’ – 6 = ‘Expert’) to determine their overall level of self-perceived knowledge about LNT. Respondents were also asked to indicate their level of agreement with a series of statements about LNT, which evaluated visitors’ awareness and global perceptions of the LNT program based on a 7-point scale (1 = ‘Strongly Disagree’ - 7 = ‘Strongly Agree’). All statements were coded to have higher means if the respondents supported LNT, except for the final statement, which portrayed LNT as ineffectual in reducing environmental harm. Lower mean scores for this particular statement would have demonstrated support for LNT.

Statements developed from LNT Principles #2, “Travel on Durable Surfaces,” #4, “Leave What You Find,” #6, “Respect Wildlife,” and #7, “Be Considerate of Other Visitors,” were used to evaluate the appropriateness of LNT practices because these Principles are pertinent to both backcountry and day-user endeavors. The statements were evaluated on a 7-point scale (1 = ‘Very Inappropriate’ – 7 = ‘Very Appropriate’). All statements represented inappropriate behaviors under strict interpretation of LNT.

Therefore, responses with lower mean scores indicated that respondent attitudes were more congruent with LNT practices.

Data Analyses

Independent samples t-tests were used to determine if day-users and backcountry-overnight visitors differed statistically. Sun, Pan and Wang (2010) suggest, “a test result that is statistically significant as judged by the p -value is not necessarily practically significant as judged by the effect size” (Sun, Pan, & Wang, p. 991). Survey research with relatively large sample sizes may result in statistically significant results, but actually have little practical value (Vaske, 2008). Effect size measures provide additional understanding of differences by offering “a standardized estimate of the magnitude of variable relationships” (Vaske, p. 117, 2008). Evaluation of effect size measures allows for greater intuitive meaning of practical differences between samples. Effect sizes between these samples were determined by evaluating Eta values (η) categorized as having either a “minimal”, ($\eta = \sim.10$), a “typical”, ($\eta = \sim.30$), or a “substantial” effect measures ($\eta = \sim.50$) (Cohen, 1988; Vaske, 2008; Vaske, Gliner, & Morgan, 2002). Consideration of statistical significance and practical significance was examined through p -values, Eta values, and the importance of the mean differences between samples.

Results

Visitor Characteristics

Demographic results were similar between backcountry-overnight visitors at ONP and the day-users at RMNP with regard to gender, mean age, race, and education. At ONP, there were slightly more male respondents (60%), while at RMNP approximately 53% of the respondents were female. ONP respondents were slightly younger with a

mean age of approximately 42 while RMNP respondents were on average 48 years old. Across both samples, 95% or more of the respondents were Caucasian, and over 90% had attended college.

Perceived Knowledge of LNT

Results concerning the level of perceived knowledge of LNT practices indicated that the majority of the backcountry-overnight visitors and day-users consider themselves as having ‘Average’ to ‘Expert’ knowledge of LNT. Mean values resulted in statistical differences between the samples, (ONP $M = 3.97$, RMNP $M = 3.45$, $p < .001$, $\eta = .177$), although the effect size suggests a minimal difference (Table 2.1). Mean differences of 0.52 based on the 7-point scale also suggest that there are little practical differences between backcountry-overnight and day-use visitors with regard to self-perceived knowledge of LNT.

Table 2.1
Self-Perceived Knowledge of LNT Practices – ONP (Backcountry-overnight visitors) and RMNP (Day-users)

Unit	<i>n</i>	Mean	SD	<i>t</i> -value	<i>p</i> -value	Eta (η)
ONP	303	3.97	0.94	5.03	<.001	.177
RMNP	384	3.45	1.74			

Note. Variables coded on a 7-point scale (0 = No Knowledge – 6 = Expert)

Awareness and Global Perceptions of LNT

Evaluation of the statements addressing global support of LNT resulted in similar mean values across both backcountry-overnight visitors and day-users (Table 2.2). Results indicate that both groups were largely supportive of LNT, with minimal differences between backcountry-overnight visitors and day-users. Mean values for four out of the five statements that suggested support of LNT were all greater than 5.84,

indicating that both backcountry-overnight visitors and day-users perceived LNT positively on a global level. The fifth statement, which was reverse-coded and portrayed LNT as ineffectual in reducing environmental harm, yielded statistically-significant differences, (ONP $M = 1.56$, RMNP $M = 1.92$, $p = .001$, $\eta = .122$), but the effect size indicated a minimal difference. Mean differences of 0.36 suggest little practical differences in perceptions of LNT between the samples.

Table 2.2
 Comparison of ONP (Backcountry-overnight visitors) and RMNP (Day-users) Awareness and Global Support of LNT

Attitude Statements	Unit	<i>n</i>	Mean	SD	<i>t</i> -value	<i>p</i> -value	Eta (η)
It is important to use minimum- impact/LNT techniques when in the backcountry.	ONP	302	6.46	1.2	0.51	.607	.020
It is important to practice “Leave No Trace” techniques when in the Park.	RMNP	384	6.51	1.1			
If I learned my actions in the backcountry damaged the environment, I would change my behavior.	ONP	302	6.46	0.9	0.41	.686	.015
If I learned my actions in the Park damaged the environment, I would change my behavior.	RMNP	384	6.50	1.1			
I get upset when I see other individuals in the backcountry not following minimum-impact/LNT practices.	ONP	303	6.14	1.1	1.87	.064	.071
I get upset when I see other individuals in the Park not following “Leave No Trace” practices.	RMNP	386	6.30	1.2			
I insist that minimum-impact/LNT practices are followed by all members of my backcountry party.	ONP	306	5.84	1.2	1.46	.143	.055
I insist that “Leave No Trace” practices are followed by all members of my group.	RMNP	386	6.0	1.3			
Minimum-impact/LNT techniques do not reduce the environmental harm caused by backcountry travel.	ONP	302	1.56 ¹	1.6	3.35	.001	.122
Practicing “Leave No Trace” does not reduce the environmental harm caused by travel in the Park.	RMNP	384	1.92 ¹	1.7			

Note. Variables coded on a 7-point scale (1 = Strongly Disagree – 7 Strongly Agree)

¹ Lower mean values reflect attitudes that support Leave No Trace because statements portray Leave No Trace as ineffectual in reducing environmental harm

Attitudes Regarding LNT Principles

Analyses of differences between attitudes of backcountry-overnight visitors and day-users varied depending upon the Principle (Table 2.3). Evaluation of Principle #2, “Travel on Durable Surfaces,” indicated that responses based on the appropriateness of

walking around muddy spots on the trail were statistically significant between backcountry-overnight visitors and day-users, (ONP $M = 4.02$, RMNP $M = 4.48$, $p = .001$, $\eta = .125$), but effect sizes reflected a minimal difference. Mean differences of only 0.46 also suggest minimal difference between the samples. The variable *hike side by side on an existing trail* resulted in similar lower mean values (ONP $M = 2.93$, RMNP $M = 3.37$, $p = .001$, $\eta = .128$), and despite statistically-significant differences, the practical significance was minimal based upon the effect size. Mean differences of only 0.44 also support this finding. Twenty-nine percent of the backcountry-overnight visitors and eleven percent of the day-user respondents considered *keeping a small item as a souvenir*, which is associated with Principle #4, “Leave What You Find,” to be an appropriate behavior. Statistically-significant differences resulted among the samples, (ONP $M = 3.52$, RMNP $M = 2.25$, $p < .001$, $\eta = .353$). The typical effect size and mean difference of 1.3 reinforce this significant finding. Examination of Principle #6, “Respect Wildlife,” suggests that only 0.6% of the backcountry-overnight visitors and only 4.4% day-users *found dropping food on the ground to provide wildlife a food source* to be an appropriate behavior. Statistical differences were significant among the samples, (ONP $M = 1.19$, RMNP $M = 1.43$, $p = .001$, $\eta = .117$), although the minimal effect size and mean difference of 0.24 suggest little practical difference between the user-groups. Attitudes regarding LNT Principle #7, “Be Considerate of Other Visitors” by *taking a break along the edge of a trail* resulted in the majority of both samples reflecting attitudes that did not align with the LNT-recommended behavior. Approximately 78% of the backcountry-overnight respondents and 74% of the day-users indicated that this behavior was

appropriate, yielding insignificant statistical differences among the groups, (ONP $M = 5.69$, RMNP $M = 5.48$, $p = 0.57$).

Table 2.3
Comparison of ONP (Backcountry-overnight visitors) and RMNP (Day-users) Attitudes Regarding LNT Practices

Attitude Statements	Unit	<i>n</i>	Mean	SD	<i>t</i> -value	<i>p</i> -value	Eta (η)
<i>LNT Principle #2: Travel and Camp on Durable Surfaces</i>							
Walking around muddy spots on the trail	ONP	308	4.02	1.6	3.39	.001	.125
Walk around muddy spots on the trail	RMNP	385	4.48	2.0			
Hiking side by side with my friends on existing backcountry trails	ONP	308	2.93	1.6	3.44	.001	.128
Hike side by side with members of my group on existing trails	RMNP	387	3.37	1.8			
<i>LNT Principle #4: Leave What You Find</i>							
Keeping a single small item like a rock or feather as a souvenir	ONP	309	3.52	1.7	9.87	<.001	.353
Keep a single item like a rock, plant, stick or feather as a souvenir	RMNP	388	2.25	1.6			
<i>LNT Principle #6: Respect Wildlife</i>							
Dropping food on the ground to provide wildlife a food source	ONP	310	1.19	0.7	3.30	.001	.117
Drop food on the ground to provide wildlife a food source	RMNP	388	1.43	1.2			
<i>LNT Principle #7: Be Considerate of Other Visitors</i>							
Taking a break along the edge of a trail	ONP	304	5.69	1.4	1.90	.057	.071
Take a break along the edge of the trail	RMNP	387	5.48	1.6			

Note. All attitude statements reflect inappropriate actions based on Leave No Trace Principles Variables coded on a 7-point scale (1 = Very Inappropriate – 7 Very Appropriate)

Discussion

LNT is a prominent educational method employed to alter visitor behaviors and mitigate resource and social impacts in parks and protected areas. Day-users are the largest group of recreationists, yet very little is known about this user-group with regard

to LNT. The goal of this study was to develop a better understanding of day-user knowledge, awareness and global perceptions, and attitudes toward LNT, by comparing their characteristics with those of overnight users. Understanding how day-users perceive LNT is essential to management so that effective messaging can be designed for this growing user-group. Overall findings suggest that the sampled backcountry-overnight visitors and day-users were rather similar with regard to perceived knowledge, awareness and global perceptions of LNT, and most of the examined attitudes regarding LNT Principles.

Examination of perceived knowledge of LNT resulted in a minimal effect size and a mean difference of only 0.5 on the 7-point scale, suggesting little practical difference between the two user-groups. The majority of respondents described their understanding of LNT practices to be ‘Average’ to ‘Expert’, indicating that both samples were fairly certain in their knowledge of LNT. However, self-perceived knowledge did not necessarily equate to appropriate behavioral understanding of specific LNT principles. For instance, practices related to Principle #2, “Travel and Camp on Durable Surfaces” and Principle #7, “Be Considerate of Other Visitors” were largely misunderstood across both samples, despite high levels of perceived knowledge.

Findings indicate that both backcountry-overnight visitors and day-users were highly supportive of LNT. Both user-groups strongly agreed with global attitude statements that positively portrayed LNT, and strongly disagreed with the statement that depicted LNT as ineffective. These findings are valuable for the LNT Center and protected areas managers as they strive to influence visitor behaviors, suggesting that

both overnight and day-use visitors will be supportive of future LNT-related educational strategies.

Attitudes regarding specific LNT principles were congruent across both samples for Principles #2, “Travel and Camp on Durable Surfaces,” #6, “Respect Wildlife,” and #7, “Be Considerate of Other Visitors.” Concepts concerning “Respecting Wildlife” resulted in attitudes that align with LNT-recommended practices and were largely understood by both user-groups. This suggests that backcountry-overnight and day-users are cognizant of the proper ethics regarding their behavior around wildlife. Behaviors embodied under “Traveling and Camping on Durable Surfaces” and “Being Considerate of Other Visitors” were, to a great extent, misinterpreted by backcountry-overnight and day-users, and deserve additional educational focus. Previous LNT-related research suggests educational messages should be clear, concise, and occur early in the visitor’s planning process (Cole et al., 1997; Douchette & Cole, 1993; Lime & Lucas, 1977; Roggenbuck & Berrier, 1982; Stewart et al., 2000), be reinforced and timely near potential problematic areas (Hockett, 2000; Hockett & Hall, 2007; Widman, 2010; Widner & Roggenbuck, 2000), and not provide so much information that the receiver is overloaded (Cole et al., 1997). Furthermore, educational messages should be based on theoretical frameworks (Manning, 2003; Marion & Reid, 2007), target salient beliefs and attitudes by making them content relevant (Ham & Krumpal, 1996), and should strive to be contextually specific (Vagias, 2009; Vagias & Powell, 2010). The results from this study suggest that future educational strategies should target backcountry and day-use visitors’ behaviors related to “Traveling and Camping on Durable Surfaces” and “Being Considerate of Other Visitors” similarly, while considering and implementing messaging

that encompasses the previous literature findings. For example, if a park is experiencing trail-widening in low-lying locations, in addition to presenting Principle # 2, “Traveling and Camping on Durable Surfaces,” management may include a message near the problematic areas stating, “Walking around puddles widens trails and damages vegetation.”

Attitudes towards Principle #4, “Leave What You Find,” resulted in substantial differences between the user-groups. More backcountry-overnight than day-user respondents found “Keeping a single item as a souvenir,” to be appropriate, based on statistically-significant mean differences of 1.3. This suggests that backcountry-overnight visitors and day-users may require different educational strategies for this particular practice. These results are important for the LNT organization, because these results may indicate an overall lack of understanding concerning the concepts related to this Principle, but perhaps more so with backcountry-overnight visitors. The LNT Center and protected areas managers should consider employing more focus to backpackers regarding Principle #4. For instance, the LNT Center could work with protected areas to implement additional messages that complement “Leave What You Find”, at the pre-trip planning level through permitting websites, permitting offices, and backcountry trailhead locations.

Study Limitations and Future Research

There were several limitations to this study that merit additional research to support and further validate findings. The ONP respondents completed self-administered mail-back surveys, while the RMNP respondents completed onsite surveys administered by researchers; each of these instruments had slightly different variable phrasing to make

the behaviors or scenarios applicable to either overnight or day-use recreationists. If feasible, future studies should apply the same survey design and wording across samples. This study only evaluated perceived knowledge and awareness of LNT, and attitudes regarding Principles #2, #4, #6, and #7 because these Principles reflected behaviors that are similar and pertinent to both overnight and day-use endeavors. Subsequent studies should attempt to include the remaining three LNT Principles, #1, “Plan Ahead and Prepare,” #3, “Dispose of Waste Properly,” and #5, “Minimize Fire Impacts.”

While results indicated similarities between backcountry-overnight visitors and day-users with regard to LNT, this study only applied to respondents at ONP and RMNP. The similar sample demographics support our speculative reasoning that these user-groups are alike, perhaps because they may be drawn from homogeneous populations, as other studies have suggested (Cole, 2001). For example, a day-user in RMNP may be a backpacker in ONP during another occasion. Future research may consider including variables that examine visitors’ previous outdoor experience and motivation to better understand this issue. While this study addressed two separate national parks, research pertaining to overnight and day-use visitors within the same protected area should also be studied. Furthermore, comparisons across several types of protected areas and demographically diverse locations (e.g., city parks, state parks, wildlife refuges, etc.) should be studied to evaluate the generalizability of future educational efforts.

Conclusion

This study provides insight and improves understanding of day-user knowledge and salient attitudes toward LNT and LNT Principles. Findings suggest that backcountry-overnight visitors and day-users are rather similar with regard to perceived

knowledge, awareness and global perceptions of LNT, and attitudes regarding LNT Principles #2, #6, and #7. LNT is believed to be important and highly effective in minimizing resource impacts and curbing depreciative behaviors across both user-groups, suggesting that future educational strategies will be well received. Principles #2 and #7 require additional educational focus, and Principle #4 may require different messaging approaches for backcountry visitors, but this study suggests that backcountry-overnight and day-users can largely be educated about LNT in similar ways. Additional research is needed to determine the salience of these findings across different demographics and protected area types.

CHAPTER III

Attitudes toward Alternative Transportation Systems in Yosemite and Rocky Mountain National Parks

Introduction

Personal automobiles have historically influenced development of park infrastructure and are an integral part of visitor experiences in national parks. High visitation and use of personal vehicles have contributed to resource and social impacts such as crowding on roadways and parking areas, resource impacts to vegetation and wildlife, safety issues, and air and noise pollution. In some units, these impacts have created an environment that aligns more with an urban setting, rather than the natural environment and associated experiences prescribed through the NPS mission.

These impacts have prompted park managers to consider implementation of alternative transportation systems (ATS), such as park shuttles, to effectively transport visitors. Parks such as Zion, Acadia, Sequoia and Kings Canyon, Grand Canyon, Mount Rainier, Yosemite and Rocky Mountain National Park have implemented shuttle systems to help alleviate reliance upon personal automobiles and associated resource and social impacts in some of the most highly-visited areas of these parks. There are currently 63 ATS in 50 national park units (Daigle, 2008), and much time, effort, and money has been expended to improve upon these systems. A comprehensive study between the Federal Transit Administration and the Federal Highway Administration determined that the majority of NPS sites within the study were in need of enhanced services and new transit systems (Krechmer, Grimm, Hodge, Mendes, & Goetzke, 2001; Turnbull, 2003), suggesting that more emphasis will be placed on ATS in the near future.

Increased focus on ATS across a substantial number of NPS units has led to a greater need for improving understanding of visitor perspectives across sites, so similar infrastructure and educational messaging may be applied that would streamline ridership experiences and decrease reliance on personal vehicles. Given the historical relationship between personal automobiles and US national parks, relatively little is known concerning how the shift to ATS affects visitor experiences, or what barriers may prevent visitors from participating in ATS. Attitudes largely determine behavioral intentions and actions (Ajzen, 1991; Ajzen & Fishbein, 1980; Fishbein & Manfredo, 1992). However, few studies have evaluated visitor attitudes toward ATS in NPS units (Pettebone et al., 2011; White et al., 2011), and no studies have compared visitor perspectives across units to determine and better understand salient attitudes.

The purpose of this study was to: 1) compare and contrast visitor attitudes regarding ATS at Yosemite National Park (YOSE) and Rocky Mountain National Park (RMNP); 2) determine salient attitudinal variables that are perceived similarly in an effort to better understand incentives and barriers to ATS participation; 3) advance understanding of potential messaging strategies that would encourage ridership; 4) inform managers of potential indicators and standards of quality related to ATS; and 5) suggest potential management strategies associated with these indicator variables. Understanding visitor attitudes toward ATS is important in order to develop transportation management policies that relieve visitor dependence on personal vehicles while mitigating potential impacts to visitor experiences. This understanding may be applied to interpretive messaging that influence visitor attitudes toward ATS, assist with development of ATS-

related indicators and standards of quality, and inform park infrastructure and development.

National Parks' History with Personal Automobiles

The automobile historically helped define infrastructure, and largely determined the way visitors experienced many US national parks. The nearly simultaneous mass production of Henry Ford's Model T and the promotional influence of the National Park Service's first director, Stephen Mather, spawned tourism and construction of park roads and facilities in units across the nation. By 1924, Henry Ford had released approximately 10,000,000 Model T's, yet there were only 12 miles of paved roads in all of the national park units (Everhart, 1983). However, Mather soon convinced Congress to allocate funding for additional roads and infrastructure, and the era of "See America First" led to increased motor visitation to the national parks.

Much of the early infrastructure within RMNP and YOSE was developed to meet this proclamation. In RMNP, Enos Mills proclaimed that roads should be "built so as to command scenery and to be for the most part mountain-sides and summits" and "touch the greatest and most beautiful spots" (Mills, p. 272, 1915). Also during this time, YOSE park planners tediously worked to insure that human-structures were hidden from view of the roadway to maintain the natural aesthetic view-scape (Colten & Dilsaver, 2005). Most park roads were designed and constructed to allow visitors to experience panoramic vistas overlooking iconic park features all by way of personal vehicle, and today, many of the focal points of visits remain the park roads (Turnbull, 2003). By the 1920s Fall River Road had been completed in RMNP allowing over 270,000 motorists to enter the park ("National Park Tourists," 1921); in YOSE, motorists had over 130 miles of roads

(mostly unpaved) to explore (“Motor Highways Poor in the National Parks,” 1923), and private automobiles had become the primary mode of visiting the park (White et al., 2011). By 1925, it was estimated that 75% of the visitors to all national parks entered by automobile (Du Puy, 1925). “Automobile tourism provided a more intimate, personal, and authentic encounter with the ‘real’ America along a network of good roads that offered access to a shared national history and culture” (Shaffer, p. 168, 2001). This era helped shape the national park visitor experience still present in numerous national parks today. However, high visitation, leading to crowding, traffic congestion, parking shortages, added air and noise pollution, as well as impacts to park resources, has created the need for ATS in national parks to help alleviate the reliance upon the personal automobile (Dunning, 2005; Pettebone et al., 2011; Turnbull, 2003; White, 2007; White et al., 2011).

Theoretical Basis

Visitor Attitudes toward ATS

There has been an increased emphasis upon implementing ATS in parks, but given the historical relationship between personal vehicles and national parks, relatively little is known concerning how visitors perceive the shift to ATS or what barriers may impede ridership. The decision to use ATS in lieu of personal autos appears to be driven primarily by visitor attitudes toward transportation modes (Anable, 2005; Anable & Gatersleben, 2005; Bamberg et al., 2003a; Bamberg et al., 2003b; Cullinane & Cullinane, 1999), because attitudes are the principle determinant of behavioral intentions and actions (Ajzen, 1991; Ajzen & Fishbein, 1980; Fishbein & Manfredo, 1992). Yet few studies

have evaluated visitor attitudes toward ATS in NPS units (Pettebone et al., 2011; White et al., 2011).

Studies addressing visitor attitudes toward ATS have generally suggested that visitors are supportive of free or voluntary ATS options, but less receptive to fee-based or mandatory ATS in parks (Holly et al., 2010; Sims et al., 2005; White, 2007), perhaps because of the loss of perceived “freedom” (Dilworth, 2003; Miller & Wright, 1999; Sims et al., 2005). For example, Holly et al., 2010 found that maintaining individual freedom was the most important factor for Acadia National Park visitors when considering whether or not to ride the park shuttle bus. Attitudes toward ATS have also been found to largely depend upon demographic features such as age or family situation, suggesting that older visitors (Dilworth, 2003; Moscardo, Pearce, & Morrison, 2001; Pettebone et al., 2011; Prideaux et al., 2001) or visitors that are traveling with small children are less likely to use ATS (Middelkoop et al., 2003; White, 2007; Youngs et al., 2008). Other studies have found that some visitors perceive an element of safety with ATS, by enabling visitors to enjoy parks while eliminating the responsibility of operating a personal vehicle (Hallo & Manning, 2009). These findings suggest that visitors have a perception of “ease” or lack thereof when choosing whether or not to participate in ATS. Other factors such as crowding on the roadways (Manning et al., 2002; Park Studies Laboratory, 2002; Pettebone et al., 2011) or parking difficulties (Pettebone et al., 2011; White, 2007; Youngs et al., 2008) have been found to affect visitor attitudes toward ATS, suggesting that elements of “stress” may play a role in visitors’ choice to use ATS. Knowledge of visitor attitudes and perceptions of ATS can assist park management with

the development of indicators and standards of quality for park transportation and visitor-use frameworks.

ATS Management Frameworks

Visitor-use frameworks rely upon the concept of quality, and are based on the identification of specific indicators and standards of quality, the development of an ensuing monitoring strategy, and the identification of appropriate management actions if standards are reached or exceeded (Manning, 2001; National Park Service, 1997). Indicators are “quantifiable proxies or measures of management objectives” while standards “define the minimum acceptable condition of indicator variables” (Manning, 2007, p. 23). As an example, perceived crowding on roadways has been determined to be a feasible transportation-related indicator of quality for parks (Hallo & Manning, 2009). If an indicator were the number of vehicles experienced per mile, and the number of encounters exceeded the established standard of 10 vehicles, the quality of a visitor’s experience may be depreciated. Adaptive management of ATS indicators and standards frameworks allows park managers to effectively facilitate use of ATS and maximize visitor experiences while minimizing resource impacts. Understanding visitor attitudes and perspectives concerning ATS across units, provides management with a more uniform approach to ATS-related user-capacity frameworks.

YOSE and RMNP ATS

The iconic history, high visitation, extensive ATS operations, and recent research within YOSE and RMNP make these NPS units highly conducive for examining visitor attitudes toward ATS. In 1978, with service along the popular Bear Lake corridor, RMNP became one of the first park units to implement ATS, where free shuttle services

have continued each year from early June through early October (Pettebone et al., 2011). Increased visitation and ensuing parking congestion led to an expansion of shuttles and shuttle-related parking infrastructure in 2001. Ridership continued to escalate and reached approximately 270,000 passengers in 2006, when the park expanded services (Hiker Shuttle) to include operation from the bordering town of Estes Park, Colorado (Pettebone et al., 2011). YOSE has also implemented a free ATS in the highly-visited Yosemite Valley, and as part of an effort to reduce reliance on personal vehicles and associated impacts, added a fleet of diesel and electric-hybrid shuttle buses that run daily in the area (White et al., 2011). The shuttles serve several popular Valley attractions and vistas as well as overnight accommodations and concessions. Additionally, free shuttle services operate from Wawona-Mariposa Grove in the spring through fall, Badger Pass ski area during the winter, Tuolumne Meadows, and various nearby hiking trailheads during the summer (<http://www.nps.gov/yose/planyourvisit/bus.htm>); the Yosemite Area Regional Transportation System (YARTS) offers a fee-based service from surrounding communities into the park (White et al., 2011).

Pettebone et al. (2011) examined factors that affect visitors' decisions to use Bear Lake shuttle service in RMNP by quantifying the proportions of visitors expected to participate in ATS given various visitor experience scenarios involving associated resource and experiential conditions. For example, a visitor may choose to ride the shuttle if they cannot find a parking space at the trailhead. Alternatively, a visitor may decide to wait for a personal parking space at the trailhead if the next shuttle is not scheduled to arrive for another thirty minutes. Results suggested that while personal vehicles were preferred over shuttles, solitude was the most influential variable related to

a visitor's travel choice, and visitors under 40 years of age were more willing than older visitors to make transportation mode trade-offs to improve their chances of being on the trail with fewer visitors. Pettebone et al. (2011) recommended messaging that encourages use of ATS, potentially through real-time intelligent transportation systems (ITS), that notify visitors of traffic and/or parking congestion as well as trail conditions. For example, messaging focusing on less-crowded routes and locations may persuade visitors to use ATS, particularly those under 40 years of age, and older visitors, who may be resistant to shuttle ridership, may be influenced through messaging that enhances the experiential qualities of the shuttle experience (Pettebone et al., 2011).

White (2007) investigated visitor perspectives related to personal vehicle and park shuttle travel behavior in YOSE through 160 semi-structured interviews. Prominent themes emerged that focused on perceived freedom and access, and stressors such as crowding and congestion. Building upon these previous findings, White et al., 2011 evaluated YOSE visitors' perceptions of travelling via ATS and personal vehicle to identify visitor preferences that would inform park management of transportation-related indicators and standards. Results suggested that personal vehicles were the most popular mode of transportation within the park, but visitors were generally satisfied with either transportation experience, personal vehicle or park shuttle. Consistent with previous YOSE findings (White, 2007; Youngs et al., 2008) and other transportation-related research in other NPS units (Davenport & Borrie, 2005; Hallo & Manning, 2009; Sims et al., 2005), results highlight stress, crowding, conflict, freedom, access, and natural experiences as important aspects of the overall transportation experience in YOSE. Three scales were ultimately created from these dimensions (1. stress and conflict, 2.

freedom and access, and 3. nature experience), and the authors recommended that YOSE transportation-related indicators and standards be based on these elements (White et al., 2011). This study advanced understanding of visitor preferences for transportation modes, and informed managers of potential indicators and standards that could be monitored to achieve desired conditions. However, this study offered little understanding of how these findings could be applied to improve visitor participation in ATS.

Research by Pettebone et al., 2011 and White et al., 2011 has advanced understanding of visitor preferences for transportation modes and attitudes toward aspects of the visitor ATS experience, and has identified a suite of factors related to transportation choice in YOSE and RMNP. The purpose of this study was to build upon these findings by contrasting visitor attitudes toward ATS at YOSE and RMNP, in an effort to determine salient attitudinal variables that are perceived similarly across these units. Understanding prevalent attitudes toward ATS allows for the development of messaging strategies that would encourage ridership, further advance understanding of ATS-related indicators and standards of quality, and inform management strategies associated with these salient indicator variables.

Methods

Study Areas and Survey Administration

During the summer of 2007, researchers administered and collected paper surveys (Appendix B) at six locations throughout YOSE including the: (a) Visitor Center in Yosemite Valley, (b) Lower Yosemite Falls, (c) Happy Isles, (d) Tunnel View Overlook, (e) Glacier Point, and (f) Tuolumne Meadows combining for a total sample of $n = 533$. During the summer of 2008, the same methodology was used to obtain a sample of $n =$

811 at four trail locations throughout the Bear Lake corridor in RMNP including: (a) Glacier Gorge, (b) Emerald Lake, (c) Dream Lake, and (d) Alberta Falls. Overall response rates at both YOSE and RMNP were 73%.

Item Measurement

YOSE and RMNP respondents were asked to evaluate attitudes toward ATS based on 21 variables focused on perceived freedom and access, and stressors such as crowding and congestion (Table 3-1). Variables were measured using a 4-point scale, 1 = Strongly Agree to 4 = Strongly Disagree.

Table 3.1
YOSE and RMNP ATS-Related Attitude Variables

Attitude Variables	Strongly Agree	Agree	Disagree	Strongly Agree
1. You have access to your personal belongings				
2. You have an opportunity to learn about the park while traveling				
3. Travel is affordable or low cost				
4. You have opportunities to see wildlife				
5. It is easy to find your way around the park				
6. You have pleasant interactions with other visitors				
7. It takes too long to get where you want to go				
8. You feel safe				
9. You have little impact on the park's natural environment				
10. You connect with the natural environment				
11. You hear natural sounds				
12. You have easy access to different areas of the park				
13. You hear sounds of traffic				
14. It is easy to get to scenic overlooks/vistas				
15. You experience a sense of freedom				
16. You feel stressed while traveling throughout the park				
17. You have trouble finding parking				
18. You can go "where you want, when you want"				
19. You experience conflict with visitors using other kinds of transportation				
20. You avoid traffic congestion				
21. You feel crowded by other visitors				

Data Analyses

Exploratory factor analysis is a common statistical method in the social sciences used to examine a group of related factors within a larger set of variables in order to inform factor structure when little theoretical guidance exists (Henson & Roberts, 2006; Hurley et al., 1997; Vaske, 2008). This technique has been applied and proven useful in

recent protected areas transportation research (Anable, 2005; Choo & Mokhtarian, 2008; Lumsdon, Downward, & Rhoden, 2006). Alternatively, confirmatory factor analysis can be used when sufficient literature and theory guides hypothesized factor structure, which can be tested to determine model fit with observed data (Henson & Roberts, 2006; Hurley et al., 1997; Russell, 2002). Confirmatory factor analysis is a form of structural equation modeling that compares a theoretical model with the observed structure found within a given sample, or multiple samples, when conducting multi-group confirmatory factor analysis (MGCFAs) (Milfont & Fischer, 2010).

Gerbing and Hamilton (1996) suggest that EFA can serve as an advantageous precursory “tool to aid the researcher in recovering an underlying measurement model that can then be evaluated with CFA” (p. 71). Similarly, in the Hurley et al. (1997) discussion between experts concerning use of factor analysis, panelist Chet Schriesheim suggested “using EFA and CFA in multiple-sample studies, perhaps first exploring and then confirming” factorial structure (p. 673). Because this study evaluated identical survey variables at two park units with little understanding of how these variables may be perceived by visitors across samples, EFA was chosen first, to guide scale development. Utilizing SPSS 18 statistical software, a principal components EFA was used to define factors across both samples. Subsequently, use of CFA and MGCFAs models, which were evaluated using LISREL 8.80 Student Edition software, allowed for empirical testing of measurement invariance between samples to better determine how perceptions of the variables contrasted between YOSE and RMNP respondents.

Variables with similar correlation coefficients that met suggested standards of $\geq .4$ were grouped as suggested factors through the EFA (Vaske, 2008). These factors were

examined separately for the YOSE and RMNP data using reliability analyses, and estimations of internal consistency were evaluated using Chronbach's alpha (α) to determine the proportion of reliability within the scaled survey responses (Vaske, 2008). Suggested factors were proposed and evaluated using CFA on YOSE and RMNP, and ultimately MGCFA was applied with the samples to test whether the survey instrument measured the same psychological constructs across both parks.

Use of MGCFA allows for latent constructs to be tested across groups (i.e., YOSE and RMNP), and requires that each observed variable, such as the attitudinal variables concerning park shuttle experience, relate to the latent constructs in the same manner. MGCFA was used to test for measurement invariance and structural invariance on the proposed group model through a sequenced order of analyses, which constrained the model further with each step (for detailed information concerning these suggested tests see Milfont & Fischer, 2010; Vandenberg & Lance, 2000). The individual CFA's and the series of MGCFA's models for the YOSE and RMNP were determined to have good model fit based on evaluations of chi-square to degrees of freedom ratio (χ^2/df), root mean square error of approximation (RMSEA), comparative fit index (CFI), standardized root mean squared residual (SRMR), normed fit index (NFI), goodness-of-fit index (GFI), and difference in chi-square between incremental models ($\Delta \chi^2$). Fit tests were evaluated based upon previous literature indicating that the χ^2/df range between 2 – 5 (Wheaton, Muthen, Alwin, & Summers, 1977), the RMSEA and SRMR values should range between .06 and .08 (Brown, MacCallum, Kim, Andersen, & Glaser, 2002; Hu & Bentler, 1999; Milfont & Fischer, 2010), the CFI (Bentler, 1990; Hu & Bentler, 1999; Milfont & Fischer, 2010), NFI (Bentler & Bonnett, 1980; Brown et al., 2002) and GFI

equal values of approximately .95 (Brown et al., 2002), and the nested model chi-square difference test $\Delta \chi^2$ results be non-significant (Milfont & Fischer, 2010; Widaman & Thompson, 2003).

Results

Visitor Characteristics

Results suggested that respondent characteristics were similar across both parks. Most respondents were Caucasian, well educated, and from the United States of America. The largest differences occurred with age and country of origin as respondents at YOSE were slightly younger ($M = 43$) than those at RMNP ($M = 47$), and more of the respondents at RMNP were from the U.S (96%) than those at YOSE (76%).

Exploratory Factor Analysis Results

A varimax rotation with factor loadings $\geq .4$ yielded three distinct factors consisting of 10 variables, which loaded similarly across both YOSE and RMNP (Table 3.2). The resulting variables were determined to be related to the latent constructs “ease,” “freedom,” and “stress.” “Ease” consisted of three variables: (a) You feel safe, (b) It is easy to find your way around the park, and (c) You have pleasant interactions with other visitors. “Freedom” also consisted of three variables: (a) It is easy to get to scenic overlooks/vistas, (b) You have easy access to different areas of the park, and (c) You experience a sense of freedom. The last latent construct, “stress” consisted of four variables: (a) You feel stressed while traveling throughout the park, (b) You experience conflict with visitors using other kinds of transportation, (c) You feel crowded by other visitors, and (d) You have trouble finding parking. These factors were then examined separately for the YOSE and RMNP data using reliability analyses, which resulted in

acceptable Chronbach's alphas, respectively (YOSE 'ease' $\alpha = .63$, 'freedom' $\alpha = .67$, 'stress' $\alpha = .72$; RMNP 'ease' $\alpha = .70$, 'freedom' $\alpha = .75$, 'stress' $\alpha = .59$).

Table 3.2
Exploratory Factor Analysis Demonstrating Similar Factor Loadings between YOSE and RMNP

Attitudinal Variables	Factors ¹					
	Ease ²		Freedom ³		Stress ⁴	
	RMNP	YOSE	RMNP	YOSE	RMNP	YOSE
You feel safe	.714	.681				
It is easy to find your way around the park	.700	.657				
You have pleasant interactions with other visitors	.603	.714				
It is easy to get to scenic overlooks/vistas			.603	.656		
You have easy access to different areas of the park			.581	.590		
You experience a sense of freedom			.558	.684		
You feel stressed while traveling throughout the park					.734	.785
You experience conflict with visitors using other kinds of transportation					.709	.759
You feel crowded by other visitors					.534	.811
You have trouble finding parking					.516	.495

Note. Variables coded on 4-point scale (1 = Strongly Agree – 4 = Strongly Disagree)

¹Factor loadings represent only coefficients $>.4$ that rotated out in a similarly across YOSE and RMNP

²Chronbach's Alpha for 'Ease' (RMNP $\alpha = .70$; YOSE $\alpha = .63$)

³Chronbach's Alpha for 'Freedom' (RMNP $\alpha = .75$; YOSE $\alpha = .67$)

⁴Chronbach's Alpha for "Stress" (RMNP $\alpha = .59$; YOSE $\alpha = .72$)

Confirmatory Factor Analysis Results

Separate confirmatory factor analysis models were evaluated based on the similar latent constructs and related observed variables for YOSE and RMNP. The model consisted of the latent constructs "ease," "freedom," and "stress," each representing the previously mentioned variables (Table 3.2). Results indicated that the proposed YOSE model (Figure 3.1) was determined to have good model fit based on the following

YOSE model, the latent constructs “ease” and “freedom” were positively correlated, while “ease” and “freedom” were negatively correlated with “stress.”

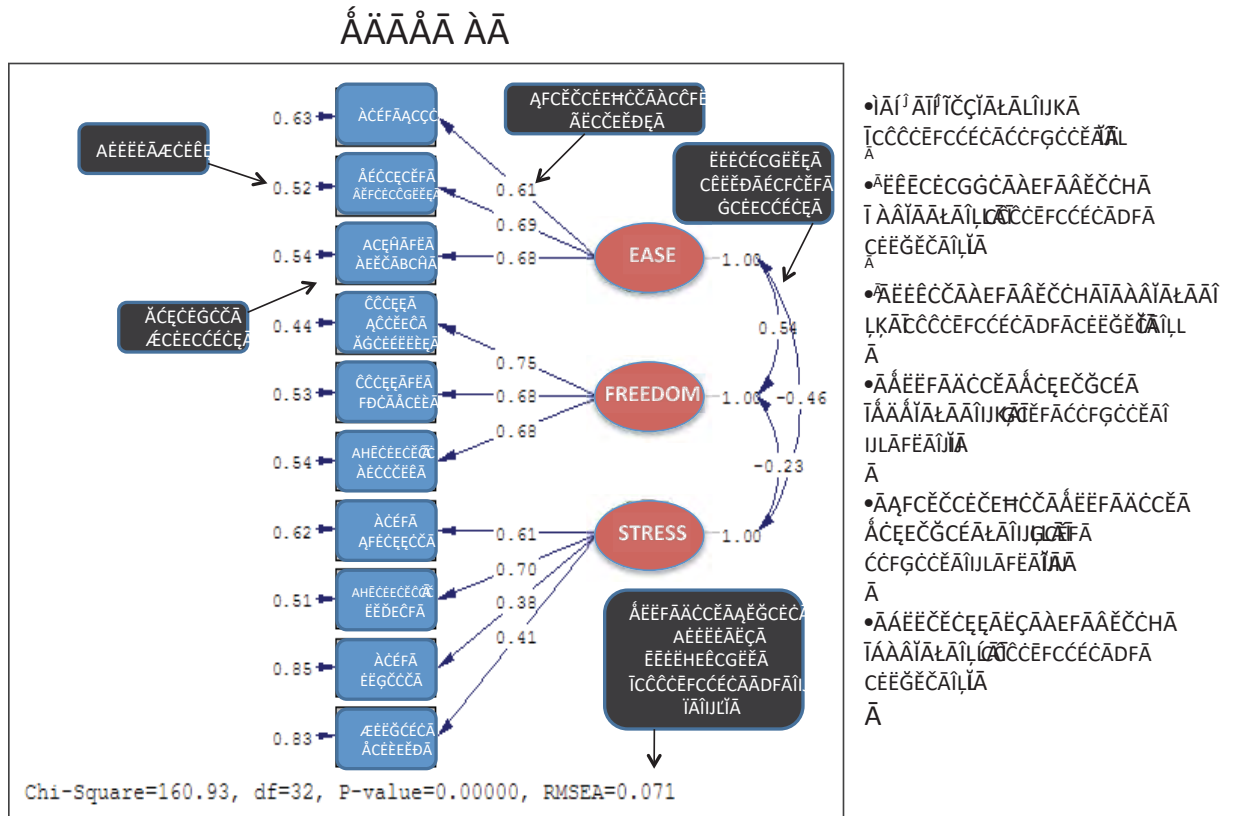
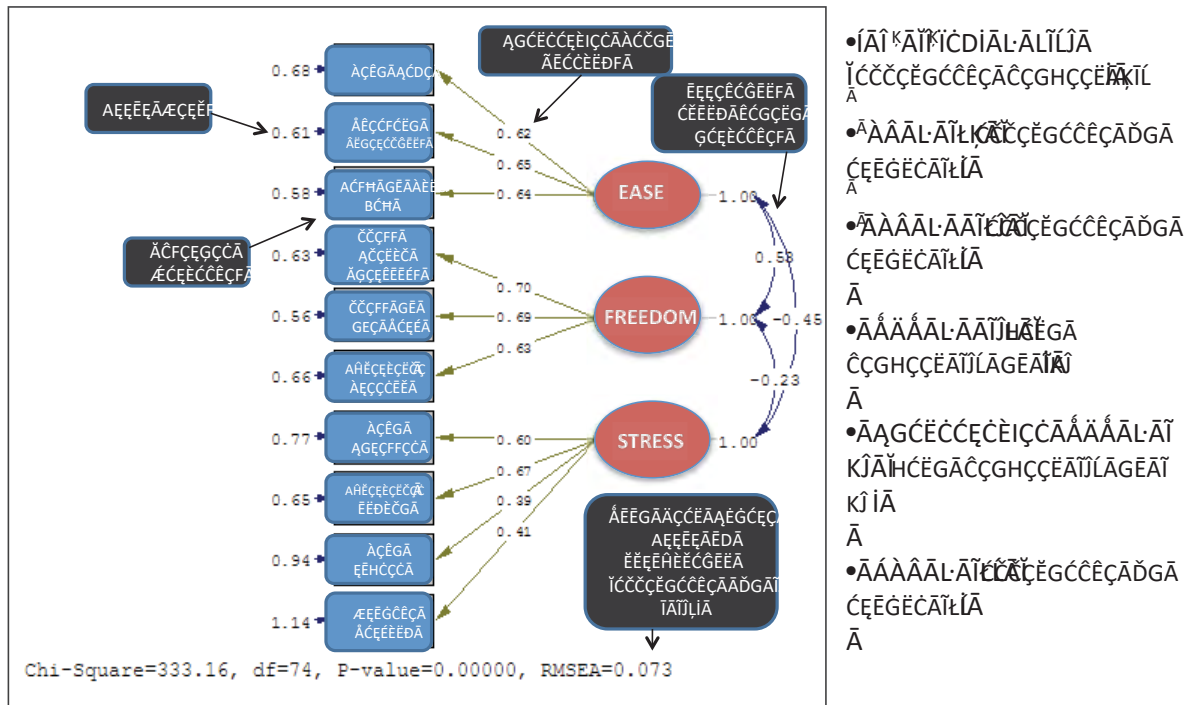


Figure 3.2: RMNP Confirmatory Factor Analysis Model

Model fit acceptable based on $\chi^2/df = 5.03$; RMSEA = .071; SRMR = .055; CFI = .95; NFI = .94; GFI = .96

Based upon the similarities between the resulting models, it was determined that a multi-group confirmatory analysis (MGCFA) should be conducted on a combined YOSE and RMNP model. A test of configural invariance, the first model in a series testing measurement invariance, was used to evaluate whether respondents in YOSE and RMNP conceptualized the constructs in the same manner. Results indicated that the combined model, (Figure 3.3), had good fit based on: (a) $\chi^2/df = 4.18$, (b) RMSEA = .069, (c) SRMR = .054, (d) CFI = .94, (e) NFI = .92, and (f) GFI = .96. Furthermore, standardized factor loadings were all $\geq .4$, and “ease” and “freedom” were positively correlated, while “ease” and “freedom” were negatively correlated with “stress.”

CÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ



- ÍÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ
- ÄÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ
- ÄÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ
- ÄÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ
- ÄÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ
- ÄÄÄÄÄÄÄÄÄÄÄÄ ÄÄÄÄÄÄÄÄÄÄ

Figure 3.4: YOSE and RMNP Metric Invariance Model
 Model fit acceptable based on $\chi^2/df = 4.50$; RMSEA = .073; SRMR = .10; CFI = .92; NFI = .90; GFI = .95

Because both the tests of configural and metric invariance suggested good model fit, the chi-square difference test ($\Delta \chi^2$), was used to evaluate whether the combined YOSE and RMNP model could be tested at the next level, testing scalar invariance. As shown in Table 3.3, the chi-square difference test resulted in a $\chi^2 = 65.59$, which exceeded the critical values of 29.588 based on $df = 10, p < .001$. Results indicated that no additional measurement invariance testing should be conducted, negating the need for the next model evaluation, structural invariance model testing (Milfont & Fischer, 2010).

Table 3.3
 Chi-square Difference Test between Configural and Metric Invariance Models

Model	χ^2	Df	χ^2/df	RMSEA	SRMR	CFI	NFI	GFI
Metric	333.16	74	4.50	.073	.10	.92	.90	.95
Configural	267.57	64	4.18	.069	.054	.94	.92	.96
$\Delta \chi^2$	65.59 ¹	10						

¹Difference test value exceeds chi-square critical value of 29.588, based on $df = 10, p < .001$

Discussion

The purpose of this study was to compare and contrast visitor attitudes regarding ATS at YOSE and RMNP to determine salient attitudinal variables that are perceived similarly at both units, advance understanding of potential indicators and standards of quality related to ATS, and suggest potential management strategies associated with these salient indicator variables. Evaluation of the attitudinal variables yielded three salient factors, which loaded similarly across both YOSE and RMNP, and resulted in the latent constructs of “ease,” “freedom,” and “stress.” “Ease” consisted of elements regarding safety, ease of finding one’s way around the park, and having pleasant interactions with other visitors. “Freedom” consisted of being able to get to scenic overlooks or vistas, having access to different areas of the park, and experiencing a sense of freedom. “Stress” consisted of feeling stressed while traveling through the park, experiencing conflict with visitors using other kinds of transportation, feeling crowded by other visitors, and having trouble finding parking.

The results of the MGCFA test of configural invariance suggested that respondents in YOSE and RMNP conceptualized these constructs in a similar manner, and the test of metric invariance indicated that the respondents at both units answered the statements similarly. These results confirm that “ease,” “freedom,” and “stress” are important factors for park managers to consider when determining indicators and standards of quality, and the associated variables related to these constructs may be applied to the ATS management frameworks at YOSE and RMNP. Previous research also confirms that elements regarding the variables represented by the constructs “ease” (Hallo & Manning, 2009; Pettebone et al., 2011; White, 2007; White et al., 2011),

“freedom” (Dilworth, 2003; Manning & Hallo, 2010; Miller & Wright, 1999; Sims et al., 2005; Pettebone et al., 2011; White, 2007; White et al., 2011), and “stress” (Manning, et al., 2002; Park Studies Laboratory, 2002; Pettebone et al., 2011; White, 2007; White et al., 2011), or lack thereof, with participating park ATS have been found to be important in these and other parks. Coupled with this previous research, these findings further affirm that these variables are pertinent to the ATS-related visitor experiences, and should be employed and tested as potential indicators of quality in YOSE and RMNP, as well as in other units.

“Ease,” “freedom,” and “stress” represent salient indicator variables that could be used within a visitor-use framework as an adaptive management strategy to effectively facilitate use of ATS and maximize visitor experiences while minimizing resource impacts. For example, with regard to “stress,” an indicator of quality variable may be the level of crowding experienced. If the level of crowding exceeds the established standard, appropriate management actions should be taken. These salient indicator variables could also be evaluated in YOSE and RMNP, as well as other NPS units to inspect the current status of ATS systems and assess the role of future ATS applications. For example, an ATS Report Card (Figure 3.5) could easily be administered to ATS riders at RMNP, YOSE and other units to essentially grade ATS operations. This would establish baseline data and allow for subsequent evaluations to determine whether park ATS operations are improving or worsening. If results indicate deficiencies in a particular area, management could focus on improving bus services with regard to these topics. From a social science perspective, this study advances understanding of those variables that are pertinent to the

ATS experience, reducing the visitor/respondent burden for evaluating 21 questions, down to 10 salient variables.

<i>Your Park Shuttle Experience:</i>	<i>Strongly Agree</i>	<i>Agree</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
<i>It was easy to find your way around the park</i>			√	
<i>You had pleasant interactions with other visitors</i>	√			
<i>You felt safe</i>	√			
<i>You had easy access to different areas of the park</i>		√		
<i>It was easy to get to scenic overlooks/vistas</i>	√			
<i>You experienced a sense of freedom</i>	√			
<i>You felt stressed while traveling throughout the park</i>				√
<i>You had trouble finding parking</i>		√		
<i>You experienced conflict with visitors using other kinds of transportation</i>		√		
<i>You felt crowded by other visitors</i>			√	

Figure 3.5: Example ATS Park Report Card

The results of this study also suggest that “ease,” “freedom,” and “stress” represent focused topics in which park management may be able to message to visitors in a manner that increases ATS ridership, and decreases the reliance on personal automobiles. Messaging can be implemented and tested in RMNP, YOSE and other units

focusing upon the “ease,” “freedom,” and lack of “stress” associated with taking the shuttle. For example, with regard to “freedom” and “stress,” the park may implement a message stating, “Avoid traffic stress ---- park here and let our free buses take you to the scenic overlooks”. Or with regard to “ease,” a message that states “Let our buses safely guide you around the park” may be appropriate. Use of ITS, which has been beneficial in other park units (Daigle & Zimmerman, 2004a; 2004b; Dilworth & Shafer, 2004; Zimmerman, Coleman, & Daigle, 2003), may be the most applicable approach to message dissemination.

Once visitors are aboard shuttles, there are additional opportunities for educational messaging through bus drivers (Manning & Hallo, 2010), on-board interpretive staff, or signage within the bus interior. Messaging that could encourage future ridership might focus on the benefits of riding the shuttle such as improved air quality, noise reduction, or overall improved resource protection (Laube & Stout, 2000; Turnbull, 2003). Messaging that focuses on ethical visitor behaviors, such as those prescribed through the Leave No Trace Center for Outdoor Ethics (LNT) may also be appropriate within the shuttle buses, and thus, improve rider experiences. The federal land agencies have already adopted the ethics promoted through LNT, and the seven LNT Principles can currently be seen at most park trailheads and within informational literature. Additional promotion of behaviors that encourage pleasant interactions with other visitors, which is largely encompassed by the LNT Principle, “Be Considerate of Other Visitors,” would target aspects of the “ease” variable examined within this study. Signage within and around the shuttle buses, indicating the amount of days without an accident, may encourage ridership by emphasizing the safety aspect of riding the bus,

which was a component of the “ease” construct. Utilizing messaging that incorporates these variables within the shuttle bus provides for yet another way to improve visitor experiences with regard to ATS, and encourages future ridership.

Park planners may also integrate aspects of “ease,” “freedom,” and “stress” into current infrastructure and consider constructing future developments around these concepts. For example, routes should be focused on enabling visitors to access scenic overlooks or vistas, and management may consider allowing only buses access to certain overlooks or attraction sites. This would encompass both the “ease” and “stress” constructs by considering access, and potentially reducing perceived conflict with personal vehicle drivers. This may also be perceived as an additional incentive to ride the shuttle bus. Management and planners should examine techniques to avoid crowding on buses, while not creating long queues and wait times that would deter ridership participation (Holly et al., 2010). This may also mitigate crowding on trail segments by limiting large quantities of people exiting buses and entering trails simultaneously (Lawson et al., 2011; Pettebone et al., 2011). Additionally, ample parking availability at shuttle bus hubs should be an important consideration to minimize visitor stress.

Study Limitations and Future Research

Evaluation of the EFA indicated that 10 attitudinal variables factored out similarly, and the separate CFAs resulted in very similar model fit. Additionally, the results of the MGCFA indicated that both configural and metric invariance suggested good model fit. However, the test of scalar invariance, the next evaluation within the MGCFA sequence, did not indicate appropriate model fit. The later indicated that the proposed combined models were not exactly the same at YOSE and RMNP. This

suggests that the proposed constructs of “ease,” “freedom,” and “stress” discussed here were perceived very similarly, but not exactly in the same manner at both units.

Perhaps YOSE and RMNP ATS provide for slightly different visitor experiences given the nature of the units themselves. While the shuttle systems in both YOSE and RMNP provide transportation for mostly day-users in some of the parks’ most popular destinations, the YOSE Valley is very different than the Bear Lake corridor in RMNP. The shuttle system in the YOSE Valley passes by iconic waterfalls and monolithic rock faces while also navigating through occasional traffic congestion attributed largely to the park’s historic hotels, camps and stores. The YOSE shuttle experience is largely based around transporting visitors to and enabling sightseeing of Valley attractions such as El Capitan, Half Dome, and Yosemite Falls. The shuttle system along the Bear Lake corridor in RMNP offers magnificent views of moraines and snow-covered peaks towering above 14,000 feet, but it does not have a sightseeing focus nor does it have the infrastructural traffic that challenges YOSE. Instead the RMNP shuttle experience is largely focused on taking visitors to and from the trailheads within the Bear Lake corridor.

Given the differences in shuttle purpose and associated visitor experiences, it is encouraging and significant that the results of this study found such substantial similarities between these parks. But because the full sequence of model testing did not meet the suggested fit for all of the MGCFA examinations, as suggested by Gerbing and Hamilton (1996), we advise that these variables be evaluated and “cross-validated on new data” (p. 71). Based on the results of this study using EFA across two park units, followed by empirically testing model fit through CFA and MGCFA, we suggest that

future analyses of these variables be tested only through confirmatory measures. For example, these variables should be evaluated in other park units, and other types of protected areas such as U.S. Forest Service (USFS), U.S. Fish and Wildlife Service (FWS), and Bureau of Land Management (BLM) lands (Turnbull, 2003).

Finally, we acknowledge that these salient attitudes are predicated by other factors related to visitor characteristics. Previous research has suggested that additional variables such as age (Dilworth, 2003; Moscardo et al., 2001; Pettebone et al., 2011; Prideaux et al., 2001), family situation (Middelkoop et al., 2003; White, 2007; Youngs et al., 2008) and motivation affect visitor perceptions of ATS, and should also be considered when researching and managing ATS.

Conclusion

The NPS is increasingly using ATS to accommodate high visitation and mitigate resource and social impacts. Given the historical relationship between personal vehicles and parks, little is known concerning how the shift to ATS affects visitor experiences; visitor attitudes toward ATS largely determine participation in shuttle services. This study evaluated visitor attitudes at YOSE and RMNP to improve understanding of salient attitudinal constructs related to ATS in parks. Findings suggest that the concepts of “ease,” “freedom,” and “stress” are important salient factors related to ATS in both parks, and may be employed and tested in these and other park units. The constructs of “ease,” “freedom,” and “stress” and the ten salient underlying variables associated with these factors should be considered as pertinent indicators and standards of quality for ATS visitor-use management frameworks. Additionally, communication strategies that encompass these concepts may increase ridership and improve current ATS visitor

experiences. Finally, management should take these variables into consideration when modifying current infrastructure or planning future ATS operations.

CHAPTER IV

The Role of Messaging on Acceptability of Military Aircraft in Sequoia National Park

Introduction

Mandates such as the 1972 Noise Control Act, the 1987 National Parks Overflights Act, and recent National Park Service (NPS) policy directives require the protection of the acoustic environment as a resource, similar to that of the flora and fauna present in our national parks, and specifies that parks should integrate monitoring and planning efforts to protect park soundscapes (Newman et al., 2010). Accordingly, the NPS Natural Sounds and Night Skies Division, which is dedicated to the protection of the acoustic environment, has begun to improve monitoring and planning efforts in many units, such as Grand Canyon National Park, Muir Woods National Monument, and Sequoia and Kings Canyon National Parks (Keizer, 2008).

Due to its proximity to military installations, military aircraft are prevalent above Sequoia and Kings Canyon National Parks (SEKI), and exposure to sounds produced by aircraft have been found to negatively detract from visitor experiences (Krog & Engdahl, 2005; Mace et al., 1999; 2004; Mace et al., 2003; Miller, 1999; Miller et al., 1999; Tarrant et al., 1995). SEKI staff have instituted multi-day “Wilderness Orientation Overflight Pack Trips” in which they take military officials into the backcountry to increase understanding of the effects of aircraft noise on the park resources and its visitors, leading to improved cooperation between federal entities (Keizer, 2008).

Despite these advances, military overflights and associated acoustic impacts are likely to continue given SEKI’s proximity to military installations, and in turn, visitor

experiences may be depreciated. This provides reasoning and need for effective management strategies that mitigate adverse effects of military aircraft sounds in SEKI. Indirect management such as educational information can effectively reshape visitor attitudes so that they are more supportive of management actions and policies (Manning, 2003). Could educational messaging alter visitor expectations and perceptions of military aircraft sounds in SEKI? Would informing visitors that they may hear or see military aircraft while recreating in SEKI increase or decrease acceptability of this anthropogenic sound intrusion? The purpose of this study was to 1) determine if indirect management actions in the form of educational messaging can significantly affect visitor acceptability and normative evaluations of quality pertaining to military aircraft sounds, 2) enhance understanding of the strength of educational messaging as it pertains to soundscape management, and 3) suggest potential educational messaging strategies that may be applied in SEKI and other NPS units.

Soundscape Management – Indicators and Standards

The majority of Americans consider opportunities to experience the sounds of nature as an important reason for protecting national parks (Haas & Wakefield, 1998). Research suggests that visitors often retreat to parks to experience the sounds of nature, such as wind, water, and natural quiet (Driver et al., 1991; Haas & Wakefield, 1998; Mace et al., 2003; McDonald et al., 1995). Anthropogenic sounds, such as loud voices, vehicles, and aircraft have been found to negatively detract from visitor experiences by masking the sounds of nature (Bell et al., 2010; Benfield et al., 2009; Krog & Engdahl, 2005; Mace et al., 2003; Miller, 1999; Miller et al., 1999; Pilcher et al., 2008; Tarrant et al., 1995).

Anthropogenic sounds can cause resource and social impacts, and mandates require the NPS to preserve the natural soundscape as a resource (Ambrose & Burson, 2004; Jensen & Thompson, 2004; Newman et al., 2010), therefore requiring managers to determine how much change should be allowed within the environmental resources, recreation experiences, and the resulting management actions. This requires that descriptive (focusing exclusively on unbiased data) and evaluative (subjective measure) components be addressed, so that management objectives (desired conditions) and ensuing indicators and standards of quality can be established (Manning, 2007). Indicators are “quantifiable proxies or measures of management objectives,” while standards “define the minimum acceptable condition of indicator variables” (Manning, 2007, p. 23).

Recent research has helped inform the NPS concerning effective sound-related indicators and standards of quality that help managers protect, maintain, and restore the natural acoustic environment. Pilcher, Newman, and Manning (2008) conducted a two-phase study in Muir Woods National Monument in which sound-related social indicators and standards of quality were established. Phase-one focused upon descriptive evaluations, by asking respondents to listen to the surrounding environment, and to determine the degree to which sounds heard were pleasing or annoying. The results of phase-one suggested that visitor-caused sounds such as groups talking, were frequently heard, and rated as annoying, and therefore would be a good indicator of quality. Phase-two focused upon the evaluative component by specifically addressing varying levels of visitor-talking sounds to determine respondents’ threshold, and subsequently established a standard of quality. A series of soundclips were created from the recordings of the area,

each containing varying levels of visitor-talking sounds. Respondent evaluations of these soundclips determined that sound pressure stemming from visitors talking at a level of 38 decibels or greater, was unacceptable. Correlating this established standard with acoustic monitoring data, the researchers suggested that visitor standards were being violated at least a portion of the time, potentially degrading the quality of the visitor experience. Potential management actions were suggested, such as indirect messaging, which could be implemented in the study area to alter visitor behaviors and decrease visitor-caused noise.

Soundscape Management – Educational Messaging

A subsequent experimental study in Muir Woods National Monument addressed strategies for managing visitor-caused sounds by implementing simple signage denoting either a “quiet zone” or a “quiet day” (Manning et al., 2010; Stack, 2008; Stack et al., 2011). Based upon the previously-defined indicators and standards, as well as acoustic monitoring data for the area (Pilcher, et al., 2008), the researchers and park managers were able to effectively lower the amount of human-caused noise. Consequently, educational messaging in the study area stating “quiet day” led to the acoustic decrease equivalent to 793 people, while the “quite zone” signage led to the acoustic decrease equivalent to 1150 people within that study area (Stack, 2008). Implementation of “quiet zone” messaging decreased visitor noise by 3 A-weighted decibel levels (dBA), essentially doubling a visitor’s listening area (Stack et al., 2011). The results of this study demonstrate the positive influence indirect management, such as educational messaging, can have on visitor behaviors and preservation of park soundscapes. This study advanced understanding of how educational messaging can alter visitor behaviors.

However, there has been limited research that evaluates the role of messaging in modifying visitor perceptions and evaluations of sounds.

Using a college psychology laboratory, Mace, Bell, Loomis, and Haas (2003) began to investigate this deficiency by examining how contextual messaging may change evaluations of helicopter noise within park settings. Using simple messages notifying participants that the helicopter sounds which they were evaluating could be attributed to “tourist overflights,” “backcountry maintenance operations,” and the “rescue of a backcountry hiker,” the researchers determined whether contextual factors affected evaluative judgment of the noise. Findings indicated that regardless of which reason attributed to the sound, amplified helicopter noise resulted in lower evaluations of the park setting and greater levels of annoyance, suggesting that park management-related noise disturbances are just as annoying as other aircraft noise sources. This study advanced understanding of how messaging may or may not influence perceptions and evaluations of sounds in parks; however, the study was conducted solely within a laboratory setting with college student respondents who evaluated only helicopter noise. Despite previous research suggesting that lab and field-based evaluations are similar (Malm, Kelley, Molenar, & Daniel, 1981; Stamps, 1990), the messaging applied in this study may not have induced elaboration among the participants, and we speculate that there may be two reasons why messaging did not alter evaluations. First, the messages may have lacked relevance, given that the respondents were not visitors in the evaluated parks. Second, the messages were simplistic (i.e., “tourist overflights,” “backcountry maintenance operations,” and the “rescue of a backcountry hiker”) and may not have contained enough information to influence respondent attitudes.

Miller, Anderson, Horonjeff and Thompon (1999) evaluated messaging concerning military aircraft and associated noise impacts in a park setting to determine if messaging could alter expectations and perceptions. This cooperative study between the US Air Force and the NPS at White Sands National Monument evaluated whether informing visitors that they may hear or see aircraft would reduce adverse effects of military aircraft on park visitors (Miller, et al., 1999). Approximately half of the visitors sampled were exposed to an NPS-formatted sign with a neutral message stating, “Military aircraft can regularly be seen or heard on this trail” (Miller et al., p. 6). Only 40% of respondents that could have seen the sign remembered seeing the message, but of that subset, results suggested that information decreased respondent annoyance by approximately 10% (Miller et al., 1999). The message applied in the study was not based on theoretical communication frameworks, but instead, was created with neutrality in mind, so as not to provide a subjective evaluation of the presence of military aircraft (Nick Miller, personal communication, 11/30/11). The findings suggested that informative messaging could affect perceptions and evaluations of aircraft, even by using a non-theoretically based, neutral message. These results could potentially be limited due to the location of White Sands National Monument—it is surrounded by White Sands Missile Range and Holloman Air Force Base. This location indirectly requires that visitors travel through the missile range in order to reach the park entrance, suggesting that some visitors to the park may have already been aware of the presence of military and associated sounds. This potential limitation does not negate the effectiveness of educational messaging, but warrants further investigation within a park setting in which the presence of military aircraft would not be as obvious.

The results of these studies suggest that educational messaging can be applied as an effective management strategy to decrease anthropogenic noise, and potentially alter perceptions of anthropogenic sounds depending upon the context and environment in which sounds are heard. These studies have advanced understanding of the role of messaging, but have applied little theoretical basis to message design. Furthermore, applying educational messaging in a park in which visitors may not be as readily cognizant of the presence of military aircraft, may result in different acceptability of associated sounds. This study builds upon previous research by designing an informative message based upon theory, and determining if that message has the potential to alter attitudes, perceptions, expectations, and therefore standards of quality concerning military aircraft sounds.

Theoretical Basis

Elaboration Likelihood Model

The Elaboration Likelihood Model (ELM) (Petty & Cacioppo, 1981; 1986) is one of the most prominent theoretical approaches applied to influence visitors in parks and protected areas (Absher & Bright, 2004). This model postulates that there are two routes to persuasion: the central, which likely occurs through thoughtful, motivated consideration of information, and the peripheral, which induces change without perusal of information (Petty & Cacioppo, 1986). ELM focuses upon the processes by which message features influence attitudes (Booth-Butterfield & Welbourne, 2002) by better understanding the level of elaboration (i.e., extent to which a message is scrutinized) that a particular communication strategy has upon an individual (Petty & Cacioppo, 1986). Perhaps most importantly, central route attitude change demonstrates “greater resistance

to counter-persuasion than attitude changes that result mostly from peripheral cues” (Petty & Cacioppo, p. 21, 1986).

Educational communication strategies in parks and protected areas often rely on central route processing (Marion & Reid, 2007), but situational and personal variables like motivation, message relevancy, potential distractions, ability, previous experiences, and knowledge all affect the level of elaboration, and determine whether central or peripheral processes occur (Petty & Cacioppo, 1986; Booth-Butterfield & Welbourne, 2002). Effective messaging design requires consideration of variables that are thought to enhance and motivate understanding such as personal relevance, personal responsibility, the number of messages, and message sources (Petty & Cacioppo, 1986). While interpretive strategists cannot always reach visitors due to situational and personal variables, developing messages that are strong and impactful, by making them relevant to the visitor (Ham, 2007; Ham et al., 2009), may lead to more central route processing.

Argument Strength

Strong messages, or messages that contain substantial argument strength, can stimulate and enhance elaboration (Petty & Cacioppo, 1986). Strong messages provide relevant, reasonable, quality information that can be used to influence attitudes. Alternatively, weak messages lack argument strength and therefore are not as effective in triggering elaboration (Petty & Cacioppo, 1986; Petty & Wegener, 2008). Attitudes that align or *match* with presented information are thought to be strengthened with strong arguments, while recipient attitudes that *mismatch* may not change if the message does not have the strength to stimulate elaboration (Petty & Wegener, 2008; Lavine & Snyder,

1996; Wood, 2000). Furthermore, framing arguments to trigger recipient values or goals increases elaboration potential and likelihood of attitude change (Wood, 2000).

Argument strength and framing can be tested through elicitation studies, in which a small sample of respondents evaluate a series of potentially useable statements, to determine which are perceived as containing quality, relevant, stimulating information (see Petty & Cacioppo, 1986, and Petty & Wegener, 2008). Those messages that exhibit the most effect, are typically the strongest, and have the most significant power to influence attitudes (Petty and Cacioppo, 1986; Petty & Wegener, 2008). Furthermore, impactful messages contain qualities that will increase the prospect of elicitation, potentially altering mismatching attitudes and increasing attitudes that already align with the concepts presented (Lavine & Snyder, 1996; Petty & Cacioppo, 1986; Petty & Wegener, 2008; Wood, 2000; Ziegler et al., 2007).

Methods

This study originates from findings from a two-phase evaluation to determine social indicators and standards of quality pertaining to sounds in SEKI. During phase-one, a visitor survey was conducted at SEKI in the summer of 2009 to explore the descriptive component, yielding a total $n = 537$ and a total response rate of 72% (Marin, 2011). A listening exercise to determine indicators of quality suggested that approximately 50% of respondents heard aircraft, and approximately 72% of those found the associated sounds to be unacceptable (Newman, Lawson, Marin, & Taff, In Review). These findings led to phase-two, this study, which applied a theoretically-based educational message and military aircraft soundclips, to evaluate visitor standards related to aircraft sounds in SEKI.

Elicitation Study

An elicitation study was used to determine which informative message should be applied during phase-two. To evaluate message strength, a series of three messages, ranging in persuasion and argument strength were tested during the spring of 2010 using a paper survey instrument (Appendix C). Thirty-eight undergraduate natural resources students at Colorado State University were asked to evaluate how hearing or seeing aircraft flying overhead during a visit to SEKI, would affect their experience. The students were then informed that they would be presented with three messages intended to provide information to park visitors about potential reasons for hearing and/or seeing aircraft while in the park. The message which resulted in the strongest argument strength, and therefore effect on respondents' acceptability was '*Military aircraft are allowed to conduct training flights over Sequoia National Park in an effort to help keep the United States of America safe. Consequently, visitors hiking in this area of the park can sometimes hear/and or see military aircraft flying overhead*'. This message was then applied at SEKI during phase-two, to determine the effect of messaging on respondent acceptability and standards of quality pertaining to military aircraft.

Study Area

Located in south-central California, SEKI was established in 1890, long before the presence of military aircraft. Current visitation now exceeds one million visitors (NPS Statistics 2010), many of who escape to this iconic park to experience the sounds of nature (Marin, Newman, Manning, Vaske, & Stack, 2011). SEKI is in near proximity to many military installations such as Lemoore Naval Air Station, China Lake Naval Air Weapons Center, and Fort Irwin National Training Center for the US Military, as well as

bases across the border in Nevada such as Nellis Air Force Base and the military test ranges associated with Area 51. Despite condition improvements stemming from collaboration between SEKI and military officials (Keizer, 2008), military overflights and associated acoustic impacts are likely to continue. Furthermore, previous research suggests that SEKI visitors are hearing aircraft, and the majority find associated sounds unacceptable (Newman et al., In Review), providing greater rationale for this study.

Survey Administration

Sampling took place at SEKI's Crescent Meadow and Wolverton trailheads during the summer of 2011, yielding a total $n = 146$ and a response rate of 88%. Willing respondents were asked to complete an on-site paper survey instrument (Appendix D and E) after listening to a series of soundclips that represented sounds found within the park.

Item Measurement

Two questionnaire versions were used in the study in order to test the effect of messaging on acceptance of military aircraft sounds. Prior to respondents' rating the acceptability of soundclips, the "primed" survey ($n = 74$) provided the message that was established through elicitation methods, informing visitors about military aircraft (Appendix D). This was followed by instructions asking visitors to indicate how acceptable it would be to hear the following sounds while hiking in this area of the park. The "unprimed" survey ($n = 72$) only asked respondents to indicate how acceptable it would be to hear the following sounds while hiking in this area of the park, without any mention of military aircraft (Appendix E). The acceptability of the aircraft soundclips was rated on a 9-point scale (-4 = Very Unacceptable; 0 = Neutral; 4 = Very Acceptable).

Military Aircraft Soundclips

The soundclips evaluated during this study were extracted from actual recordings of SEKI with the National Park Service Sounds and Night Skies Division acoustical monitoring equipment during July and August of 2009. Sound events were analyzed and extracted into MP3 format using SPLAT and Adobe Audition 1.0 with the assistance of the staff at the NPS Division office. Clips were chosen to typify both natural ambient and military aircraft overflight episodes from several days and times, so as to represent various potential visitor experiences at Sequoia. Only clips with wind speeds < 1.14 meters/second were chosen to negate masking effects. Ultimately, five forty-second A-weighted soundclips, ranging in decibel levels, were chosen for field application. A-weighted decibel (dBA) levels can be measured and developed by merged sound energy using a weighted function, which adjusts sound pressure levels to allow for human hearing (Ambrose & Burson, 2004; Fahy, 2001; Fristrup, 2010; Stack, et al., 2011). One recording clip contained natural ambient sounds from the park, consisting predominantly of wind, birds, and water, which were at max level, 28 dBA. The additional four recordings contained both natural ambient sounds masked by military aircraft, which resulted in varying levels of sound pressure ranging at a peak of 66 dBA down to 33 dBA. The soundclips were played for the respondents through noise-cancelling headphones beginning with the natural ambient recording, followed by the 66 dBA, the 53 dBA, the 46 dBA, and 33 dBA military aircraft recording.

Data Analyses

Independent samples t-tests were used to determine if messaging statistically affected acceptance of military aircraft sounds. Statistical and practical significance was

examined through consideration of p -values, Eta values, and the importance of the mean differences between the primed and unprimed samples.

Results

Primed versus Unprimed

Recording one, which contained natural ambient sounds from SEKI, but no military aircraft, resulted in similar, non-statistically different mean values between the “primed” and “unprimed” samples (Primed $M = 3.59$, Unprimed $M = 3.63$) (Table 4.1). Recording two, which contained military aircraft peaking in sound pressure at 66 dBA resulted in statistically-different mean values between respondents notified of the presence of military aircraft and those that were not (Primed $M = -.08$, Unprimed $M = -1.42$, $p = .001$, $\eta = .272$). Recording three, which contained military aircraft peaking at 53 dBA also resulted in statistically-different mean values between “primed” and “unprimed” respondents (Primed $M = -.31$, Unprimed $M = -1.64$, $p = <.001$, $\eta = .284$). Recording four, which consisted of military aircraft sounds peaking in sound pressure at 46 dBA also resulted in statistically-different mean values between samples (Primed $M = .12$, Unprimed $M = -.97$, $p = <.001$, $\eta = .230$). Recording five, which contained the lowest level of military aircraft sound pressure peaking at 33 dBA, also resulted in statistically-significant differences between “primed” and “unprimed” respondents (Primed $M = .18$, Unprimed $M = -.65$, $p = .005$, $\eta = .169$) although the effect size suggests a minimal relationship. Three of the four soundclips that contained military aircraft resulted in statistically-significant mean differences with typical effect sizes between samples.

Table 4.1
 Comparison of Primed (Respondents notified of military aircraft presence through messaging) and Unprimed (Respondents not informed of military aircraft presence) visitors at Sequoia National Park

Soundclips	Sample	N	Mean	SD	t-value	p-value	Eta (η)
Recording 1 – peak 28 dBA natural ambient wind, water, and bird	Primed	74	3.59	1.0	-1.70	.719	.014
	Unprimed	72	3.63	1.2			
Recording 2 – peak 66 dBA natural ambient masked by military aircraft	Primed	74	-.08	2.6	3.40	.001	.272
	Unprimed	72	-1.42	2.1			
Recording 3 – peak 53 dBA natural ambient masked by military aircraft	Primed	74	-.31	2.5	3.60	<.001	.284
	Unprimed	72	-1.64	2.0			
Recording 4 – peak 46 dBA natural ambient masked by military aircraft	Primed	74	.12	2.6	2.90	<.001	.230
	Unprimed	72	-.97	2.0			
Recording 5 – peak 33 dBA natural ambient masked by military aircraft	Primed	74	.18	2.6	2.10	.005	.169
	Unprimed	72	-.65	2.2			

Note. Variables coded on a 9-point scale (-4 = Very Unacceptable; 0 = Neutral; 4 = Very Acceptable)

Soundclip Acceptability

Results suggest that both “primed” and “unprimed” respondents found the natural ambient soundclip to be very acceptable (Figure 4.1), but upon hearing soundclips two and three, mean values dropped below acceptability for both samples. Evaluation of soundclips four and five resulted in mean values that were acceptable for “primed” respondents, but “unacceptable” for unprimed respondents. “Primed” respondents’ mean acceptability of the military aircraft soundclips was approximately 15% more acceptable

than “unprimed” respondents for recording two and three, and 9% more acceptable for recordings four and five.

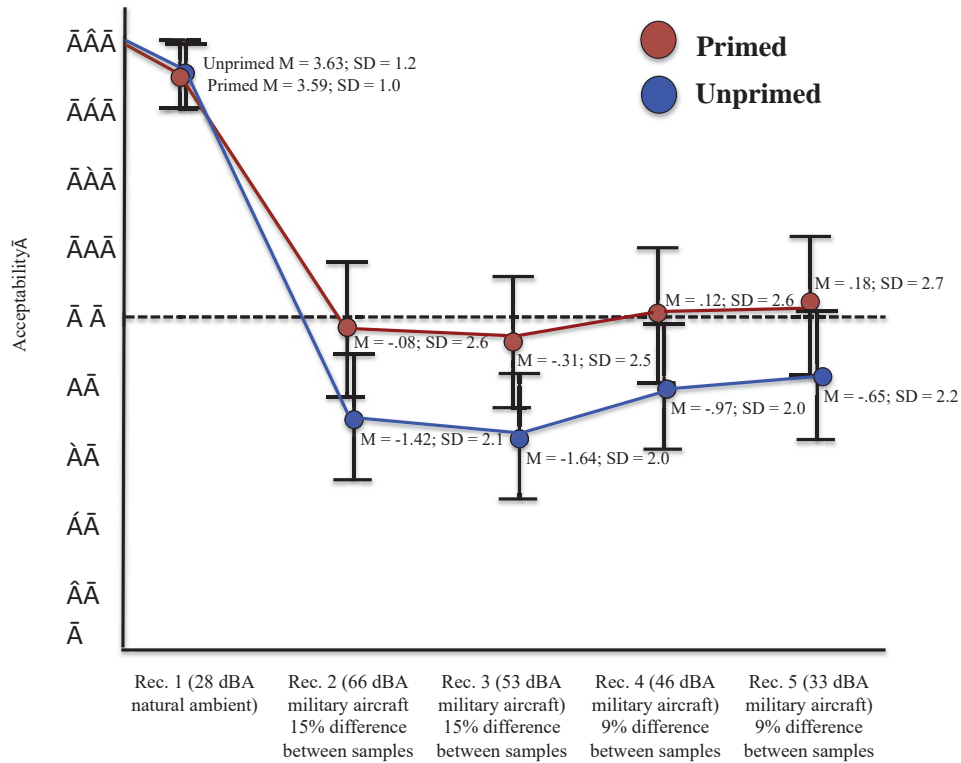


Figure 4.1: Plotted trend comparing primed and unprimed respondent acceptability of military aircraft soundclips

Discussion

The purpose of this study was to determine if indirect management actions in the form of educational messaging could significantly affect visitor acceptability and normative evaluations of military aircraft sounds. Subsequently, our goal was to increase understanding of the strength of educational messaging and to discuss how it may be applied to soundscape management in SEKI and other units. This study demonstrated that a theoretically-based and tested message could be applied in a park unit to effectively

alter visitor attitudes, perceptions, expectations, and therefore, normative evaluations of quality concerning military aircraft sounds.

Educational messaging is one of many indirect management tools that may assist managers to protect, maintain, and restore the natural acoustic environment and visitor experiences. This study, along with previous soundscape messaging research (Mace et al., 2003; Manning et al., 2010; Miller, et al., 1999; Stack, 2008; Stack et al., 2011) increases managers' understanding of the strength of educational messaging as it pertains to soundscape management. Through theoretical development and elicitation testing, the strongest message was chosen and applied in this field study. This message did increase acceptability of military aircraft sounds by as much as 15%, suggesting that educational messaging may offer immediate benefits to SEKI visitor experiences. These significant results do not necessarily suggest that the evaluated message should be implemented in SEKI, but instead demonstrate how messaging can affect visitor perspectives and evaluations of aircraft sounds.

Given the improved relations and ensuing collaborative efforts between NPS and military staff to protect SEKI's soundscape, the findings of this study provide these officials with additional tools to manage visitor experiences as they pertain to park soundscapes. The results suggest that this message could be implemented permanently to improve acceptability of military aircraft, or perhaps used on selective occasions when military overflights might be more prevalent. Whether NPS officials and SEKI managers chose to employ this message or not, we recommend that any implementation of educational messaging rely upon elements of the ELM framework for the most effective influence. ELM provides greater understanding of the challenges managers may face

when attempting to communicate with visitors, and suggests strategies for stimulating central route processing. While managers cannot always reach visitors due to situational and personal variables, developing messages that are relevant, strong, and impactful (Ham, 2007; Ham et al., 2009), may lead to more central route processing.

The effectiveness of soundscape-related messaging efforts should be greater when multiple methods of communication (e.g., trailhead signage, brochures, interpretive presence) are provided (Stack et al., 2011). Any message design should maintain the appearance of current NPS messaging to induce greater perceived source credibility among recipients. Messages should be implemented and evaluated through temporary placement, near areas which tend to be most problematic, to determine how they affect visitor behaviors and experiences. For example, in SEKI, areas where visitors have reported hearing aircraft and finding those associated sounds unacceptable, may be the most appropriate locations for temporary messaging. Those messages that are found to assist with soundscape protection and improve visitor experiences could be employed more permanently. At Muir Woods National Monument, the effective results of experimental messaging through temporary signage led to designation of a permanent quiet zone within the study area (Stack et al., 2011).

Limitations and Future Research

As with all experimental research, this study has limitations. The sample size of this study is relatively small given annual visitation to SEKI, which now exceeds one million visitors (NPS statistics, 2010). The evaluated message was provided only to respondents through the “primed” survey, with no additional communication diffusion (e.g., trailhead signage, brochures, interpretive ranger talk). Additional research should

evaluate other communication strategies in problematic areas to determine if these effects are salient, and which method is most and least effective. Following the natural ambient soundclip, respondents in this study were provided military soundclips in descending order, which may have produced an order effect, similar to order bias discovered through visual/photo methods (Gibson, 2011). Despite trends that suggest that visitors were generally less accepting of louder than quieter military aircraft (Figure 4-1), soundclip order should be evaluated in future studies. This study only tested soundclip acceptability at SEKI, but other NPS units that experience predominantly military aircraft overflights, such as Death Valley National Park, City of Rocks National Reserve, Oregon Pipe National Monument, and John Day Fossil Beds National Monument (Vicki McCusker, personal communication 11/28/11) should also be evaluated to determine salience. Messaging concerning the presence of other types of aircraft (e.g., commercial or air-tour) should be tested in units that experience those predominate events to determine if educational information has a similar effect on visitor perceptions.

We acknowledge that these results only relate to improved social aspects pertaining to visitor experiences, and do not directly improve resource protection or preservation. However, we would hope that if messaging were implemented, it would increase visitor understanding concerning the importance of soundscape protection. We also acknowledge that informing visitors may also negatively impact some visitor experiences. For example, some individuals may not have previously noticed aircraft sounds, even if aircraft were present during their visit, and a message may prime those visitors, and in turn, negatively affect their experience. While stronger messages can provide greater elaboration even when attitudes mismatch, this message may produce

more fervent attitudes in individuals who hold attitudes that misalign with the concepts provided through the tested message. These individuals may in turn become agitated with the NPS for providing the message. Despite these limitations, the results of this study demonstrate the strength of a theoretically-derived message on visitor perspectives.

Conclusion

This study demonstrated how messaging can have a profound effect on visitor perspectives concerning aircraft in SEKI. The results of this study determined that informing visitors about the presence of military aircraft through a theoretically-derived educational message could improve acceptability and alter normative evaluations of military aircraft sounds by as much as 15%. The educational message provided to “primed” respondents resulted in statistically-significant differences in acceptability compared with respondents that were not informed about the presence of military aircraft. “Unprimed respondents” who did not receive the message, found all soundclips that contained military aircraft to be unacceptable. However, priming respondents improved acceptance of military aircraft sounds that peaked at 33 dBA and 46 dBA to an acceptable level, suggesting that the tested message could alter visitor evaluations of military aircraft at SEKI. These results indicate that educational messaging may offer immediate benefits to SEKI visitor experiences.

Indirect management in the form of educational messaging is one of many management tools that may assist managers to protect, maintain, and restore the natural acoustic environment and visitor experiences. This study adds to the growing body of literature that has increased knowledge of soundscape management in parks. The results

improve understanding of how messaging can be applied to park issues by demonstrating that educational messaging may offer immediate benefits to visitor experiences in SEKI.

CHAPTER V

The Value of Messaging for Park Management

The purpose of this dissertation was to evaluate visitor attitudes and increase understanding of the potential for managing visitor perceptions, and ultimately visitor behaviors, with educational messaging. This was accomplished by first examining visitor attitudes toward LNT to gain understanding of the cognitive processing which could be applied to improve day-user behaviors and efficacy, thus mitigating resource and social impacts. The next study evaluated attitudes toward ATS to improve understanding of visitor perceptions, which could be applied to user capacity planning and messaging to improve participation in ATS and reduce reliance of personal automobiles in park units. Finally, the third study assessed the ability of theoretically-derived educational messaging to alter visitor perceptions of intrusive anthropogenic noise from military aircraft.

Summary of Findings

LNT Results Summary

The purpose of the study explained in Chapter two was to develop a better understanding of day-user perceptions of LNT to inform the LNT Center and park managers of effective messaging strategies that can mitigate resource and social impacts. This was accomplished by contrasting Rocky Mountain National Park day-user knowledge, awareness and global perceptions, and attitudes toward LNT with those of overnight users at Olympic National Park. Overall results suggested that these user-groups were similar with regard to knowledge, awareness and global perceptions of LNT, and attitudes regarding LNT Principles #2 (“Travel and Camp on Durable Surfaces”), #6

(“Respect Wildlife”), and #7 (“Be Considerate of Other Visitors”). Both groups believed LNT to be important and highly effective in minimizing resource impacts and curbing depreciative behaviors, suggesting that future educational strategies will be well received. Principles #2 and #7 require additional educational focus because, to a great extent, both groups misinterpreted underlying actions related to these principles. Principle #4 (“Leave What You Find”) may require different messaging approaches for backcountry-overnight visitors because substantially more overnight respondents found “Keeping a single item” to be acceptable than did day-users. However, overall results suggested that backcountry-overnight and day-users could largely be educated about LNT in similar ways.

LNT Implications

The results of this study suggested that future educational strategies aimed at improving LNT efficacy should be well received with both day and overnight visitors, and that education methods can largely be the same for these user-groups. Global perceptions of LNT are positive, and because of this, the LNT Center and park managers should continue using the LNT logo and recommended Principles to increase source credibility. Effective messaging design requires consideration of variables that are thought to enhance and motivate understanding, and should contain elements that promote feelings of personal relevance and responsibility. All LNT messaging should strive to exhibit these features because they are more likely to stimulate central processing, attitude and behavior change.

This study indicated that messaging strategies should focus on targeting day and overnight visitor behaviors related to “Traveling and Camping on Durable Surfaces” and

“Being Considerate of Other Visitors” similarly. Both user-groups indicated having attitudes that largely misalign with recommended practices regarding these Principles, suggesting a need for increased messaging. For example, if a park is experiencing trail-widening in low-lying locations, Principle # 2, “Traveling and Camping on Durable Surfaces,” could be provided with an additional contextually-relevant message stating, “Walking around puddles widens trails and damages vegetation.” This approach would adhere to previously-effective findings, which have indicated that messages should be reinforced and timely near problematic areas, (Hockett, 2000; Hockett & Hall, 2007; Widman, 2010; Widner & Roggenbuck, 2000). Providing a contextually-specific message in addition to Principle #2, will increase resonance with recipients by repeating what they likely may have seen on trailhead signage (i.e., The Seven LNT Principles). This would also stimulate greater elaboration by providing reasoning and a sense of personal responsibility (i.e., potentially damaging vegetation) for not walking around puddles.

Attitudes towards Principle #4, “Leave What You Find,” resulted in substantial differences between the user-groups, as more backcountry-overnight respondents found “Keeping a single item as a souvenir,” to be appropriate than did day-users. These results indicated an overall lack of understanding concerning the concepts related to this Principle, but perhaps more so with backcountry-overnight visitors. The LNT Center and park managers should consider employing additional focus to backpackers regarding Principle #4. For example, the LNT Center could work with parks to implement additional messages that complement “Leave What You Find,” at the pre-trip planning level through permitting websites, permitting offices and backcountry trailhead locations.

In addition to Principle #4, a potential contextual messaging may state, “Don’t you want your children’s children to experience this beautiful place, just as you have?” A message of this level would be expected to appeal to visitors by making it easy to process and be relevant, while instilling a sense of responsibility (i.e., focusing on family and timelessness).

ATS Results Summary

The purpose of the study explained in Chapter three, was to advance understanding of potential messaging and management strategies related to ATS, by determining salient visitor attitudes toward ATS experiences in parks. This was accomplished by contrasting visitor attitudes regarding ATS at Yosemite and Rocky Mountain National Park. Results suggested that the concepts of “ease,” “freedom,” and “stress” and the ten salient underlying variables associated with these factors should be applied to messaging strategies aimed at increasing ridership, improving current ATS visitor experiences, and reducing reliance of personal vehicles. These results also provided greater understanding of potential indicators and standards of quality for ATS visitor-use management frameworks, and indicated that park management should take these variables into consideration when modifying current infrastructure or planning future ATS operations.

ATS Implications

Findings suggested that “ease,” “freedom,” and “stress” represent topics in which park management may be able to message to visitors in a manner that increases ATS ridership, improves visitor experiences, and decreases the reliance on personal automobiles, ultimately reducing impacts to park resources. Results indicate that

messaging should be implemented and tested in YOSE, RMNP and other units focusing upon the “ease,” “freedom,” and lack of “stress” associated with taking the shuttle. All potential messages should incorporate the constructs and underlying variables discussed within this study, while also considering factors that motivate understanding, and engender personal relevance and responsibility. There are numerous messages that could be generated assimilating these elements, and several potential examples are included in Table 5.1.

Table 5.1
Potential ATS Messaging Incorporating Variables Pertaining to “Ease,” “Freedom,” and “Stress”

“Avoid traffic stress ---- park here and let our free buses take you to the scenic overlooks”
“Let our buses safely guide you around the park”
“Avoid parking-lot crowds by taking the easy, safe park shuttle”
“Enjoy the freedom of not having to drive ---- Take our easy shuttles”
“It’s easy to find your way around the park when our trained shuttle drivers safely transport you to the scenic sites”
“Enjoy the scenic sites of the park on a pleasant, safe shuttle”
“Experience the freedom of accessing the park while escaping the driving and parking stress ---- Take the park shuttle”

The salient attitudinal variables discovered with this study demonstrate the importance of messaging to visitors in a manner than emphasizes the problems associated with driving personal vehicles. If drivers are not aware of personal vehicle impacts (i.e., impacts to natural resources and social experiences), they will likely not be as enticed to participate in ATS (Cullinane & Cullinane, 1999). These can be emphasized by pairing messages with additional statements demonstrating the positive effects of using ATS, such as improved air quality, noise reduction, and greater wildlife presence (Laube & Stout, 2000; Turnbull, 2003). Implementation of the LNT Principles at shuttle hubs and on shuttle buses should also be considered, as this will reinforce overall resource protection, while encouraging pleasant interactions with other visitors. While multiple

dissemination strategies should be implemented (i.e., signage inside and outside the park, within buses, websites, surrounding community businesses), ITS may be the most beneficial strategy because of its versatility and proven usefulness within other park units (Daigle & Zimmerman, 2004a; 2004b; Dilworth & Shafer, 2004; Zimmerman et al., 2003). Managers should strive to provide messages early in the visitors' planning process so that expectations and preparations can be made to align with ATS structures.

The results of this study also informed park management concerning potential indicators and standards of quality, and planning efforts pertaining to ATS. Use of the ATS Report Card (Figure 3.5) is encouraged to establish baseline data and allow for subsequent evaluations of ATS operations. Park planners should also consider aspects of "ease," "freedom," and "stress" with current infrastructure and future developments. Results suggested that conforming infrastructure around these concepts may increase acceptance and participation in ATS in other units. That is, if visitors perceive ATS as a viable, easy, and safe mode of travel within one unit, they are likely to participate in ATS in another unit if it provides for a similar experience. All developments should consider these constructs and the associated underlying variables, and examine techniques to avoid crowding on buses, while not creating long queues and wait times that would deter ridership participation (Holly et al., 2010). Planners must consider ATS messaging and infrastructure systematically, as a visitor's choice to participate in ATS may have unintended consequences such as crowding on trail segments, and ensuing resource and social impacts (Lawson, et al., 2011; Pettebone et al., 2011). Messaging should be seen as a viable approach to encourage visitors to go where and when park managers deem

appropriate, to maximize visitor experiences while mitigating resource and social impacts.

Soundscape Messaging Results Summary

The purpose of the study explained in Chapter four was to determine if educational messaging could significantly affect visitor acceptability and normative evaluations of quality pertaining to military aircraft sounds. This was accomplished by formulating and testing a theoretically-derived message, and evaluating its effectiveness with visitors in Sequoia National Park. Results determined that informing visitors about the presence of military aircraft could improve acceptability and alter visitor evaluations of military aircraft sounds by as much as 15%. The educational message provided to “primed” respondents resulted in statistically-significant differences in acceptability compared with respondents that were not informed about the presence of military aircraft. “Unprimed respondents” who did not receive the message, found all soundclips that contained military aircraft to be unacceptable. “Priming” respondents improved acceptance of military aircraft sounds that peaked at 33 dBA and 46 dBA to an acceptable level, which suggested that messaging could alter visitor evaluations of military aircraft at Sequoia.

Soundscape Messaging Implications

The findings of this study indicated that educational messaging might offer immediate benefits to visitor experiences. These significant results do not necessarily suggest that the evaluated message should be implemented in Sequoia, but instead demonstrates the effect messaging can have on visitor perspectives and evaluations of aircraft sounds. These results provide park managers with additional tools to manage

visitor experiences as they pertain to park soundscapes. If park managers deem this approach to be applicable, messaging should be tested using multiple methods of dissemination (e.g., trailhead signage, brochures, interpretive presence) following design features congruent with existing NPS messaging. Messages should be implemented and evaluated through temporary placement, near areas which tend to be most problematic, to determine how they affect visitor behaviors and experiences. Those messages that are found to assist with soundscape protection and improve visitor experiences could be employed more permanently.

Limitations and Future Research

There were several limitations to the studies discussed within this dissertation that merit additional research to support and further validate findings, and to generalize across NPS units. The day-users and overnight visitors sampled for the LNT study completed different types of survey instruments, and each contained slightly different variable phrases to make the behaviors or scenarios applicable for the respective user-groups. If feasible, future studies should apply the same survey design and wording across samples, and should attempt to evaluate all seven LNT Principles. The LNT study measured samples from two separate national parks, but research pertaining to these user-groups should be evaluated within the same park and at other types of protected areas (e.g., city parks, state parks, wildlife refuges, etc.) to evaluate the generalizability of future educational efforts. The example messaging designed from the findings of the LNT study should also be evaluated in Olympic and Rocky Mountain National Parks, as well as other protected areas, to determine if attitude-based LNT messages alter behaviors.

The series testing using multi-group confirmatory factor analyses for the ATS study indicated that the constructs of “ease,” “freedom,” and “stress” were perceived very similarly at Yosemite and Rocky Mountain National Parks, but not exactly in the same manner at both units. It is recognized that these parks, and each NPS unit across the country offer different visitor experiences, and not all ATS messaging or infrastructure can be the same. Despite the differences in shuttle purpose and associated visitor experiences at Yosemite and Rocky, it is encouraging and significant that the results of this study found such substantial similarities between these parks. But because the full sequence of model testing did not meet the suggested fit for all of the statistical examinations, it is suggested that these variables be evaluated for salience at other park units, and other types of protected areas. We recommend that identical variables be evaluated and confirmatory and multi-group confirmatory factor analysis procedures be replicated using the procedures described within Chapter three. Future ATS research should also evaluate visitor characteristics such as age, family situation, and motivation, because these have been found to affect perceptions of ATS. Experimental implementation of proposed messaging should be evaluated in Yosemite and Rocky, as well as other units to determine if these communication strategies actually increase ATS ridership, improve visitor experiences, and decrease the reliance on personal automobiles.

The soundscape messaging study discussed in Chapter four had limitations that warrant additional research. The military aircraft message was provided only to “primed” respondents through a paper on-site survey, and future research should evaluate the effectiveness of other communication methods (e.g., trailhead signage, brochures, interpretive ranger talk). Perhaps the most challenging aspect of messaging to visitors is

to actually motivate them enough to contemplate a given message. For example, the Miller et al., study demonstrated that only 40% of respondents, who had an opportunity to view the message, remembered seeing it. All future messaging studies should strive to continue examining messaging features, to determine the most effective way to stimulate visitor elaboration. The evaluated soundclips described with this study were played for respondents in descending order, which may have produced an order effect. Despite trends that suggest that visitors were generally less acceptable of louder than quieter military aircraft, soundclip order should be evaluated in future studies. This study only tested soundclip acceptability at Sequoia National Park, but other NPS units that experience predominantly military aircraft overflights should also be evaluated to determine salience. Messaging concerning the presence of other types of aircraft (e.g., commercial or air-tour) should be tested in units that experience those predominate events to determine if educational information has a similar effect on visitor perceptions.

Management Principles

This dissertation demonstrated the strength of social science research to evaluate visitor attitudes and to apply that understanding to create empirically-based messages, which could be applied to alter visitor attitudes, behaviors and perceptions. The findings presented within these studies can be used by the NPS and other protected areas to manage escalating visitor use, and external stressors, such as noise from aircraft overflights, while preserving and protecting resource and social conditions. This dissertation adds to the visitor use management toolbox with four overarching principles discovered through the studies presented here.

- **Managing visitor use, requires that we understand visitors.**

Effectively accommodating visitor use and visitor experiences requires that park managers understand who visitors are, their motivations, and how they perceive aspects of the park experience. Much of this can be accomplished by comprehending visitor attitudes. Understanding visitor attitudes allows managers to better protect park resources and social conditions by altering behaviors and experiences to align with management objectives.

- **Visitor attitudes inform messaging strategies.**

Through this dissertation, we have gained a deeper understanding of day-user attitudes toward LNT and associated behaviors. This comprehension allows the LNT Center and park managers to move forward, largely messaging to day-users in a similar manner as overnight visitors. We have also been able to decipher that there are particular behaviors in which minimum-impact education should be targeting, through implementation of contextually-relevant messaging. Similarly, we now understand visitor attitudes toward ATS, and in doing so, have determined salient topics that can be used to influence travel mode decisions. Finally, our comprehension of visitor attitudes toward aircraft sounds can be used to foster the development of influential messaging that can alter park experiences.

- **Messaging can alter visitor perspectives to align with management objectives.**

Maintaining management objectives while accommodating internal factors such as high visitation, and inevitable external factors such as aircraft overflights, can be a daunting task. Yet managers should feel empowered, knowing that messaging can be used to effectively maximize visitor experiences while mitigating resource and social

impacts. This dissertation has suggested viable messaging strategies, founded in theoretical frameworks and salient visitor attitudes, that are effective in managing visitor use. As author, naturalist, and environmentalist Edward Abbey (1989) once said, “One word is worth a thousand pictures – If it’s the right word” (p. 56). As it relates to visitor use, dissemination of management objectives through effective wording can alter visitor attitudes, perceptions, and behaviors, ultimately improving resource and social conditions. Messaging should be seen as an advantageous approach to encourage visitors to conform to recommended behaviors, to go where, when, and how park managers deem appropriate, and to positively influence visitor experiences within a park setting.

- **Messaging can improve the quality of visitor experiences.**

The formulation of messaging based on salient attitudes, allows managers to tailor park experiences to meet visitor needs and expectations. Awareness of attitudes toward ATS allows managers to modify transportation experiences to meet visitor desires, and in doing so, improves the quality of experiences and encourages future ridership. Visitor attitudes toward aircraft noise are generally negative, yet this is an inevitable external feature that will likely continue to impact park visitor experiences. However, this dissertation has shown that implementation of effective educational messaging pertaining to aircraft sounds can affect normative evaluations of quality, and ultimately enhance visitor experiences. This dissertation adds to the visitor-use management toolbox by demonstrating the strength of assessing visitor perspectives, to apply relevant, impactful messaging that can improve visitor experiences and achieve management objectives.

REFERENCES

- Abbey, E. (1989). *A voice crying in the wilderness: Notes from a secret journal*. New York, NY: St. Martin's Press.
- Absher, J. D., & Bright, A. D. (2004). Communication research in outdoor recreation and natural resources management. In M. J. Manfredi, J. J. Vaske, B. L. Bruyere, D. R. Field, & P. J. Brown (Eds.), *Society and Natural Resources: A Summary of Knowledge* (pp. 117 – 126). Jefferson, MO: Modern Litho.
- Ajzen, I. (1985). From intentions to actions: A theory of planned behavior. In J. Kuhl & J. Beckmann (Eds.), *Action control: From cognition to behavior* (pp. 11 – 39). New York, NY: Springer-Verlag.
- Ajzen, I. (1991). The theory of planned behavior. *Organizational Behavior and Human Decision Processes*, 50, 179 – 211.
- Ajzen, I. & Fishbein, M. (1980). *Understanding attitudes and predicting social behavior*. Englewood Cliffs, NJ: Prentice-Hall.
- Ambrose, S., & Burson, S. (2004). Soundscape studies in national parks. *George Wright Society Forum*, 21(1), 29 – 38.
- Anable, J. (2005). 'Complacent Car Addicts' or 'Aspiring Environmentalists'? Identifying travel behaviour segments using attitude theory. *Transport Policy*, 12(1), 65 – 78.
- Anable, J., Gatersleben, B. (2005). All work and no play? The role of instrumental and affective factors in work and leisure journeys by different travel modes. *Transportation Research Part A-Policy and Practice*, 39(2-3), 163 – 181.
- Anonymous. (1923, March 11). Motor highways poor in the national parks. *New York Times*, p. XX6.
- Anonymous. (1921, December 4). National park tourists. *New York Times*, p. 107.
- Ballantyne, R. & Hughes, K. (2006). Using front-end and formative evaluation to design and test persuasive bird feeding warning signs. *Tourism management*, 27, 235 – 246.
- Bamberg, S., Ajzen, I., & Schmidt, P. (2003). Choice travel mode in the theory of planned behavior: The roles of past behavior, habit, and reasoned action. *Basic and Applied Social Psychology*, 25(3), 175 – 187.
- Bamberg, S., Rolle, D., & Weber, C. (2003). Does habitual car use not lead to more resistance to change of travel mode? *Transportation* 30, 97 – 108.

- Barber, J.R., Fristrup, K.F., Brown, C.L., Hardy, A.R., Angeloni, L.M., & Crooks, K.R. (2010). Conserving the wild life therein: Protecting park fauna from anthropogenic noise. *Park Science*, 26(3), 26 – 31.
- Barber, J.R., Turina, F., & Fristrup, K.M. (2010). Tolerating noise and the ecological costs of “habituation”. *Park Science*, 26(3), 24 – 25.
- Bell, P. A., Mace, B. L., & Benfield, J. A. (2010). Aircraft overflights at national parks: Conflict and its potential resolution. *Park Science*, 26(3), 65 – 67.
- Benfield, J. A., Bell, P. A., Troup, L. J., & Soderstrom, N. (2010). Does anthropogenic noise in national parks impair memory? *Environment and Behavior*, 42(5), 693 – 706.
- Bentler, P. M. (1990). Comparative fit indexes in structural models. *Psychological Bulletin*, 107(2), 238 – 246.
- Bentler, P. M., & Bonett, D. G. (1980). Significance tests and goodness of fit in the analysis of covariance structures. *Psychological Bulletin*, 88(3), 588 – 606.
- Booth-Butterfield, S., & Welbourne, J (2002). The elaboration likelihood model: Its impact on persuasion theory and research. In J. P. Dillard, & M. Pfau (Eds.), *The persuasion handbook: Developments in theory and practice* (pp. 135 – 173). Thousand Oaks, CA: Sage Publications.
- Bradley, J. A. (1979). A human approach to reducing wildland impacts. In R., Ittner, D. R., Potter, J. K., Agee, & S. Anschell, S. (Eds.), *Proceedings: Recreational impacts on wildlands*. Portland, OR: USDA Forest Service, Pacific Northwest Region.
- Bright, A. D., Teel, T., Manfredi, M. J., & Brooks, J. (2003). *Attitudes toward drilling in the Alaska National Wildlife Refuge: An application of the elaboration likelihood model of persuasion*. Paper presented at the Conference on Human Dimensions in Natural Resources, Sun Valley, ID.
- Brown, M. W., MacCallum, R. C., Kim, C., Andersen, B. L., & Glaser, R. (2002). When fit indices and residuals are incompatible. *Psychological Methods*, 7(4), 403 – 421.
- Cialdini, R. B., Demaine, L. J., Sagarin, B. J., Barrett, D. W., Rhoads, K., & Winter, P. L. (2006). Managing social norms for persuasive impact. *Social Influence*, 1(1), 3 – 15.
- Choo, S., & Mokhtarian, P. L. (2008). How do people respond to congestion mitigation policies? A multivariate probit model of the individual consideration of three travel-related strategy bundles. *Transportation*, 35, 145 – 163.

- Chavez, D. J. (2000). Wilderness visitors in the 21st century: Diversity, day use, and preferences. *International Journal of Wilderness*, 6(2), 10 – 11.
- Christensen, H. & Cole, D. N. (2000). Leave no trace practices: Behaviors and preferences of wilderness visitors regarding use of cookstoves and camping away from lakes. In S.F. McCool, W.T. Borrie, J. O'Loughlin (Eds.), *Proceedings: Wilderness Science in a Time of Change Conference* (pp. 77 – 85). Ogden, UT: USDA Forest Service, Rocky Mountain Research Station.
- Cohen, J. (1988). *Statistical power analysis for the behavioral sciences*. (2nd ed.). Hillsdale, NJ: Erlbaum.
- Cole, D. N. (2001). *Day users in wilderness: how different are they?* USDA Forest Service Research Paper RMRS-RP-31. Ogden, UT: Rocky Mountain Research Station
- Cole, D. N. (2004). Environmental impacts of outdoor recreation in wildlands. In M. J. Manfredi, J. J. Vaske, B. L. Bruyere, D. R. Field, & P. J. Brown (Eds.), *Society and Natural Resources: A Summary of Knowledge* (pp. 107 – 116). Jefferson, MO: Modern Litho.
- Cole, D. N., & Stankey, G. H. (1997). Historical development of limits of acceptable change: Conceptual clarifications and possible extensions. *Proceedings: Limits of tourism carrying capacity: Fantasy or reality? Acceptable change and related planning processes: Progress and future directions*. Missoula, MT: USDA Forest Service.
- Cole, D. N., Hammond, T., & McCool, S. (1997). Information quality and communication effectiveness: Low-impact messages on wilderness trailside bulletin boards. *Leisure Sciences*, 19(1), 59-72.
- Cole, D. N., Watson, A. E., & Roggenbuck, J. W. (1995). *Trends in wilderness visitors and visits: Boundary Waters Canoe area, Shining Rock, and Desolation Wildernesses*. Ogden, UT: USDA Forest Service Research Paper INT-RP-483. 38
- Colten, C. E., & Dilsaver, L. M. (2005). The hidden landscape of Yosemite National Park. *Journal of Cultural Geography*, 22(2), 27 – 50.
- Confer, J. J., Mowen, A. J., Graefe, A. R., & Absher, J. D. (2000). *Magazines as wilderness information sources: Assessing users' general wilderness knowledge and specific Leave No Trace knowledge*. USDA Forest Service Proceedings RMRS-P-15-VOL-4.
- Cullinane, S., Cullinane, K. (1999). Attitudes towards traffic problems and public transport in Dartmoor and Lake District National Parks. *Journal of Transport Geography*, 7, 79 – 87.

- Daigle, J. J. (2008). Transportation research needs in national parks: A summary and exploration of future trends. *The George Wright Forum*, 25(1), 57 – 64.
- Daigle, J. J., & Zimmerman, C. A. (2004a). Alternative transportation and travel technologies: monitoring parking lot conditions over three summer seasons at Acadia National Park. *Journal of Park and Recreation Administration*, 22(4), 81 – 102.
- Daigle, J. J., & Zimmerman, C. A. (2004b). The convergence of transportation, information technology, and visitor experience at Acadia National Park. *Journal of Travel Research*, 43(2), 151 – 160.
- Daniels, M. L., & Marion, J. L. (2005). Communicating Leave No Trace ethics and practices: Efficacy of two-day trainer courses. *Journal of Park and Recreation Administration*, 23(4), 1 – 19.
- Davenport, M. A., & Borrie, W. T. (2005). The appropriateness of snowmobiling in national parks: an investigation of the meanings of snowmobiling experiences in Yellowstone National Park. *Environmental Management* 35, 151 – 160.
- Dilworth, V. A. (2003). *Visitor perceptions of alternative transportation systems and intelligent transportation systems in National Parks*. Department of Parks, Recreation, and Tourism Sciences, Texas A&M University, College Station, TX.
- Dilworth, G., & Shafer, S. (2004). Visitor perceptions of intelligent transportation systems in a national park. In K. Bricker (Ed.), *Proceedings of the 2004 Northeastern Recreation Research Symposium* (Vol. Gen. Tech Rep. NE-326, pp. 158 – 163). Newtown Square, PA: USDA Forest Service Northeastern Research Station.
- Douchette, J. E., & Cole, D. N. (1993). *Wilderness visitor education: Information about alternative techniques*: USDA Forest Service General Technical Report INT-295.
- Driver, B. L., Tinsley, H.E., & Manfredi, M. J. (1991). Leisure and recreation experience preference scales: Results from two inventories designed to assess the breadth of the perceived psychological benefits of leisure. In B.L. Driver, P.J. Brown , & G.L. Peterson (Eds.), *The benefits of leisure* (pp. 263-287). State College, PA: Venture
- Dowell, G. S., & McCool, S. F. (1986). Evaluation of a wilderness information dissemination program. In R. C. Lucas (Ed.), *Proceedings: National Wilderness Research Conference: Current Research*. General Technical Report INT-212. Ogden, UT: USDA Forest Service, Intermountain Research Center.

- Duncan, G. S., & Martin, S. R. (2002). Comparing the effectiveness of interpretive and sanction messages for influencing wilderness visitors' intended behavior. *International Journal of Wilderness*, 8(2), 20 – 25.
- Dunning, A., 2005. Impacts of transit in national parks and gateway communities. *Transportation Research Records: Journal of the Transportation Research Board* 1931, 129 – 136.
- Du Puy, W. A. (1925, May 31). Curtain rises on nation's park show. *New York Times*, p. SM4.
- Eagly, A.H., & Chaiken, S. (1993). *The psychology of attitudes*. Fort Worth, TX: Harcourt Brace Jovanovich.
- Everhart, W. (1983). *The National Park Service*. Boulder, CO: Westview Press.
- Ewert, A. W. (1996). Human dimensions research and natural resource management. In A.W. Ewert, D. J. Chavez, & A.W. Magill (Eds.), *Culture, conflict, and communication in the wildland-urban interface* (pp. 5 – 12). Boulder, CO: Westview Press.
- Fahy, F. (2001). *Foundations of engineering acoustics*. London, UK: Academic Press.
- Fazio, J.R. (1979). Communicating with the Wilderness User. University of Idaho College of Forestry, Wildlife and Range Experiment Station, *Bulletin Number 28*.
- Fishbein, M., & Ajzen, I. (1975). *Belief, intention and behavior: An introduction to theory and research*. Sydney, Australia: Addison-Wesley.
- Fishbein, M., & Manfredo, M. J. (1992). A theory of behavior change. In M. Manfredo, J. (Ed.), *Influencing human behavior: Theory and application in recreation, tourism, and natural resources management*. Champaign, IL: Sagamore Publishing Inc.
- Fristrup, K. M. (2010). Applying community noise metrics in parks. *Park Science*, 26(3), 21 – 22.
- Gerbing, D. W., & Hamilton, J. G. (1996). Viability of exploratory factor analysis as a precursor to confirmatory factor analysis. *Structural Equation Modeling*, 3(1), 62 – 72.
- Gibson, A. W. (2011). *Photograph presentation order and range effects in visual based outdoor recreation research*. (Doctoral Dissertation). Colorado State University, Fort Collins, CO.

- Graefe, A., Kuss, F., & Vaske, J. (1990). *Visitor impact management: The planning framework*. Washington, DC: National Parks and Conservation Association.
- Gramann, J. H., & Vander Stoep, G. A. (1986). *Reducing Depreciative Behavior at Shiloh National Military Park*. Technical report No. 2. College Station, TX: USDI National Park Service, Cooperative Park Studies Unit.
- Griffin, C. (2004). *Leave no trace and national park wilderness areas*. Paper presented at the Northeastern Recreation Research Symposium. Bolton Landing, NY.
- Haas, G. E. (2004). On the waterfront: Vital judicial ruling addresses visitor capacity. *Parks and Recreation*, 39(9), 106 – 113.
- Haas, G.E., & Wakefield, T.J. (1998). *National Parks and the American Public*. A summary report of the National Parks Conservation Association, conducted by Colorado State University.
- Hale, J. L., Householder, B. J., & Green, K. L. (2002). The theory of reasoned action. In J. P. Dillard, & M. Pfau (Eds.), *The persuasion handbook: Developments in theory and practice* (pp. 259 – 286). Thousand Oaks, CA: Sage Publications.
- Hallo, J. C., Manning, R. E. (2009). Transportation and recreation: A case study of visitors driving for pleasure at Acadia National Park. *Journal of Transport Geography* 17, 491 – 499.
- Ham, S. H. (2007). From interpretation to protection: Is there a theoretical basis? *Journal of the Association for Heritage Interpretation*, 12(3), 20 – 23.
- Ham, S. H., Brown, T., Curtis, J., Weiler, B., Hughes, M., & Poll, M. (2009). *Promoting persuasion in protected areas: A guide for managers who want to use strategic communication to influence visitor behavior*. Technical Report for the Sustainable Tourism Cooperative Research. Centre. Gold Coast, Queensland. ISBN: 9781921521751
- Ham, S. H., & Krumpel, E. E. (1996). Identifying audiences and messages for nonformal environmental education - A theoretical framework. *Journal of Interpretation Research*, 1(1), 11 – 23.
- Hammitt, W. E., & D. N. Cole. (1998). *Wildland Recreation: Ecology and Management*. New York: John Wiley & Sons.
- Harding, J., Borrie, W., & Cole, D. (2000). *Factors that limit compliance with low-impact recommendations*. Paper presented at the Wilderness science in a Time of Change Conference, Missoula Montana.

- Harmon, W. (1997). *Leave no trace: Minimum impact outdoor recreation*. Helena, MT: Falcon Publishing, Inc.
- Hendee, J. C., & Dawson, C. (2002). *Wilderness management: Stewardship and protection of resources and values* (3rd ed.), Golden, CO: Fulcrum Publishers.
- Hendricks, W. W. (1999). Persuasive communication and grade level effects on behavioral intentions within a wilderness education program. *International Journal of Wilderness*, 5(2), 21 – 25.
- Hendricks, W. W., Ramthun, R. H., & Chavez, D. J. (2001). The effects of persuasive message source and content on mountain bicyclists' adherence to trail etiquette guidelines. *Journal of Park and Recreation Administration* 19(3), 38 – 61.
- Henson, R. K., & Roberts, K. J. (2006). Use of exploratory factor analysis in published research: Common errors and some comment on improved practice. *Educational and Psychological Measurement*, 66, 393 – 416.
- Hockett, K.S. (2000). *The effectiveness of two interpretations on reducing deer feeding behavior by park visitors*. (Unpublished Masters Thesis). Virginia Polytechnic Institute and State University. Blacksburg, Virginia.
- Hockett, K. S., & Hall, T. E. (2007). The effect of moral and fear appeals on park visitors' beliefs about feeding wildlife. *Journal of Interpretation Research*, 12(1), 4 – 26.
- Holly, F. M., Hallo, J. C., Baldwin, E. D., Mainella, F. P. (2010). Incentives and disincentives for day visitors to park and ride public transportation at Acadia National Park. *Journal of Park and Recreation Administration*, 28(2), 74 – 93.
- Hu, L. T., & Bentler, P. M. (1999). Cutoff criteria for fit indexes in covariance structure analysis: Conventional criteria versus new alternatives. *Structural Equation Modeling*, 6(1), 1 – 55.
- Huffman, M. G., & Williams, D. R. (1987). *Computer versus brochure information dissemination as a backcountry management tool*. Paper presented at the National Wilderness Research Conference, USDA Forest Service, Intermountain Research Center Ogden, UT General Technical Report INT-212.
- Hurley, A. E., Scandura, T A., Schriesheim, A C., Brannick, M. T., Seers, A., Vandenberg, R. J., & Williams, J. L. (1997). Exploratory and confirmatory factor analysis: Guidelines, issues, and alternatives. *Journal of Organizational Behavior*, 18, 667 – 683.

- Jacobi, C. (2003). *An experiment using signs to reduce visitor-built cairns in Acadia National Park*. ANP Natural Resource Report 20002-04. Bar Harbor, ME: USDI National Park Service, Acadia National Park.
- Jensen, M., & Thompson, H. (2004). Natural sounds: An endangered species. *The George Wright Forum*, 21(1), 10 – 13.
- Johnson, D. R., & Swearingen, T. C. (1992). The effectiveness of selected trailside sign texts in deterring off-trail hiking, Paradise Meadows, Mount Rainier National Park. In H. H., Christensen, D., Johnson, & M., Brookes. (Eds.), *Vandalism: Research, prevention and social policy* (pp. 103–19). General Technical Report PNW-GTR-293. Portland, OR: USDA Forest Service, Pacific Northwest Region.
- Jones, M. (1999). *Leave No Trace: Pilot project report*. Retrieved from http://www.bouldercolorado.gov/index.php?option=com_content&task=view&id=3054&Itemid=411
- Jones, M., & Bruyere, B. (2004). *Frontcountry Leave No Trace program evaluation, city of Boulder Open Space and Mountain Parks*. Paper presented at the International Symposium on Society and Resource Management Keystone, Colorado, June 5, 2004.
- Keizer, G. (2008). Preserving silence in national parks: A battle against noise aims to save our natural soundscapes. Retrieved from <http://www.smithsonianmag.com/science-nature/sounds-in-parks.html#ixzz1fmGA52vC>
- Kernan, A., & Drogin, E. (1995). The effect of a verbal interpretive message on day user impacts at Mt. Rainier National Park. In C. Dawson (Ed.), *Proceedings of the 1994 Northeastern Recreation Research Symposium* (pp. 127 – 129). General Technical Report NE-198. Radnor, PA: USDA Forest Service, Northeastern Forest Experiment Station.
- Krechmer, D., Grimm, L., Hodge, D., Mendes, D., & Goetzke, F. (2001). *Federal lands alternative transportation systems study: Summary of national ATS needs* (Vol. 3). (FTA-TPL Publication No. 10-2000; FHWA-EP Publication No. 00-024). Report to Federal Highway Administration & Federal Transit Administration prepared by Cambridge Systematics, Inc. & BRW Group, Inc., Cambridge, MA.
- Krog, N. H., & Engdahl, B. (2005). Annoyance with aircraft noise in local recreational areas and the recreationists' noise situation at home. *Journal of the Acoustical Society of America*, 117(1), 221 – 231.
- Lackey, B. K., & Ham, S. H. (2003). Assessment of communication focused on human-black bear conflict at Yosemite National Park. *Journal of Interpretation Research*, 8(1), 25 – 40.

- Laube, M. M., & Stout, R. W. (2000). Grand Canyon National Park – Assessment of transportation alternatives. *Transit: Planning, Intermodal Facilities, Management, and Marketing*, (1735), 59 – 69.
- Lavine, H., & Snyder, M. (1996). Cognitive processing and the functional matching effect in persuasion: The mediating role of subjective perceptions of message quality. *Journal of Experimental Social Psychology*, 32, 580 – 604.
- Lawson, S., Chamberlin, R., Choi, J., Swanson, B., Kiser, B., Newman, P., Monz, C., Pettebone, D., & Gamble, L. (2011). Modeling the effects of shuttle service on transportation system performance and quality of visitor experience in Rocky Mountain National Park. *Transportation Research Record: Journal of the Transportation Research Board*, 2244, 97 – 106.
- Leung, Y. F., & Attarian, A. (2003). *Evaluating the effectiveness of the Leave No Trace program in the city of Durango, Colorado*. Final report submitted to the Leave No Trace, Inc.
- Leung, Y. F., & Marion, J. L. (2000). Recreation impacts and management in wilderness: A state-of-knowledge review: In S.F. McCool, W.T. Borrie, J. O'Loughlin (Eds.), *Wilderness science in a time of change conference proceedings* (pp. 23 – 48). RMRS-P-15-VOL-5. Ogden, UT: USDA Forest Service, Rocky Mountain Research Station.
- Lime, D., W., & Lucas, R. C. (1977). Good information improves the wilderness experience. *Naturalist*, 28, 18 – 20.
- Lucas, R. C. (1981). *Redistributing Wilderness Use Through Information Supplied to Visitors*. Research Paper-INT-277. Ogden, UT: USDA Forest Service, Intermountain Forest and Range Experiment Station.
- Lucas, R. C. (1983). The role of regulations in recreation management. *Western Wildlands*, 9(2), 6 – 10.
- Lumsdon, L., Downward, P., Rhoden, S. (2006). Transport for tourism: Can public transport encourage a modal shift in the day visitor market? *Journal of Sustainable Tourism*, 14, 139 – 156.
- Mace, B. L., Bell, P. A., & Loomis, R. J. (1999). Aesthetic, affective, and cognitive effects of noise on natural landscape assessment. *Society & Natural Resources*, 12(3), 225 – 242.
- Mace, B. L., Bell, P. A., & Loomis, R. J. (2004). Visibility and natural quiet in national parks and wilderness areas: Psychological considerations. *Environment and Behavior*, 36, 5 – 31.

- Mace, B. L., Bell, P. A., Loomis, R. J., & Haas, G. E. (2003). Source attribution of helicopter noise in pristine national park landscapes. *Journal of Park and Recreation Administration*, 21(3), 97-119.
- Malm, W. C., Kelley, K., Moenar, J., & Daniel, T. C. (1981). Human perception of visual air quality (uniform haze). *Atmospheric Environment*, 15, 1875 – 1980.
- Manfredo, M., J., & Bright, A. D. (1991). A model for assessing the effects of communication on recreationists. *Journal of Leisure Research*, 23(1), 1 – 20.
- Manning, R.E. (1999). *Studies in outdoor recreation: Search and research for satisfaction*. Corvallis, OR: Oregon State University Press.
- Manning, R. E. (2001). Visitor experience and resource protection: A framework for managing the carrying capacity of national parks. *Journal of Park and Recreation Administration*, 19(1), 93 – 108.
- Manning, R. E. (2003). Emerging principles for using information/education in wilderness education. *International Journal of Wilderness*, 9(1), 20 – 27.
- Manning, R. E. (2007). *Studies in outdoor recreation: Search and research for satisfaction*. (3rd ed). Corvallis, OR: Oregon State University Press.
- Manning, R. F., Lawson, S., Valliere, W., Bacon, J., Laven, D. (2002). *Schoodic Peninsula, Acadia National Park Visitor Study 2000 – 2001*. University of Vermont, Parks Studies Laboratory, Burlington, VT.
- Manning, R. E., Newman, P., Fristrup, K., Stack, D. W., Pilcher, E. J. (2010). A program of research to support management of visitor-caused noise at Muir Woods National Monument. *Park Science*, 26(3), 54 – 58.
- Marin, L. D. (2011). *An exploration of visitor motivations: The search for silence*. (Master's Thesis). Colorado State University. Fort Collins, CO.
- Marin, L. D., Newman, P., Manning, R. E., Vaske, J. J., & Stack, D. (2011). Motivation and acceptability norms of human-caused sound in Muir Woods National Monument. *Leisure Sciences*, 33(2), 147 – 161.
- Marion, J. L., Dvorak, R. G., Manning, R. E. (2008). Wildlife feeding in parks: Methods for monitoring the effectiveness of educational interventions and wildlife food attraction behaviors. *Human Dimensions of Wildlife* 13: 429 – 442.
- Marion, J., & Reid, S. (2001). Development of the United States Leave No Trace program: A historical perspective. In M. B. Usher, (Ed.), *Enjoyment and Understanding of the Natural Heritage* (pp. 81 – 92). Edinburgh, Scotland: The Stationary Office Ltd.

- Marion, J. L., & Reid, S. E. (2007). Minimizing visitor impacts to protected areas: The efficacy of visitor education programs. *Journal of Sustainable Tourism, 15*(1), 5 – 27.
- Martin, D. C. (1992). The effect of three signs and a brochure on visitors' removal of pumice at mount St. Helens. In H. H., Christensen, D., Johnson, & M., Brookes (Eds.), *Vandalism: Research, prevention and social policy* (pp. 121–31). General Technical Report PNW-GTR-293. Portland, OR: USDA Forest Service, Pacific Northwest Region.
- McAvoy, L. H., & Hamborg, R. (1984). Wilderness visitor knowledge of regulations: A comparison of visitor contact methods. *Journal of Interpretation, 9*(1), 1 – 10.
- McCool, S. F., & Cole, D. N. (2000). *Communicating minimum impact behavior with trailside bulletin boards: Visitor characteristics associated with effectiveness*. USDA Forest Service Report RMRS-P-15-VOL-4.
- McDonald, C.D., Baumgartner, R.M., & Iachan, R. (1995). *National Park Service aircraft management studies*. National Park Service, USDI, Report No. 94 – 2, Denver, CO.
- Mertz, S. (2002). *Compliance with Leave No Trace frontcountry principles: A preliminary examination of visitor behavior*. City of Boulder Open Space and Mountain Parks. Retrieved from http://joomla.ci.boulder.co.us/files/openspace/pdf_research/obsv-stdy-report.pdf
- Middelkoop, M. V., Borgers, A., & Timmermans, H. (2003). Inducing heuristic principles of tourist choice of travel mode: A rule-based approach. *Journal of Travel Research, 42*(1), 75 – 83.
- Milfont, T. L., & Fischer, R. (2010). Testing measurement invariance across groups: Applications in cross-cultural research. *International Journal of Psychological Research, 3*(1), 111 – 121.
- Miller, N. P. (1999). The effects of aircraft overflights on visitors to U.S. national parks. *Noise Control Engineering Journal, 47*(3), 112 – 117.
- Miller, N. P., Anderson, G. S., Horonjeff, R. D., & Thompon, R. H. (1999). *Mitigating the effects of military aircraft overflights on recreational users of parks*. Final Report. HMMH Report No. 294470.04.
- Miller, T., Borrie, W., & Harding, J. (2001). *Basic knowledge of factors that limit the practice of low-impact behaviors*. Report USDA, Forest Service, Rocky Mountain Research Station, Aldo Leopold Wilderness Research Institute, Missoula, MT: University of Montana.

- Miller, C. A., & Wright, G. R. (1999). An assessment of visitor satisfaction with public transportation services at Denali National Park and preserve. *Park Science* 19, 18 – 21.
- Mills, E. A. (1915). *Rocky Mountain Wonderland*. Boston, MA & New York, NY: Riverside Press Cambridge.
- Monz, C. A., Cole, D. N., Leung, Y. F., & Marion, J. L. (2010). Sustaining visitor use in protected areas: Future opportunities in recreation ecology research based on the USA experience. *Environmental Management*, 45, 551 – 562.
- Moscardo, G., Pearce, P., Morrison, A. (2001). Evaluating different bases for market segmentation: A comparison of geographic origin versus activity participation for generating tourist market segments. *Journal of Travel & Tourism Marketing* 10(1), 29 – 49.
- National Park Service (1997). *The visitor experience and resource protection (VERP) framework: A handbook for planners and managers*. USDI. Denver, CO: NPS Denver Service Center.
- National Park Service Organic Act (1916). 16 USC 1.
- National Park Service Natural Sounds and Night Skies Division Interpretive Handbook (2010). Retrieved from <http://www1.nrintra.nps.gov/naturalsounds/outreach/>
- National Park Overflight Act (1987). Congress enacted Public Law 100 – 91.
- National Park Visitor Use (2006). NPS Visitor Use Handbook. Chapter 8.2.
- Newman P., Lawson, S., L. D., Marin, & B. D. Taff (In Review). *Soundscape indicators of quality research in Yosemite (YOSE) and Sequoia and Kings Canyon National Parks (SEKI), Phase I*. National Park Service Report. Colorado State University, Fort Collins, CO. Resource Systems Group, White River Junction, VT.
- Newman, P., Lawson, S., & Monz, C. (2011). *Integrated approach to transportation and visitor use management at Rocky Mountain National Park*. Report for Rocky Mountain National Park. Colorado State University, Fort Collins, CO. Resource Systems Group, White River Junction, VT. Utah State University, Logan, UT.
- Newman, P., Manning, R., Bacon, J., Graefe, & Kyle, G. (2003). An evaluation of Appalachian Trail hikers' knowledge of minimum impact skills and practices. *International Journal of Wilderness*, 9(2), 34 – 38.
- Newman, P., Manning, R., & Trevino, K. (2010). From landscapes to soundscapes: Introduction to the special issue. *Park Science*, 26(3), 2 – 5.

- Oliver, S. S., Roggenbuck, J. W., & Watson, A. E. (1985). Education to reduce impacts in forest campgrounds. *Journal of Forestry*, 83(4), 234 – 236.
- Outdoor Foundation Outdoor Participation Report (2010). Retrieved from <http://www.outdoorfoundation.org/research.participation.2010.html>
- Papenfuse, M. K., Roggenbuck, J. W., & Hall, T. E. (2000). The rise of the day visitor in wilderness: should managers be concerned? In D. N., Cole, S. F., McCool, W. T., Borrie, & J., O'Loughlin. (Eds.), *Wilderness science in a time of change conference: Wilderness visitors, experiences, and visitor management*, (pp. 148 – 154). U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.
- Park, L., Manning, R., Marion, J., Lawson, S., & Jacobi, C. (2008). Managing Visitor Impacts in Parks: A Multi-Method Study of the Effectiveness of Alternative Management Practices. *Journal of Park and Recreation Administration* 26(1), 97 – 121.
- Park, L., Lawson, S., Kaliski, K., Newman, P., & Gibson, A. (2010). Modeling and mapping hikers' exposure to transportation noise in Rocky Mountain National Park. *Park Science* 26(3), 59 – 64.
- Park Studies Laboratory (2002). *Blue Ridge Parkway Visitor Survey*. Study Completion Report. University of Vermont, Burlington.
- Perloff, R. M. (2003). *The dynamics of persuasion: Communication and attitudes in the 21st century*. (2nd ed.). Mahwah, NJ: Lawrence Erlbaum Associates.
- Pettebone, D., Newman, P., Lawson, S., Hunt, L., Monz, C., & Zwiefka, J. (2011). Estimating visitors' travel mode choices along the Bear Lake Road in Rocky Mountain National Park. *Journal of Transport Geography*, 19, 1210 – 1221.
- Petty, R. E., & Cacioppo, J. T. (1981). *Attitudes and persuasion: Classic and contemporary approaches*. Dubuque, IA: Wm. C. Brown.
- Petty, R. E., & Cacioppo, J. T. (1986). Communication and persuasion: Central and peripheral routes to attitude change. New York, NY: Springer-Verlag.
- Petty, R. E., & Wegener, D. (1998). Attitude change: Multiple roles for persuasion variables. In D. Gilbert, S., Fiske, & G. Lindzey (Eds.), *The handbook of social psychology* (Vol. 1, pp. 323 – 390). Boston, MA: McGraw-Hill.
- Petty, R. E., & Wegener, D. (1999). The Elaboration Likelihood Model: Current status and controversies. In S. Chaiken, & Y. Trope (Eds.), *Dual process theories in social psychology* (pp. 37 – 72).

- Petty R. E., & Wegener, D. (2008). Matching versus mismatching attitude functions: Implications for scrutiny of persuasive messages. In R. H., Fazio, & R. E., Petty, (Eds.), *Attitudes their structure, function and consequences: Key readings in social psychology*. New York, NY: Psychology Press.
- Pilcher, E. J., Newman, P., & Manning, R. E. (2009). Understanding and managing experiential aspects of soundscapes at Muir Woods National Monument. *Environmental Management*, 43(3), 425 – 435.
- Powell, R. D., Wright, B. A., & Vagias, V. M. (2008). *Preliminary evaluation of recreational skills and ethics training programs occurring on public lands: The Leave No Trace visitor education program*. Department of Parks, Recreation and Tourism Management, Clemson University, Clemson, SC.
- Prideaux, B., Wei, S., Ruys, H. (2001). The senior drive tour market in Australia. *Journal of Vacation Marketing* 7(3), 209 – 219.
- Reid, S. (2000). From dog waste to daisy pickers: "Leave No Trace" educates outdoor recreators. *Parks and Recreation*, 35(7), 70 – 77.
- Reid, S. E., & J. L. Marion. (2004). An adaptive management assessment of new camping policies in Shenandoah National Park. *Environmental Conservation* 31(4), 274 – 282.
- Reuhrwein, J. R. (1998). *Exploring knowledge, attitudes, and reported behavior of southern Utah backcountry recreationalists*. (Unpublished Masters Thesis) Utah State University, Logan, UT.
- Roggenbuck, J. W., & Berrier, D. (1982). A comparison of the effectiveness of two communication strategies in dispersing wilderness campers. *Journal of Leisure Research*, 14, 77-89.
- Roggenbuck, J. W., & Lucas, R. C. (1987). Wilderness use and user characteristics: a state-of-knowledge review. In R. C., Lucas (Ed.), *Proceedings: National wilderness research conference: Issues, state-of-knowledge, future directions*. Ogden, UT: USDA Forest Service General Technical Report INT-202: 204-245.
- Roggenbuck, J. W., Marion, J. L., & Manning, R. F. (1994). Day users of the backcountry: The neglected national park visitor. *Trends*, 31(3), 19 – 24.
- Russell, D. W. (2002). In search of underlying dimensions: The use (and abuse) of factor analysis in personality and social psychology bulletin. *Personality and Social Psychology Bulletin*, 28(12), 1629 – 1646.

- Schwartzkopf, S. K. (1984). *Feeding of golden mantled ground squirrels by park visitors at Crater Lake National Park*. Corvallis, OR: National Park Service Cooperative Park Studies Unit. Res. CPSU/OSU 84 – 89.
- Shaffer, M. S. (2001). *See America first: Tourism and national identity, 1880-1940*. Washington, DC: Smithsonian Institution Press.
- Shelby, B., & Heberlein, T. A. (1986). *Carrying capacity in recreation settings*. Corvallis, OR: Oregon State University Press.
- Shelby, B., Vaske, J. J., Donnelly, M. P. (1996). Norms, standards, and natural resources, *Leisure Sciences*, 18(2), 103 – 123.
- Sims, C. B., Hodges, D. G., Fly, J. M., & Stephens, B. (2005). Modeling acceptance of a shuttle system in the Great Smoky Mountains National Park. *Journal of Park and Recreation Administration*, 23(3), 25 – 44.
- Stack, D. W. (2008). *Human dimensions of natural soundscape management in national parks: Visitor perceptions of soundscapes and managing for natural sound*. (Master's Thesis). Colorado State University. Fort Collins, CO
- Stack, D. W., Newman, P., Manning, R. E., & Fristrup, K. M. (2011). Reducing visitor noise levels at Muir Woods National Monument using experimental management. *Journal of the Acoustical Society of America*, 129(3). 1375 – 1380.
- Stamps, A. E. (1990). Use of photographs to simulate environments: A meta-analysis. *Perceptual and Motor Skills*, 71, 907 – 913.
- Stankey, G. H., Cole, D., Lucas, R., Peterson, M., Frissell, S., & Washburne, R. (1985). *The limits of acceptable change (LAC) system for wilderness planning*. USDA Forest Service General Technical Report. Ogden: U.S. Department of Agriculture, Forest Service, Intermountain Forest and Range Experiment Station.
- Stewart, W., Cole, D. N., Manning, R. E., Valliere, W., Taylor, J., Lee, M. (2000). Preparing for a day hike at Grand Canyon: What information is useful? In D. N., Cole, S. F., McCool, W. T., Borrie, & J., O'Loughlin, Jennifer (Eds.), *Wilderness science in a time of change conference: Wilderness visitors, experiences, and visitor management* (pp. 221 – 225). USDA, Forest Service, Rocky Mountain Research Station.
- Stubbs, C. J. (1991). *Low-impact recreational practices: Assessing and improving wilderness user knowledge, behavioral intentions, and behavior*. (Unpublished Masters Thesis). Virginia Polytechnic Institute and State University, Blacksburg, VA.

- Sun, S., Pan, W., & Wang, L. L. (2010). A comprehensive review of effect size reporting and interpreting practices in academic journals in education and psychology. *Journal of Educational Psychology, 102*(4), 989 – 1004.
- Tarrant, M. A., Bright, A. D., & Cordell, H. K. (1996). *The effect of persuasive communication strategies on rural resident attitudes toward ecosystem management*. Paper presented at the Sixth International Symposium on Society and Natural Resource Management, University Park, PA.
- Tarrant, M. A., Haas, G. H., & Manfredi, M. J. (1995). Factors affecting visitor evaluations of aircraft overflights of wilderness areas. *Society & Natural Resources, 8*(4), 351 – 360.
- Teel, T. L., Bright, A. D., Manfredi, M. J., & Brooks, J. J. (2006). Evidence of biased processing of natural resource-related information: A study of attitudes toward drilling oil in the Arctic National Wildlife Refuge. *Society and Natural Resources, 19*, 447 – 463.
- Thorn, T. F. (1995). *Teaching low-impact camping practices to wilderness backpackers: An evaluation of trailhead information signing and personal contact*. (Unpublished Master's Thesis). Utah State University, Logan, UT.
- Todorov, A., Chaiken, S., Henderson, M. D. (2002). The heuristic-systematic model of social information processing. In J. P., Dillard, & M., Pfau (Eds.), *The persuasion handbook: Developments in theory and practice* (pp. 195 – 211). Thousand Oaks, CA: Sage Publications.
- Trafimow, D., & Borrie, W. T. (1999). Influencing future behavior by priming past behavior: A test in the context of Petrified Forest National Park, *Leisure Sciences, 21*, 31 – 42.
- Turnbull, K. (2003). Transport to nature: Transportation strategies enhancing visitor experience in national parks. *TR News, 224*, 15 – 21.
- Vagias, W. M. (2009). *An examination of the Leave No Trace visitor education program in two U.S. national park service units*. (Doctoral Dissertation). Clemson University, Clemson, SC.
- Vagias, W.M., & Powell, R.B. (2010). Backcountry visitors' Leave No Trace attitudes. *International Journal of Wilderness, 16*(3), 21 – 27.
- Vandenberg, R. J., & Lance, C. E. (2000). A review and synthesis of the measurement invariance literature: Suggestions, practices, and recommendations for organizational research. *Organizational Research Methods, 3*, 4 – 69.

- Vaske, J. J. (2008). *Survey research and analysis: Applications in parks, recreation and human dimensions*. State College, PA: Venture Publishing.
- Vaske, J. J., Gliner, J. A., & Morgan, G. A. (2002). Communicating judgments about practical significance: Effects size, confidence intervals and odds ratios. *Human Dimensions of Wildlife, 7*, 287 – 300.
- Wheaton, B., Muthen, B., Alwin, D. F., & Summers, G. F. (1977). Assessing the reliability and stability in panel models. *Sociological Methodology, 8*, 84 – 136.
- White, D. D. (2007). An interpretive study of Yosemite National Park visitors' perspectives toward alternative transportation in Yosemite Valley. *Environmental Management, 39*(1), 50 – 62.
- White, D. D., Aquino, J. F., Budruk, M., & Golub, A. (2011). Visitors' experiences of traditional and alternative transportation in Yosemite National Park. *Journal of Park and Recreation Administration, 29*(1), 38 – 57.
- Whittaker, D., Shelby, B., Manning, B., Cole, D., & Hass, G. (2011). Capacity reconsidered: Finding consensus and clarifying differences. *Journal of Park and Recreation Administration, 29*(1), 1 – 20.
- Widaman, K. F., & Thompson, J. S. (2003). On specifying the null model for incremental fit indices in Structural Equation Modeling. *Psychological Methods, 8*(1), 16 – 37.
- Widman, C. G. (2010). *Discouraging off-trail hiking to protected park resources: Evaluating management efficacy and natural recovery*. (Master's Thesis). Virginia Polytechnic Institute and State University, Blacksburg, VA.
- Widner, C. J., & Roggenbuck, J. R. (2000). Reducing theft of petrified wood at Petrified Forest National Park. *Journal of Interpretation Research, 5*(1), 1 – 18.
- Widner, C. J., & Roggenbuck, J. R. (2003). Understanding park visitors' response to reduce petrified wood theft. *Journal of Interpretation Research, 8*(1), 67 – 82.
- Winter, P. L. (2006). The impact of normative message types on off-trail hiking. *Journal of Interpretation Research, 11*(1), 34 – 52.
- Wood, W. (2000). Attitude change: Persuasion and social influence. *Annual Review of Psychology, 51*, 539 – 570.
- Youngs, Y. L., White, D. D., & Wodrich, J. A. (2008). Transportation systems as cultural landscapes in national parks: The case of Yosemite. *Society & Natural Resources, 21*(9), 797 – 811.

Ziegler, R., Dobre, B., & Diehl, M. (2007). Does matching versus mismatching message content to attitude functions lead to biased processing? The role of message ambiguity. *Basic and Applied Social Psychology*, 29(3), 269 – 278.

Zimmerman, C. A., Coleman, T. G., Daigle, J. J. (2003). *Evaluation of Acadia National Park ITS Field Operational Test Final Report*. FHWA-OP-03-130. U.S.D.O.T. ITS Joint Program Office, Washington, DC.

APPENDIX A

AEEFGEEAACAEECA
 AAHHIIIÄ Ä Date: / / 2009Ä
 Time: _____ AM/PM



1. Please indicate your level of agreement with the following statements using the scale '1' NOT AT ALL UNDER MY CONTROL to '7' COMPLETELY UNDER MY CONTROL. Circle the number of your response for each statement.

	Not at all under my control	Neutral	Completely under my control
CH AEGAAACCCEAEDAAEECEGAEEECBAACBPCAAACE DEH	1A	1AAAAAA	7A
CH ADCAGAAACADDEECBAEEDAEADCEGA AEEECBAECEBACEEHA	1A	1AAAAAA	7A
CH A GECCECCBAECCBCEEAEECEGA EEEECBA ACEDEECEAACEEACH	1A	1AAAAAA	7A
CH AEGCAGACDCEBCECECEEAEECEGADEEEACEEDCEAA AEECEGA EEEECBAECEBACEEHA	1A	1AAAAAA	7A

2. Please indicate how INAPPROPRIATE or APPROPRIATE you think each of the following activities is for a visitor to do in Rocky Mountain National Park. Circle the number of your response for each statement.

Activities	Very Inappropriate	Neutral	Very Appropriate
CH AGECEBCECCACEEECEGAEEEECECEDEEAEEEGECEA EAGCECEAEADGCECEACEAAAEAEAE	1A	1AAAAAA	7A
CH ACDCCCEAGAEBAECEBAECEAECEADDECECEEA ECECEAECECEEADECEA	1A	1AAAAAA	7A
CH AECFCBAECCAECEDEBAECEAEEDCAECEEECEA CEDEEECEEA	1A	1AAAAAA	7A
CH B CEEACEEECEACCGAEEEEEAEEDCAEECEEA 1A	1A	1AAAAAA	7A
CH AEECDACEDEEEEAACECECEBCEEECECEAA EDECACEEAECEDECEDEAC	1A	1AAAAAA	7A
CH CEEGACEEAEDCEEAEGAECCBAEBAACECECEEA CCDBCA	1A	1AAAAAA	7A
DH ACCBAEEDAECEACAECECAECECEDEEA CCCEDECAEEFCDEEA	1A	1AAAAAA	7A
DH A EFCBAECEEAECEEEAEDEEA CECAACEEEDA EECEEAEECECAEECEEECEEA	1A	1AAAAAA	7A
DH AEEEAACEEAEAEAEDEEECAEEAEAEAEAEAEAEAE CEEEAECEEA	1A	1AAAAAA	7A
DH EEEECDDAGDEEDCECAEEAEDEEEEA 1A	1A	1AAAAAA	7A
EH AECBAEACGAEBAAGDAECECEEAEECEAEAEAE CGDEEDCEDEEA	1A	1AAAAAA	7A
EH AECACACECEACEBAEADAECDECAEAECEAE 1A	1A	1AAAAAA	7A

3. Please indicate the level at which you think each of the following activities would reduce negative impacts and improve visitor experiences in the Park. Circle the number of your response for each statement.

Participating in the following activities in Rocky Mountain National Park would reduce impact...	Never	Sometimes	Every time
1. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
2. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
3. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
4. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
5. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
6. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
7. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3

4. The same activities are listed below. Regardless of how effective you think each of the following activities are, please indicate how DIFFICULT you think each of the following activities would be for a visitor to do in Rocky Mountain National Park. Circle the number of your response for each statement.

Activities	Not at all Difficult	Moderately Difficult	Extremely Difficult
1. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
2. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
3. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
4. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
5. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
6. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3
7. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3

5. The same activities are listed below. In COLUMN A tell us if you DO each activity by circling NEVER, SOMETIMES or ALWAYS.

In COLUMN B, please indicate how LIKELY are you to do the activity in the future by circling the number of your response for each statement.

Activities	Column A			Column B		
	Do You Do This Now?			How Likely Are You To Do This In The Future?		
	Never	Sometimes	Always	Not at all Likely	Moderately Likely	Extremely Likely
1. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3
2. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3
3. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3
4. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3
5. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3
6. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3
7. Participating in the following activities in Rocky Mountain National Park would reduce impact...	1	2	3	1	2	3

APPENDIX B

Surveyor Use Only
 ID: 1 _____
 Date: / / 2008
 Time: _____ AM/PM

OMB # 1024-0224 (NPS # 08-028)
 Expiration Date: 12/31/2008
 IRB ID# 08-107H



Rocky Mountain National Park



Alberta Falls Survey

1. **Including this visit, approximately how many times have you visited Rocky Mountain National Park?**

Number of visits: _____

2. **On the scale below, please indicate how familiar you are with Rocky Mountain National Park ? (Circle one number.)**

1	2	3	4	5	6	7	8	9
Not at all familiar							Extremely familiar	

3. **Have you visited Alberta Falls before? (Check one.)**

Yes (CONTINUE TO QUESTION 4)
 No (SKIP TO QUESTION 5)

4. **Including this time, approximately how many times have you visited Alberta Falls?**

Number of visits: _____

5. **On your trip today, at which trailhead did you begin your hike?**
(Check one.)

Glacier Gorge Trailhead
Bear Lake Trailhead
Don't know
Other: _____

6. **On your hike today, which locations did you visit? (Check all that apply.)**

Alberta Falls
Mills Lake
Black Lake
Loch Vale
Sky Pond
Dream Lake
Emerald Lake
Nymph Lake
None of the above
Don't know
Other: _____

7. **Approximately what time did you start your hike to Alberta Falls today?**

_____ AM/PM

OR

Don't know

8. **In general, how did the encounters you had with other people at Alberta Falls today affect your overall enjoyment of your hiking experience? (Please check one response, even if you did not see other people.)**

- Greatly added to my enjoyment
- Somewhat added to my enjoyment
- Had no effect
- Somewhat reduced my enjoyment
- Greatly reduced my enjoyment

9. A We would like to know how many other people you think you could encounter at Alberta Falls without feeling too crowded. To help judge this, please rate each of the photographs by indicating how acceptable you find it based on the number of people in the photo. (Circle one number for each photo)

	Very Unacceptable					Very Acceptable				
Photo 1	-4	-3	-2	-1	0	1	2	3	4	
Photo 2	-4	-3	-2	-1	0	1	2	3	4	
Photo 3	-4	-3	-2	-1	0	1	2	3	4	
Photo 4	-4	-3	-2	-1	0	1	2	3	4	
Photo 5	-4	-3	-2	-1	0	1	2	3	4	

- B Which photograph looks most like the number of people you saw at Alberta Falls today?

- Photo 1
 Photo 2
 Photo 3
 Photo 4
 Photo 5

- C Which photograph looks most like the number of people you would prefer to see at Alberta Falls?

- Photo 1
 Photo 2
 Photo 3
 Photo 4
 Photo 5

10. How crowded did you feel while you were at Alberta Falls today? (Circle one number.)

1	2	3	4	5	6	7	8	9
Not at all Crowded		Slightly Crowded			Moderately Crowded		Extremely Crowded	

11. How much of a problem were each of the following items for you at Alberta Falls today? (Check one box for each item.)

	Not a Problem	Small Problem	Big Problem	Don't Know/No Opinion
Difficulty locating the trailhead				
Lack of available parking at the trailhead				
Not enough information provided at the trailhead about how to prepare for a hike on the trail				
Not enough signs with information about the natural and cultural history of the area				
Not enough directional signs along the trail				
Trails are too wide				
Trails are too eroded (e.g. exposed roots, rocks, channeling)				
Litter along the trail				
Improperly disposed human waste evident on or near the trail				
Too many people on the trail				
Off-trail trampling around Alberta Falls				
Sound from aircraft				
Sound from large groups of visitors				
Sound from other visitors				
Sound from NPS maintenance				
Sound from vehicles (e.g. cars, buses, motorcycles)				
Other:				

12. What did you like best about your trip to Alberta Falls today?

Response:

13. What did you like least about your trip to Alberta Falls today?

Response:

14. We would like to know how you feel about using different kinds of transportation in Rocky Mountain National Park. For each statement below:

1. Rate how much you agree or disagree that the statement describes traveling in Rocky Mountain National Park in your *personal vehicle*
then

2. Rate how much you agree or disagree that the statement describes traveling using the Rocky Mountain National Park *shuttle bus*. Please answer this part even if you have not yet used the shuttle bus system.

Statements	Your Personal Vehicle				Park Shuttle			
	1= Strongly Agree	2= Agree	3= Disagree	4= Strongly Disagree	1= Strongly Agree	2= Agree	3= Disagree	4= Strongly Disagree
You have easy access to your personal belongings (such as recreation equipment)	1	2	3	4	1	2	3	4
You have an opportunity to learn about the park while traveling	1	2	3	4	1	2	3	4
Travel is affordable or low cost	1	2	3	4	1	2	3	4
You have opportunities to see wildlife	1	2	3	4	1	2	3	4
It is easy to find your way around the park	1	2	3	4	1	2	3	4
You have pleasant interactions with other visitors	1	2	3	4	1	2	3	4
It takes too long to get where you want to go	1	2	3	4	1	2	3	4
You feel safe	1	2	3	4	1	2	3	4
You have little impact on park's natural environment	1	2	3	4	1	2	3	4
You connect with the natural environment	1	2	3	4	1	2	3	4
You hear natural sounds	1	2	3	4	1	2	3	4
You have easy access to different areas of the park	1	2	3	4	1	2	3	4
You hear the sounds of traffic	1	2	3	4	1	2	3	4
It is easy to get to scenic overlooks/vistas	1	2	3	4	1	2	3	4
You experience a sense of freedom	1	2	3	4	1	2	3	4
You feel stressed while traveling through the park	1	2	3	4	1	2	3	4
You have trouble finding parking	1	2	3	4	1	2	3	4
You can go "where you want, when you want"	1	2	3	4	1	2	3	4
You experience conflict with visitors using other kinds of transportation	1	2	3	4	1	2	3	4
You avoid traffic congestion	1	2	3	4	1	2	3	4
You feel crowded by other visitors	1	2	3	4	1	2	3	4

15. How did you get to the trailhead today?

- Personal vehicle
- Shuttle bus
- Other: _____

16. What is your sex? (Check one.)

- Male
- Female

17. In what year were you born?

Year born: 19_____

18. Do you live in the United States? (Check one.)

- Yes - What is your zip code? _____
- No - In what country do you live? _____

19. What is the highest level of formal education you have completed (Check one.)

- Some high school
- High school graduate or GED
- Some college, business or trade school
- College, business or trade school graduate
- Some graduate school
- Master's, doctoral or professional degree

20. Are you Hispanic or Latino? (Check one)

- Yes
- No

21. What is your race? (Check one or more.)

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or other Pacific Islander
- White

Thank you for your help with this survey!

Please return the completed questionnaire to the survey administrator.

PRIVACY ACT and PAPERWORK REDUCTION ACT statement: 16 U.S.C. 1a-7 authorizes collection of this information. This information will be used by park managers to better serve the public. Response to this request is voluntary. No action may be taken against you for refusing to supply the information requested. The permanent data will be anonymous. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. BURDEN ESTIMATE statement: Public reporting burden for this form is estimated to average 10 minutes per response. Direct comments regarding the burden estimate or any other aspect of this form to:

Superintendent
Rocky Mountain National Park
Estes Park, CO 80538

OMB # 1024-0224 (NPS # 08-028) Expiration Date: 12/31/2008

APPENDIX C

Ä

Please imagine yourself as a visitor to Rocky Mountain National Park. If you were to hear and/or see aircraft flying overhead during your visit, to what extent would it affect your experience? It would make my experience...

Very Unacceptable -4 -3 -2 -1 0 1 2 3 4 Very Acceptable

The following 3 messages are intended to provide Park visitors with information about potential reasons for hearing and/or seeing aircraft while in the Park. Please read the following messages and answer the questions that follow.

Commercial aircraft flying to and from major cities in Colorado are allowed to fly over Rocky Mountain National Park. Consequently, visitors hiking in this area of the park can sometimes hear and/or see high-altitude commercial jets flying overhead.

Would receiving the above message make hearing and/or seeing aircraft more or less acceptable to you?

Less Acceptable -4 -3 -2 -1 0 1 2 3 4 More Acceptable

How does this statement make you feel about your experience in the Park?

Many people use commercial aircraft to fly to and from major cities. Because of the proximity to Denver, Colorado, commercial aircraft are allowed to fly over Rocky Mountain National Park. Consequently, visitors hiking in this area of the park can sometimes hear and/or see high-altitude commercial aircraft overhead.

Would receiving the above message make hearing and/or seeing aircraft more or less acceptable to you?

Less Acceptable -4 -3 -2 -1 0 1 2 3 4 More Acceptable

How does this statement make you feel about your experience in the Park?

Ä

Visitors hiking in this area of the park can sometimes hear and/or see high-altitude commercial jets flying overhead because they are allowed to fly over Rocky Mountain National Park.

Would receiving the above message make hearing and/or seeing aircraft more or less acceptable to you?

Less Acceptable -4 -3 -2 -1 0 1 2 3 4 More Acceptable

How does this statement make you feel about your experience in the Park?

Please turn and complete page 2...

Now, please imagine yourself as a visitor to Sequoia National Park. If you were to hear and/or see aircraft flying overhead during your visit, to what extent would it affect your experience? It would make my experience...

Very Unacceptable									Very Acceptable
-4	-3	-2	-1	0	1	2	3	4	

The following 3 messages are intended to provide Park visitors with information about potential reasons for hearing and/or seeing aircraft while in the Park. Please read the following messages and answer the question that follows.

Military aircraft are allowed to conduct training flights over Sequoia National Park. Consequently, visitors hiking in this area of the park can sometimes hear military aircraft flying overhead.

Would receiving the above message make hearing and/or seeing aircraft more or less acceptable to you?

Less Acceptable				No Effect					More Acceptable
-4	-3	-2	-1	0	1	2	3	4	

How does this statement make you feel about your experience in the Park?

Visitors hiking in this area of the park can sometimes hear/and or see military aircraft overhead because they are allowed to fly over Sequoia National Park.

Would receiving the above message make hearing and/or seeing aircraft more or less acceptable to you?

Less Acceptable				No Effect					More Acceptable
-4	-3	-2	-1	0	1	2	3	4	

How does this statement make you feel about your experience in the Park?

Military aircraft are allowed to conduct training flights over Sequoia National Park in an effort to help keep the United States of America safe. Consequently, visitors hiking in this area of the park can sometimes hear/and or see military aircraft flying overhead.

Would receiving the above message make hearing and/or seeing aircraft more or less acceptable to you?

Less Acceptable				No Effect					More Acceptable
-4	-3	-2	-1	0	1	2	3	4	

How does this statement make you feel about your experience in the Park?

Thank you for your participation in this study!!!

Ä

APPENDIX D

ID: _____ Location: _____

Date: ____/____/2011 Time: _____AM / PM

Sequoia and Kings Canyon National Parks Visitor Survey

1. How many people are in your personal group (family/friends) today?
Group size: _____

2. Is your personal group part of a commercial tour in the park today? (Check one.)
 Yes
 No

3. Have you ever visited Sequoia or Kings Canyon National Parks before? (Check one.)
 Yes (CONTINUE TO QUESTION 4)
 No (SKIP TO QUESTION 5)

4. Approximately how many times have you visited Sequoia or Kings Canyon National Parks before today? (Record a number or check the box.)
Approximate number of visits: _____ **OR** Don't know/Not sure

5. Please rate the importance of each of the following reasons for your visit to Sequoia or Kings Canyon National Parks today. (Check one box for each item.)

	Not important at all	Slightly important	Moderately important	Very important	Extremely important
Appreciate the scenic beauty.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experience solitude.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spend time with family/friends.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Get some exercise.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experience the sounds of nature.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experience a sense of connection with nature.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enjoy peace and quiet.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Please indicate how your experience of each of the following items during your visit compared with your expectations. (Check one box for each item.)

How did it compare with your expectations?

	I had no expectations	A lot less than expected	Less than expected	About as expected	More than expected	A lot more than expected
Number of people you saw while hiking.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Opportunity to experience sounds of nature.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Opportunity to view wildlife.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Amount of time you heard aircraft.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FOR THE NEXT SET OF QUESTIONS, PLEASE ASK THE SURVEY ATTENDANT FOR ASSISTANCE.

7. *Military aircraft are allowed to conduct training flights over Sequoia National Park in an effort to help keep the United States of America safe. Consequently, visitors hiking in this area of the park can sometimes hear/and or see military aircraft flying overhead. We would like to know how acceptable you think it is to hear sounds from military aircraft while hiking in this area of the park. To help judge this, we would like you to listen to several short recordings of sounds in Sequoia and Kings Canyon National Parks. Please rate each recording by indicating how acceptable you would find the sounds heard in the audio clip while hiking in this area of the park. (Circle one number for each recording.)*

Very Unacceptable	Recording 1								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 2								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 3								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 4								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 5								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

**YOU HAVE COMPLETED THIS PORTION OF YOUR LISTENING SESSION.
CONTINUE TO THE NEXT PAGE**

8. Which of the five recordings you just heard sounds most like what you heard at Sequoia or Kings Canyon National Parks today? (Check one.)

- Recording 1
- Recording 2
- Recording 3
- Recording 4
- Recording 5

9a. Please describe the sounds in the recordings that you found to be pleasing or annoying.

Pleasing sounds: _____

Annoying sounds: _____

9b. Please describe the sounds in the recordings that you found to be appropriate or inappropriate for this area.

Appropriate sounds: _____

Inappropriate sounds: _____

10. Humans can cause noise in national parks in several ways. Please rate the degree to which you think the following types of human-caused noises were a problem during your visit in this area of Sequoia and Kings Canyon National Park. (Check one box for each item.)

Noise from...	Problem during your hike today?		
	No Problem	Small Problem	Big Problem
Automobile traffic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Park operations (e.g., trail maintenance, construction vehicles)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visitors talking loudly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aircraft flying overhead	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal electronics (e.g., cell phone, iPod)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. Please indicate the extent to which you would support or oppose each of the following potential management actions at Sequoia National Park (Check one box for each item.)

	Strongly Support	Support	Neither Support nor Oppose	Strongly Oppose	Don't Know/Not Sure
Reduce the number of military aircraft allowed to fly over the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintain the number of military aircraft allowed to fly over the park at the current level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increase the number of military aircraft allowed to fly over the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Require military aircraft to be flown over the park only during designated dates and times.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Require military aircraft to use designated flight paths over limited areas of the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prohibit military aircraft from flying over the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12. What is your gender? (Check one.)

- Male
 Female

13. In what year were you born?

Year born: _____

14. Do you live in the United States? (Check one.)

- Yes (What is your zip code? _____)
 No (What country do you live in? _____)

15. What is the highest level of formal education you have completed? (Check one.)

- Some high school
 High school graduate or GED
 Some college, business or trade school
 College, business or trade school graduate
 Some graduate school
 Master's, doctoral or professional degree

16. Are you Hispanic or Latino? (Check one.)

- Yes No

17. What is your race? (Check all that apply.)

- American Indian or Alaska Native
 Asian
 Black or African American
 Native Hawaiian
 Pacific Islander other than Native Hawaiian
 White

**Sequoia and Kings Canyon and Colorado State University thank you for your help!
Please return the completed questionnaire to the survey administrator.**

PRIVACY ACT and PAPERWORK REDUCTION ACT statement: 16 U.S.C. 1a-7 authorizes collection of this information. This information will be used by park managers to better serve the public. Response to this request is voluntary. No action may be taken against you for refusing to supply the information requested. The permanent data will be anonymous. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. OMB #: 1024-0024 exp. Date: 06/30/2012
BURDEN ESTIMATE statement: Public reporting burden for this form is estimated to average 15 minutes per response. Direct comments regarding the burden estimate or any other aspect of this form to:

Koren R. Nydick, Science Coordinator/Ecologist, Sequoia and Kings Canyon National Parks
47050 Generals Highway, Three Rivers, CA 93271
Koren_Nydick@nps.gov

APPENDIX E

ID: _____ Location: _____

Date: ____/____/2011 Time: _____AM / PM

Sequoia and Kings Canyon National Parks Visitor Survey

1. How many people are in your personal group (family/friends) today?
Group size: _____

2. Is your personal group part of a commercial tour in the park today? (Check one.)
 Yes
 No

3. Have you ever visited Sequoia or Kings Canyon National Parks before? (Check one.)
 Yes (CONTINUE TO QUESTION 4)
 No (SKIP TO QUESTION 5)

4. Approximately how many times have you visited Sequoia or Kings Canyon National Parks before today? (Record a number or check the box.)
Approximate number of visits: _____ **OR** Don't know/Not sure

5. Please rate the importance of each of the following reasons for your visit to Sequoia or Kings Canyon National Parks today. (Check one box for each item.)

	Not important at all	Slightly important	Moderately important	Very important	Extremely important
Appreciate the scenic beauty.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experience solitude.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spend time with family/friends.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Get some exercise.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experience the sounds of nature.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experience a sense of connection with nature.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enjoy peace and quiet.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Please indicate how your experience of each of the following items during your visit compared with your expectations. (Check one box for each item.)

How did it compare with your expectations?

	I had no expectations	A lot less than expected	Less than expected	About as expected	More than expected	A lot more than expected
Number of people you saw while hiking.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Opportunity to experience sounds of nature.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Opportunity to view wildlife.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Amount of time you heard aircraft.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FOR THE NEXT SET OF QUESTIONS, PLEASE ASK THE SURVEY ATTENDANT FOR ASSISTANCE.

7. We would like to know how acceptable you think it is to hear the following sounds while hiking in this area of the park. To help judge this, we would like you to listen to several short recordings of sounds in Sequoia and Kings Canyon National Parks. Please rate each recording by indicating how acceptable you would find the sounds heard in the audio clip while hiking in this area of the park. (Circle one number for each recording.)

Very Unacceptable	Recording 1								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 2								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 3								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 4								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

ADVANCE YOUR PLAYER AND RESUME YOUR LISTENING SESSION.

Very Unacceptable	Recording 5								Very Acceptable
-4	-3	-2	-1	0	+1	+2	+3	+4	

**YOU HAVE COMPLETED THIS PORTION OF YOUR LISTENING SESSION.
CONTINUE TO THE NEXT PAGE**

8. Which of the five recordings you just heard sounds most like what you heard at Sequoia or Kings Canyon National Parks today? (Check one.)

- Recording 1
- Recording 2
- Recording 3
- Recording 4
- Recording 5

9a. Please describe the sounds in the recordings that you found to be pleasing or annoying.

Pleasing sounds: _____

Annoying sounds: _____

9b. Please describe the sounds in the recordings that you found to be appropriate or inappropriate for this area.

Appropriate sounds: _____

Inappropriate sounds: _____

10. Humans can cause noise in national parks in several ways. Please rate the degree to which you think the following types of human-caused noises were a problem during your visit in this area of Sequoia and Kings Canyon National Park. (Check one box for each item.)

Noise from...	Problem during your hike today?		
	No Problem	Small Problem	Big Problem
Automobile traffic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Park operations (e.g., trail maintenance, construction vehicles)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visitors talking loudly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aircraft flying overhead	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal electronics (e.g., cell phone, iPod)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. Please indicate the extent to which you would support or oppose each of the following potential management actions at Sequoia National Park (Check one box for each item.)

	Strongly Support	Support	Neither Support nor Oppose	Strongly Oppose	Don't Know/Not Sure
Reduce the number of military aircraft allowed to fly over the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintain the number of military aircraft allowed to fly over the park at the current level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increase the number of military aircraft allowed to fly over the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Require military aircraft to be flown over the park only during designated dates and times.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Require military aircraft to use designated flight paths over limited areas of the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prohibit military aircraft from flying over the park.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12. What is your gender? (Check one.)

- Male
 Female

13. In what year were you born?

Year born: _____

14. Do you live in the United States? (Check one.)

- Yes (What is your zip code? _____)
 No (What country do you live in? _____)

15. What is the highest level of formal education you have completed? (Check one.)

- Some high school
 High school graduate or GED
 Some college, business or trade school
 College, business or trade school graduate
 Some graduate school
 Master's, doctoral or professional degree

16. Are you Hispanic or Latino? (Check one.)

- Yes No

17. What is your race? (Check all that apply.)

- American Indian or Alaska Native
 Asian
 Black or African American
 Native Hawaiian
 Pacific Islander other than Native Hawaiian
 White

**Sequoia and Kings Canyon and Colorado State University thank you for your help!
Please return the completed questionnaire to the survey administrator.**

PRIVACY ACT and PAPERWORK REDUCTION ACT statement: 16 U.S.C. 1a-7 authorizes collection of this information. This information will be used by park managers to better serve the public. Response to this request is voluntary. No action may be taken against you for refusing to supply the information requested. The permanent data will be anonymous. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. OMB #: 1024-0024 exp. Date: 06/30/2012
BURDEN ESTIMATE statement: Public reporting burden for this form is estimated to average 15 minutes per response. Direct comments regarding the burden estimate or any other aspect of this form to:

Koren R. Nydick, Science Coordinator/Ecologist, Sequoia and Kings Canyon National Parks
47050 Generals Highway, Three Rivers, CA 93271
Koren_Nydick@nps.gov

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: MOA edits
Date: Tuesday, November 13, 2018 7:27:32 PM
Attachments: [Growler Consultation MOA DRAFT.docx](#)

October 8, 2018 - Email from Dr. Allyson Brooks, Washington SHPO

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Monday, October 8, 2018 3:59 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED] Army, Matthew L CAPT
NAS Whidbey Is., N00 [REDACTED]
Cc: Helen Price Johnson [REDACTED]; Griffin, Kristen [REDACTED]
Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED]
Subject: [Non-DoD Source] MOA edits

Please see our edits to the MOA. Our edits have been coordinated with Kristin Griffin and Jim Baumgart from the Governor's office.

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]

[REDACTED]

1 **MEMORANDUM OF AGREEMENT**
2 **AMONG**
3 **COMMANDER, NAVY REGION NORTHWEST,**
4 **AND**
5 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
6 **AND THE**
7 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
8 **REGARDING THE EA-18G “GROWLER” AIRFIELD OPERATIONS,**
9 **NAVAL AIR STATION WHIDBEY ISLAND,**
10 **ISLAND COUNTY, WASHINGTON**
11 **2018**

12
13 WHEREAS, Commander, Navy Region Northwest (hereinafter “Navy”) proposes to increase the
14 number of aircraft stationed at Naval Air Station (NAS) Whidbey Island and the number airfield
15 operations at both Ault Field and Outlying Field (OLF) Coupeville (Undertaking); and
16

17 WHEREAS, Navy will continue to implement its current operational mitigation practices to
18 avoid and minimize noise impacts on the surrounding communities as feasible; and
19

20 WHEREAS, Navy has determined that the proposed Undertaking has the potential to cause
21 effects on historic properties subject to review under section 106 of the National Historic
22 Preservation Act (hereinafter “NHPA”) 54 U.S.C. § 306108, and its implementing regulations,
23 36 C.F.R. § 800; and
24

25 WHEREAS, Navy invited the Advisory Council on Historic Properties (ACHP) to participate in
26 the entire section 106 process under Subpart B of 36 CFR § 800 and the ACHP agreed to
27 participate in the entire process; and
28

29 WHEREAS, Navy established the Area of Potential Effect (APE) for the Undertaking consistent
30 with 36 C.F.R. § 800.16(d), by taking into consideration the following three components of the
31 Undertaking:

- 32 • On-installation Direct Effect Area: Areas on the installation where historic properties
33 could be directly affected (e.g., by ground disturbance, demolition, or alteration).
- 34 • On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB
35 Day Night Sound Level (DNL) noise contours where historic properties could be disturbed
36 by the introduction of visual, atmospheric, or audible elements.
- 37 • Off-installation Indirect Effect Area: Areas off installation but within operational areas
38 bounded by the 65 DNL noise contours (i.e. introduction of visual, atmospheric, or audible
39 elements), including the Central Whidbey Island Historic District; and
40

41 WHEREAS, the Central Whidbey Island Historic was determined eligible for listing in the
42 National Register of Historic Places (NRHP) in 1973, and the 1978 National Parks and
43 Recreation Act designated the area of the historic district the Ebey’s Landing National Historic
44 Reserve (ELNHR) for the purposes of protecting a rural community and its significant history
45

46 WHEREAS, the ELNHR is the first historical reserve in the National Park System and is
47 managed by a Trust Board through coordination of the four land managing partners who have a
48 preservation and/or management interest in the Reserve: The National Park Service (hereinafter
49 “NPS”), Washington State Parks and Recreation Commission, the Town of Coupeville
50 (hereinafter “Coupeville”), and Island County; and

51
52 WHEREAS, Navy determined that the Undertaking will result an adverse effect to the Central
53 Whidbey Island Historic District, which includes Ebey’s National Historic Reserve, as a result of
54 more frequent aircraft operations affecting certain landscape components of the historic district,
55 specifically perceptual qualities that currently make the Historic District eligible for the NRHP;
56 and

57
58 WHEREAS, Navy has consulted with the Washington State Historic Preservation Officer
59 (SHPO) on the determination of effect, and SHPO concurred on June 27, 2018; and

60
61 WHEREAS, Navy has consulted with Swinomish Indian Tribal Community, Upper Skagit
62 Indian Tribe, Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the
63 Tulalip Tribes of Washington, and the Jamestown S’Klallam Tribe who expressed no concerns
64 about the Undertaking; and

65
66 WHEREAS, Navy has consulted with Trust Board of Ebey’s Landing National Historical
67 Reserve (hereinafter “Trust Board”), NPS, Island County Commissioners (hereinafter
68 “Commissioners”), Coupeville, City of Port Townsend (hereinafter “Port Townsend”),
69 Washington State Parks, Seattle Pacific University, the Citizens of Ebey’s Reserve (hereinafter
70 “COER”), and Mr. David Day; and

71
72 WHEREAS, Navy has made information about its NHPA section 106 review of the Undertaking
73 available to the public during NEPA public meetings, as well as on the EIS website, and provided
74 opportunity for comments per 36 C.F.R. §800.5(d) and §800.8; and

75
76 WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), Navy notified the ACHP of the adverse
77 effect determination, providing the specified documentation, and the ACHP has chosen to
78 continue to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

79
80 WHEREAS, Navy invited Swinomish Indian Tribal Community, Upper Skagit Indian Tribe,
81 Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the Tulalip Tribes of
82 Washington, and the Jamestown S’Klallam Tribe to participate in the development of this MOA;
83 and

84
85 WHEREAS, Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, Samish Indian
86 Nation, Stillaguamish Tribe of Indians, and the Jamestown S’Klallam Tribe did not express an
87 interest to actively participate, but request review of final MOA and the Lummi Nation and the
88 Tulalip Tribes of Washington did not respond to Navy’s invitation to consult on the development
89 of this MOA; and

90

91 WHEREAS, Navy invited the Trust Board, NPS, Commissioners, Coupeville, Port Townsend,
92 Washington State Parks, Seattle Pacific University, COER, and Mr. David Day to participate in
93 the development of this MOA; and

94
95 WHEREAS, the Trust Board, NPS, Commissioners, Coupeville, Port Townsend, COER, and Mr.
96 David Day agreed to participate; and

97
98 NOW, THEREFORE, Navy, SHPO, ACHP, and NPS, as the signatory parties, agree that the
99 following stipulations resolve Adverse Effects to Historic Properties caused by the undertaking
100 in compliance with the NHPA and that the stipulations govern all aspects of the Undertaking
101 unless this MOA expires or is terminated.

102 STIPULATIONS

103
104
105 Navy will ensure that the following stipulations are implemented and carried out under the
106 supervision of a cultural resource professional(s) meeting the Secretary of the Interior (SOI)
107 Professional Qualifications as defined in 36 C.F.R. Part 61.

108 I) MITIGATION OF ADVERSE EFFECTS OF THE UNDERTAKING

109 **Barn and Historic Structure Rehabilitation for Resolution of Adverse Effects. Navy**
110 **will provide the State of Washington, Department of Archaeology and Historic**
111 **Preservation with funds, not to exceed \$8,000,000, to support preservation of the**
112 **Central Whidbey Island Historic District also known as Ebey's Historic Reserve and**
113 **other historic properties in Whidbey Island which may include stabilizing historic**
114 **barns, stabilizing and soundproofing historic structures.**

- 115
116
117 1) **Preservation projects that enhance and/or stabilize barns and structures in**
118 **Ebey's Historic Reserve and other areas of Whidbey Island will be eligible for**
119 **preservation funding under this provision.**
120 2) **Preservation projects must comply with the Secretary of Interior's Standards**
121 **for historic preservation.**
122 3) **Prior to transfer of funds a plan for meeting funding requirements under this**
123 **MOA will be provided to the Navy for review to ensure legal requirements for**
124 **transfer of funds are met including:**
125 i. **Providing specific and certain information about components for**
126 **preservation projects under a Grant Program, the location of the**
127 **components, and details on the preservation services to be performed.**
128 ii. **Plan for funds transferred to be obligated within the same fiscal year. Funds**
129 **which are unexpended at the conclusion of five years will be returned to the**
130 **statewide Heritage Barn Grant program.**

131 B) Southern Gateway

132
133
134 Within four years of the execution of the agreement Navy will provide NPS with funds, not
135 to exceed \$75,000, to complete the design, construction, and installation of a southern
136 gateway entry sign to the ELNHR.

- 137 1) Prior to transfer of funds NPS will coordinate with the Reserve to develop a scope of
138 work and execution plan on project goals and with the Navy to ensure legal
139 requirements for transfer of funds are met.
140 2) NPS will provide Navy opportunity to participate in the development of the portion of
141 the gateway exhibit referencing Navy history and/or current aviation use at Outlying
142 Field Coupeville with the goal to provide context to visitors explaining the presence
143 of Navy lands and aircraft in the ELNHR.
144 3) All funds transferred will be obligated within the same fiscal year.
145

146 C) Navy Volunteer Collaboration

147

148 Navy will communicate to NASWI personnel that volunteer opportunities exist in ELNHR
149 for Sailors to take part in the restoration and care of the reserve.

- 150 1) Sailors seeking to improve their communities often volunteer their time and energy to
151 projects and causes. The Navy does not mandate volunteerism, but does
152 communicate community needs to interested Sailors.
153 2) NASWI will connect interested volunteers with the needs of the reserve through the
154 NASWI Command Master Chief, who will communicate directly with NPS and
155 ELNHR to understand the Reserve's schedule and needs and match those needs with
156 volunteer Sailors.
157

158 ADMINISTRATIVE PROVISIONS

159

160 I) DISPUTE RESOLUTIONS

161

162 A) Should any signatory party to this MOA object at any time to any actions proposed or the
163 manner in which the terms of this MOA are implemented, the party shall notify Navy in
164 writing, and Navy shall consult with the parties to the PA to resolve the objection. If
165 Navy determines that such objection cannot be resolved, Navy will:
166

- 167 1) Forward all documentation relevant to the dispute, including Navy's proposed
168 resolution, to the ACHP. The ACHP shall provide Navy with its advice on the
169 resolution of the objection within thirty (30) calendar days of receiving adequate
170 documentation.
171 (i) Prior to reaching a final decision on the dispute, Navy shall prepare a written
172 response that takes into account any timely advice or comments regarding the
173 dispute from the ACHP and/or signatories, and provide them with a copy of this
174 written response. Navy will then proceed according to its final decision.
175
176 2) If the ACHP does not provide its advice regarding the dispute within the thirty (30)
177 calendar day time period, Navy may make a final decision on the dispute and proceed
178 accordingly.
179 (i) Prior to reaching such a final decision, Navy shall prepare a written response that
180 takes into account any timely comments regarding the dispute from the
181

182 signatories to the MOA, and provide them and the ACHP with a copy of such
183 written response.

- 184
185 B) Navy's ability and responsibility to carry out all other components of the Undertaking not
186 subject to the dispute shall remain unchanged.

187
188
189 II) ANTI-DEFICIENCY ACT

- 190
191 A) The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits federal agencies from incurring an
192 obligation of funds in advance of or in excess of available appropriations. Accordingly,
193 the Signatory Parties agree that any requirement for the obligation of funds arising from
194 the terms of this MOA will be subject to the availability of appropriated funds for that
195 purpose. The Stipulations contained in this MOA will not be interpreted as requiring the
196 obligation or expenditure of funds in violation of the Anti-Deficiency Act.

- 197
198 B) If compliance with the Anti-Deficiency Act impairs Navy's ability to implement the
199 Stipulations of this MOA, Navy will consult with the Signatory Parties to determine if an
200 amendment is necessary to fully satisfy the stipulation herein.

201
202 III) AMENDMENTS

203
204 This MOA may be amended when such an amendment is agreed to in writing by all
205 signatories. The amendment will be effective on the date a copy signed by all of the
206 signatories is filed with the ACHP.

207
208 IV) TERMINATION

- 209
210 A) If any signatory to this MOA determines that its terms will not or cannot be carried out,
211 that party shall immediately consult with the other parties to attempt to develop an
212 amendment per Stipulation IV, above. If within thirty (30) calendar days (or another time
213 period agreed to by all signatories) an amendment cannot be reached, any signatory may
214 terminate the MOA upon written notification to the other signatories.

- 215
216 B) Once the MOA is terminated, and prior to work continuing on the undertaking, Navy
217 must either (a) execute an MOA pursuant to 36 C.F.R. § 800.6 or (b) request, take into
218 account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Navy shall
219 notify the signatories as to the course of action it will pursue.

220
221 V) COORDINATION

222
223 Navy will ensure that each Signatory and Concurring Party is provided a copy of the fully
224 executed MOA within thirty (30) calendar days of executing the MOA.

225
226 VI) POST REVIEW DISCOVERY

228 If during the performance of the undertaking or in the course performance of the
229 stipulations in this MOA previously unknown historic properties are discovered or
230 unanticipated effects on historic properties found, Navy shall immediately implement the
231 Inadvertent Discovery Plan (Appendix B).
232

233 VII) DURATION
234

235 This MOA will expire if its terms are not carried out within five (5) years from the date
236 of its execution. Prior to such time, Navy may consult with the other signatories to
237 reconsider the terms of the MOA and amend it in accordance with Stipulation IV above.
238

239 Execution of this MOA by Navy, SHPO, and the ACHP and implementation of its terms
240 evidence that Navy has taken into account the effects of this undertaking on historic properties
241 and afforded the ACHP an opportunity to comment.
242

DRAFT

243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

SIGNATORIES:

DEPARTMENT OF THE NAVY

By: _____ Date: _____
CHRISTOPHER GRAY, Rear Admiral, U.S. Navy
Commander, Navy Region Northwest

By: _____ Date: _____
MATHEW ARNY, Captain, U.S. Navy
Commander, Naval Air Station Whidbey Island

271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

SIGNATORIES:

WASHINGTON STATE HISTORIC PRESERVATION OFFICE

By: _____ Date: _____
DR. ALLYSON BROOKS
Washington State Historic Preservation Officer

295 **MEMORANDUM OF AGREEMENT**
296 **AMONG**
297 **COMMANDER, NAVY REGION NORTHWEST,**
298 **AND**
299 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
300 **AND THE**
301 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
302 **REGARDING THE SECURITY ENHANCEMENTS AT**
303 **OUTLYING LANDING FIELD COUPEVILLE,**
304 **NAVAL AIR STATION WHIDBEY ISLAND,**
305 **ISLAND COUNTY, WASHINGTON**
306 **2018**

307
308
309 **SIGNATORIES:**

310
311
312 **ADVISORY COUNCIL ON HISTORIC PRESERVATION**

313
314
315 By: _____ Date: _____
316 JOHN M. FOWLER
317 Executive Director, Advisory Council on Historic Preservation
318

319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

NATIONAL PARK SERVICE AT EBEBY'S LANDING NATIONAL HISTORICAL RESERVE

By: _____ Date: _____

ROY ZIPP

Operations Manager, National Park Service at Ebey's National Historical Reserve

341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

TRUST BOARD OF EBEBY'S LANDING NATIONAL HISTORICAL RESERVE

By: _____ Date: _____
KRISTEN GRIFFIN
General Manager, Ebey's Landing National Historical Reserve

364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

ISLAND COUNTY COMMISSIONERS

By: _____ Date: _____
NAME
District XX

387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

TOWN OF COUPEVILLE

By: _____ Date: _____
MOLLY HUGHES
Mayor, Town of Coupeville

410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CITY OF PORT TOWNSEND

By: _____ Date: _____
DEBRAH STINSON
Mayor, City of Port Townsend

433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CONCERNED CITIZEN OF COUPEVILLE

By: _____ Date: _____
DAVID DAY

455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CITIZENS OF EBEBY'S RESERVE

By: _____ Date: _____
[NAME]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: MOA edits
Date: Tuesday, November 13, 2018 7:16:25 PM

October 16, 2018 - Email from Dr. Allyson Brooks, Washington SHPO

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Tuesday, October 16, 2018 7:44 AM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED]
Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; kkerr@achp.gov; Louter, David [REDACTED]
Subject: [Non-DoD Source] Re: MOA edits

The proposals were done in conjunction with Ebey's Historical Reserve. They were not done independently. While the Navy contends the scope of the undertaking is limited, the people who live on Whidbey feel very differently and have expressed to me numerous times that the impact is substantial to their quality of life. They feel they are suffering now, and will in the future, and the impact on the historic reserve may be substantial as well if people can't live there.

I will say it again...when you diminish the quality of life on the one hand, you should enhance it on the other. You are going to severely diminish the quality of life for the residents of historic Coupeville and Ebey's with the addition of the 36 Growlers and additional flights. You need to enhance in other ways for the historic properties. \$250K doesn't even begin to touch the effects to the Reserve.

Finally, you spend millions on natural resources so cultural resources should be considered equally.

All the best

Allyson

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Monday, October 15, 2018 9:36:31 PM
To: Brooks, Allyson (DAHP)
Cc: Baumgart, Jim (GOV); Katims, Casey (GOV); Campbell, Kendall D CIV NAVFAC NW, PRW4;
kkerr@achp.gov
Subject: RE: MOA edits

Dr. Brooks,

Thank you for your suggested changes to the draft MOA. I have read through them and consulted with others, but have come to the conclusion that the amount is excessive and beyond the scale of the anticipated adverse effect. It would be useful to understand how you arrived at this dollar figure and this expanded area of resolution; particularly when these proposals have not been part of the consultation discussion thus far.

Thank you for your effort in this partnership to work toward a suitable resolution in this process. I do look forward to discussing this with you and ACHP on the 19th.

Regards,
CAPT Matt Army
NAS Whidbey Island
Commanding Officer

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Monday, October 8, 2018 3:59 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Army, Matthew L CAPT
NAS Whidbey Is., N00 [REDACTED]
Cc: Helen Price Johnson [REDACTED]; Griffin, Kristen [REDACTED];
Baumgart, Jim (GOV) [REDACTED]; Katims, Casey (GOV) [REDACTED]
Subject: [Non-DoD Source] MOA edits

Please see our edits to the MOA. Our edits have been coordinated with Kristin Griffin and Jim Baumgart from the Governor's office.

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]

[REDACTED]

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: Growler MOA Consultation
Date: Tuesday, November 13, 2018 6:12:22 PM

October 16, 2018 - Email from Ms. Maryon Attwood, Citizens of Ebey's Reserve

-----Original Message-----

From: maryon [REDACTED]
Sent: Tuesday, October 16, 2018 5:08 AM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; tmcculloch [REDACTED]
kkerr [REDACTED]; Brooks, Allyson (DAHP) [REDACTED]; Arny, Matthew L CAPT NAS
Whidbey Is., N00 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV
[REDACTED]; Thedwall, Craig S CDR NLSC, RLSO NW, SJA [REDACTED];
Padgett, Lisa M CIV USFF, N46 [REDACTED]; Malik, Joan M CDR USFF N01L
[REDACTED]; Shurling, Cynthia [REDACTED]; Zipp, Roy [REDACTED]; Griffin,
Kristen [REDACTED]; Molly Hughes [REDACTED]; Deborah Stinson
[REDACTED]; Helen Price Johnson [REDACTED]; Debbie Thompson
[REDACTED]; David Day [REDACTED] >
Subject: [Non-DoD Source] Re: Growler MOA Consultation

Kendall, we have not had an in-person meeting in some time.
I would like to request that our next meeting in October be conducted in person instead of via the telephone.
The telephone meetings seem very difficult to participate in and not the best format for this process.

Thank you for your consideration.

Maryon Attwood

Maryon Attwood
COER, President
[REDACTED]
Coupeville, WA 98239
[REDACTED]

From: "Campbell, Kendall D CIV NAVFAC NW, PRW4" [REDACTED]
[REDACTED]
Date: Thursday, October 11, 2018 at 4:18 PM
To: "tmcculloch@[REDACTED]"
[REDACTED] "kkerr@[REDACTED]"
[REDACTED] "Brooks, Allyson (DAHP)" [REDACTED]
[REDACTED] "Army, Matthew L CAPT NAS Whidbey Is., N00"
[REDACTED] >, "Manley, William R CIV NAVFAC HQ, EV"
[REDACTED] >, "Thedwall, Craig S CDR NLSC, RLSO NW,
SJA" [REDACTED] >, "Padgett, Lisa M CIV USFF, N46"
<Lisa.Padgett@[REDACTED]>, "Malik, Joan M CDR USFF N01L"
<joan.malik@[REDACTED]>, "Shurling, Cynthia" [REDACTED]
[REDACTED] >, "Zipp, Roy" [REDACTED] >, Kristen Griffin
[REDACTED] >, Molly Hughes
[REDACTED] >, Deborah Stinson
[REDACTED] >, Helen Price Johnson
[REDACTED] >, Debbie Thompson
[REDACTED] >, David Day [REDACTED]
[REDACTED] >, Maryon Attwood [REDACTED]

Subject: Growler MOA Consultation

Greeting Consultation Parties,

Since we did not have an established date for our next consultation, I am sending out a meeting invitation to all those who have actively participated in the MOA development to save the date and time for our next consultation meeting.

The Navy continues to take your concerns and suggestions into consideration as we develop the MOA. I will send out a proposed agenda and reminder a few days prior to the consultation.

I have also attached the meeting summaries from our Sept. 17 and Sept. 27 consultation meetings for your review.

All My Best,

Kendall

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: [Non-DoD Source] Fwd: Meeting today at 2pm Town Hall
Date: Tuesday, November 13, 2018 6:13:11 PM
Attachments: [Ferry House potential mitigation options with cost estimates.pdf](#)
[NPS mitigation comment letter to NASWI \(RZ 13Sep2018\).pdf](#)

October 22, 2018 – Email from Roy Zipp, Operations Manager, NPS

-----Original Message-----

From: Zipp, Roy [REDACTED]
Sent: Monday, October 22, 2018 5:21 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] Fwd: Meeting today at 2pm Town Hall

Hi Kendall,

Passing on FYI correspondence I just sent to Adam Lemieux who is staff for congressman Larsen. I'll be in Seattle tomorrow calling from our regional office there.

<http://>

Roy M. Zipp
Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

[REDACTED]
Coupeville, Washington 98239
[REDACTED]

[REDACTED]
www.nps.gov/ebla <<http://www.nps.gov/ebla>>

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

----- Forwarded message -----

From: Zipp, Roy [REDACTED] >
Date: Mon, Oct 22, 2018 at 5:01 PM
Subject: Re: Meeting today at 2pm Town Hall
To: <adam.lemieux@[REDACTED]>, Mary Kenworthy
<maryanne.kenworthy@[REDACTED]>
Cc: Molly Hughes <mayor@[REDACTED]>, Shelton, Mike
<district1@[REDACTED]>, Jon Crimmins
[REDACTED] >, Louter, David
[REDACTED] >, Griffin, Kristen
Wilbur Bishop [REDACTED]

Adam,

Thanks for the meeting today.

Mary Anne Kenworthy [REDACTED]; email in recipient list) is the attorney in the DOI Portland Office who has been assigned to assist NPS in negotiations with the navy on the 106 process/Memorandum of Agreement.

Mary Anne is fully up to speed on the growler issue, but I need to brief her on the bigger mitigation portfolio we discussed today since this new concept differs from the measures she has been discussing with the navy to date (captured FYI in the attached consultation letter we sent to NASWI last month).

Also attached FYI is the scope of tasks associated with the ferry house that (on the high end) would be \$1.8 million.

Roy

<<http://>>

Roy M. Zipp
Superintendent, National Park Service Operations
Ebey's Landing National Historical Reserve
Reuble Farmstead

[REDACTED]
Coupeville, Washington 98239

[REDACTED]

[REDACTED]

www.nps.gov/ebla <<http://www.nps.gov/ebla>>

<<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>>

On Mon, Oct 22, 2018 at 10:27 AM Griffin, Kristen [REDACTED]
[REDACTED] > wrote:

Reminder: Meeting today at 2 pm, town hall, to talk about Trust Board Section 106 mitigation proposal. David can't make it. I asked Roy to come because he has some figures relevant to the Ferry House component.

--

Kristen P. Griffin
Reserve Manager
Ebey's Landing National Historical Reserve
[REDACTED]
Coupeville, WA 98239
[REDACTED]

Ferry House at Ebey's Landing National Historical Reserve

History of NPS ownership

- Acquired ca. 2001 from Nature Conservancy. House in very poor condition on verge of collapse.
- NPS in 2001-2002 did emergency stabilization on house and outbuildings. Installed interior framing to stabilize floors and walls. Repaired windows and roof. Rebuilt porch, repointed masonry chimney, replaced gutters (2007).

Current Management Guidance

- Preserve the exterior building envelope as an exhibit on the landscape.
- Provide for interpretation on site, including occasional guided tours inside
- Reestablish prehistoric trail/historic trail from shoreline at Ebey's Landing up the ravine to the house and connect to a trail leading to the bluff

Projects to be implemented in 2019-2020

- Rehabilitate the historic outbuildings and trail up ravine. \$175k.
- Install basic security and fire detection system \$330k. No power or water on site. Will install modest solar array to power the system. Would need at least \$250k more for fire suppression, so basic system was chosen while future options for house are developed. Detection system could then be expanded to include suppression.

Future project needs for Ferry House

Continued current management could include the following actions (with rough cost estimates) which would primarily address deferred maintenance but also provide modest additional amenities to welcome the public to this iconic asset in the Reserve:

- Remove wooden interior framing and install discrete steel framing with seismic retrofit (\$200-\$400k—very rough estimate need engineer).
- Install fire suppression system after retrofit (\$220-\$1.2mil depending on system).
- Repair chimney removed following 1996 earthquake (\$33k).
- Conduct extensive rodent proofing (\$50k).
- Replace non-historic doors and related retrofits and replace roof (\$52k). (presently funded in FY22).
- Install interpretive media in outbuildings and provide for day use (\$10-30k).
- Provide for accessible parking and accessible trail to house and surrounding grounds (\$20k).



United States Department of the Interior

NATIONAL PARK SERVICE
Ebey's Landing National Historical Reserve
Reuble Farmstead
593 Fort Casey Road
Coupeville, Washington 98239

EMAIL CORRESPONDENCE

September 13, 2018

Naval Air Station Whidbey Island
Attention: Captain Army, Commanding Officer
[REDACTED]
Oak Harbor, WA 98278-5000

Subject: Section 106 Consultations, EA-18G "Growler" Airfield Operations

Dear Captain Army:

Thank you for the opportunity to collaborate on mitigations for this undertaking, which will impose extreme noise above residential, commercial and tourist areas both day and night, and render the Reserve as one of the loudest units within the NPS system. The intent of this letter is to assist you and the other consulting parties in identifying and refining actionable measures to mitigate adverse effects to the greatest extent feasible, recognizing the navy does not intend at this time to consider measures to avoid and minimize impacts by selecting less impactful alternatives that reduce flights at the Outlying Field (OLF).

These comments address the mitigation options summarized on August 28, 2018 matrix entitled "*Resolution Options for Growler Section 106 Consultation Discussion*," which was provided to the consulting parties by Kendall Campbell via email on August 28, 2018 (Attachment A). This letter re-states each numbered comment in that matrix, then responds with the NPS' perspective.

Comment 1. Establish a grant program to restore and stabilize heritage barns located both within Ebey's Reserve and the APE, to be administered locally by the Trust Board of ELNHR with guidance from and in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP).

NPS Response: We concur. The Ebey's Forever Grant program already exists to implement this measure. It is an outstanding program that promotes historic preservation on private land throughout the Reserve, but is woefully underfunded given the long list of historic preservation needs. Providing financial assistance to boost this program would yield lasting, tangible benefits.

Comment 2. Establish a grant program for the sound-proofing and stabilization of historic homes and structures within Ebey's Reserve, Coupeville Historic District and the APE, to be administered by either DAHP or the Trust Board of ELNHR in consultation with DAHP.

NPS Response. We concur, and also recommend that this measure along with the heritage barn grants be combined for administrative efficiency. These program should receive the highest priority for mitigation, because these measures would have the most direct nexus to mitigating noise. NPS staffs would be available to provide technical assistance with preservation, with funding provided by the navy to support our involvement.

As you know the NPS Operational Base at the historic Reuble Farmstead, which includes workshops and office space, is directly under the flight path during carrier landing practices at the OLF. Soundscapes monitoring

conducted here in 2015 documented sound exposure levels up to 117.2 a-weighted decibels, which is physically painful when working outside without ear protection. Informal decibel measurements indoors indicate levels nearing 100 decibels. These noise intensities make it very difficult to use the phone or converse with coworkers when growlers are training. Funding for sound proofing of our offices is specifically requested, but this funding should be separate of funding provided to advance the grant program.

Comment 3. Continue operations mitigations.

NPS Response. We appreciate current mitigations, but also share the concerns conveyed by Mayor Hughes and Commissioner Price-Johnson that these measures need to be formalized to the maximum extent feasible. Moreover, these measures should not be time limited. As long as the growlers are in the sky, these measures should remain in place.

Comment 4. Fund an internship within ELNHR to update and make functional historic property inventory databases.

NPS Response. We support funding an internship to advance knowledge of historic resources, but it is our understanding that the Trust Board has largely completed this inventory. Alternative tasks suitable for an intern abound, and we encourage exploring these possibilities further with Kristen Griffin, Reserve Manager.

Comment 5. Fund a study to examine the impact of noise vibrations on historic properties.

NPS Response. Although there is anecdotal evidence that windows have cracked during training, these are likely isolated incidents involving loose windows rattling in their frames. It seems unlikely that the extreme noise generated by growlers imposes sufficient kinetic energy to harm the structural integrity of the predominately wood-framed structures in the Reserve, especially relative to natural events such as the high winds that routinely buffet the island.

Comment 6. Integrate considerations regarding historic resources in Navy AICUZ and further update recommendations to Island County.

NPS Response. We support ensuring historic resources are considered, but defer to Island County on this matter since local land use decisions are beyond the purview of the NPS' authority.

Comment 7. Purchase easements to retain the current use (and thereby historical character) of land in the Reserve (to include through the National Park Service existing process using Scenic Easements).

NPS Response. Scenic easements are an important tool for preservation in the Reserve, and we support exploring this topic further with the navy. We normally rely on Land and Water conservation funds, which are difficult to obtain. Expanding funding options would be very helpful, and harmonizing our scenic easement provisions with yours makes obvious sense as a practical matter.

Comment 8. Install information kiosks related to the affected landscape viewpoints.

NPS Response. Funding educational kiosks was recently used in the Reserve to mitigate adverse effects of realigning Parker Road. The Washington State Department of Transportation provided \$100,000 to the Trust Board for design, construction, and installation of waysides throughout the Reserve, which is being implemented now. This case study merits repeating.

In 2011, the navy transferred administrative jurisdiction of 1-acre parcel of disjunct OLF land bordering the southern boundary of the Reserve to the NPS. This was done to enable construction of a southern gateway to the Reserve as provided by our General Management Plan (Attachment B). NPS has not been able to advance that project because funding for new construction is difficult to obtain due to higher priorities aimed at addressing the Reserve's \$4.8 million maintenance backlog. We would like to partner with the navy and see this proposal through to completion. In addition to welcoming and orienting visitors with maps and related media, this site would provide an opportunity for the navy to interpret the historical significance of military operations in the Reserve, which is currently being prepared as mitigation for the blocks at the OLF. Interpreting the historical

highlights of this report on site would be a logical next step. Aside from conveying the historic context, media should also be installed to help visitors understand the importance of the OLF for pilot training and military readiness that is driving this adverse undertaking. This would help explain the incongruent context for the adverse effects of growlers in the Reserve. Obviously the extreme noise would be an issue when jets are flying, but that should not preclude the project because jets will not always be flying, especially on weekends. The design could provide for visitors to remain in their vehicles to reduce noise exposure when growlers are flying, at least to obtain baseline information. This project would reach tens if not hundreds of thousands of visitors each year.

Comment 9. Conduct a study to assess the landscape integrity and inform multi-agency efforts to preserve its character.

NPS Response. We support ongoing analyses of landscape integrity.

New Comments

Having responded to the comments in the working mitigation matrix (Attachment A), we have one additional mitigation recommendation. Notwithstanding the concerns driving this consultation, we believe the navy should play a more formal role in helping to further the Reserve idea, which at its core depends upon close cooperation at the federal, state and local level. The navy is clearly part of the historic fabric of Whidbey Island, and formalizing a partnership between our agencies is a logical way to affirm this fact in a manner that respects the Reserve and advances our mutual interests.

In recent years the navy has fielded volunteers for trails maintenance and historic preservation projects. Navy staffs are exceptional volunteers, and this assistance has been very helpful in addressing our maintenance backlog and the needs of our partners. We would like to establish a more formal partnership to support our Volunteer in Parks program. This program would include navy staffs, their families and veterans, supported with funding and in-kind support from the navy. Design and installation of the southern gateway could be the first initiative pursued under this partnership.

Please contact me if you have any questions: [REDACTED]

Sincerely,



Roy Zipp
Superintendent, NPS Operations

Attachments (2): A. 29Aug18 Mitigation Matrix; B. NPS Director Letter OLF parcel

Consultation for the Resolution of Adverse Effects to Historic Properties and Development of a
Section 106 Memorandum of Agreement (MOA) for the Proposed Growler Airfield Operations
Increase at Naval Air Station Whidbey Island

AGENDA

23 October 2018

- I. Introductions**
- II. Discussion of SHPO and Ebey's Reserve Comments and Edits to MOA**
- III. Discussion of DRAFT MOA language**
- IV. Follow up and Action Items.**

27 September 2018, 1000 – 1200 PM

Growler Section 106 Consultation DRAFT Meeting Minutes

NAS Whidbey Island

Attendees

Naval Air Station Whidbey Island/U.S. Department of the Navy

CAPT Army – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
CDR Thedwall – Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
LCDR Par- Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
Lisa Padgett – Home Basing NEPA Program Manager, USFF
Bill Manley – DFPO, NAVFAC Headquarters
Cindy Shurling – EIS Consultant team (meeting minutes)
LCDR Montague – Legal Counsel, USFF

Advisory Council on Historic Preservation

Katharine (Kate) Kerr – Program Analyst, Office of Federal Agency Programs
Dr. Tom McCulloch– Assistant Director, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks– Washington State Historic Preservation Officer (SHPO)
Dr. Rob Whitlam– Washington State Archaeologist

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Coupeville

Mayor Molly Hughes– Town of Coupeville

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR
Fran Einterz – Reserve Trust Board Member

Introduction –

Ms. Campbell noted after introductions that Mayor Stinson and Commissioner Price-Johnson would not be able to join the call today and that Ms. Atwood may join once the call begins.

Captain Army welcomed everyone and encouraged participants to use this call to memorialize the MOA and resolutions. He suggested starting with the draft points and working line by line to get to a document that works for all parties.

Ms. Campbell explained that the preamble tells the “story” of how the Navy got to the finding of adverse effects and invited discussion on this section of the document.

Capt. Army added there are suggested measures provided by consulting parties that are not in the document; the Navy is working hard to meet the intent of suggested measures that are legally feasible. Some cannot be included due to constraints of the National Historic Preservation Act (NHPA), legal processes, military mission requirements and fiscal authorities. Specifically, the Navy considers each

proposed resolution option based on the following criteria: 1. Does the resolution option fit the scale and scope of the proposed undertaking; 2. Does the resolution option meet the intent and federal agency responsibilities under the NHPA; 3. Does the Navy have the fiscal authority to implement the proposed resolution option; and 4. Does the proposed resolution option conflict with the NAS Whidbey Island mission.

- Dr. Brooks asked about the Economy Act of 1932, as amended, 31 U.S.C. § 1535 and asked for further clarification on why the Navy feels there are restrictions on the funding mechanisms. Dr. Brooks also asked for the reference to the ‘land trust’ law we referenced in previous consultations.
- Capt. Army responded that Dr. Brooks was likely referring to REPI and requested assistance from legal to explain the funding process.
- CDR Thedwall provided information on the REPI program, which is authorized under 10 USC 2684a– this is the statutory authority that provides the Navy the ability to partner with outside entities in the purchase of land conservation easements.
 - o Dr. Brooks asked what “act” this is under and how this was brought into the US Code.
 - o Capt. Army said that they would get back to her on this.
 - o Dr. Brooks suggested it was the Sikes Act (16 USC 670a-670o, 74 Stat. 1052)

Ms. Griffin provided comments on the preamble. She noted that she thinks the National Park Service (NPS) staff should be noted as being separate from the Trust Board.

- Ms. Campbell noted this is explained on Line 66.
- Between Lines 52 and 55 – Ms. Griffin asked Ms. Kerr to clarify because there is some confusion as to whether the impact is to certain landscape components or to the whole of the district.
- Ms. Griffin also noted a line that stated where it says the Reserve is the first historical reserve in the NPS system - it should clarify that it is the first in the nation.

Ms. Kerr (ACHP) asked Ms. Griffin to re-state the question.

- Ms. Griffin noted “Is the adverse effect to the individual landscape components or to the district as a whole?”
- Ms. Kerr said it is the federal agencies responsibility to identify the historic properties and notes that the district was “the” property identified in general terms.
- Ms. Campbell agreed that the adverse effect occurs at specific locations to specific contributing resources in the district, the district is the designated property that is affected. She further explained the Navy’s position was that while the district was the affected historic property, the adverse effect occurred at the identified locations (five landscapes) within the district and that the mitigation should be focused on these effects.
- Ms. Kerr noted the mitigation is to the adverse effects; the MOA does not need to say to which individual spots. The heart of the mitigation is to show that adverse effects to the District are going to be resolved.
- Capt. Army said they have received concurrence from SHPO and ACHP about the adverse effect to the perceptual qualities of the five landscapes. He also noted the difference between stating specifics versus general information. This will be important consideration when considering the fiscal mechanism for funding the mitigation options.

Ms. Campbell moved into the discussion of the first resolution (A-Landscape Preservation). She explained this is in resolution to the adverse effect. She noted there is remaining internal Navy discussion about the most appropriate funding mechanism for execution. She would like feedback on the generalities of these ideas and while they are working on determining the funding mechanism. The idea is to either input directly into the Ebey’s Forever Grant or, if encounter fiscal restrictions to fund a similar program

administered through NPS. The, the Navy would like to do something that would replicate the Ebey's Forever Grant program (one that has been successful for the Reserve and to allow successes to continue).

Dr. Brooks stated that in reading the Sikes Act, she notes Section 202, which calls for conservation plans. She said there is the potential for agreements with state agencies. She asked if someone could read this, see how it might apply to this situation, and then report to parties. She said this might be applicable to the barns and structures programs already in place. (Addendum to meeting minutes: Section 202 is only applicable to public lands under the control of Dept of Interior and Dept of Agriculture, and is not applicable to DoD-land.)

Capt. Army noted the Navy would review these laws. Ms. Campbell reaffirmed they are open to new and creative ideas.

Ms. Campbell summarized the Navy's proposal to provide funds to NPS for use in the Ebey's Forever Program to fund appropriate restoration projects. Ms. Brooks raised the issue of eliminating references to indirect effects in the MOA and changing references from the District to the Reserve. Ms. Campbell pointed out the relationship btw the District and Reserve in the whereas clauses and CAPT Army indicated the Navy would ensure the MOA was consistent in using these terms.

Ms. Griffin provided comments from the Board:

- Ms. Griffin received direction from the Trust Board on mitigation (but they had not seen the documents provided last night).
- She has a comment that applies to the whole discussion of mitigation.
 - o The Board has directed her to prepare a letter indicating their position on the impact of the undertaking and the best way to mitigate it has not changed.
 - o They are concerned about the impacts to the Reserve/District. They have clearly identified three main points – one of which is new.
 - Because the adverse impact is related to noise, they need to address having less noise.
 - As land and people managers, they also need to be able to plan and better manage the resources in the reserve and are focused on on-the-ground sound monitoring so they can know what is being impacted and how to direct/guide people.
 - They feel that a proper mitigation would be to ensure that the OLF is made as safe as possible for everyone and that they recommend that a safety waiver not be approved for the operation.
 - o The Board directed her to include in the letter the mitigations discussed – to fund or support the preservation grant program.
 - She has had contact with the Friends of Ebey's and noted this is a local program and is not sure if it would benefit the program to mingle that with federal resources.
 - For the Ebey's Forever Grant Program, locals raise the funds and the Board administers them.
 - o With easements, the Trust Board is charged with managing the Reserve as a whole (different than NPS) – they are interested in those measures that meet the objective of the enabling legislation and land protections need. These are the only ones they are interested in.
 - o In terms of volunteer capacity – the Reserve feels it is their lifeblood, but they do not see how this is a mitigation – just see it as good relations between different partners. They did not see how this functions as mitigation.

- The Board is concerned for some of the ways that non-historic buildings would be impacted; and this relates to NHPA because of enabling legislation – because of land use patterns and how they are recorded within the land.
 - Activities such as farming that take place outside need to be considered. The Reserve wants to be able to provide a program, funding, or compensation to have their businesses and farms and homes continue to be as “un-impacted” as possible. Things like sound proofing, windows, and installation would be in their best interest.
 - They have realized that within the affected area - this is 4,400 acres with \$1.3 billion economic value; the amount of value the Navy is putting in is very small compared to the potential economic impact (when land is devalued) – even if by 1/3 – they would lose about \$400 million.
 - She is not sure what this would mean as a loss to Island County, where local government is funded.
- Ms. Griffin (speaking from Board) would like to see a process addresses these impacts.
 - Capt. Army appreciated the feedback and would like to keep working as good neighbors. The concerns about the amount of money with the first resource measure with the Ebey’s Forever Grant program is something that definitely needs to be discussed (first resolution measure).
 - Ms. Campbell asked if Ebey’s Forever Grant program did not want federal money. The intention of this measure was to mirror the Ebey’s Forever program due to its past successes.
 - Ms. Griffin, clarified that the program takes NPS funding, so federal money is not an issue, but that the Grant program is proud of their community funding raising efforts and of the local character of the current program and she is uncertain it would have the capacity to manage the amount of funds indicated in the MOA.
 - Ms. Campbell asked if they can work within (or follow) their eligibility criteria and their process?
 - Dr. Brooks indicated she would like to re-write the section to indicate money would be transferred to the State of Washington from the Navy, and then she could work with the local groups.
 - Ms. Campbell re-emphasized the Navy would look into this and asked if SHPO could provide examples of federal agencies providing funds to her office to mitigate for federal projects under the NHPA
 - Capt. Army said this would likely be a Congressional appropriation, but noted the intent is to provide a resolution measure.
 - Dr. Brooks reiterated she would like the federal laws reviewed.
 - Capt. Army said the Navy team would take this for action.
- Ms. Kerr asked what happens if the Navy cannot transfer the money to the State of Washington.
- Dr. Brooks mentioned the Governor has talked to the Admiral. She said there is a discussion going on at a much higher level.
 - Capt. Army assured her they are looking into an appropriate legal method and reiterated that the Navy would examine all fiscal options.
 - Ms. Kerr noted that if the SHPO is looking for a way to do this – she asked that Dr. Brooks investigate how the State could accept the money and how the SHPO would then be able to distribute it to a specific spot.
 - Dr. Brooks said they executed a MOA for a project with FERC and a local PUD, which enabled funds to be directed from the project to the State.

- Ms. Kerr said that this might work with FERC and a non-federal entity. Ms. Kerr said that Dr. Brooks would need to provide the research so all consulting parties are comfortable with a path forward. She would like to see the state laws and other items that allow for this type of funding mechanism.

Kristen Griffin asked if this would be similar to the impact funds through the local schools? Capt. Army will take this question to the Navy team and see how the legal process works.

Ms. Campbell clarified the Navy would like to provide funds for preservation funds to resolve adverse effects. She asked if the concern was with providing the funds to NPS or just providing the funds in general.

- Ms. Griffin said it is a local fund and right now, there is no money in it. This was a comment that came up at the Board Meeting.
- Capt. Army asked if it was an issue to take money from the federal agency.
- Ms. Griffin said they regularly take money from the NPS. This would change the nature of the local program if it started to operate with federal funding. Ms. Griffin noted that this never came up before and that this conversation came up with the Friends of Ebey's, one of the partners.
- Ms. Griffin noted she would be willing to work with the State Barn Program.
- Dr. Brooks said she was concerned about NPS overhead and how Mr. Zinke (Secretary of Interior) sees mitigation as extortion.
- Capt. Army reiterated that the Navy would examine all options for funding.

Ms. Campbell summarized this as a way to look for funding for preservation.

Dr. Brooks said she crossed out the "landscape" part and put in Barns and Structures. Dr. Brooks will provide suggested changes to the MOA by separate correspondence.

Ms. Campbell asked if it was okay to leave in the parts about the Ebey's Forever Grant Program, even if it ends up not being this program.

- Ms. Griffin noted that this is modeled after the barn preservation program. She would be happy to share what they have about the Ebey's Forever Grant Program.

Ms. Campbell said the Navy will look to work with the NPS and the Reserve on the wording. She noted without being bogged down with the details, they might need to look at the development of a plan to meet these resolution criteria of Ebey's Forever Grant Program. She would appreciate any input/suggestions.

Dr. Brooks said that Barns and Structures component should not be tied to a one year spending requirement. She said like other operating funds – a one-time payment that can be used as needed would be preferable, it would be difficult to do in one calendar year.

- Ms. Campbell said the Navy will look into this and how this would work depending on the mechanism to fund this resolution option.

Ms. Griffin asked about Point No. 4, the creation of a Navy staff level temporary position.

- Ms. Campbell noted this would infuse work to the NPS/Reserve and looked to ways to support this. A robust discussion was held as to the Navy's capacity to fund or perform work for non-federal agencies and organizations. The Navy generally cannot fund other non-federal or other federal entity job positions. They can only fund work that is done for the Navy. The Navy is willing to do this, but they would have to do as a contract or part-time position for this particular work. They may be able to work every day with Ms. Griffin and provide a report to Ms. Campbell. The "hard wall" is that the Navy cannot fund this job position unless it is under a Navy position.

- Capt. Army asked if this is still desired to help lessen the burden of administering some of these resolution options. (i.e., the first resolution measure for a grant program).

Mr. Zipp supports looking for funding methods that may or may not necessitate participation by NPS. He wanted to note this on record that he is okay to pursue other means.

- Capt. Army thanked him for this.
- Mr. Zipp noted that the NPS could be the back-stop, if needed.

Dr. Brooks asked if there is a possibility to add in something about aircraft operations and operational mitigations. She noted that the community has asked for this. It is not referenced in the MOA.

- Ms. Campbell said that this is included in the second “whereas” clause. To address Mayor Hughes’ concern (and others), this whereas clause provides recognition of the operational mitigation measures that the Navy is already doing and that the Navy intends to continue to do.
- Capt. Army further explained that in conversations with Mayor Hughes, the Navy thought it appropriate to place here as a whereas clause due to the sundown potential of the MOA.
- Dr. Brooks thought there should be a stipulation that a plan would be written.
- Ms. Campbell noted they have had a number of conversations and that the Navy was providing a hard no with regards to making this a stipulation under the NHPA process.
- Capt. Army clarified this is for this process; this does not mean it is not being done otherwise.

Ms. Campbell noted the Navy hosts and participates in many community forum meetings with elected leaders to balance the needs of the Navy with those of the community.

- Mayor Hughes joined the call. Capt. Army welcomed her to the call.

To summarize the conversation for Mayor Hughes, Dr. Brooks reiterated the discussion about operational mitigation not being included as a stipulation.

Capt. Army noted this would not be included as part of the NHPA stipulations and emphasized the Navy’s mission and the need for flexibility to address world event. He also described the conversations that they have had about how this is in the broader context of the undertaking.

- Dr. Brooks noted this type of stipulation was in the DOT 520 MOA. She noted the State has done this before and does not understand why operational mitigation cannot be included here.
 - o Ms. Campbell explained the Navy follows a number of established operation measures to mitigate impacts to the surrounding community outlined in other documents such as FFA Guidelines and Base Air Ops Instructions.
- Dr. Brooks asked if these are signed agreements.
- Ms. Campbell explained that some are instructions, some are internal policies, some are handshake agreements, etc.
- Capt. Army will be meeting with Mayor Hughes this afternoon and will discuss how they will move forward on this.
- Mayor Hughes said the handshake agreements have been working well with the past three commanders and it is more important to have them now if the number of flights are increasing (4-fold increase). There is not the same level of confidence without a formal agreement
 - o Capt. Army said they already are conducting the number of FCLPs at Ault Field close to what the Draft EIS and that the Navy is not flying on weekends. He wants to talk face-to-face with her and wants to show her these numbers. He recognizes that people may extrapolate these to the weekends. They can decide what path to take to memorialize for future leaders.
- Ms. Campbell said they would keep this discussion outside of the NHPA and with the communities.

Ms. Campbell described Resolution B – Cultural Landscape Inventory. She opened this for discussion based on the need described by the Reserve.

- Ms. Griffin noted this was not a priority for the Trust Board as a mitigation.
- Ms. Campbell asked to open for discussion to other consulting parties.
- Capt. Army asked for clarification as to where this is within the priority list as it is not listed to take something else out – it is included to ensure everything is being covered.
- Ms. Griffin said they do not view it as a strong mitigation option, but are okay with it being included.
- Dr. Brooks said the State does not want it either and would rather see this funding going to the grant program.
 - o Capt. Army noted the \$250,000 over 5 years in the first stipulation was based on information received in consultation regarding the annual amount of grant funds normally issued by the Ebey’s Forever Grant Program and was not meant to be a portion of a total amount for all stipulation. He would like to understand if they want the first stipulation in the MOA or not. He also would like to discuss if the \$250,000 is at an appropriate level.
- Mr. Zipp would like to go back to the NPS Cultural team and discuss this mitigation in relation to previous work that has been done. Building on Dr. Brooks’ point, the inventory is not mitigation, but it does provide more information to support future decisions on awarding grants. He would support adding to the grant program but would like to consult with others.
- Capt. Army would like to understand from the Reserve and the State if this grant amount is executable with viable proposals over the period of the MOA.
- The question was asked to see how much money would be needed to do a cultural landscape inventory. Mr. Zipp noted he could not provide a cost estimate and said it might need to be done by a professional consultant.
- Dr. Brooks suggested a side conversation with Mr. Zipp and Ms. Griffin to determine an amount.
- Capt. Army would appreciate the feedback from this conversation to see what the actual costs are.
- This resolution will stay in place for right now, but the Navy can take this out if it is determined it is not necessary.

Ms. Campbell continued to Resolution C– Southern Gateway. The idea is to provide funds using an appropriate funding method. The idea is to work within the NPS and Reserve plans for signage with support and feedback from the Navy.

- Ms. Griffin noted again that this is not a priority of the Trust Board; they have concerns about the location, too. With the Cooperative Agreement with the NPS, the Trust Board does develop the interpretative materials. They do not control all of the messaging, but when they create the exhibits, they intend to vet interpretative themes that relate to the reserve history and enabling legislation. As an example for the OLF MOA, Ms. Griffin noted the importance of developing a historic context for the OLF (including Navy history). She finds the Navy component hard to fit into the Reserve and the specific period of significance.
- Ms. Campbell indicated that a location is not included and that the Navy would be open to discussing where and how. This option is not intended to focus on Navy history, but to introduce the Reserve history and to explain Navy aircraft presence. This option could be removed or reworded. The intent was not to focus on the Southern Gateway to the Reserve.
- Ms. Griffin pointed out this was not something the Board views as mitigation and is not a priority.
- Mr. Zipp suggested that one thought would be to use this as a way to bring people to the site; the Park Service acquired the land in 2011 and had a broad conceptual idea for further development. The vision was to provide space for someone to pull off onto this parcel and have an entrance sign. He would like to go back and talk to facility managers to scope this out and see if the magnitude of funding would be appropriate for this. He is fine with the language as written but would like to get back to the group with better information.
- Ms. Campbell noted that the goal was to work within existing processes. She asked for assistance in wording and how to incorporate what they do for the interpretative signage.
- Ms. Griffin was concerned they would be developing a facility that would create maintenance issues. They already have a facility like this that already is problematic.

- Ms. Campbell indicated they did not specify the type of facility to allow something that will meet the needs of the Reserve. This was meant to be broadly written to consider appropriate interpretive information that would best meet the groups needs. Ms. Campbell asked Ms. Griffin and Mr. Zipp to assist with wording this.

Ms. Campbell began the discussion on Resolution D – Historic Preservation Easements. She explained that REPI requires willing homeowners and willing non-governmental organization (NGO) partner such as Nature Conservatory or Whidbey-Camano Land Trust. It can be challenging to identify interested landowners. The Navy will promote REPI and conservation easements but cannot guarantee an outcome.

- Dr. Brooks asked this be removed; she indicated the REPI program seems to be more about The Navy’s needs and not the community’s needs.
- Ms. Campbell said the REPI program is a tool that can meet both sets of needs, and that the Navy is looking at ways to include historic preservation.
- Capt. Arny noted we had previously discussed the viability of scenic easements and re-iterated that on this point the needs of the Reserve and the Navy were aligned
- Ms. Padgett noted the REPI program has been very successful at NASWI – protecting about 1,500 acres which includes small farms and forested areas. This helps preserve the rural character of the area. The scope of REPI can be built upon and the Navy could work with willing homeowners.
- Dr. Brooks noted she is skeptical, but will defer.
- Ms. Griffin said that easements are the preferred method of preserving/protecting land. The easements are closely informed by the enabling legislation and land protection plan. She is not sure that this is the same way that they have been used in this manner.
- Capt. Arny said as discussed previously there is a precedence for REPI projects related to cultural resource (Addendum to meeting minutes: see meeting minutes of 17 Sept and see attached REPI Fact Sheet for Fort A. P. Hill) and that the NPS has a scenic easement program.
- Ms. Griffin noted that it would be important to show this would be aligned with the Reserve priorities.
- Mr. Zipp noted this is important to retain this mitigation measure because of the source of funding for scenic easements. While the funding comes from Land and Water Conservation Fund, execution of a scenic easement requires willing landowners and it is difficult to predict when a landowner may be identified now or in the future. The most difficult thing is to identify a willing landowners.
- Ms. Griffin noted the priorities in the plan are there because of the structure of the Reserve. She wants to make sure the priorities are followed. She agrees there is no benefit to remove it; there are moving parts to make it work.
- Ms. Campbell noted they are not able to say which specific parcels. She said that there is room to fix up the language in this one and include it to strengthen the tie to the Reserve.

Ms. Campbell explained the volunteer collaboration (Resolution E). She noted that while the Navy cannot force sailors to volunteer at the Reserve, the Navy can help guide the sailors to opportunities to volunteer.

- Mr. Zipp appreciates the Navy putting this in. He felt it was good from the NPS standpoint. He noted that when military personnel volunteer they get things done. He would like to flesh out projects in advance and have more directive to make this useful.
- Ms. Griffin loves to find projects that encourages and supports volunteering. She thinks this would foster good communication and improved relationship with the Navy. She again felt that this is not mitigation for an adverse effect.
- Ms. Campbell noted that this would not be a stand-alone mitigation measure, but would be done in conjunction with the other items put forth in the MOA.
- Capt. Arny said if they take it out – it will not change how the Navy relays volunteer opportunities to Sailors. This will continue either way, so long as the Reserve wants volunteers.

- Ms. Griffin mentioned that in the past, they used to have more collaborative planning for volunteer opportunities. As a separate set of objectives, she would be on-board to have more.
- Capt. Army looks forward to a conversation with Ms. Griffin and Mr. Zipp to see how to continue this and how to bring activities back.

Ms. Campbell noted that she would like the group to look at the language in the remainder of the MOA document – it is similar to the recent MOA.

Ms. Campbell asked if there were any further questions or concerns; she again mentioned that the language is draft and appreciated the group working on this.

- Dr. Brooks asked for additional legal review of the MOA and underlying military regulations. She asked the Navy team to investigate finding a way to transfer funds to the State of Washington.
 - o Ms. Campbell said that they will follow this up.
 - o Capt. Army will get back to Dr. Brooks and will add to the list of options that the Navy is looking at.

Ms. Campbell noted the way forward is to keep the document moving. The Navy will look at addressing the following topics/concerns:

- Dr. Brooks' concern on the consistent naming of District/Reserve;
- The wording noted by Ms. Griffin;
- Leaving the on-going operational mitigation clause in the Whereas section;
- Working through Resolution A;
- Ms. Griffin will think on Number 4 – using or having a Navy contract person;
- Cultural landscape inventory – Mr. Zipp will talk with the NPS and see if we should keep within the resolution;
- Looking at number (dollar amount) for what is needed to execute;
- What fiscal method is used to get funds – also if must obligate funds within one year or funds can carry over multiple years;
- Southern Gateway – will keep in for now– Mr. Zipp will look at feasibility of number proposed and work with Ms. Griffin to work within the Reserve interpretation process (entrance/informational);
- Keep language of Resolution D, but will work within preservation priorities; and
- Keep Resolution E – this can be removed if decided by group.

Ms. Griffin asked if anything new could be added, specifically reduction in sound, noise monitoring and operating without a safety waiver.

- Ms. Campbell noted that the first two options are resolution options discussed and previously eliminated during previous consultation discussions and that these would not be included in the Draft MOA. And, Ms. Campbell noted that these are outside the scope of the NHPA.
- Capt. Army reviewed the notes from the Governor and ASN Bayer's conversation, including residential needs and reduction in jet engine noise. Under the proposed Congressional authorization, moneys are identified for Navy to research on noise reduction technologies.

Capt. Army thanked everyone and noted his appreciation for the group's participation.

Ms. Campbell noted that she will distribute summaries and an invitation for another meeting – possibly October 18th. Capt. Army noted that they will distribute options via email.

The meeting adjourned at approximately 1200 pm PST.

23 October 2018, 1000 – 1200 PM

Growler Section 106 Consultation DRAFT Meeting Minutes

NAS Whidbey Island

Naval Air Station Whidbey Island/U.S. Department of the Navy

Captain Army – Commanding Officer, NAS Whidbey Island
Kendall Campbell – Archaeologist/Cultural Resources Program Manager, NAS Whidbey Island
CDR Thedwall – Regional Legal Service Office, NAVFAC Northwest, Staff Judge Advocate
Lisa Padgett – Home Basing NEPA Program Manager, USFF
Bill Manley – DFPO, NAVFAC Headquarters
Commander Malik – Fleet Environmental Counsel U.S. Fleet Forces Command
Sarah Stallings - Environmental Planning, NAVFAC Atlantic
Cindy Shurling – EIS Consultant team (meeting minutes)

Advisory Council on Historic Preservation

Katharine (Kate) Kerr – Program Analyst, Office of Federal Agency Programs
Dr. Tom McCulloch– Assistant Director, Office of Federal Agency Programs
Reid Nelson – Director, Office of Federal Agency Programs

Washington State Department of Archaeology and Historic Preservation

Dr. Allyson Brooks– Washington State Historic Preservation Officer (SHPO)

National Park Service (NPS)

Roy Zipp – Superintendent, NPS Operations Ebey’s Landing National Historical Reserve Reuble Farmstead

Coupeville

Mayor Molly Hughes– Town of Coupeville

Port Townsend

Mayor Deborah Stinson – Town of Port Townsend

Trust Board of Ebey’s Landing National Historical Reserve (ELNHR)

Kristen Griffin – Reserve Manager, ELNHR
Fran Einterz – Reserve Trust Board Member

Citizens of Ebey’s Reserve

Maryon Atwood – President

Congressman Larsen’s District Office

Adam Lemeiux,

Consultation began with a discussion on the release of the Draft Memorandum of Agreement (MOA) to the public for comment. Ms. Campbell reminded the parties that in the Consultation Plan presented to the parties back at the beginning of this resolution phase, it indicated in Section 3 that public input would be solicited. A public press release is planned for publication on Wednesday, October 24, 2018. The release will also appear on the Navy’s websites. There will be no set time limit for the public to comment.

Ms. Griffin asked where the language is noting that the draft MOA is not final.

- The Navy explained that the language is on the website, located in the introduction to the draft document, and notated in the watermark of the document itself. During the call, the Navy verified that the materials included the “draft” watermark.

Ms. Griffin asked which consulting parties were consulted with prior to the posting of the draft MOA and questioned which parties had indicated they were okay with the document as it currently reads.

- Ms. Campbell responded the Navy has been responding to comments throughout this process and they have spoken with the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Office (SHPO), and others. The Navy noted it is clearly stated that the document is not final and that it will be updated as comments are received.

Ms. Griffin said they are confused and that people do not (or will not) believe that this is a draft.

Ms. Griffin says that she feels the Navy is done listening and that they are just moving this along to meet their needs and timeline. If there was a plan – it has resulted in confusion.

Ms. Atwood asked if the Navy is planning to hold a public meeting for the historic resources consultation.

- Ms. Campbell noted they have never planned to hold a public meeting. They are releasing the draft MOA so the public have an opportunity to express their views on the throughout the process of drafting the MOA.

Mr. Nelson wanted to make a suggestion – knowing that the public often knows very little about the process and may not know what a MOA is – to include website links; and include the Citizen’s Guide to Section 106 and an online course from the ACHP.

- Ms. Campbell noted there are links to some of these items already on NASWI’s website.
- Mr. Nelson suggested raising the links for the guide and the online course, as they really show the public what to look for.
- Ms. Campbell will boost the discussion of what a MOA is and what the process is on the website. She asked Ms. Griffin if this would be okay to assist with the public review.

Ms. Griffin said there is no consensus on the draft MOA and she does not understand why it has been sent out.

- Capt. Army noted it was sent out to acknowledge the requests by several consulting party members for a public review process and its release was done in consultation with the SHPO and ACHP.
- Dr. Brooks clarified her position in that she did not ask for the document to be publicized. The Navy is including notations that the state did not agree with the draft MOA. Dr. Brooks indicated they are not in agreement with the document.

Ms. Campbell noted it has been nearly a month since the last meeting. At that meeting, the consulting parties discussed a variety of measures. She noted the draft does not include anything not already discussed and wanted to make sure the draft was something the parties had an opportunity to review. She noted that new information (counterproposals) were gathered since the last meeting – Ms. Griffin had provided some information, among others.

- She indicated as a reminder that the signatories are the Navy, SHPO, and ACHP. A discussion took place with these groups; and their edits can be distributed to the group. They have had the chance to review some of this information.

Capt. Army thanked everyone for the continued effort in the consultation. He has spoken with Dr. Brooks and Mr. Baumgart; yesterday, he spoke with Ms. Griffin. The issue with the draft MOA has been tying the resolution options to the adverse effect of the undertaking. Navy has continued to take into consideration concerns to determine appropriate resolutions of effects of the undertaking and has attempted to determine its ability to fund measures under Economy Act transfer (to the National Park Service [NPS]). The Navy's intent in finding that mechanism was to get the funds to the local level. The last element for discussion at this point is the amount of funds.

Capt. Army continued that one of the issues in coming to agreement is how some people are feeling that the National Historic Preservation Act (NHPA) is the last opportunity for the community to engage in their non-NHPA concerns. He would like people to understand that this is not the last chance to participate. But, section 106 consultation on the development of a MOA to resolve adverse effects is not the process to work through all issues when it does not fit the legal resolution under NHPA. This is the first time the Navy is working to fund mitigation of adverse effects to historic properties off Navy property. He noted the Navy will continue to resolve issues that are important to the community. For the draft MOA, the dollar amount to NPS is \$250,000 for the Grant program, which double the annual budget for the Ebey's Forever grant program over a five-year period. The Navy has been looking at various proposals. The Navy is not able to increase this amount if not tied to the undertaking/adverse effect.

- Dr. Brooks asked if not able or not willing?
 - o Capt. Army noted that they are not able.
- Ms. Atwood noted that they submitted an operational mitigation plan. She had not heard any feedback on this and asked why this was.
 - o Capt. Army noted that the operational mitigation plan was related to the National Environmental Policy Act (NEPA) process (80/20 split) and therefore, not related to the NHPA process. He has spoken to several community members about operational mitigation. NASWI continues to manage FCLP to avoid weekends and tries the best they can to maintain this. They may at times (although rarely) train on weekends. And, he reminded everyone that the Navy publishes FCLP schedules one week in advance and announces any changes, should a schedule change occur.
- A question was asked if this would be put in writing.
 - o Capt. Army said that they will not put this in writing; if they need to deploy forces, they may have to work on weekends to train the pilots before they can deploy. He noted they will continue their operational mitigations as expressed in the FEIS already.

Kristen Griffin - asked if the area of potential of effects (APE) was the entire Central Whidbey Island Historic District (Ebey's Landing). She expressed concern that Navy appears to be approaching the analysis assuming there are very few/minimal places in the APE being impacted. She asked the ACHP's opinion on this.

- Mr. Nelson deferred to Ms. Kerr and Dr. McCullough.
- Ms. Kerr noted the ACHP role is to ensure that the process has been met and it has. This is a tough discussion as there is a fundamental disagreement between the parties. Mitigation should be appropriate to the effects determined within the APE.
- Dr. McCullough said they try to look at the appropriateness to the undertaking. The Navy is looking at the noise levels. The ACHP said they suggested the Navy work with the communities and be good neighbors.
- Mr. Nelson noted a general question about Section 106 – the agency is responsible for resolving adverse effects wherever they occur – either on or off their lands. They are required to develop an area of potential effects (APE) – the geographic assessment of where there is a potential for

effects to occur – regardless of whether it is on or off their lands. They then are responsible (where not fully avoided) for resolving those effects. The Navy determines if proportionate and proper. There is no hard and fast rule about thresholds; no requirements for mitigations (whether a lot or a little). It is open to a number of view points. He discussed the responsibility of the Navy to look at the properties within the APE.

- Capt. Army said the area of adverse effect does include the whole of the Reserve, but also includes the area around Ault Field and the majority of the APE is not included in the area where adverse effects were determined.
- Mr. Nelson continued that it should include all places where effects could occur and that it does not always include the whole of a property.

Dr. Brooks noted that the SHPO did not agree with the APE and that it does not include all areas where impacts could occur. Dr. Brooks noted in her opinion, by tying the information to the APE is showing where the Navy does not necessarily understand how Section 106 should proceed.

- Mr. Nelson noted that it is concerning there is still disagreement about the APE and the area of adverse effect. The ACHP is willing to assist the agencies if needed.

Ms. Griffin had a question about the geographic aspect of the APE. She asked if mitigation for the district should be fair game for the whole of the district. Her understanding is the Navy is trying to localize the adverse effect and the mitigation. She feels the parties need to have this answered.

- Ms. Kerr noted that mitigation can come in many forms and noted that the consulting parties are not restricted from proposing these mitigation measures. The federal agency, however, does not have to agree or pursue these measures. In this case, the federal agency (the Navy) has considered them and taken them into account and has decided they cannot do them. The ACHP cannot force the Navy to do them. The consultation is in finding the compromise. The ACHP is most interested in the best preservation outcome.
- Dr. McCullough said they quite often see this happening, where there is a limited number of dollars to assist in mitigation.

Ms. Griffin asked about an expert opinion on Part 800 (implementing regulations for NHPA). She questioned if the Navy was asking them to comment on the mitigation for the whole of the district and for the specific areas identified.

Capt. Army said some of the money has restrictions. It has to be tied to adverse effect to historic properties in the APE. The Navy has worked through all of the proposals, transparently during one of our last conference calls, and that the consulting parties had focused on five mitigation options to carry forward for further discussion. These five mitigation options were tied to the undertaking and to the scale and scope of the undertaking.

- The Navy has taken a look at a number of examples and has found they cannot go outside the APE even if other entities have considered mitigation outside the APE.
- Dr. Brooks wants to make certain everyone understands she has seen this happen in other circumstances; and that if this is the Navy process, it needs to be clear that this is their restriction. She noted the mitigation in Guam where \$6 million was spent on a museum; she feels these discussions have not resulted in compromises similar to the Guam process and would like the Navy to be more flexible.
- Ms. Kerr noted that in Guam, the measure that allocated \$6 million for the museum was not a direct funding mechanism for the money to go to the government of Guam; what was negotiated was for the Navy to advocate for the funding and it took more than 10 years to be funded through Congressional appropriations.

- Dr. Brooks noted this Guam example shows more advocacy for the local community on behalf of the Navy than what is currently being proposed in the draft MOA.
- Mr. Manley, who was involved directly in the Guam proposal, provided some clarification. The authority/review of the request and advocacy with Congress and for the appropriation – it was under the auspices and authority of process of Office of Economic Adjustment, a DoD agency, and not a under the NHPA and not part of a programmatic agreement or MOA. The Navy said they would advocate for reasonably foreseeable effects in Guam. It did not occur under NHPA; the impacted cultural resources just benefited under it. It is important not to characterize this Guam example in another manner.

Ms. Griffin noted that her question is much more basic. She noted the acreage of the historic property and the property will experience an adverse effect due to loss of integrity. Her understanding is that the Navy is only willing to offer mitigation in five areas. She said that they should be able to propose mitigation throughout the Reserve and not just those five places.

- Dr. Brooks indicated that it seemed that the Navy was saying this draft MOA was its final offer. Capt. Army appreciated what Dr. Brooks noted. He indicated the Navy's advocacy for the community concerns. His advocacy is wide-reaching and will be continuing. It is important to him to advocate for housing, schools, and economic development noting that his efforts are outside the NHPA process.

Ms. Griffin needs to report back to the board and partners that they are limiting the discussion of mitigation to these five areas.

Capt. Army suggested talking about the dollar figure in the draft MOA. The Navy developed the amount for the five-year period that doubles the annual budget of the Ebey's Forever grant program. The plan would be to have projects vetted and then would pass the funds to the NPS and then locally. Would the group (consulting parties) be able to expend this amount of money in a particular amount of time? Could they expend more money with the constraints they are under within their fiscal authority?

- Dr. Brooks noted they have a expiration date of five years. She noted the MOA could be extended. She is not sure why they need to be confined to a period of five years.
- Mayor Hughes noted she was in support of Ms. Griffin. She is not interested in the Navy spending money on this mitigation (landscape study). It is not a priority to them. She is confused why the draft MOA included this option as they already have a baseline for cultural inventory; so, they do not need further inventory and it was not a priority for their organization. In addition, the NPS asked for the southern gateway; some consulting parties disagree very much that this is a priority for the Reserve or that it should be defined as a mitigation measure. She feels that they are moving further apart in the consultation process rather than closer together.
- Capt. Army noted this draft MOA was one that was released before the priorities were discussed with Kristin and Molly in the last day or two. The Navy is happy to remove the \$125,000 related to the landscape inventory and provide that proposed funding to another mitigation option with a higher priority. Capt. Army reminded that consulting parties that many of the previous mitigation options discussed were not items the Navy could fund under their authorities and mechanisms. The Navy would like them to take another look at the five mitigation options and consider how best to match them to the Reserve's priorities.
- Dr. Brooks expressed her frustration. None of the partners asked for the landscape study; only the NPS asked for the gateway. The state has not asked for these things. She noted that Congressman Larsen's office is on the line.

Ms. Griffin asked about the funds. She said she might have a very short list of projects that can take this funding through the Ebey's Forever Grant Program. She feels that the money/mitigation should be eligible for the whole of the district. The reserve would need to have a willing property owner with the capacity to match the grant funds. Other factors to consider are: the urgency of the preservation, the integrity of a structure, and if the project was in the best interest of the historic as a whole. Timing is also very important. The Reserve has over 400 structures; some are major historic properties and since they are outside these small areas, they would not be able to use the funds.

Ms. Atwood noted that they have a fundamental disagreement on the APE. She suggested they take Mr. Nelson's suggestion.

- Ms. Kerr said that while Mr. Nelson said this – the ACHP has already opined on the definition of the APE.
- Ms. Atwood asked what the conclusion was. Was this the five areas or the whole district?
 - o Ms. Kerr said the ACHP concurred with the 65dB DNL contour, which is used by the Federal Aviation Administration (FAA). They would not go above or below what other federal agencies have used.
 - o Ms. Griffin noted that the whole of the district is in the APE. The locals have a strong interest in this, and it is all within the APE.
 - o Kendall confirmed that the district was considered in the APE.

Ms. Griffin said that there are only a few places in the five areas that would have these indirect effects.

- Dr. Brooks said that the effects are to the whole, not the five areas. There is also disagreement about average noise. She noted again this a place where they are not in agreement with the Navy; the public is looking at single event noise not just average noise.
- Capt. Army said funds need to be tied to the adverse effect and the APE, per discussions in 2016. They cannot go back to and re-negotiate what happened in 2016. The Navy is trying to work with the partnership, and will continue to work with the communities to address other concerns; but the Navy cannot go back and change the methodology.
- Mayor Hughes noted she does not know where these five areas are located. She does not believe that the Ferry House is within them.

Dr. Brooks noted there is no such thing as an area of adverse effect. She wanted to point out that the Senator who carried the NHPA through Congress was Scoop Jackson and if people went back to 1966, 1980, and 1992, Congress expected federal agencies to take a higher level of care to historic properties. She noted this again and to respect what has been done for preservation. She asked that they do not confuse this.

Capt. Army stated Navy cannot provide funds for the noise that people hear in Central Whidbey through NHPA.

- Dr. Brooks said that they agree to an adverse effect to a historic property, not to the individual areas.
- Ms. Griffin said that it should not be just the increase from the 36 Growlers, but also the 80/20 split.
- Dr. Brooks noted that the Record of Decision (ROD) is not related to the NHPA.

Dr. Brooks said she feels they are at an impasse; her role with the office is to try and work through this. She said her office needs some time to consider next steps. Dr. Brooks cannot sign the MOA at this time.

- Capt. Army said they need to find a way to get through the impasse.

Mayor Hughes asked if there was a way to get a map so they can visualize these five areas and how they can increase funding to spend it in these areas.

- Capt. Army will have NASWI staff prepare this map. He will have it prepared in time for the visit from Mayor Hughes.

Dr. Brooks is very nervous about applying the adverse effect in this manner, and the potential to set a precedent; she stated she will need to work through this issue.

Mayor Hughes also said that she would decline signing the MOA at this time. She felt it was not a true discussion and does not agree mitigation should be restricted. She is clear the Navy is the ultimate decision maker and does not want to cut off the discussion and close out the opportunity to get additional funds.

Ms. Atwood asked to see the areas, as well.

Dr. Brooks noted the ACHP could assume the SHPO is intransigent and can come in and sign over her, if needed.

- Dr. McCullough clarified that they can do this if there is a termination of the consultation by the SHPO.
 - o Dr. Brooks said the MOA can be signed without the State of Washington.
 - o Ms. Kerr said again, only if the WA SHPO chooses to terminate the consultation.
- Dr. Brooks is not terminating, and she is holding the course at this time.

Mayor Hughes repeated this is why she would like to see these areas on a map.

Ms. Griffin said she would bring this information to the Board later today. They do not have concurrence with the Friends of Ebey's yet with regard to the infusion of money. and is concerned they were named in the MOA document without ever being consulted.

Ms. Campbell will narrow in on the area they refer to. The five areas are identified in the nomination package (1998 amendment). Those areas were never mapped, but they are described.

Ms. Griffin asked if it would be possible to pull the draft MOA from the website.

- Ms. Campbell said there are other options available. The goal is to allow for public participation. She noted they have worked hard to include language so the public knows this is not final and is not agreed upon by consulting parties.

Ms. Griffin said it gives the public a perception this is what is moving forward. She thinks it would be best to pull it until they see something where they are in agreement.

- Capt. Army indicated it would then seem to be the final. He would like to have the public see the transparency and allow them to see the changes to the MOA as it develops over time.

Mayor Hughes said that if the Navy puts out a press release, people will automatically "jump." She does not believe this is genuine transparency. She has already received a few emails.

- Capt. Army noted it is difficult to separate out the NEPA and NHPA no matter what is done. He appreciates the concerns and they will take a look at the options and get back to the group.

Capt. Army closed the meeting and thanked everyone for the time on the call.

The call ended at approximately 11:37 AM.

Minutes of the Trust Board of Ebey's Landing National Historical Reserve
Regular Business Meeting, October 23, 2018 – 4:00pm
Coupeville Library
788 NW Alexander St., Coupeville, WA 98239

Members Present: Wilbur Bishop, Fran Einterz, Al Sherman, Rip Robbins, Jon Crimmins, Lisa Bernhardt, Harry Anderson.

Members Absent: David Louter, Sally Garratt

Staff Present: Kristen Griffin, Carol Castellano

Other Attendees: Alix Roos (Friends of Ebey's)

Call to Order:

Chair Bishop opened the meeting at 4:05pm.

Following "This Day in History," Bishop moved to approval of the Minutes from September's meeting.

Minutes:

ACTION: Bishop entertained a motion to approve the minutes of the regular meeting of September 25, 2018. Moved by Bernhardt, second by Robbins. Hearing no discussion, Bishop called for the vote, minutes were approved unanimously.

Friends of Ebey's Report:

Roos reported that preparation for the Annual Community Potluck is underway and will include a slideshow, "Snapshot of the Reserve, and Unbroken Historical Record." In addition, the Friends are preparing their annual End of Year Appeal. The Friends have not officially weighed in on the draft MOA presented by the Navy, but since grant funding is mentioned, they will discuss it.

Treasurer's Report:

Sherman noted that operations vouchers were under \$20,000 and that we're heading into a challenging fiscal time, so expenses have been minimized. Sherman passed around vouchers from operations and for the restricted funds.

Partner Reports

Washington St. Parks: Crimmins reported a new manager based at Ft. Casey has been hired, and will start December 1st. The Haunted Fort is set for the 26th & 27th, and parks are expecting a good crowd.

Island County: Commissioner Price-Johnson reported that the County is moving into budget season, and there will be a public hearing set for December. The planning department is also working on the event code, and will make recommendations at the end of the year. Price-Johnson noted the Trust Board is welcome to comment.

Minutes of the Trust Board of Ebey's Landing National Historical Reserve
Regular Business Meeting, October 23, 2018 – 4:00pm

National Park Service: No Report

Town of Coupeville: No Report

New Business:

No New Business.

Old Business:

Bishop moved to discussion of the draft MOA and the Sec. 106 process. Griffin noted that the process is changing and shifting minute by minute, with the release of the draft to the newspapers and a press release prior to the conference call with active parties – all of whom knew nothing about this. The draft sent to the papers, was one that had already been vetted by the parties involved and rejected. Much discussion ensued as to the best course of action for the Trust Board. Griffin stated the Trust Board needs to write a letter to the editor in response to the article carried in the paper stating that this is not an agreement the board is endorsing. Anderson noted it was important to see the process through. Bishop noted the board needs consensus as the process moves forward. Bernhardt agreed the board needs to stay in the game, and show the community the Board is fighting for it.

ACTION: Einterz made a motion to support the direction Griffin has laid out in the mitigation process. Second by Bernhardt. Following further discussion to define a 3-step plan, Bishop called for the vote. Approved unanimously.

Bishop moved to Voucher approval, then returned to Old Business.

Voucher Approval:

Bishop called on Sherman to present the vouchers for both the restricted and operating funds.

ACTION: Sherman moved for approval of vouchers from the Restricted Fund, 19-019 to 19-021, in the amount of \$7199.08. Second by Anderson. Hearing no discussion, Bishop called for the vote, approved unanimously.

ACTION: Sherman moved for approval of the vouchers from the Operating Fund, vouchers 19-001 to 19-018, in the amount of \$17,236.72. Second by Bernhardt. Hearing no discussion, Bishop called for the vote, approved unanimously.

Returning to Old Business, Bishop asked if discussion on the NPS owned Main St. Parcel should move to another workshop or be addressed in a Land Use Committee meeting. Following brief discussion, the issue will be a Land Use Committee topic.

Discussion turned to visitor management recommendations for Ebey's Landing, and Bishop said this would be a discussion at the next Trust Board workshop. Sherman added he'd get with Griffin to schedule an Education/Outreach committee meeting in the next month.

Minutes of the Trust Board of Ebey's Landing National Historical Reserve
Regular Business Meeting, October 23, 2018 – 4:00pm

Reserve Manager Report & Other Committee Reports:

Reserve Manager Report: Griffin reported that we are at the “thinnest” time of year in relation to financial capacity, and that the office is adjusting to this. Griffin also reported she is working on a job description for the Preservation Coordinator position.

Bishop would like to have some type of update on the design review ordinance for the next agenda.

Robbins asked if there was a trail update from the Whidbey Camano Land Trust and would connect with Einterz on this.

Good of the Order

Einterz shared “This Day in History.” Sherman spoke briefly about the death of Senator John McCain and told a story of McCain’s visit with Senator Slade Gorton to the dairy farm.

Adjourn

Hearing no further business, Bishop adjourned the meeting at 6:08 pm.

Minutes respectfully submitted by Carol L. Castellano

Date

October 25, 2018

Captain M. Army
Commanding Officer
Naval Air Station Whidbey Island

[REDACTED]
Oak Harbor, Washington 98278-5000

Dear Captain Army:

On September 28, 2018, the US Navy announced the final Environmental Impact Statement (EIS) regarding the EA-18G Growler operations at Naval Air Station Whidbey Island and Outlying Landing Field Coupeville and identified Alternative 2A as the preferred alternative. From the Navy's announcement, I understand that final decision will be made within thirty days of the September 28 announcement.

As the mayor of the City of Port Townsend, I would like to reiterate the City's previous comments to the draft EIS as well as the Section 106 historic properties identification (enclosed) that appear to have made no difference throughout the process. The City's concerns remain the same.

We once again ask that the Area of Potential Effect be expanded to cover all historic areas subject to impacts from flight operations, not just take-off and landing zones. We repeat our request that you measure those impacts as precisely as possible, using the Effective Perceived Noise Level rather than the Day-Night Average Sound level and accounting for low-frequency impacts.

We appreciate the implementation of the Precision Landing Mode that will result in a 30-percent reduction in the FCLP requirement from that analyzed in the Draft EIS and, as always, the City understands the need for pilot training and is grateful for the sacrifices made by the members of our military and their families. Nonetheless, we respectfully request that all future Environmental Assessment processes for proposed Navy operations within the Olympic Military Operations Area comply with NEPA's requirement that the effects of functionally-related activities be assessed together and address cumulative impacts.

Sincerely,



Deborah Stinson
Mayor

cc:

Honorable Patty Murray, U.S. Senator

Honorable Maria Cantwell, U.S. Senator

Honorable Derek Kilmer, U.S. Representative

Honorable Kevin Van de Wege, Washington State Senator

Honorable Steve Tharinger, Washington State Representative

Honorable Mike Chapman, Washington State Representative

Rear Admiral Scott Gray, U.S. Navy Commander, Navy Region Northwest

Dr. Allyson Brooks, Washington State Historic Preservation Officer

Reid J. Nelson, Advisory Council on Historic Preservation

Ms. Kendall Campbell, NASWI Cultural Resources Program Manager





Deborah Stinson
Mayor
250 Madison, Suite 2
Port Townsend, WA 98368
360-379-5047
dstinson@cityofpt.us

August 8, 2017

Captain G.C. Moore
Commanding Officer
Naval Air Station Whidbey Island

Oak Harbor, Washington 98278-5000

Subject: Section 106 Consultations for the Proposed Increase in EA-18G Growler Operations

Dear Captain Moore:

This letter responds to your July 14, 2017, letter regarding the definition of the Area of Potential Effect (APE), and Ms. Campbell's July 19, 2017, letter updating the City on the Navy's efforts to identify historic properties within the APE.

The City is extremely disappointed in the Navy's decision to use the 65 dB DNL to establish the APE. Growler operations are not constant – they are intermittent. The fact that using the 65 dB DNL standard is a “long-standing practice” among federal agencies does not change the fact that averaging intermittent noise as if it was constant noise has the practical effect of severely limiting the APE to parts of Whidbey Island, while ignoring the very real effects on Port Townsend's historic districts. We ask that you reconsider your position and use the Effective Perceived Noise Level measure instead of the 65dB DNL measure.

Sincerely,

A handwritten signature in cursive script that reads "Deborah S. Stinson".

Deborah S. Stinson
Mayor

cc: Honorable Patty Murray, U.S. Senator
Honorable Maria Cantwell, U.S. Senator
Honorable Derek Kilmer, U.S. Representative
Honorable Kevin Van de Wege, Washington State Senator
Honorable Steve Tharinger, Washington State Representative
Honorable Mike Chapman, Washington State Representative
Dr. Allyson Brooks, Washington State Historic Preservation Officer
Reid J. Nelson, Advisory Council on Historic Preservation
Kendall Campbell, NASWI Cultural Resources Program Manager



**Deborah Stinson
Mayor**

250 Madison, Suite 2
Port Townsend, WA
98368
360-379-5047
dstinson@cityofpt.us

January 18, 2017

EA-18G Growler EIS Project Manager
Naval Facilities Engineering Command Atlantic
Attn: Code EV21/SS

[REDACTED]
Norfolk, VA 23508

Dear Sir or Madam:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) published November 11, 2016 on the addition of 36 EA-18G "Growler" jets to the fleet of 82 existing Growlers at Naval Air Station Whidbey Island (NASWI). The City previously provided scoping comments on the DEIS in its letter dated January 1, 2015. It also submitted comments and a request for Section 106 consultation on August 16, 2016.

The published DEIS does **not** address our previous comments. To summarize, our January 8, 2015 scoping comments addressed:

- The Navy's piecemeal EIS and Environmental Assessment processes for proposed Navy operations in the Military Operations Area in the Olympic National Forest do not comply with NEPA's requirement that the effects of functionally-related activities must be assessed together and the cumulative impacts of those activities addressed.
- The DEIS does not properly reflect the impacts of jet noise, pollution and other stressors to the health and well-being of our community and our neighbors on the Olympic Peninsula.

Since sending this letter, we have discovered other issues that could have direct impact on Port Townsend and our Olympic Peninsula neighbors:

- Verbal statements by Navy personnel in public meetings are still not clearly reflected in written materials. As an example, the DEIS numbers for

Growler operations do not include an additional 42 planes, as was discussed at the Navy's December open house.

- There is no mention of weekend training flights in the DEIS, but the Washington State Forest Services Draft Permit does talk about weekend flights.

Additionally, our Section 106 consultation letter addressed:

- A request that for noise impacts, the Navy expand the area of study, as well as the definition of the indirect effects component of the Area of Potential Effect (APE.)
- A request to consider using a different measure of sound impacts.
- A request to include an evaluation of all the historic areas over which the Growlers fly, not just the much smaller historic areas affected by takeoffs and landings.
- A request to enter into formal consultation with the City of Port Townsend under authority of Section 106 of the National Historic Preservation Act.

We remain concerned that the Navy continues to separate the ground, air, and sea-based activities on and around the Olympic Peninsula into different public processes. This practice of segmentation has resulted in numerous separate comment periods between January 2014 and now. As we have previously stated, we share the view of some of our constituents who do not view these electronic warfare testing, training and flight activities as separate. And, that the Navy's segmentation of impacts into numerous distinct public processes continues to cause confusion and frustration to people who are trying to piece together the full scope of impacts.

While not directly related to this DEIS, we note that this continues a practice that we described in a September 2007 letter to the Navy in relation to proposed actions at Naval Magazine Indian Island.

NEPA requires that all functionally related activities be considered together, and it mandates "...review of cumulative, incremental impacts of actions when following and/or added to other actions regardless of what agency – federal, nonfederal, private – undertakes such other actions." (40 CFR 1508.7) The Navy's persistent and chronic segmentation of impacts and its lack of cumulative effects analyses are cause for serious and long term concerns about public and environmental health in our own community.

Noise Impacts:

We incorporate our August 16, 2016 Section 106 consultation letter into our general comments. As we mentioned in that letter, the DEIS uses an outdated

noise simulation model that a DoD-commissioned study found is not appropriate for Growler engines.

Historic Preservation:

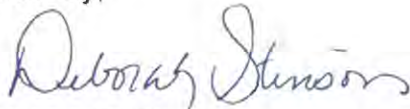
As we stated in our Section 106 consultation letter, we believe that the decision to restrict the APE to areas that immediately surround runways, and to not take into account noise from flight operations beyond that narrow scope, does not accurately measure the effect of those operations on our National Historic Districts.

We appreciate the Navy's extension of the comment period until February 24, 2017. We are aware that many constituent groups have expressed their need for additional time to prepare comments, and believe that granting this extension will result in the Navy having more specific information that they can use to evaluate the comments to the DEIS.

Additionally, while our limited resources constrain our ability to provide you with more detailed suggestions, we commend the detailed analyses and suggestions of our constituent groups, such as the West Coast Action Alliance.

We look forward to the formal Section 106 consultation, as well as seeing your responses to our comments. The City of Port Townsend appreciates the need for military training and is grateful for the sacrifices made by the members of our military and their families.

Sincerely,



Deborah S. Stinson
Mayor

cc: Honorable Patty Murray, U.S. Senator
Honorable Maria Cantwell, U.S. Senator
Honorable Derek Kilmer, U.S. Representative
Honorable Kevin Van de Wege, Washington State Senator
Honorable Steve Tharinger, Washington State Representative
Honorable Mike Chapman, Washington State Representative
Dr. Allyson Brooks, Washington State Historic Preservation Officer
Reid J. Nelson, Advisory Council on Historic Preservation



**Deborah Stinson
Mayor**

250 Madison, Suite 2
Port Townsend, WA 98368
360-379-5047
dstinson@cityofpt.us

August 16, 2016

Captain G.C. Moore
Commanding Officer
Naval Air Station, Whidbey Island

[REDACTED]
Oak Harbor, Washington 98278-5000

RE: Request for Section 106 Comments – EA-18G Growler Operations

Dear Captain Moore:

Thank you for the opportunity you provide in your July 12, 2016 letter for the City of Port Townsend to consult on the proposed Area of Potential Effect (“APE”) for the continuation and increase of Growler operations at NAS Whidbey Island.

The City asks that you expand your area of study, as well as your definition of the indirect effects component of the APE. We also ask that you consider using a different measure of sound impacts.

Area of study is too narrow.

Your area of study does not include all of the historic areas over which the Growlers fly. While the primary impact areas on Whidbey are affected by take-off and landing operations, many other areas of the Salish Sea area, including the City, are affected by flight operations. The City was founded in 1851 and contains two U.S. National Historic Landmark Districts: our Downtown and Uptown areas, as well as the Fort Worden Historic District. The Districts include approximately 40 separately-listed properties and structures on the National Register of Historic

Places. The noise impacts from Growler operations impacts residents, visitors, and historic structures in the District. Therefore, the City asks that the APE be expanded to include all historic areas within the training flight areas.

Measure of sound impacts does not take into account rural/naturally quiet areas.

The City believes that the flight operations may diminish the integrity of the setting of Port Townsend's Historic Districts in that they change the historically-quiet setting of those Districts. Also, flight operations may have an adverse physical effect on some historic structures within those Districts¹.

According to your letter, your baseline for impacts is noise over 65 decibel ("dB") Day-Night Average Sound Level ("DNL"). This is an average noise level measured over the course of a year. While this is the FAA standard, FAA policy does not preclude local jurisdictions from setting a lower threshold of compatibility for new land use developments, and the policy allows for supplemental or alternative measurements².

The average decibel level in the City, especially at night, is likely to be very low – even below 55dB in certain parts of the City. Growler operations are not continuous; the noise impacts of the operations vary based on the exercise, but include flights over and near the City for hours at a time – frequently at night. Therefore, the City believes that measuring the noise impacts here and on Whidbey using an Effective Perceived Noise Level as provided in Federal Aviation Regulation Part 36 would be a more accurate measure of the effect of flight operations.

Finally, the DNL uses A-weighting for the decibel measurement. It does not take into account low-frequency noise. As noted in a 2004 article:

Regulatory authorities must accept that annoyance by low frequency noise presents a real problem which is not addressed by the commonly used assessment methods. In particular, the A-weighted level is very inadequate, as are the NR and NC criterion curves. Assessment methods specific to low frequency noise are emerging, but a limitation of existing methods is that they do not give full assessment of fluctuations. It is possible that application of noise quality concepts, in particular fluctuation and roughness (Zwicker and Fastl, 1999), may be a way forward.

¹ See FAA Section 106 Handbook, June 2015, Page 27, Section C(1)(a), (e); Noise Basics and the Effect of Aviation Noise on the Environment, Wyle, Page 25, Sections 3.10, 3.11 (Viewed at <http://www.rduaircraftnoise.com/rdaircraftnoise/noiseinfo/downloads/NoiseBasicsandEffects.pdf> on August 16, 2016).

² Report No. DOT/FAA/AEE/2011-02, Technical Support for Day/Night Average Sound Level (DNL) Replacement Metric Research, June 14, 2011. Mestre, Schomer, Fidell, & Berry, Authors

Leventhall H G. Low frequency noise and annoyance. Noise Health [serial online] 2004 [cited 2016 Aug 3];6:59-72. Available from: <http://www.noiseandhealth.org/text.asp?2004/6/23/59/31663>.

The City appreciates the need for pilot training, and is grateful for the sacrifices made by the members of our military and their families. We ask that the APE be expanded to cover all historic areas subject to flight operations, not just take-off and landing. We also ask that you measure those impacts as precisely as possible, and take into consideration low-impact frequencies.

Sincerely,


Deborah S. Stinson
Mayor

Encl.

cc: Honorable Patty Murray, U.S. Senator
Honorable Maria Cantwell, U.S. Senator
Honorable Derek Kilmer, U.S. Representative
Honorable James Hargrove, Washington State Senator
Honorable Steve Tharinger, Washington State Representative
Honorable Kevin Van De Wege, Washington State Representative

National Register of Histori...

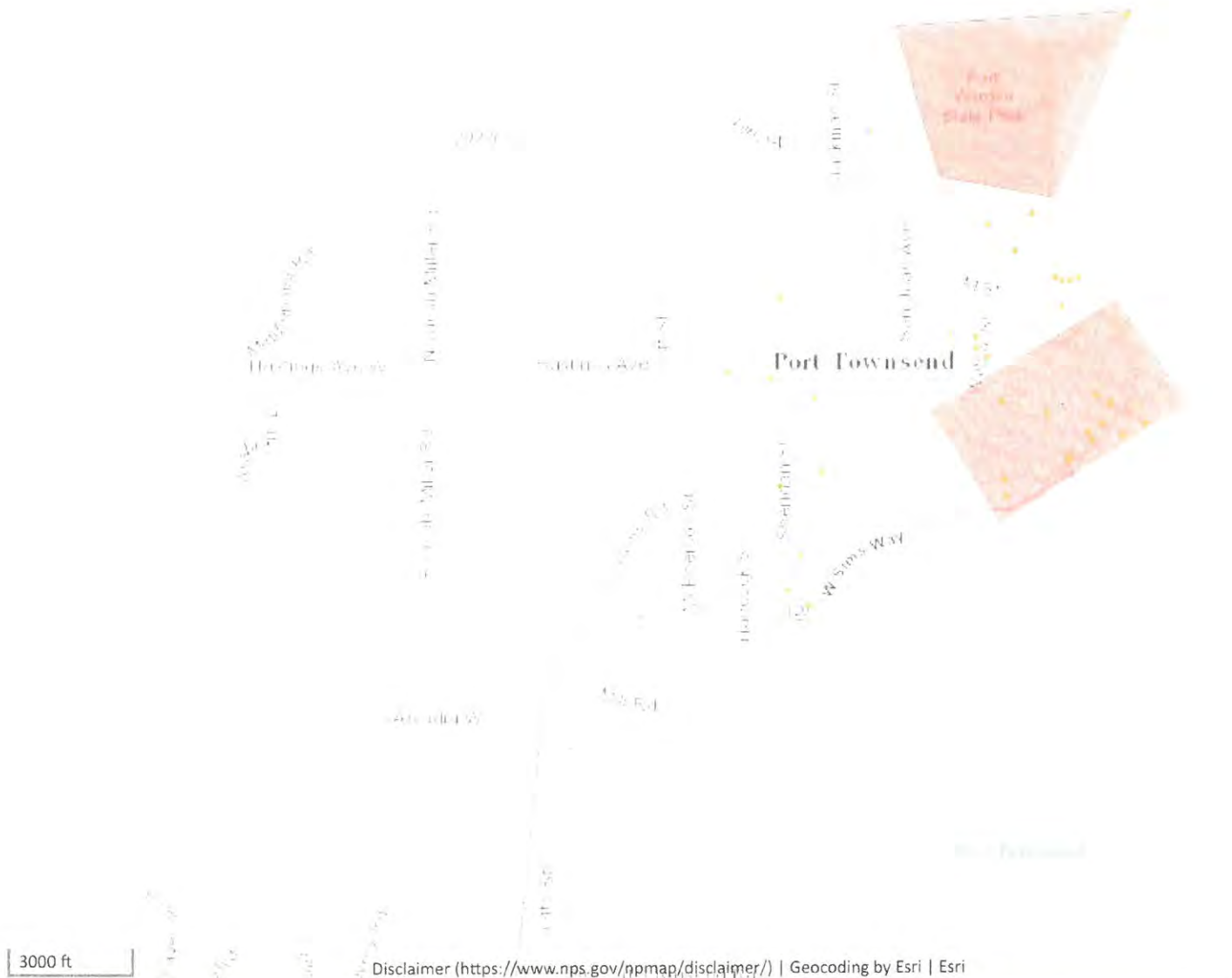
National Park Service
U.S. Department of the Interior

Public, non-restricted data depicting National Register spatial data proce...



Port Townsend, Washington

Esri Topo



From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: [Non-DoD Source] Trust Board comment on draft MOA
Date: Tuesday, November 13, 2018 6:13:57 PM
Attachments: [TB Growler Section 106 MOA letter 10-26-2018.pdf](#)

October 26, 2018 – Email from Ms. Kristen Griffin, Trust Board of Ebey’s Landing National Historical Reserve

-----Original Message-----

From: Griffin, Kristen [REDACTED]
Sent: Friday, October 26, 2018 1:32 PM
To: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Brooks, Allyson (DAHP) [REDACTED]; Molly Hughes [REDACTED]; Helen Price-Johnson [REDACTED]; David Day [REDACTED]; maryon [REDACTED]; dstinson@[REDACTED]; kkerr@[REDACTED]; Roy Zipp [REDACTED]
Cc: Wilbur Bishop [REDACTED]
Subject: [Non-DoD Source] Trust Board comment on draft MOA

Hello Growler Section 106 consulting parties: Attached is a letter providing input to the Navy regarding the draft MOA routed for public comment by the Navy.

--

Kristen P. Griffin
Reserve Manager
Ebey's Landing National Historical Reserve [REDACTED] Coupeville, WA 98239
[REDACTED] ebla <<http://www.nps.gov/ebla>>



EBEY'S LANDING
NATIONAL HISTORICAL RESERVE



EBEY'S LANDING 1978 - 2018
NATIONAL HISTORICAL RESERVE
Celebrating 40 Years of Community Partnership

Trust Board Members

Wilbur Bishop, Chair

Harry Anderson, Vice-Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Rip Robbins

Sally Garratt

Jon Crimmins

David Louter

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

National Park Service

Washington State Parks

Island County

Town of Coupeville

Post Office Box 774
Coupeville, WA 98239
Phone (360) 678-6084
www.nps.gov/ebla

October 26, 2018

Naval Air Station Whidbey Island
Attn: Captain Matthew Army

[REDACTED]
Oak Harbor, WA 98278-5000

Subject: Continuing Section 106 Consultation – EA-18G Growler Operations at NASWI (letter of June 25, 2018; SER N442096).

The Trust Board of Ebey's Landing National Historical Reserve is a consulting party working with the Navy under Section 106 of the National Historic Preservation Act to develop a Memorandum of Agreement (MOA) to resolve adverse effects to the Central Whidbey Island Historic District (District), also known as Ebey's Landing National Historical Reserve (the Reserve).

The Trust Board would like to clarify that, while they have been involved in the consultation, the Draft MOA presented for public comment does not reflect the Trust Board's view of appropriate mitigation for the adverse effect.

Throughout the consultation process, the Trust Board has remained unchanged in their view that because noise is the cause of the adverse effect, the only way to resolve or mitigate the adverse effect is to reduce the increase in noise that this undertaking will bring. However, because the Section 106 review is directly focused on the District/ Reserve, the Trust Board has participated in consultation to discuss ways to avoid, minimize or mitigate the undertaking's adverse effects.

The Trust Board's view of appropriate mitigation is that the Reserve and the District were established because the public actively sought protection for this area and its unbroken, ongoing history. Therefore, the Trust Board feels mitigation projects should benefit the public and focus on historic properties that are valued by the public, and open to public access and oversight. The Trust Board also feels that mitigation should reflect the local, multi-partner stewardship of the Reserve. This means that the partners and partnership that set priorities for preservation in the Reserve should inform the Navy of how best to mitigate the adverse effect.

While resolving mitigation typically involves discussion of funding needed to accomplish mitigation, this is not the Trust Board's main concern. Above all, the Board supports mitigation projects that achieve a clear public benefit, reflect local preservation priorities, and reinforce the partnership model that was established to protect the nation's first National Historical Reserve. Instead of the stipulations proposed in the current Draft MOA, the Trust Board has suggested that the Navy consider the following alternative mitigation measures that are consistent with the Trust Board's view:

- Provide funding to support a project to stabilize historic concrete structures in Fort Casey and Fort Ebey State Parks (owned by Washington State Parks). Estimated \$2 million dollars.
- Provide funding to support structural historic rehabilitation of the Coupeville Wharf (owned by the Port of Coupeville). Estimated \$2 million dollars.

- Provide funding to reverse deferred maintenance and make structural and security improvements to the historic Ferry House (owned by the NPS). Estimated \$1.8 million dollars.
- Provide \$100,000 in overhead to the Trust Board to assist with administration and help coordinate and support preservation projects in the Reserve (as requested).

The Trust Board looks forward to continued participation in the consultation to address adverse effects to the Central Whidbey Island Historic District. The Board appreciates the opportunity to encourage consideration of projects that will protect the historic integrity of the District and Reserve, and provide lasting public benefit to our community.

Sincerely,



Wilbur Bishop, Chair
Trust Board of Ebey's Landing National Historical Reserve

*Cc Trust Board of Ebey's Landing National Historical Reserve
Congressman Rick Larsen, Washington
Senator Patty Murray, Washington
Senator Maria Cantwell, Washington
Governor Jay Inslee, Washington
Allyson Brooks, SHPO, Department of Archaeology and Historic Preservation
Commissioner Helen Price Johnson, Board of Island County Commissioners
Mayor Molly Hughes, Town of Coupeville
Jon Crimmins, Washington State Parks
Roy Zipp, NPS
Rob Smith, NPCA
file*

October 26, 2018

Mrs. Phyllis L. Bayer
Assistant Secretary of the Navy
Energy, Installations and Environment
[REDACTED]
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

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

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: Growler MOA Consultation Revised DRAFT MOA
Date: Wednesday, November 7, 2018 3:06:08 PM
Attachments: [Growler Consultation DRAFT V2.docx](#)

Good Afternoon Consulting Parties,

Following our last consultation meeting on October 23, the Navy took into consideration the comments of the consulting parties and invites you to review and comment on the attached revised DRAFT MOA. Since the consultation meeting the Navy met with several of our consulting partners to seek opportunities to find alternative resolutions to those proposed in the first DRAFT MOA. From those discussions Navy took into consideration the communities desire to see a resolution options that provided a public benefit, met an Ebey's Trust Board priority, and provided potential long-term benefits to a publically valued historic property in the Reserve.

Please review the revised DRAFT MOA and provide me any comments or concerns. Following consulting parties review we will update the DRAFT MOA for public review and comment.

All My Best,
Kendall

Kendall Campbell
Archaeologist and Cultural Resources Program Manager
NAS Whidbey Island

[REDACTED]
Oak Harbor, WA 98278
[REDACTED]
[REDACTED]

1 **MEMORANDUM OF AGREEMENT**
2 **AMONG**
3 **COMMANDER, NAVY REGION NORTHWEST,**
4 **AND**
5 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
6 **AND**
7 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
8 **REGARDING THE EA-18G “GROWLER” AIRFIELD OPERATIONS,**
9 **NAVAL AIR STATION WHIDBEY ISLAND,**
10 **ISLAND COUNTY, WASHINGTON**
11 **2018**

12
13 WHEREAS, Commander, Navy Region Northwest (Navy) proposes to increase the number of
14 aircraft stationed at Naval Air Station (NAS) Whidbey Island and the number airfield operations
15 at both Ault Field and Outlying Field (OLF) Coupeville (Undertaking); and

16
17 WHEREAS, Navy will continue to implement its current operational mitigation practices to
18 avoid and minimize noise impacts on the surrounding communities as feasible; and

19
20 WHEREAS, Navy has determined that the proposed Undertaking has the potential to cause
21 effects on historic properties subject to review under section 106 of the National Historic
22 Preservation Act (NHPA) 54 U.S.C. § 306108, and its implementing regulations, 36 C.F.R. §
23 800; and

24
25 WHEREAS, Navy invited the Advisory Council on Historic Preservation (ACHP) to participate
26 in the entire section 106 process under Subpart B of 36 CFR § 800 and the ACHP agreed to
27 participate in the entire process; and

28
29 WHEREAS, Navy established the Area of Potential Effects (APE) for the Undertaking
30 consistent with 36 C.F.R. § 800.16(d), by taking into consideration the following three
31 components of the Undertaking:

- 32 • On-installation Direct Effect Area: Areas on the installation where historic properties
33 could be directly affected (e.g., by ground disturbance, demolition, or alteration).
- 34 • On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB
35 Day Night Sound Level (DNL) noise contours where historic properties could be disturbed
36 by the introduction of visual, atmospheric, or audible elements.
- 37 • Off-installation Indirect Effect Area: Areas off installation but within operational areas
38 bounded by the 65 DNL noise contours, including the Central Whidbey Island Historic
39 District; and

40
41 WHEREAS, the Central Whidbey Island Historic District was determined eligible for listing in
42 the National Register of Historic Places (NRHP) in 1973, and the 1978 National Parks and
43 Recreation Act designated the area of the historic district the Ebey’s Landing National Historical
44 Reserve (ELNHR) for the purposes of protecting a rural community and its significant history;
45 and

47 WHEREAS, the ELNHR is the first historical reserve in the National Park System and is
48 managed by a trust board through coordination of the four land managing partners who have a
49 preservation and/or management interest in the ELNHR: The National Park Service (NPS),
50 Washington State Parks and Recreation Commission, the Town of Coupeville (Coupeville), and
51 Island County; and

52
53 WHEREAS, Navy determined that the Undertaking will result in an adverse effect to the Central
54 Whidbey Island Historic District, which includes ELNHR, as a result of more frequent aircraft
55 operations affecting certain landscape components of the historic district, specifically perceptual
56 qualities that currently make the Historic District eligible for the NRHP; and

57
58 WHEREAS, Navy has consulted with the Washington State Historic Preservation Officer
59 (SHPO) on the determination of effect, and SHPO concurred on June 27, 2018; and

60
61 WHEREAS, Navy has consulted with Swinomish Indian Tribal Community, Upper Skagit
62 Indian Tribe, Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the
63 Tulalip Tribes of Washington, and the Jamestown S’Klallam Tribe who expressed no concerns
64 about the Undertaking; and

65
66 WHEREAS, Navy has consulted with Trust Board of Ebey’s Landing National Historical
67 Reserve (Trust Board), NPS, Island County Commissioners (Commissioners), Coupeville, City
68 of Port Townsend (Port Townsend), Washington State Parks, Seattle Pacific University, the
69 Citizens of Ebey’s Reserve (COER), and Mr. David Day; and

70
71 WHEREAS, Navy has made information about its NHPA section 106 review of the Undertaking
72 available to the public during NEPA public meetings, as well as on the EIS and NAS Whidbey
73 Island website and in local media, and provided opportunity for comments per 36 C.F.R.
74 §800.5(d), §800.6(a)(4), and §800.8; and

75
76 WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), Navy notified the ACHP of the adverse
77 effect determination, providing the specified documentation, and the ACHP has chosen to
78 continue to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

79
80 WHEREAS, Navy invited Swinomish Indian Tribal Community, Upper Skagit Indian Tribe,
81 Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the Tulalip Tribes of
82 Washington, and the Jamestown S’Klallam Tribe to participate in the development of this
83 Memorandum of Agreement (MOA); and

84
85 WHEREAS, Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, Samish Indian
86 Nation, Stillaguamish Tribe of Indians, and the Jamestown S’Klallam Tribe did not express an
87 interest to actively participate, but request review of final MOA and the Lummi Nation and the
88 Tulalip Tribes of Washington did not respond to Navy’s invitation to consult on the development
89 of this MOA; and

90

91 WHEREAS, Navy invited the Trust Board, NPS, Commissioners, Coupeville, Port Townsend,
92 Washington State Parks, Seattle Pacific University, COER, and Mr. David Day to participate in
93 the development of this MOA; and

94
95 WHEREAS, the Trust Board, Commissioners, Coupeville, Port Townsend, COER, and Mr.
96 David Day agreed to participate in the development of, and opportunity to concur in this MOA;
97 and

98
99 WHEREAS: Navy, in consultation to mitigate the adverse effects on historic properties agreed to
100 evaluate alternatives that took into consideration resolution options that included the priorities of
101 the ELNHR, and that provided potential long term and public benefits to the ELNHR; and

102
103 WHEREAS: As a contributing structure in the Central Whidbey Island Historic District, the
104 Ferry House has been determined to hold significance for the American people, and be worthy of
105 protection and preservation. The Navy appreciates the value of the historic importance of the
106 Ferry House to the Trust Board, NPS, and the citizens of central Whidbey Island as a publicly
107 accessible focal point for interpreting the cultural landscape and historic settlement and rural
108 agricultural character of ELNHR. The Ferry House is one of the most significant and iconic
109 structures in the ELNHR and offers the public exceptional opportunities to experience and be
110 inspired by the history of the Central Whidbey Island Historic District, and the purpose of
111 ELNHR. In addition, the community has protected the Ferry house for generations,
112 demonstrating its importance to Central Whidbey Island’s history, even prior to ELNHR
113 creation. The Ferry House, held in trust for the public with NPS management, contributes to the
114 cultural landscape of ELNHR and represents a high priority for the Trust Board in the execution
115 of its plan to preserve the historic heritage of central Whidbey Island; and

116
117 WHEREAS: The Navy recognizes the local community has concerns about the preservation of
118 central Whidbey Island’s historic properties, to include potential community and economic
119 impacts, which are not addressed by the NHPA. The Navy recognizes that local Whidbey Island
120 communities are also Navy communities and works to understand these community concerns and
121 help identify solutions to benefit quality-of-life and infrastructure needs; and

122
123 NOW, THEREFORE, Navy, SHPO, ACHP, and NPS, as the signatory parties, agree that the
124 following stipulations resolve Adverse Effects to Historic Properties caused by the undertaking
125 in compliance with the NHPA and that the stipulations govern all aspects of the Undertaking
126 unless this MOA expires or is terminated.

127

128

129

STIPULATIONS

130 Navy will ensure that the following stipulations are implemented and carried out under the
131 supervision of a cultural resource professional(s) meeting the Secretary of the Interior
132 Professional Qualifications Standards as defined in Appendix A to 36 C.F.R. Part 61.

133

134 I) MITIGATION OF ADVERSE EFFECTS OF THE UNDERTAKING

135

136 A) **Landscape Preservation**

137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182

Ebey’s Prairie is a landscape that contributes to the Central Whidbey Island Historic District’s eligibility, in which an indirect adverse effect was identified, as defined in the determination of adverse effect dated June 25, 2018. Navy will provide NPS with funds, not to exceed \$400,000, to support preservation projects that enhance the landscape integrity of the Ebey’s Prairie landscape by preserving and protecting the Ferry House and associated cluster of outbuildings and structures. Although the Ferry House is not within an area of increased noise frequentness greater than 5 dB above 65 dB DNL as explained in the determination analysis, the historic landscape that the Ferry House contributes to is within this area, as part of the “entry to Coupeville from Ebey’s Prairie into prairie and along Main Street.”

- 1) Funding will support preservation projects to the Ferry House and contributing cluster of outbuildings and structures.
- 2) Preservation projects must comply with Secretary of the Interior Historical Preservation standards.
- 3) In cooperation with the Trust Board, NPS will coordinate the development of a scope of work for preservation projects to the Ferry House.
- 4) Within four years and prior to transfer of funds, NPS will provide the Navy the scope of work for Ferry House preservation projects for review to ensure legal requirements for transfer of funds are met including:
 - i. Providing specific and certain information about the project’s benefit to landscape eligibility components, and details on the preservation services to be performed on the Ferry House or cluster components.
 - ii. Requiring all funds transferred to be obligated within the same fiscal year. Funds which are unexpended at the conclusion of the fiscal year shall be returned to the Navy.

B) Southern Gateway

Within four years of the execution of the agreement Navy will provide NPS with funds, not to exceed \$75,000, to complete the design, construction, and installation of a southern gateway entry sign to the ELNHR.

- 1) Prior to transfer of funds NPS will coordinate with the ELNHR to develop a scope of work and execution plan on project goals and with the Navy to ensure legal requirements for transfer of funds are met.
- 2) NPS will provide Navy opportunity to participate in the development of the portion of the gateway exhibit referencing Navy history and/or current aviation use at Outlying Field Coupeville with the goal to provide context to visitors explaining the presence of Navy lands and aircraft in the ELNHR.
- 3) All funds transferred must be obligated within the same fiscal year.

C) Historic Preservation Easements

In fiscal year 2020, Navy will seek partnership opportunities through the Readiness and Environmental Protection Integration (REPI) Program to support the creation of scenic

183 easements. Navy will communicate its support for appropriate conservation easements to
184 DoD officials, but cannot guarantee the outcome of the REPI process. At the end of the
185 period of this MOA the Navy will provide SHPO and the ACHP with a report of successful
186 REPI partnerships in the ELNHR.

187 188 **D) Navy Volunteer Collaboration**

189
190 Navy will communicate volunteer opportunities to NASWI personnel that exist in ELNHR to
191 take part in the restoration and care of the ELNHR.

- 192 1) Sailors seeking to improve their communities often volunteer their time and energy to
193 projects and causes. The Navy does not mandate volunteerism, but does
194 communicate community needs to interested Sailors.
- 195 2) Navy will connect interested volunteers with the needs of the ELNHR through the
196 NASWI Command Master Chief, who will receive volunteer opportunities directly
197 from NPS and ELNHR and match those needs with volunteer Sailors.

198 199 **ADMINISTRATIVE PROVISIONS**

200 201 **I) DISPUTE RESOLUTIONS**

202
203 A) Should any signatory party to this MOA object at any time to any actions proposed or the
204 manner in which the terms of this MOA are implemented, the party shall notify Navy in
205 writing, and Navy shall consult with the parties to this MOA to resolve the objection. If
206 Navy determines that such objection cannot be resolved, Navy will:

- 207
208 1) Forward all documentation relevant to the dispute, including Navy's proposed
209 resolution, to the ACHP. The ACHP shall provide Navy with its advice on the
210 resolution of the objection within thirty (30) calendar days of receiving adequate
211 documentation.
 - 212 (i) Prior to reaching a final decision on the dispute, Navy shall prepare a written
213 response that takes into account any timely advice or comments regarding the
214 dispute from the ACHP and/or signatories, and provide them with a copy of this
215 written response. Navy will then proceed according to its final decision.
- 216
217 2) If the ACHP does not provide its advice regarding the dispute within the thirty (30)
218 calendar day time period, Navy may make a final decision on the dispute and proceed
219 accordingly.
 - 220 (i) Prior to reaching such a final decision, Navy shall prepare a written response that
221 takes into account any timely comments regarding the dispute from the
222 signatories to the MOA, and provide them and the ACHP with a copy of such
223 written response.

224
225 B) Navy's ability and responsibility to carry out all other components of the MOA not
226 subject to the dispute shall remain unchanged. Navy's ability to carry out the undertaking
227 shall remain unchanged during any dispute.

229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274

II) ANTI-DEFICIENCY ACT

- A) The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits federal agencies from incurring an obligation of funds in advance of or in excess of available appropriations. Accordingly, the Signatory Parties agree that any requirement for the obligation of funds arising from the terms of this MOA will be subject to the availability of appropriated funds for that purpose. The Stipulations contained in this MOA will not be interpreted as requiring the obligation or expenditure of funds in violation of the Anti-Deficiency Act.
- B) If compliance with the Anti-Deficiency Act impairs Navy's ability to implement the Stipulations of this MOA, Navy will consult with the Signatory Parties to determine if an amendment is necessary to fully satisfy the stipulation herein.

III) AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

IV) TERMINATION

- A) If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation III, above. If within thirty (30) calendar days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.
- B) Once the MOA is terminated, and prior to work continuing on the undertaking, Navy must either (a) execute an MOA pursuant to 36 C.F.R. § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Navy shall notify the signatories as to the course of action it will pursue.

V) COORDINATION

Navy will ensure that each Signatory and Concurring Party is provided a copy of the fully executed MOA within thirty (30) calendar days of executing the MOA.

VI) POST REVIEW DISCOVERY

If during the performance of the undertaking or in the course performance of the stipulations in this MOA previously unknown historic properties are discovered or unanticipated effects on historic properties found, Navy shall immediately implement the Inadvertent Discovery Plan (Appendix B).

VII) DURATION

275
276 This MOA will expire if its terms are not carried out within five (5) years from the date
277 of its execution. Prior to such time, Navy may consult with the other signatories to
278 reconsider the terms of the MOA and amend it in accordance with Stipulation III above.
279

280 Execution of this MOA by Navy, SHPO, and the ACHP and implementation of its terms
281 evidence that Navy has taken into account the effects of this undertaking on historic properties
282 and afforded the ACHP an opportunity to comment.
283

DRAFT

284 **MEMORANDUM OF AGREEMENT**
285 **AMONG**
286 **COMMANDER, NAVY REGION NORTHWEST,**
287 **AND**
288 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
289 **AND**
290 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
291 **REGARDING THE SECURITY ENHANCEMENTS AT**
292 **OUTLYING LANDING FIELD COUPEVILLE,**
293 **NAVAL AIR STATION WHIDBEY ISLAND,**
294 **ISLAND COUNTY, WASHINGTON**
295 **2018**

296
297
298 **SIGNATORIES:**

299
300 DEPARTMENT OF THE NAVY

301
302
303 By: _____ Date: _____
304 CHRISTOPHER GRAY, Rear Admiral, U.S. Navy
305 Commander, Navy Region Northwest

306
307
308 By: _____ Date: _____
309 MATHEW ARNY, Captain, U.S. Navy
310 Commander, Naval Air Station Whidbey Island

311

312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

SIGNATORIES:

WASHINGTON STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: _____
DR. ALLYSON BROOKS
Washington State Historic Preservation Officer

336 **MEMORANDUM OF AGREEMENT**
337 **AMONG**
338 **COMMANDER, NAVY REGION NORTHWEST,**
339 **AND**
340 **THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,**
341 **AND**
342 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**
343 **REGARDING THE SECURITY ENHANCEMENTS AT**
344 **OUTLYING LANDING FIELD COUPEVILLE,**
345 **NAVAL AIR STATION WHIDBEY ISLAND,**
346 **ISLAND COUNTY, WASHINGTON**
347 **2018**

348
349
350 **SIGNATORIES:**

351
352
353 **ADVISORY COUNCIL ON HISTORIC PRESERVATION**

354
355
356 By: _____ Date: _____

357 JOHN M. FOWLER

358 Executive Director, Advisory Council on Historic Preservation

359

360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

SIGNATORIES:

NATIONAL PARK SERVICE AT EBEBY'S LANDING NATIONAL HISTORICAL RESERVE

By: _____ Date: _____

ROY ZIPP

Operations Manager, National Park Service at Ebey's National Historical Reserve

382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

TRUST BOARD OF EBEBY'S LANDING NATIONAL HISTORICAL RESERVE

By: _____ Date: _____
KRISTEN GRIFFIN
General Manager, Ebey's Landing National Historical Reserve

405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

ISLAND COUNTY COMMISSIONER

By: _____ Date: _____
NAME

427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

TOWN OF COUPEVILLE

By: _____ Date: _____
MOLLY HUGHES
Mayor, Town of Coupeville

450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CITY OF PORT TOWNSEND

By: _____ Date: _____
DEBRAH STINSON
Mayor, City of Port Townsend

473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CITIZENS OF EBEBY'S RESERVE

By: _____
MARYON ATWOOD
President of Citizens of Ebey's Reserve

Date: _____

495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE SECURITY ENHANCEMENTS AT
OUTLYING LANDING FIELD COUPEVILLE,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

CONCURRING PARTIES:

CONCERNED CITIZEN OF COUPEVILLE

By: _____ Date: _____
DAVID DAY

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Shurling, Cynthia](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#)
Cc: [Kondak, Tegan](#)
Subject: FW: Draft MOA conversation
Date: Tuesday, November 13, 2018 7:18:05 PM

Another recent.

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Thursday, November 8, 2018 6:21 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Subject: [Non-DoD Source] Re: Draft MOA conversation

Respectfully Captain Army, I need to hear back from these groups first. I believe the ELNHR will be sending me a letter and I need to consult with the Governor's office.

I still believe your offer is low. Kristin Griffin told me 400K would hardly allow them to do any substantial rehabilitation work. I cannot understand how the Navy can only manage to find 400K to assist a community.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer
Dept. of Archaeology and Historic Preservation
[REDACTED]

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Thursday, November 8, 2018 5:43:20 PM
To: Brooks, Allyson (DAHP)
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: Draft MOA conversation

Dr. Brooks,

As you probably saw, Kendall provided the updated draft MOA to the consulting parties yesterday. I hope that you will have a chance to read it soon. I have been working very hard within the Navy to create resolutions that serve priorities for the Reserve, NPS, and the Central Whidbey community. It is important for the Navy to recognize those local interests and goals. I am interested in your thoughts on this at any time.

The Boards of ELNHR and the Town of Coupeville will be voting on the new draft on the 13th and I'm looking forward to their decision. I'd like to speak with you by phone afterwards on the 14th, so that I can receive your position on the community's decision. I understand that you may be out of town supporting State business on other matters, so I will make myself available at any time that day to hear from you. Just let me know the time that works best for you and I will arrange my schedule accordingly.

Regards,

CAPT Matt Army

NAS Whidbey Island

Commanding Officer



Minutes of the Trust Board of Ebey's Landing National Historical Reserve

Workshop, November 13, 2018 – 4:00pm

Trust Board Office – the Cottage

162 Cemetery Rd., Coupeville, WA 98253

Members Present: Wilbur Bishop, Fran Einterz, Al Sherman, Rip Robbins, Lisa Bernhardt, Harry Anderson

Members Absent: David Louter, Sally Garratt, Jon Crimmins

Staff Present: Kristen Griffin, Carol Castellano

Other Attendees: Roy Zipp, NPS; Molly Hughes, Mayor of Coupeville

Call to Order: Chair Bishop opened the meeting at 4:05pm:

- **MEMORANDUM OF AGREEMENT.** Bishop turned the floor over to Griffin for discussion of the Memorandum of Agreement with the Navy. Griffin asked for Trust Board direction on the latest version of the MOA, noting that the latest version has no funding for grants, landscape inventory, state parks, or the Coupeville Wharf. It does retain the southern gateway, volunteer collaboration, funding for the Ferry House, and the REPI program.

Einterz made a motion for the Trust Board to not sign the MOA with the Navy and to continue negotiations. Second by Bernhardt. Bishop called for further discussion. Following extensive discussion, Sherman called for the question, the motion was restated – *for the Trust board to not sign the MOA with the Navy and continue negotiations* – Bishop called for the vote, approved unanimously.

Following the vote, discussion continued on the directions the negotiations should take. Einterz recommended the board continue with Ferry House as part of the MOA, along with the Coupeville Wharf & State Parks. Griffin was instructed to communicate the board's decision to the Navy.

- **MAIN STREET PARCEL.** Discussion turned to the recommendation from the Trust Board to the National Park Service on the future of the Main Street Parcel. Bishop suggested a scaled down exchange might work best. More discussion ensued, with Bishop noting that facilitating a land exchange would help jump start the land protection process.
- **OTHER BUSINESS.** Several board members were excused, with minor discussion (without a quorum) continuing on federal funding issues.

Adjourn

Hearing no further business, and with no quorum present, Bishop excused the workshop at 6:08 pm.

Minutes respectfully submitted by Carol L. Castellano

Date



EBEY'S LANDING
NATIONAL HISTORICAL RESERVE

Trust Board Members

Wilbur Bishop, Chair

Harry Anderson, Vice Chair

Al Sherman, Treasurer

Lisa Bernhardt, Secretary

Fran Einterz

Rip Robbins

Sally Garratt

Jon Crimmins

David Louter

*Kristen Griffin,
Reserve Manager*

Trust Board Partners

Town of Coupeville

Island County

Washington State Parks

National Park Service

To: Captain Matthew Army, Commanding Officer, NASWI
From: Trust Board of Ebey's Landing National Historical Reserve
Date: November 14, 2018
Subject: Continuing Section 106 Consultation – Comment on Draft MOA.

The Trust Board of Ebey's Landing National Historical Reserve (Trust Board) has reviewed the Navy's Draft Section 106 MOA for the Growler operation expansion. Following discussion at a meeting on 11/13/2018, the Trust Board voted to not approve (sign) the proposed Draft MOA.

The Trust Board also expressed their interest in continuing consultation to develop an MOA that is more in line with the Trust Board's prior suggestions for mitigation. Those suggestions included funding for landscape preservation projects that help preserve key contributing historic properties in the Central Whidbey Island Historic District:

- Provide funding to support a project to stabilize historic concrete structures in Fort Casey and Fort Ebey State Parks (owned by Washington State Parks). Estimated \$2 million dollars.
- Provide funding to support structural historic rehabilitation of the Coupeville Wharf (owned by the Port of Coupeville). Estimated \$2 million dollars.
- Provide funding to reverse the effects of deferred maintenance and make structural and security improvements to the historic Ferry House (owned by the NPS). Estimated \$1.8 million dollars.

In general, the board felt that the stipulations in the proposed Draft MOA are not proportional to the adverse effect to the Central Whidbey Island Historic District, and therefore do not resolve adverse effects to historic properties caused by the undertaking. Please let me know if consultation will continue, or if you have questions regarding the Trust Board's response to the Draft MOA.

Sincerely,

Kristen Griffin
Reserve Manager

162 Cemetery Rd.
P.O. Box 774
Coupeville, WA 98239
360.678.6084
www.nps.gov/ebla

cc Trust Board of Ebey's Landing National Historical Reserve
Kendall Campbell, NASWI Cultural Resources Program Manager
file

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Thedwall, Craig S CDR NLSC, RLSC NW, SJA](#); [Padgett, Lisa M CIV USFF, N46](#); [Malik, Joan M CDR USFF N01L](#); [Montague, Michael G LCDR USFF HQ, N01L](#); [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Friday, November 16, 2018 4:23:10 PM

ACHP response to version 2 of the Draft MOA.

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 16, 2018 1:18 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; Allyson Brooks Ph.D [REDACTED]; John Fowler [REDACTED]
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also

believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not hesitate to call me at [REDACTED] or via email at [REDACTED].

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

From: [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
To: [Shurling, Cynthia](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Wednesday, November 28, 2018 10:41:24 AM

Cynthia,

Here is an email for the admin record in the Growler 106. I'll be sending you several of these in the next few minutes. Thanks!

V/R

--Craig

Craig Thedwall
CDR, JAGC, USN
Region Environmental Counsel
Navy Region Northwest
Ph: [REDACTED]

-----Original Message-----

From: Arny, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Tuesday, November 27, 2018 2:51 PM
To: Reid Nelson [REDACTED]; Allyson Brooks Ph.D [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED];
Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow,
Sue SES OPNAV, N45 [REDACTED] Katharine R. Kerr
[REDACTED]; Tom McCulloch [REDACTED]; John Fowler
[REDACTED] mayor@townofcoupeville.org; Griffin, Kristen
[REDACTED]; Helen Price-Johnson
[REDACTED]; Baumgart, Jim (GOV) [REDACTED]
[REDACTED] Nashold, Elizabeth A SES USFF, N46/Director
[REDACTED]; Padgett, Lisa M CIV USFF, N46
[REDACTED]; Morrison, Jillian L CIV SES EIE
[REDACTED]; Cecchini, Joseph D CIV OASN EI&E
[REDACTED]; Jill.Johnson@[REDACTED]
[REDACTED] Gray, Christopher S RDML Navy Region NW, N00
[REDACTED] Thedwall, Craig S CDR NLSC, RLSO NW, SJA
Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

This is an update from my email on November 21. The Navy team has received a list of potential Ferry House projects from the National Park Service. The Navy is willing to fund up to \$1 million worth of preservation projects. Examples of permissible projects from the list that meet Secretary of the Interior standards for preservation are:

- . Remove wooden interior framing and install discrete steel framing with seismic retrofit
- . Install fire suppression system after retrofit
- . Repair chimney removed following 1996 earthquake
- . Conduct extensive rodent proofing
- . Replace non-historic doors and related retrofits and replace roof

. Install interpretive media in outbuildings and provide for day use

This information completes the details promised in my last email to you, and comprises the final offer from the Navy. The risk of impact to Navy operations remains, however, so your acceptance or rejection of this offer will need to be in hand by 5 pm Pacific time on 29 November 2018.

Otherwise, Navy will proceed with termination.

I think this offer represents a win for all parties, and I'm looking forward to your response. I am available to discuss this if you would like.

Regards,

CAPT Matt Army
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 23, 2018 10:23 AM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED];
Allyson Brooks Ph.D [REDACTED] >
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED];
Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow,
Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr
[REDACTED]; Tom McCulloch [REDACTED]; John Fowler
[REDACTED]; mayon [REDACTED] Griffin, Kristen
[REDACTED] Helen Price-Johnson
[REDACTED] Baumgart, Jim (GOV) [REDACTED];
[REDACTED] Nashold, Elizabeth A SES USFF, N46/Director
[REDACTED]; Padgett, Lisa M CIV USFF, N46
[REDACTED]; Morrison, Jillian L CIV SES EIE
[REDACTED]; Cecchini, Joseph D CIV OASN EI&E
[REDACTED]; Jill.Johnson@[REDACTED]

Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for this update, I thought the call we had earlier in the week was very useful and look forward to another next week. I am available on the 27th.

We appreciate the interest in supporting projects at the Ferry House that would help maintain or contribute to the historic integrity of the property, and look forward to hearing how additional investments might be made toward that end. We appreciate also your support of pursuing the Sentinel Landscape designation, as well as seeking additional REPI funds.

While I recognize the interest in wrapping this up very soon, I'd appreciate knowing a bit more about your schedule and particularly how other consulting parties might be given some time to comment on these and any other developments that may come out of a call next week, before November 30.

Reid Nelson
Director

Office of Federal Agency Programs

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00

Sent: Wednesday, November 21, 2018 5:15 PM

To: Reid Nelson; Allyson Brooks Ph.D

Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4; William R. Manley; Goodfellow, Sue SES OPNAV, N45; Katharine R. Kerr; Tom McCulloch; John Fowler; mayor@[REDACTED] Griffin, Kristen; Helen Price-Johnson; Baumgart, Jim (GOV); Zipp, Roy; Nashold, Elizabeth A SES USFF, N46/Director; Padgett, Lisa M CIV USFF, N46; Morrison, Jillian L CIV SES EIE; Joseph Cecchini; Jill.Johnson@[REDACTED] r.hannold@[REDACTED]
Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

Thank you for your comments in the email below and for your participation in the phone call on Monday. We sincerely value our relationships with both of you, the other consulting parties, and the Whidbey Island community. The Navy strives to be open and transparent, and we have gone to great lengths throughout this process to listen to and respond to concerns from the public and the consulting parties that can be addressed under the National Historic Preservation Act. The Navy remains hopeful that we can reach a reasonable resolution that results in mutual agreement.

To that end, Navy has considered the comments provided in the email below and during our phone call on Monday and we are prepared to offer the following:

FERRY HOUSE. Navy is prepared to fund projects for the Ferry House that maintain or contribute to the integrity of the characteristics that make the Ferry House and its buildings cluster in the landscape eligible for listing on the National Register of Historic Properties. We believe our original offer to provide \$400,000 to the National Park Service (NPS) to preserve the Ferry House was reasonable as it (1) was informed by the NPS estimate provided by Roy Zipp in late October and (2) included projects within the scope of preservation (as limited by the standards of rehabilitation and restoration), i.e., to protect and stabilize the property through ongoing maintenance and repairs rather than extensive replacements and new exterior or other construction. We understand that NPS is refining its original cost estimate of preservation projects for the Ferry House. We expect to receive that cost estimate on Monday, November 26th and commit to provide you a final list of appropriate, preservation-related projects we will fund from the revised estimate no later than Tuesday, November 27th.

SENTINEL LANDSCAPES. Navy is happy to advocate for and assist Whidbey Island in becoming designated as a Sentinel Landscape. Specifically, we support Whidbey Island joining a broader Sentinel Landscape effort, combined with ongoing efforts in the Hood Canal and at Naval Base Kitsap, which are currently being coordinated with Federal, State, and local partners for the Department of Agriculture's consideration.

EASEMENTS. The draft MOA currently includes an offer to seek Readiness Environmental Protection Integration (REPI) funds in fiscal year 2020 to support the creation of easements in the affected landscapes. This commitment fits into the overall REPI objective at NAS Whidbey, where DoD

has invested over \$12 million and protected over 1,000 acres via REPI easements on Whidbey Island to date. The majority of this money was spent in Central Whidbey Island. The Navy will commit to seeking additional funds and easements in fiscal year 2020 that are focused on preservation of the rural quality of the landscape. As noted in the MOA and explained during the consultation, REPI funds are not controlled by Navy and we can only commit to work with the community to develop robust proposals and then advocate for REPI funding for those projects.

At this point, because Navy has engaged in many rounds of discussions in an effort to reach an agreement, Navy is dangerously close to incurring significant operational impacts to vital military construction and training. Further delay or prolonged discussion will exacerbate the risk of operational impacts. In a final effort to reach an agreement, we are communicating this proposed way forward as our best offer. I would like to schedule a time for a telephone call on Tuesday, November 27, 2018 to discuss the specifics of the Ferry House projects. We will need your concurrence on our final offer by noon PST, November 29, 2018. We have copied the other consulting parties on this email and sincerely hope that we can come to agreement on November 29, 2018. If we do not receive your concurrence by that time, Navy will be forced to initiate termination procedures on Friday, November 30, 2018.

Please confirm receipt of this email and have a Happy Thanksgiving.

Regards,

CAPT Matt Arny
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 16, 2018 1:18 PM
To: Arny, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow,
Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr
[REDACTED]; Tom McCulloch [REDACTED]; Allyson Brooks Ph.D
[REDACTED]; John Fowler [REDACTED] >
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler"
operations

Captain Arny,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not
hesitate to call me at [REDACTED] or via email at [REDACTED]
[REDACTED]

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#)
Cc: [Malik, Joan M CDR USFF N01L](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Tuesday, November 27, 2018 8:52:31 PM

Another one for the Admin record.

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Wednesday, November 21, 2018 2:41 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]; Reid Nelson [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]
John Fowler [REDACTED]; mayor@ [REDACTED]; Griffin, Kristen [REDACTED]
Price Johnson, Helen (DOHi) [REDACTED]; Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED]; Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED]
Morrison, Jillian L CIV SES EIE [REDACTED]; Cecchini, Joseph D CIV OASN EI&E [REDACTED]; Jill.Johnson@ [REDACTED]; r.hannold@ [REDACTED]; Katims, Casey (GOV) [REDACTED]; Adam.LeMieux@ [REDACTED]; maryon [REDACTED]; Modaff, Pete (Cantwell) [REDACTED]
Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Dear Captain Army,

Unfortunately, at this time, I am unable to say whether I can meet you requested date of a final decision by noon on Thursday November 29th. There is a meeting scheduled with Governor Inslee at 12:30 on the 29th and other meetings with Governor's staff that may or may not occur before noon on Thursday the 29th.

Further, I received a copy of a letter today from Rep. Larsen to Secretary Spencer and I believe it would only be respectful to give Rep. Larsen and Secretary Spencer the appropriate amount of time to communicate.

Finally, I had a long conversation with Roy Zipp today and I am concerned by your characterization of his analysis regarding the Ferry House. Our conversation was extremely different from the one you have stated in your e-mail. In fact, we spent quite a bit of time discussing how to get the exact numbers you have been requesting. I gave him some references of excellent preservationists that could help delineate exact costs. Therefore, your statement of \$400,00 is incorrect based on today's discussions with NPS.

Overall, based on necessary conversations with Governor Inslee and his staff, along the need for a response to Rep. Larsen, I am unable to state at this time whether I will be able to meet your arbitrary and capricious deadline.

Have a great Thanksgiving,

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director Department of Archaeology and Historic Preservation
[REDACTED]

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00 <matthew.arny@navy.mil>

Sent: Wednesday, November 21, 2018 2:15 PM

To: Reid Nelson [REDACTED]; Brooks, Allyson (DAHP) [REDACTED]

Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]

[REDACTED]; Katharine R. Kerr [REDACTED] Tom McCulloch [REDACTED]

John Fowler [REDACTED] mayor@[REDACTED] Griffin, Kristen [REDACTED]

[REDACTED] Price Johnson, Helen (DOHi) [REDACTED] Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED]; Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED];

Morrison, Jillian L CIV SES EIE [REDACTED]; Cecchini, Joseph D CIV OASN EI&E [REDACTED]; Jill.Johnson@[REDACTED] r.hannold [REDACTED]

Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

Thank you for your comments in the email below and for your participation in the phone call on Monday. We sincerely value our relationships with both of you, the other consulting parties, and the Whidbey Island community. The Navy strives to be open and transparent, and we have gone to great lengths throughout this process to listen to and respond to concerns from the public and the consulting parties that can be addressed under the National Historic Preservation Act. The Navy remains hopeful that we can reach a reasonable resolution that results in mutual agreement.

To that end, Navy has considered the comments provided in the email below and during our phone call on Monday and we are prepared to offer the following:

FERRY HOUSE. Navy is prepared to fund projects for the Ferry House that maintain or contribute to the integrity of the characteristics that make the Ferry House and its buildings cluster in the landscape eligible for listing on the National Register of Historic Properties. We believe our original offer to provide \$400,000 to the National Park Service (NPS) to preserve the Ferry House was reasonable as it (1) was informed by the NPS estimate provided by Roy Zipp in late October and (2) included projects within the scope of preservation (as limited by the standards of rehabilitation and restoration), i.e., to protect and stabilize the property through ongoing maintenance and repairs rather than extensive replacements and new exterior or other construction. We understand that NPS is refining its original cost estimate of preservation projects for the Ferry House. We expect to receive that cost estimate on Monday, November 26th and commit to provide you a final list of appropriate, preservation-related projects we will fund from the revised estimate no later than Tuesday, November 27th.

SENTINEL LANDSCAPES. Navy is happy to advocate for and assist Whidbey Island in becoming designated as a Sentinel Landscape. Specifically, we support Whidbey Island joining a broader Sentinel Landscape effort, combined with ongoing efforts in the Hood Canal and at Naval Base Kitsap, which are currently being coordinated with Federal, State, and local partners for the Department of Agriculture's consideration.

EASEMENTS. The draft MOA currently includes an offer to seek Readiness Environmental Protection Integration (REPI) funds in fiscal year 2020 to support the creation of easements in the affected landscapes. This commitment fits into the overall REPI objective at NAS Whidbey, where DoD has invested over \$12 million and protected over 1,000 acres via REPI easements on Whidbey Island to date. The majority of this money was spent in Central Whidbey Island. The Navy will commit to seeking additional funds and easements in fiscal year 2020 that are focused on preservation of the rural quality of the landscape. As noted in the MOA and explained during the consultation, REPI funds are not controlled by Navy and we can only commit to work with the community to develop robust proposals and then advocate for REPI funding for those projects.

At this point, because Navy has engaged in many rounds of discussions in an effort to reach an agreement, Navy is dangerously close to incurring significant operational impacts to vital military construction and training. Further

delay or prolonged discussion will exacerbate the risk of operational impacts. In a final effort to reach an agreement, we are communicating this proposed way forward as our best offer. I would like to schedule a time for a telephone call on Tuesday, November 27, 2018 to discuss the specifics of the Ferry House projects. We will need your concurrence on our final offer by noon PST, November 29, 2018. We have copied the other consulting parties on this email and sincerely hope that we can come to agreement on November 29, 2018. If we do not receive your concurrence by that time, Navy will be forced to initiate termination procedures on Friday, November 30, 2018.

Please confirm receipt of this email and have a Happy Thanksgiving.

Regards,

CAPT Matt Army
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 16, 2018 1:18 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; Allyson Brooks Ph.D [REDACTED]; John Fowler [REDACTED]
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically

needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not hesitate to call me at [REDACTED] or via email at [REDACTED].

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#)
Cc: [Malik, Joan M CDR USFF N01L](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Tuesday, November 27, 2018 8:52:34 PM

For the Admin record

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 23, 2018 10:23 AM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED] >; Allyson Brooks Ph.D [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; John Fowler [REDACTED]; mayor@[REDACTED] Griffin, Kristen [REDACTED]; [REDACTED]; Helen Price-Johnson [REDACTED]; Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED] Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED] >; Morrison, Jillian L CIV SES EIE [REDACTED]; Cecchini, Joseph D CIV OASN EI&E [REDACTED] Jill.Johnson@[REDACTED] r.hannold@[REDACTED]
Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for this update, I thought the call we had earlier in the week was very useful and look forward to another next week. I am available on the 27th.

We appreciate the interest in supporting projects at the Ferry House that would help maintain or contribute to the historic integrity of the property, and look forward to hearing how additional investments might be made toward that end. We appreciate also your support of pursuing the Sentinel Landscape designation, as well as seeking additional REPI funds.

While I recognize the interest in wrapping this up very soon, I'd appreciate knowing a bit more about your schedule and particularly how other consulting parties might be given some time to comment on these and any other developments that may come out of a call next week, before November 30.

Reid Nelson
Director
Office of Federal Agency Programs

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Wednesday, November 21, 2018 5:15 PM
To: Reid Nelson; Allyson Brooks Ph.D
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4; William R. Manley; Goodfellow, Sue SES OPNAV, N45; Katharine R. Kerr; Tom McCulloch; John Fowler; mayor@townofcoupeville.org; Griffin, Kristen; Helen Price-Johnson; Baumgart, Jim (GOV); Zipp, Roy; Nashold, Elizabeth A SES USFF, N46/Director; Padgett, Lisa M CIV USFF, N46; Morrison, Jillian L CIV SES EIE; Joseph Cecchini; Jill.Johnson [REDACTED] r.hannold [REDACTED]
Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

Thank you for your comments in the email below and for your participation in the phone call on Monday. We sincerely value our relationships with both of you, the other consulting parties, and the Whidbey Island community. The Navy strives to be open and transparent, and we have gone to great lengths throughout this process to listen to and respond to concerns from the public and the consulting parties that can be addressed under the National Historic Preservation Act. The Navy remains hopeful that we can reach a reasonable resolution that results in mutual agreement.

To that end, Navy has considered the comments provided in the email below and during our phone call on Monday and we are prepared to offer the following:

FERRY HOUSE. Navy is prepared to fund projects for the Ferry House that maintain or contribute to the integrity of the characteristics that make the Ferry House and its buildings cluster in the landscape eligible for listing on the National Register of Historic Properties. We believe our original offer to provide \$400,000 to the National Park Service (NPS) to preserve the Ferry House was reasonable as it (1) was informed by the NPS estimate provided by Roy Zipp in late October and (2) included projects within the scope of preservation (as limited by the standards of rehabilitation and restoration), i.e., to protect and stabilize the property through ongoing maintenance and repairs rather than extensive replacements and new exterior or other construction. We understand that NPS is refining its original cost estimate of preservation projects for the Ferry House. We expect to receive that cost estimate on Monday, November 26th and commit to provide you a final list of appropriate, preservation-related projects we will fund from the revised estimate no later than Tuesday, November 27th.

SENTINEL LANDSCAPES. Navy is happy to advocate for and assist Whidbey Island in becoming designated as a Sentinel Landscape. Specifically, we support Whidbey Island joining a broader Sentinel Landscape effort, combined with ongoing efforts in the Hood Canal and at Naval Base Kitsap, which are currently being coordinated with Federal, State, and local partners for the Department of Agriculture's consideration.

EASEMENTS. The draft MOA currently includes an offer to seek Readiness Environmental Protection Integration (REPI) funds in fiscal year 2020 to support the creation of easements in the affected landscapes. This commitment fits into the overall REPI objective at NAS Whidbey, where DoD has invested over \$12 million and protected over 1,000 acres via REPI easements on Whidbey Island to date. The majority of this money was spent in Central Whidbey Island. The Navy will commit to seeking additional funds and easements in fiscal year 2020 that are focused on preservation of the rural quality of the landscape. As noted in the MOA and explained during the consultation, REPI funds are not controlled by Navy and we can only commit to work with the community to develop robust proposals and then advocate for REPI funding for those projects.

At this point, because Navy has engaged in many rounds of discussions in an effort to reach an agreement, Navy is dangerously close to incurring significant operational impacts to vital military construction and training. Further delay or prolonged discussion will exacerbate the risk of operational impacts. In a final effort to reach an agreement, we are communicating this proposed way forward as our best offer. I would like to schedule a time for a telephone call on Tuesday, November 27, 2018 to discuss the specifics of the Ferry House projects. We will need your concurrence on our final offer by noon PST, November 29, 2018. We have copied the other consulting parties on this email and sincerely hope that we can come to agreement on November 29, 2018. If we do not receive your concurrence by that time, Navy will be forced to initiate termination procedures on Friday, November 30, 2018.

Please confirm receipt of this email and have a Happy Thanksgiving.

Regards,

CAPT Matt Arny
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 16, 2018 1:18 PM
To: Arny, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]

Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; Allyson Brooks Ph.D [REDACTED] John Fowler [REDACTED]
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not hesitate to call me at [REDACTED] or via email at [REDACTED].

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

From: Thedwall, Craig S CDR NLSC, RLSO NW, SJA [REDACTED]
Sent: Wednesday, November 28, 2018 10:41 AM
To: Shurling, Cynthia
Cc: Malik, Joan M CDR USFF N01L; Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: FW: [Non-DoD Source] Re: [EXTERNAL] RE: ACHP comments on MOA for the EA-18G "Growler" operations
Attachments: Ferry House potential mitigation options with cost estimates.pdf

Cynthia,
For Growler 106 record, as mentioned.

V/R
--Craig

Craig Thedwall
CDR, JAGC, USN
Region Environmental Counsel
Navy Region Northwest
Ph: [REDACTED]

-----Original Message-----

From: Arny, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Tuesday, November 27, 2018 11:57 AM
To: Gray, Christopher S RDML Navy Region NW, N00 [REDACTED]
Cc: Huffman, Gregory C CAPT Navy Region NW, N04 [REDACTED]; Verhofstadt, Albert P CIV Executive Director Navy Region NW, N01 [REDACTED]; Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Thedwall, Craig S CDR NLSC, RLSO NW, SJA [REDACTED]
Subject: FW: [Non-DoD Source] Re: [EXTERNAL] RE: ACHP comments on MOA for the EA-18G "Growler" operations

RDML Gray,
I just received this from Roy Zipp. Acting NPS director was cc'ed.
VR,
Skipper

-----Original Message-----

From: Zipp, Roy [REDACTED]
Sent: Tuesday, November 27, 2018 11:19 AM
To: Arny, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Paul (Dan) Smith <paul_smith@nps.gov>
Subject: Re: [Non-DoD Source] Re: [EXTERNAL] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Matt,

Attached is a one page summary of seven interrelated tasks for the Ferry House with cost estimates, and background information for context. My plan until yesterday was to flesh this list out a bit more with input from a consulting historic architect, but he will not be able to get here until Thursday (11/29).

The first bullet provides a \$400k estimate for structural stabilization that needs professional peer review and could be a significant underestimate. The remaining bullets are more accurate in terms of potential cost, especially the alarm/fire suppression system, which is informed by an August 2018 engineering analysis.

I am CCing NPS Acting Director, Dan Smith, as requested, so he is directly in the loop.

Roy

<http://>

Roy M. Zipp

Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

[Redacted]
Coupeville, Washington 98239

[Redacted]

[Redacted]

www.nps.gov/ebla <http://www.nps.gov/ebla>

<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>

On Wed, Nov 21, 2018 at 3:17 PM Army, Matthew L CAPT NAS Whidbey Is., N00 [Redacted]
[Redacted] > wrote:

Thanks Roy. Have a Happy Thanksgiving.
Regards,
Matt

-----Original Message-----

From: Zipp, Roy [Redacted]
Sent: Wednesday, November 21, 2018 2:25 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [Redacted]
Subject: [Non-DoD Source] Re: [EXTERNAL] RE: ACHP comments on MOA for the EA-18G "Growler" operations

I'll get the Ferry House details you requested to you Monday following my meeting with a consulting historic architect that day. His wife was ill this week so had to postpone, hence the delay.

Happy Thanksgiving.....Roy

<http://>

Roy M. Zipp

Superintendent, National Park Service Operations Ebey's Landing National Historical Reserve Reuble Farmstead

[Redacted]

Coupeville, Washington 98239

[REDACTED]

[REDACTED]

www.nps.gov/ebla <http://www.nps.gov/ebla> <http://www.nps.gov/ebla>

<https://www.nps.gov/subjects/centennial/images/NPS-FYP-E-Mail-Signature.jpg>

On Wed, Nov 21, 2018 at 2:15 PM Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]

> wrote:

Mr. Nelson and Dr. Brooks,

Thank you for your comments in the email below and for your participation in the phone call on Monday. We sincerely value our relationships with both of you, the other consulting parties, and the Whidbey Island community. The Navy strives to be open and transparent, and we have gone to great lengths throughout this process to listen to and respond to concerns from the public and the consulting parties that can be addressed under the National Historic Preservation Act. The Navy remains hopeful that we can reach a reasonable resolution that results in mutual agreement.

To that end, Navy has considered the comments provided in the email below and during our phone call on Monday and we are prepared to offer the following:

FERRY HOUSE. Navy is prepared to fund projects for the Ferry House that maintain or contribute to the integrity of the characteristics that make the Ferry House and its buildings cluster in the landscape eligible for listing on the National Register of Historic Properties. We believe our original offer to provide \$400,000 to the National Park Service (NPS) to preserve the Ferry House was reasonable as it (1) was informed by the NPS estimate provided by Roy Zipp in late October and (2) included projects within the scope of preservation (as limited by the standards of rehabilitation and restoration), i.e., to protect and stabilize the property through ongoing maintenance and repairs rather than extensive replacements and new exterior or other construction. We understand that NPS is refining its original cost estimate of preservation projects for the Ferry House. We expect to receive that cost estimate on Monday, November 26th and commit to provide you a final list of appropriate, preservation-related projects we will fund from the revised estimate no later than Tuesday, November 27th.

SENTINEL LANDSCAPES. Navy is happy to advocate for and assist Whidbey Island in becoming designated as a Sentinel Landscape. Specifically, we support Whidbey Island joining a broader Sentinel Landscape effort, combined with ongoing efforts in the Hood Canal and at Naval Base Kitsap, which are currently being coordinated with Federal, State, and local partners for the Department of Agriculture's consideration.

EASEMENTS. The draft MOA currently includes an offer to seek Readiness Environmental Protection Integration (REPI) funds in fiscal year 2020 to support the creation of easements in the affected landscapes. This commitment fits into the overall REPI objective at NAS Whidbey, where DoD has invested over \$12 million and protected over 1,000 acres via REPI easements on Whidbey Island to date. The majority of this money was spent in Central Whidbey Island. The Navy will commit to seeking additional funds and easements in fiscal year 2020 that are focused on preservation of the rural quality of the landscape. As noted in the MOA and explained during the consultation, REPI funds are not controlled by Navy and we can only commit to work with the community to develop robust proposals and then advocate for REPI funding for those projects.

At this point, because Navy has engaged in many rounds of discussions in an effort to reach an agreement, Navy is dangerously close to incurring significant operational impacts to vital military construction and training. Further delay or prolonged discussion will exacerbate the risk of operational impacts. In a final effort to reach an agreement, we are communicating this proposed way forward as our best offer. I would like to schedule a time for a telephone call on Tuesday, November 27, 2018 to discuss the specifics of the Ferry House projects. We will need your concurrence on our final offer by noon PST, November 29, 2018. We have copied the other consulting parties on this email and sincerely hope that we can come to agreement on November 29, 2018. If we do not receive your concurrence by that time, Navy will be forced to initiate termination procedures on Friday, November 30, 2018.

Please confirm receipt of this email and have a Happy Thanksgiving.

Regards,

CAPT Matt Army
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]

Sent: Friday, November 16, 2018 1:18 PM

To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]

Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]

Manley, William R CIV NAVFAC HQ, EV [REDACTED]

> > Goodfellow, Sue SES OPNAV, N45 [REDACTED]

> Katharine R. Kerr [REDACTED]

> Tom McCulloch [REDACTED]

> Allyson Brooks Ph.D [REDACTED]

> John Fowler [REDACTED]

>

Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding

station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not hesitate to call me at [REDACTED] or via email at [REDACTED]

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

Ferry House at Ebey's Landing National Historical Reserve

History of NPS ownership

- Acquired ca. 2001 from Nature Conservancy. House in very poor condition on verge of collapse.
- NPS in 2001-2002 did emergency stabilization on house and outbuildings. Installed interior framing to stabilize floors and walls. Repaired windows and roof. Rebuilt porch, repointed masonry chimney, replaced gutters (2007).

Current Management Guidance

- Preserve the exterior building envelope as an exhibit on the landscape.
- Provide for interpretation on site, including occasional guided tours inside
- Reestablish prehistoric trail/historic trail from shoreline at Ebey's Landing up the ravine to the house and connect to a trail leading to the bluff

Projects to be implemented in 2019-2020

- Rehabilitate the historic outbuildings and trail up ravine. \$175k.
- Install basic security and fire detection system \$330k. No power or water on site. Will install modest solar array to power the system. Would need at least \$250k more for fire suppression, so basic system was chosen while future options for house are developed. Detection system could then be expanded to include suppression.

Future project needs for Ferry House

Continued current management could include the following actions (with rough cost estimates) which would primarily address deferred maintenance but also provide modest additional amenities to welcome the public to this iconic asset in the Reserve:

- Remove wooden interior framing and install discrete steel framing with seismic retrofit (\$200-\$400k—very rough estimate need engineer).
- Install fire suppression system after retrofit (\$220-\$1.2mil depending on system).
- Repair chimney removed following 1996 earthquake (\$33k).
- Conduct extensive rodent proofing (\$50k).
- Replace non-historic doors and related retrofits and replace roof (\$52k). (presently funded in FY22).
- Install interpretive media in outbuildings and provide for day use (\$10-30k).
- Provide for accessible parking and accessible trail to house and surrounding grounds (\$20k).

From: [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
To: [Shurling, Cynthia](#)
Cc: [Malik, Joan M CDR USFF N01L](#); [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Wednesday, November 28, 2018 10:43:58 AM

Cynthia,
Same.
--Craig

Craig Thedwall
CDR, JAGC, USN
Region Environmental Counsel
Navy Region Northwest
Ph: [REDACTED]

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Tuesday, November 27, 2018 3:04 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]; Reid Nelson [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 <kendall.campbell1@navy.mil>; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; John Fowler [REDACTED]; mayor@[REDACTED] Griffin, Kristen [REDACTED]; Price Johnson, Helen (DOHi) [REDACTED] Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED]; Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED]; Morrison, Jillian L CIV SES EIE [REDACTED]; Cecchini, Joseph D CIV OASN EI&E [REDACTED]; Jill.Johnson@[REDACTED] r.hannold@[REDACTED] Gray, Christopher S RDML Navy Region NW, N00 [REDACTED]; Thedwall, Craig S CDR NLSC, RLSO NW, SJA [REDACTED]
Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army - Thank you for this increased offer. I will relay the offer to the Governor's staff. I think it is important to give the Governor a chance to speak with the community at 12:30 pm on the 29th.

Thank you for your cooperation and continued efforts towards a productive resolution.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director Department of Archaeology and Historic Preservation
[REDACTED]

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Tuesday, November 27, 2018 2:51 PM
To: Reid Nelson [REDACTED] Brooks, Allyson (DAHP) [REDACTED]

Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; John Fowler [REDACTED]; mayor@townofcoupeville.org; Griffin, Kristen [REDACTED]; Price Johnson, Helen (DOHi) [REDACTED]; Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED]; Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED]; Morrison, Jillian L CIV SES EIE [REDACTED]; Cecchini, Joseph D CIV OASN EI&E [REDACTED]; Jill Johnson [REDACTED]; r.hannold [REDACTED]; Gray, Christopher S RDML Navy Region NW, N00 [REDACTED]; Thedwall, Craig S CDR NLSC, RLSO NW, SJA [REDACTED]

Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

This is an update from my email on November 21. The Navy team has received a list of potential Ferry House projects from the National Park Service. The Navy is willing to fund up to \$1 million worth of preservation projects. Examples of permissible projects from the list that meet Secretary of the Interior standards for preservation are:

- . Remove wooden interior framing and install discrete steel framing with seismic retrofit
- . Install fire suppression system after retrofit
- . Repair chimney removed following 1996 earthquake
- . Conduct extensive rodent proofing
- . Replace non-historic doors and related retrofits and replace roof
- . Install interpretive media in outbuildings and provide for day use

This information completes the details promised in my last email to you, and comprises the final offer from the Navy. The risk of impact to Navy operations remains, however, so your acceptance or rejection of this offer will need to be in hand by 5 pm Pacific time on 29 November 2018.

Otherwise, Navy will proceed with termination.

I think this offer represents a win for all parties, and I'm looking forward to your response. I am available to discuss this if you would like.

Regards,

CAPT Matt Army
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 23, 2018 10:23 AM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Allyson Brooks Ph.D [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; John Fowler [REDACTED]; mayor@ [REDACTED] Griffin, Kristen [REDACTED]; Helen Price-Johnson [REDACTED]; Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED]; Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED]

[REDACTED]; Morrison, Jillian L CIV SES EIE
[REDACTED]; Cecchini, Joseph D CIV OASN EI&E
[REDACTED]; Jill.Johnson@ [REDACTED]

r.hannold@ [REDACTED]

Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thank you for this update, I thought the call we had earlier in the week was very useful and look forward to another next week. I am available on the 27th.

We appreciate the interest in supporting projects at the Ferry House that would help maintain or contribute to the historic integrity of the property, and look forward to hearing how additional investments might be made toward that end. We appreciate also your support of pursuing the Sentinel Landscape designation, as well as seeking additional REPI funds.

While I recognize the interest in wrapping this up very soon, I'd appreciate knowing a bit more about your schedule and particularly how other consulting parties might be given some time to comment on these and any other developments that may come out of a call next week, before November 30.

Reid Nelson
Director
Office of Federal Agency Programs

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00

Sent: Wednesday, November 21, 2018 5:15 PM

To: Reid Nelson; Allyson Brooks Ph.D

Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4; William R. Manley; Goodfellow, Sue SES OPNAV, N45; Katharine R. Kerr; Tom McCulloch; John Fowler; mayon [REDACTED] Griffin, Kristen; Helen Price-Johnson; Baumgart, Jim (GOV); Zipp, Roy; Nashold, Elizabeth A SES USFF, N46/Director; Padgett, Lisa M CIV USFF, N46; Morrison, Jillian L CIV SES EIE; Joseph Cecchini; Jill.Johnson@ [REDACTED] r.hannold@ [REDACTED]
Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

Thank you for your comments in the email below and for your participation in the phone call on Monday. We sincerely value our relationships with both of you, the other consulting parties, and the Whidbey Island community. The Navy strives to be open and transparent, and we have gone to great lengths throughout this process to listen to and respond to concerns from the public and the consulting parties that can be addressed under the National Historic Preservation Act. The Navy remains hopeful that we can reach a reasonable resolution that results in mutual agreement.

To that end, Navy has considered the comments provided in the email below and during our phone call on Monday and we are prepared to offer the following:

FERRY HOUSE. Navy is prepared to fund projects for the Ferry House that

maintain or contribute to the integrity of the characteristics that make the Ferry House and its buildings cluster in the landscape eligible for listing on the National Register of Historic Properties. We believe our original offer to provide \$400,000 to the National Park Service (NPS) to preserve the Ferry House was reasonable as it (1) was informed by the NPS estimate provided by Roy Zipp in late October and (2) included projects within the scope of preservation (as limited by the standards of rehabilitation and restoration), i.e., to protect and stabilize the property through ongoing maintenance and repairs rather than extensive replacements and new exterior or other construction. We understand that NPS is refining its original cost estimate of preservation projects for the Ferry House. We expect to receive that cost estimate on Monday, November 26th and commit to provide you a final list of appropriate, preservation-related projects we will fund from the revised estimate no later than Tuesday, November 27th.

SENTINEL LANDSCAPES. Navy is happy to advocate for and assist Whidbey Island in becoming designated as a Sentinel Landscape. Specifically, we support Whidbey Island joining a broader Sentinel Landscape effort, combined with ongoing efforts in the Hood Canal and at Naval Base Kitsap, which are currently being coordinated with Federal, State, and local partners for the Department of Agriculture's consideration.

EASEMENTS. The draft MOA currently includes an offer to seek Readiness Environmental Protection Integration (REPI) funds in fiscal year 2020 to support the creation of easements in the affected landscapes. This commitment fits into the overall REPI objective at NAS Whidbey, where DoD has invested over \$12 million and protected over 1,000 acres via REPI easements on Whidbey Island to date. The majority of this money was spent in Central Whidbey Island. The Navy will commit to seeking additional funds and easements in fiscal year 2020 that are focused on preservation of the rural quality of the landscape. As noted in the MOA and explained during the consultation, REPI funds are not controlled by Navy and we can only commit to work with the community to develop robust proposals and then advocate for REPI funding for those projects.

At this point, because Navy has engaged in many rounds of discussions in an effort to reach an agreement, Navy is dangerously close to incurring significant operational impacts to vital military construction and training. Further delay or prolonged discussion will exacerbate the risk of operational impacts. In a final effort to reach an agreement, we are communicating this proposed way forward as our best offer. I would like to schedule a time for a telephone call on Tuesday, November 27, 2018 to discuss the specifics of the Ferry House projects. We will need your concurrence on our final offer by noon PST, November 29, 2018. We have copied the other consulting parties on this email and sincerely hope that we can come to agreement on November 29, 2018. If we do not receive your concurrence by that time, Navy will be forced to initiate termination procedures on Friday, November 30, 2018.

Please confirm receipt of this email and have a Happy Thanksgiving.

Regards,

CAPT Matt Arny
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 16, 2018 1:18 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]
Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow,
Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr
[REDACTED]; Tom McCulloch [REDACTED] Allyson Brooks Ph.D
[REDACTED]; John Fowler [REDACTED]
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler"
operations

Captain Army,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not hesitate to call me at [REDACTED] or via email at [REDACTED]

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

From: [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
To: [Shurling, Cynthia](#)
Cc: [Malik, Joan M CDR USFF N01L](#); [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Wednesday, November 28, 2018 11:20:59 AM

Cynthia,
Same as previous.
--Craig

Craig Thedwall
CDR, JAGC, USN
Region Environmental Counsel
Navy Region Northwest
Ph: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Wednesday, November 28, 2018 8:02 AM
To: Allyson Brooks Ph.D [REDACTED] Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr [REDACTED]; Tom McCulloch [REDACTED]; John Fowler [REDACTED]; mayor [REDACTED]; Griffin, Kristen [REDACTED]; Price Johnson, Helen (DOHi) [REDACTED]; Baumgart, Jim (GOV) [REDACTED]; Zipp, Roy [REDACTED]; Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]; Padgett, Lisa M CIV USFF, N46 [REDACTED]; Morrison, Jillian L CIV SES EIE [REDACTED]; Cecchini, Joseph D CIV OASN EI&E [REDACTED]; Jill Johnson [REDACTED]; r.hannold [REDACTED]; Gray, Christopher S RDML Navy Region NW, N00 [REDACTED]; Thedwall, Craig S CDR NLSC, RLSO NW, SJA [REDACTED]
Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army,

Thanks, we appreciate the Navy's willingness to fund more preservation projects at the Ferry House and see this as a very positive step in moving consultation forward. Perhaps we can arrange for a call at a time that works best for the parties. I will do what is necessary to keep my schedule reasonably open on the 29th and 30th.

Reid

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Tuesday, November 27, 2018 6:04 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00; Reid Nelson
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4; William R. Manley; Goodfellow, Sue SES OPNAV, N45; Katharine R. Kerr; Tom McCulloch; John Fowler; mayor [REDACTED] Griffin, Kristen; Price Johnson, Helen (DOHi); Baumgart, Jim (GOV); Zipp, Roy; Nashold, Elizabeth A SES USFF, N46/Director; Padgett, Lisa M CIV USFF, N46; Morrison, Jillian L CIV SES EIE; Joseph Cecchini; Jill Johnson [REDACTED]; r.hannold [REDACTED]; Gray, Christopher S RDML Navy Region NW, N00; Thedwall, Craig S CDR NLSC, RLSO NW, SJA

Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army - Thank you for this increased offer. I will relay the offer to the Governor's staff. I think it is important to give the Governor a chance to speak with the community at 12:30 pm on the 29th.

Thank you for your cooperation and continued efforts towards a productive resolution.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director Department of Archaeology and Historic Preservation



-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [redacted]
Sent: Tuesday, November 27, 2018 2:51 PM
To: Reid Nelson [redacted]; Brooks, Allyson (DAHP) [redacted] >
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [redacted]; Manley, William R CIV NAVFAC HQ, EV [redacted]; Goodfellow, Sue SES OPNAV, N45 [redacted]; Katharine R. Kerr [redacted]; Tom McCulloch [redacted]; John Fowler [redacted]; mayor@[redacted].org; Griffin, Kristen [redacted]; Price Johnson, Helen (DOHi) [redacted]; Baumgart, Jim (GOV) [redacted]; Zipp, Roy [redacted]; Nashold, Elizabeth A SES USFF, N46/Director [redacted]; Padgett, Lisa M CIV USFF, N46 [redacted]; Morrison, Jillian L CIV SES EIE [redacted]; Cecchini, Joseph D CIV OASN EI&E [redacted]; Jill Johnson [redacted]; us; r.hannold [redacted]; Gray, Christopher S RDML Navy Region NW, N00 [redacted]; Thedwall, Craig S CDR NLSC, RLSO NW, SJA [redacted]

Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,
This is an update from my email on November 21. The Navy team has received a list of potential Ferry House projects from the National Park Service. The Navy is willing to fund up to \$1 million worth of preservation projects. Examples of permissible projects from the list that meet Secretary of the Interior standards for preservation are:

- . Remove wooden interior framing and install discrete steel framing with seismic retrofit
- . Install fire suppression system after retrofit
- . Repair chimney removed following 1996 earthquake
- . Conduct extensive rodent proofing
- . Replace non-historic doors and related retrofits and replace roof
- . Install interpretive media in outbuildings and provide for day use

This information completes the details promised in my last email to you, and comprises the final offer from the Navy. The risk of impact to Navy operations remains, however, so your acceptance or rejection of this offer will need to be in hand by 5 pm Pacific time on 29 November 2018. Otherwise, Navy will proceed with termination. I think this offer represents a win for all parties, and I'm looking forward to your response. I am available to discuss this if you would like.

Regards,

CAPT Matt Army
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 23, 2018 10:23 AM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED];
Allyson Brooks Ph.D [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED];
Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow,
Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr
[REDACTED]; Tom McCulloch [REDACTED]; John Fowler
[REDACTED]; mayor@townofcoupeville.org; Griffin, Kristen
[REDACTED]; Helen Price-Johnson [REDACTED]
Baumgart, Jim (GOV) [REDACTED]
Nashold, Elizabeth A SES USFF, N46/Director [REDACTED]
; Padgett, Lisa M CIV USFF, N46 [REDACTED]
; Morrison, Jillian L CIV SES EIE [REDACTED]
; Cecchini, Joseph D CIV OASN EI&E [REDACTED]
; Jill.Johnson [REDACTED]
r.hannold [REDACTED]
Subject: [Non-DoD Source] RE: ACHP comments on MOA for the EA-18G "Growler"
operations

Captain Army,

Thank you for this update, I thought the call we had earlier in the week was very useful and look forward to another next week. I am available on the 27th.

We appreciate the interest in supporting projects at the Ferry House that would help maintain or contribute to the historic integrity of the property, and look forward to hearing how additional investments might be made toward that end. We appreciate also your support of pursuing the Sentinel Landscape designation, as well as seeking additional REPI funds.

While I recognize the interest in wrapping this up very soon, I'd appreciate knowing a bit more about your schedule and particularly how other consulting parties might be given some time to comment on these and any other developments that may come out of a call next week, before November 30.

Reid Nelson
Director
Office of Federal Agency Programs

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Sent: Wednesday, November 21, 2018 5:15 PM
To: Reid Nelson; Allyson Brooks Ph.D
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4; William R. Manley; Goodfellow,
Sue SES OPNAV, N45; Katharine R. Kerr; Tom McCulloch; John Fowler;
mayor@townofcoupeville.org; Griffin, Kristen; Helen Price-Johnson; Baumgart,

Jim (GOV); Zipp, Roy; Nashold, Elizabeth A SES USFF, N46/Director; Padgett, Lisa M CIV USFF, N46; Morrison, Jillian L CIV SES EIE; Joseph Cecchini; Jill.Johnson@co.island.wa.us; r.hannold [REDACTED]
Subject: RE: ACHP comments on MOA for the EA-18G "Growler" operations

Mr. Nelson and Dr. Brooks,

Thank you for your comments in the email below and for your participation in the phone call on Monday. We sincerely value our relationships with both of you, the other consulting parties, and the Whidbey Island community. The Navy strives to be open and transparent, and we have gone to great lengths throughout this process to listen to and respond to concerns from the public and the consulting parties that can be addressed under the National Historic Preservation Act. The Navy remains hopeful that we can reach a reasonable resolution that results in mutual agreement.

To that end, Navy has considered the comments provided in the email below and during our phone call on Monday and we are prepared to offer the following:

FERRY HOUSE. Navy is prepared to fund projects for the Ferry House that maintain or contribute to the integrity of the characteristics that make the Ferry House and its buildings cluster in the landscape eligible for listing on the National Register of Historic Properties. We believe our original offer to provide \$400,000 to the National Park Service (NPS) to preserve the Ferry House was reasonable as it (1) was informed by the NPS estimate provided by Roy Zipp in late October and (2) included projects within the scope of preservation (as limited by the standards of rehabilitation and restoration), i.e., to protect and stabilize the property through ongoing maintenance and repairs rather than extensive replacements and new exterior or other construction. We understand that NPS is refining its original cost estimate of preservation projects for the Ferry House. We expect to receive that cost estimate on Monday, November 26th and commit to provide you a final list of appropriate, preservation-related projects we will fund from the revised estimate no later than Tuesday, November 27th.

SENTINEL LANDSCAPES. Navy is happy to advocate for and assist Whidbey Island in becoming designated as a Sentinel Landscape. Specifically, we support Whidbey Island joining a broader Sentinel Landscape effort, combined with ongoing efforts in the Hood Canal and at Naval Base Kitsap, which are currently being coordinated with Federal, State, and local partners for the Department of Agriculture's consideration.

EASEMENTS. The draft MOA currently includes an offer to seek Readiness Environmental Protection Integration (REPI) funds in fiscal year 2020 to support the creation of easements in the affected landscapes. This commitment fits into the overall REPI objective at NAS Whidbey, where DoD has invested over \$12 million and protected over 1,000 acres via REPI easements on Whidbey Island to date. The majority of this money was spent in Central Whidbey Island. The Navy will commit to seeking additional funds and easements in fiscal year 2020 that are focused on preservation of the rural quality of the landscape. As noted in the MOA and explained during the consultation, REPI funds are not controlled by Navy and we can only commit to work with the community to develop robust proposals and then advocate for REPI funding for those projects.

At this point, because Navy has engaged in many rounds of discussions in an

effort to reach an agreement, Navy is dangerously close to incurring significant operational impacts to vital military construction and training. Further delay or prolonged discussion will exacerbate the risk of operational impacts. In a final effort to reach an agreement, we are communicating this proposed way forward as our best offer. I would like to schedule a time for a telephone call on Tuesday, November 27, 2018 to discuss the specifics of the Ferry House projects. We will need your concurrence on our final offer by noon PST, November 29, 2018. We have copied the other consulting parties on this email and sincerely hope that we can come to agreement on November 29, 2018. If we do not receive your concurrence by that time, Navy will be forced to initiate termination procedures on Friday, November 30, 2018.

Please confirm receipt of this email and have a Happy Thanksgiving.

Regards,

CAPT Matt Army
NAS Whidbey Island
Commanding Officer
Office: [REDACTED]

-----Original Message-----

From: Reid Nelson [REDACTED]
Sent: Friday, November 16, 2018 1:18 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED];
Manley, William R CIV NAVFAC HQ, EV [REDACTED]; Goodfellow,
Sue SES OPNAV, N45 [REDACTED]; Katharine R. Kerr
[REDACTED]; Tom McCulloch [REDACTED]; Allyson Brooks Ph.D
[REDACTED]; John Fowler [REDACTED]
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler"
operations

Captain Army,

Thank you for providing us the most recent version of the Memorandum of Agreement (MOA) for the EA-18G "Growler" operations. The ACHP has also reviewed the Trust Board's comments on this version of the MOA, provided to us by the Washington SHPO. As you know, the ACHP has actively participated in consultation meetings and offered our general views on previous drafts within the context of those meetings. However, given the rapid pace of consultation and new developments in recent weeks, we have not had the chance to weigh in on this latest draft. The ACHP offers its views on this draft, and next steps, here.

The Navy's proposed mitigation package includes \$400,000 in funding to the National Park Service (NPS) to be used for renovation projects at the Ferry House; \$75,000 to the NPS to establish a Southern Gateway wayfinding station; Supporting Readiness and Environmental Protection Integration (REPI) easements to maintain the agricultural opportunities in the area; and the establishment of volunteer collaboration efforts for service members.

It is clear to us that both the Trust Board's suggested mitigation (in their comments dated 11/14/18) and that put forth by the Washington SHPO (in edits made to an earlier version of the draft MOA) take different approaches, and are somewhat apart from that which the Navy has felt appropriate in the latest draft of the MOA. We understand there are several reasons for this disparity, including the size of the Area of Potential Effects and differing perceptions of the severity of future auditory adverse effects on some historic properties.

We find that the transfer of mitigation funds to another federal agency (NPS) to be reasonable in this instance; however, we question the sufficiency of the amounts the Navy proposed to spend on mitigation, and would urge the Navy to review this matter. We note in particular the significant future costs associated with carrying out critically needed work at the Ferry House, and the likely extensive costs associated with pursuing easements to maintain agricultural opportunities in the broader area.

Given the concerns expressed by the consulting parties on the future of the rural character of the area, we also believe the Navy Region Northwest should advocate for and actively assist Whidbey Island in becoming a designated Sentinel Landscape. This is an initiative of the US Departments of Agriculture, Defense and Interior that works with local communities to preserving the working and rural character of key landscapes and strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes.

We are fully aware that this has been a contentious consultation and the resulting mitigation package will not satisfy all consulting parties. However, we believe with further adjustments it could represent a reasonable and proportional commitment to resolving adverse effects.

We also have identified several areas where we believe language within the agreement can and should be tightened to more clearly assign responsibilities and clarify commitments. We anticipate that these adjustments will be non-controversial and pledge to share them with you early next week.

If you have any questions or would like to discuss this matter, do not hesitate to call me at [REDACTED] or via email at [REDACTED]

Reid Nelson

Director

Office of Federal Agency Programs

Advisory Council on Historic Preservation

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#)
Cc: [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
Subject: FW: ACHP comments on MOA for the EA-18G "Growler" operations
Date: Wednesday, November 28, 2018 9:16:04 PM
Attachments: [2018 11 04 Growler Consultation DRAFT ACHP cts.docx](#)

Here is the email from ACHP today with suggested edits to the MOA.

-----Original Message-----

From: Tom McCulloch [REDACTED]
Sent: Wednesday, November 28, 2018 1:21 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; Reid Nelson [REDACTED]; Katharine R. Kerr [REDACTED]; Allyson Brooks Ph.D [REDACTED]; Katharine R. Kerr [REDACTED]; Goodfellow, Sue SES OPNAV, N45 [REDACTED]; Manley, William R CIV NAVFAC HQ, EV [REDACTED]
Subject: [Non-DoD Source] ACHP comments on MOA for the EA-18G "Growler" operations

Captain Army, Reid Nelson asked that I provide the ACHP's technical comments on the draft MOA for the Growlers. Our comments, which have been reviewed by our Office of General Counsel, are largely technical and editorial in nature, designed to make this a more straightforward, enforceable, and readable document. We have not commented on the mitigation section as this has yet to be finalized.

Tom McCulloch PhD, RPA
Assistant Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
[REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12

**MEMORANDUM OF AGREEMENT
AMONG
COMMANDER, NAVY REGION NORTHWEST,
AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE EA-18G “GROWLER” AIRFIELD OPERATIONS,
NAVAL AIR STATION WHIDBEY ISLAND,
ISLAND COUNTY, WASHINGTON
2018**

13 WHEREAS, Commander, Navy Region Northwest (Navy) proposes to increase the number of
14 aircraft stationed at Naval Air Station (NAS) Whidbey Island and the number airfield operations
15 at both Ault Field and Outlying Field (OLF) Coupeville (Undertaking); and

16
17 WHEREAS, Navy will continue to implement its current operational mitigation practices to
18 avoid and minimize noise impacts on the surrounding communities as feasible; and

19
20 WHEREAS, Navy, in consultation with the Washington State Historic Preservation Officer
21 (SHPO), has determined that the proposed Undertaking has the potential to cause effects on
22 historic properties thus requiring review under section 106 of the National Historic Preservation
23 Act (NHPA) 54 U.S.C. § 306108, and its implementing regulations, 36 C.F.R. Part 800; and

24
25 WHEREAS, Navy invited the Advisory Council on Historic Preservation (ACHP) to participate
26 in the Section 106 review for this Undertaking prior to its assessment of effects and the ACHP
27 agreed to participate in the review process for this Undertaking; and

28
29 WHEREAS, Navy established the Area of Potential Effects (APE) for the Undertaking
30 consistent with 36 C.F.R. § 800.16(d), by taking into consideration the following potential
31 effects of the Undertaking:

- 32
- 33 • On-installation Direct Effect Area: Areas on the installation where historic properties
 - 34 could be directly affected (e.g., by ground disturbance, demolition, or alteration).
 - 35 • On-installation Indirect Effect Area: Areas within the installation bounded by the 65 dB
 - 36 Day Night Sound Level (DNL) noise contours where historic properties could be disturbed
 - 37 by the introduction of visual, atmospheric, or audible elements.
 - 38 • Off-installation Indirect Effect Area: Areas off installation but within operational areas
 - 39 bounded by the 65 DNL noise contours, including the Central Whidbey Island Historic
 - 40 District; and

41
42 WHEREAS, the Central Whidbey Island Historic District was determined eligible for listing in
43 the National Register of Historic Places (NRHP) in 1973, and the 1978 National Parks and
44 Recreation Act designated the area of the historic district the Ebey’s Landing National Historical
45 Reserve (ELNHR) for the purposes of protecting a rural community and its significant history;
46 and

47
48 WHEREAS, the ELNHR is the first historical reserve in the National Park System and is
49 managed by a trust board (Trust Board) through coordination of the four land managing partners
50 who have a preservation and/or management interest in the ELNHR: The National Park Service
51 (NPS), Washington State Parks and Recreation Commission, the Town of Coupeville
52 (Coupeville), and Island County; and

53
54 WHEREAS, Navy determined that the Undertaking will result in an adverse effect to the Central
55 Whidbey Island Historic District, which includes ELNHR, as a result of more frequent aircraft
56 operations affecting certain landscape components of the historic district, specifically perceptual
57 qualities that currently make the Historic District eligible for the NRHP; and

58
59 WHEREAS, Navy has consulted with the Washington SHPO in assessing the effects on historic
60 properties that would result from this Undertaking; and

61
62 WHEREAS, Navy has consulted with Swinomish Indian Tribal Community, Upper Skagit
63 Indian Tribe, Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the
64 Tulalip Tribes of Washington, and the Jamestown S'Klallam Tribe who expressed no concerns
65 about the Undertaking; and

66
67 WHEREAS, Navy has consulted with Trust Board of Ebey's Landing National Historical
68 Reserve (Trust Board), NPS, Island County Commissioners (Commissioners), Coupeville, City
69 of Port Townsend (Port Townsend), Washington State Parks, Seattle Pacific University, the
70 Citizens of Ebey's Reserve (COER), and Mr. David Day; and

71
72 WHEREAS, Navy has made information about its Section 106 review of the Undertaking
73 available to the public during NEPA public meetings, as well as on the EIS and NAS Whidbey
74 Island website and in local media, and provided opportunity for comments per 36 C.F.R.
75 §800.5(d), §800.6(a)(4), and §800.8(a); and

76
77 WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), Navy notified the ACHP of the adverse
78 effect determination, providing the specified documentation, and the ACHP has chosen to
79 continue to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

80
81 WHEREAS, Navy invited Swinomish Indian Tribal Community, Upper Skagit Indian Tribe,
82 Samish Indian Nation, Stillaguamish Tribe of Indians, the Lummi Nation, the Tulalip Tribes of
83 Washington, and the Jamestown S'Klallam Tribe to participate in the development of this
84 Memorandum of Agreement (MOA); and

85
86 WHEREAS, Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, Samish Indian
87 Nation, Stillaguamish Tribe of Indians, and the Jamestown S'Klallam Tribe did not express an
88 interest to actively participate, but requested review of the final MOA and the Lummi Nation and
89 the Tulalip Tribes of Washington did not respond to Navy's invitation to consult on the
90 development of this MOA; and

91

92 WHEREAS, Navy invited the Trust Board, NPS, Commissioners, Coupeville, Port Townsend,
93 Washington State Parks, Seattle Pacific University, COER, and Mr. David Day to participate in
94 the development of this MOA; and

95
96 WHEREAS, the Trust Board, Commissioners, Coupeville, Port Townsend, COER, and Mr.
97 David Day agreed to participate in the development of, and opportunity to concur in this MOA;
98 and

99
100 WHEREAS, Navy, in consultation to mitigate the adverse effects on historic properties agreed to
101 evaluate alternatives that took into consideration resolution options that included the priorities of
102 the ELNHR, and that provided potential long term and public benefits to the ELNHR; and

103
104 WHEREAS, as a contributing structure in the Central Whidbey Island Historic District, the Ferry
105 House has been determined to hold significance for the American people, and be worthy of
106 protection and preservation. The Navy appreciates the value of the historic importance of the
107 Ferry House to the Trust Board, NPS, and the citizens of central Whidbey Island as a publicly
108 accessible focal point for interpreting the cultural landscape and historic settlement and rural
109 agricultural character of ELNHR. The Ferry House is one of the most significant and iconic
110 structures in the ELNHR and offers the public exceptional opportunities to experience and be
111 inspired by the history of the Central Whidbey Island Historic District, and the purpose of
112 ELNHR. In addition, the community has protected the Ferry house for generations,
113 demonstrating its importance to Central Whidbey Island’s history, even prior to ELNHR
114 creation. The Ferry House, held in trust for the public with NPS management, contributes to the
115 cultural landscape of ELNHR and represents a high priority for the Trust Board in the execution
116 of its plan to preserve the historic heritage of central Whidbey Island; and

117
118 WHEREAS, the Navy recognizes the local community has concerns about the preservation of
119 central Whidbey Island’s historic properties as well as concerns about other potential community
120 and economic impacts to the area which are not addressed by the NHPA. The Navy recognizes
121 that local Whidbey Island communities are also Navy communities and works to understand
122 these community concerns and help identify solutions to benefit quality-of-life and infrastructure
123 needs; and

124
125 NOW, THEREFORE, Navy, SHPO, ACHP, and NPS, as the signatory parties, agree that the
126 undertaking shall be implemented in accordance with the following stipulations in order to take
127 into account the effect of the undertaking on historic properties.

128
129 **STIPULATIONS**

130
131 Navy will ensure that the following measures are carried out:

132
133 The Navy will ensure these stipulations are carried out under the supervision of a cultural
134 resource professional(s) meeting the Secretary of the Interior Professional Qualifications
135 Standards as defined in Appendix A to 36 C.F.R. Part 61.

136
137 I) **MITIGATION OF ADVERSE EFFECTS OF THE UNDERTAKING**

138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182

ADMINISTRATIVE PROVISIONS

I) DISPUTE RESOLUTIONS

A) Should any signatory party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the party shall notify Navy in writing, and Navy shall consult with the parties to this MOA to resolve the objection. If Navy determines that such objection cannot be resolved, Navy will:

- 1) Forward all documentation relevant to the dispute, including Navy’s proposed resolution, to the ACHP. The ACHP shall provide Navy with its advice on the resolution of the objection within thirty (30) calendar days of receiving adequate documentation.
 - (i) Prior to reaching a final decision on the dispute, Navy shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and/or signatories, and provide them with a copy of this written response. Navy will then proceed according to its final decision.
- 2) If the ACHP does not provide its advice regarding the dispute within the thirty (30) calendar day time period, Navy may make a final decision on the dispute and proceed accordingly.
 - (i) Prior to reaching such a final decision, Navy shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response.

B) Navy's ability and responsibility to carry out all other components of the MOA not subject to the dispute shall remain unchanged. Navy’s ability to carry out the undertaking shall remain unchanged during any dispute.

II) ANTI-DEFICIENCY ACT

A) The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits federal agencies from incurring an obligation of funds in advance of or in excess of available appropriations. Accordingly, the Signatory Parties agree that any requirement for the obligation of funds arising from the terms of this MOA will be subject to the availability of appropriated funds for that purpose. The Navy shall make a good faith effort to implement the terms of this MOA as

183 stated. The Stipulations contained in this MOA will not be interpreted as requiring the
184 obligation or expenditure of funds in violation of the Anti-Deficiency Act.
185

- 186 B) If compliance with the Anti-Deficiency Act impairs Navy's ability to implement the
187 Stipulations of this MOA, Navy will consult with the Signatory Parties to determine if an
188 amendment is necessary to fully satisfy the stipulation herein.
189

190 III) AMENDMENTS

191
192 This MOA may be amended when such an amendment is agreed to in writing by all
193 signatories. The amendment will be effective on the date a copy signed by all of the
194 signatories is filed with the ACHP.
195

196 IV) TERMINATION

- 197
198 A) If any signatory to this MOA determines that its terms will not or cannot be carried out,
199 that party shall immediately consult with the other parties to attempt to develop an
200 amendment per Stipulation III, above. If within thirty (30) calendar days (or another time
201 period agreed to by all signatories) an amendment cannot be reached, any signatory may
202 terminate the MOA upon written notification to the other signatories.
203

- 204 B) Once the MOA is terminated, and prior to work continuing on the undertaking, Navy
205 must either (a) execute an MOA pursuant to 36 C.F.R. § 800.6 or (b) request, take into
206 account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Navy shall
207 notify the signatories as to the course of action it will pursue.
208

209 V) COORDINATION

210
211 Navy will ensure that each Signatory and Concurring Party is provided a copy of the fully
212 executed MOA within thirty (30) calendar days of executing the MOA.
213

214 VI) POST REVIEW DISCOVERY

215
216 If during the performance of the undertaking or in the course performance of the
217 stipulations in this MOA previously unknown historic properties are discovered or
218 unanticipated effects on historic properties found, Navy shall immediately implement the
219 Inadvertent Discovery Plan (Appendix B).
220

221 VII) DURATION

222
223 This MOA will expire if its terms are not carried out within five (5) years from the date
224 of its execution. Prior to such time, Navy may consult with the other signatories to
225 reconsider the terms of the MOA and amend it in accordance with Stipulation III above.
226

227 Execution of this MOA by Navy, SHPO, and the ACHP and implementation of its terms
228 evidence that Navy has taken into account the effects of this undertaking on historic properties
229 and afforded the ACHP an opportunity to comment.

DRAFT

From: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
To: [Williamson, Todd H CIV NAVFAC LANT, EV](#); [Shurling, Cynthia](#)
Cc: [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
Subject: FW: Growlers
Date: Wednesday, November 28, 2018 9:15:08 PM

Here is the email from Dr. Brooks as well!

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Wednesday, November 28, 2018 1:03 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; rnelson@[REDACTED]
Subject: [Non-DoD Source] Growlers

Captain Army - I realize you gave me until 5 pm Thursday to make a decision but I just realized we still need to see final language (in all fairness). It may be a final decision in concept if the Navy does not yet have a final draft for us to review by 5pm.

And..as I stated, it needs to remove the landscape proposal, and remove the words "up to". Just to safe.

Thanks!

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]

[REDACTED]

From: [Thedwall, Craig S CDR NLSC, RLSO NW, SJA](#)
To: [Shurling, Cynthia](#)
Cc: [Campbell, Kendall D CIV NAVFAC NW, PRW4](#)
Subject: FW: Growlers
Date: Wednesday, November 28, 2018 9:12:15 PM

Cynthia,

I have another email below to add to the admin record on the Growler 106.
V/R
--Craig

Craig Thedwall
CDR, JAGC, USN
Region Environmental Counsel
Navy Region Northwest
Ph: [REDACTED]

-----Original Message-----

From: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED] >
Sent: Wednesday, November 28, 2018 4:40 PM
To: Brooks, Allyson (DAHP) [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; rnelson@[REDACTED]
Subject: RE: Growlers

Dr. Brooks,
We are looking for agreement in concept only. An email response is adequate. We recognize there will be some honing of language and edits needed before final agreement and signature.

We have removed the landscape study from the agreement.

The offer is \$1M for the ferry house and outbuildings. It will not be "up to" a million. We have already reviewed the project description and feel that there is \$1M worth of projects that fit the purpose of this resolution. I apologize for the confusion.

Regards,
Matt

CAPT Matt Army
Commanding Officer
NAS Whidbey Island
Office: [REDACTED]

-----Original Message-----

From: Brooks, Allyson (DAHP) [REDACTED]
Sent: Wednesday, November 28, 2018 1:03 PM
To: Army, Matthew L CAPT NAS Whidbey Is., N00 [REDACTED]
Cc: Baumgart, Jim (GOV) [REDACTED]; Campbell, Kendall D CIV NAVFAC NW, PRW4 [REDACTED]; rnelson@[REDACTED]

Subject: [Non-DoD Source] Growlers

Captain Arny - I realize you gave me until 5 pm Thursday to make a decision but I just realized we still need to see final language (in all fairness). It may be a final decision in concept if the Navy does not yet have a final draft for us to review by 5pm.

And..as I stated, it needs to remove the landscape proposal, and remove the words "up to". Just to safe.

Thanks!

All the best

Allyson

Allyson Brooks Ph.D.

State Historic Preservation Officer/Executive Director

Department of Archaeology and Historic Preservation

[REDACTED]

[REDACTED]



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

November 29, 2018

Captain Matthew L. Arny
Commanding Officer
Naval Air Station Whidbey Island
[REDACTED]
Oak Harbor, Washington 98278-5000

Re: Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations &
Development of Support Facilities, NASWI (Log No: 102214-23-USN)

Dear Captain Arny:

As State Historic Preservation Officer I will not be signing the current Section 106 Memorandum of Agreement. Both the state and local community contend that the mitigation is not adequate for the adverse effects of the additional Growlers and their operations.

It is most unfortunate that the efforts of our Department, the Ebey's Historical Reserve Trust Board, and the local community, all of whom offered other more proportional mitigation proposals, were summarily rejected by the U.S. Navy.

These impacts from the additional Growlers will adversely affect the setting, feeling, and association of Ebey's National Historic Reserve as well as the town of Coupeville.

We had all hoped that through some form of operational mitigation or avoidance we could diminish those effects. As we are unable to reach agreement on an appropriate level of mitigation the State of Washington will not be signing the current Section 106 Memorandum of Agreement.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Allyson Brooks', is written over a light blue horizontal line.

Allyson Brooks
State Historic Preservation Officer

[REDACTED]
[REDACTED]



Captain Matthew L. Arny
November 29, 2018
Page 2

C: Jim Baumgart, Governor's Office
Kendall Campbell, NASWI Cultural Resources Program
Kristin Griffin, Trust Board of Ebey's Landing NHR
Deborah S. Stinson, Mayor, City of Port Townsend
John M. Fowler, Executive Director, Federal Advisory Council on Historic
Preservation
Reid Nelson, Director, Federal Advisory Council on Historic Preservation



From: [Brooks, Allyson \(DAHP\)](#)
To: [Army, Matthew L CAPT NAS Whidbey Is., N00](#)
Subject: [Non-DoD Source] Larsen
Date: Friday, November 30, 2018 1:30:09 PM

Captain Army - If the Navy can meet Larsen's request for mitigation the Governor sounds much more open to having me sign the MOA. Asst. Sec Bayer is calling me at 11:00. But that could solve the issue.

All the best

Allyson


Allyson Brooks Ph.D.
State Historic Preservation Officer
Dept. of Archaeology and Historic Preservation
[REDACTED]

From: [Brooks, Allyson \(DAHP\)](#)
To: [Army, Matthew L CAPT NAS Whidbey Is., N00](#)
Subject: [Non-DoD Source] Funds
Date: Friday, November 30, 2018 1:30:35 PM

Captain Army - I would also like to make the point that you can pass funds to NPS, and NPS has authority to pass funds to me, and I have authority to pass funds to non-profits and local governments.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer
Dept. of Archaeology and Historic Preservation


From: [REDACTED]
Sent: Wednesday, October 24, 2018 7:42:45 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

Dear Sirs,

Living under the pattern "14", south of Coupeville, it is difficult to stay buoyant. Knowing how adversely I, and everyone else in and around Coupeville will be negatively affected by your egregious increase in Growler operations.

I think that sums it up.

[REDACTED]
Coupeville

From: [REDACTED]
Sent: Thursday, October 25, 2018 10:34:26 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] 106 comment
Auto forwarded by a Rule

Commanding Officer, NASWI
Attn: CRPM
[REDACTED]
Oak Harbor, WA 98278

Mitigation is only possible thru fewer flights. There is no mitigation without this. Signs, placards, kiosks are NOT mitigation.

Please reduce the number of flights from 6k to zero....that's called mitigation.

Regards

[REDACTED]
Coupeville WA
98239

From: [REDACTED]
Sent: Wednesday, October 24, 2018 7:21:53 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] 106 comment- fly the jets Auto forwarded by a Rule

Fly your jets, the noise is not going to harm our island. The jet noise is not going to hurt that historic site or anything else. Stop worrying about what Coupeville is whining about. It's a select few. The rest of are sick and tired of their complaining. We are proud to share the island with the Navy and love THE SOUND OF FREEDOM. We have a house in the flight path. GO NAVY!

Thank you for your service
[REDACTED]

Sent from my iPhone

From: [REDACTED]
Sent: Wednesday, October 24, 2018 1:41:16 PM
To: NAVFAC NW CR
Cc: Representative Derek Kilmer; Office of Senator Maria Cantwell
Subject: [Non-DoD Source] Growler 106 MOA Comments Auto forwarded by a Rule

All

I read the attachment,links etc. regarding this issue. Clear as mud. It seems like the Navy is willing to throw money at affected sites damaged by the growler noise. Not a good approach.

How can you think this will remediate damage? Now, with the noise, property values are badly affected. Tourism also. I work at a museum and talk to visitors who had to leave the area due to the noise. Night and day. So the Navy ignores all our environmental and health related concerns we recently expressed. The navy also tried to reduce public response opportunities (and therefore seemed sneaky and untrustworthy) this past year. Now you want the affected public to believe a little money will undo damage to historic sites. Oh yes. You will also send "volunteers" to assist.

Please. The navy is not being a good neighbor. Take your important work and do it somewhere less populated and less historic and less environmentally sensitive.

I realize our congressmen and senators are in your pocket, but it is not like no one notices that the Navy is trampling our rights near to the growler bases. Maybe Mar A Lego in Florida Would be a better spot for the training.



Port Townsend Washington

"You can check out any time you like, but you can never leave"

Eagles - Hotel California

From: [REDACTED]
Sent: Thursday, October 25, 2018 5:41:03 PM
To: NAVFAC NW CR
Cc: Brooks, Allyson (DAHP); Campbell, Kendall D CIV NAVFAC NW, PRW4
Subject: [Non-DoD Source] 2018-10-25 Joe A. Kunzler Growler 106 MOA Comment Auto forwarded by a Rule

25 October 2018

Commanding Officer Captain Matthew Army, USN, NAS Whidbey Island,
Attn: CRPM

[REDACTED]
Oak Harbor, WA 98278
[REDACTED]

Dear Captain Army;

Attached is my commentary on the Memorandum of Agreement (MOA) regarding security EA-18G "Growler" Airfield Operations. Thanks to you and your Cultural Resources Manager Kendall Campbell for the opportunity to comment on this draft. Please accept these comments to have your staff address and get back to me please as appropriate. We have a post-COER world to shape – and time is acute as we feel the hand of history upon our shoulders while Team Whidbey works.

I also read, "The Navy will update the draft as consultation continues to provide the public opportunity to express their views on resolving the adverse effects of the undertaking." Good, I hope these comments trigger more than one update.

Very respectfully;

A large black rectangular redaction box covering the signature and name of the sender.



**■■■■■■■■■■■■■■■■■■■■■ COMMENTS ON THE SECTION 106 MEMORANDUM
OF AGREEMENT (MOA) RE: EA-18G GROWLER AIRFIELD OPS EIS**



[Word to the wise: Document is written to be printed double-sided and lay flat. *Thanks.*]

25 October 2018

Commanding Officer Captain Matthew Army, USN,
NAS Whidbey Island,
Attn: CRPM


Oak Harbor, WA 98278


Dear Captain Army;

Attached is my commentary on the Memorandum of Agreement (MOA) regarding security EA-18G “Growler” Airfield Operations. Thanks to you and your Cultural Resources Manager Kendall Campbell for the opportunity to comment on this draft. Please accept these comments to have your staff address and get back to me *please* as appropriate. We have a post-COER world to shape – and time is acute as we feel the hand of history upon our shoulders while Team Whidbey works.

I also read, “The Navy will update the draft as consultation continues to provide the public opportunity to express their views on resolving the adverse effects of the undertaking.” Good, I hope these comments trigger *more than one* update.

Very respectfully;

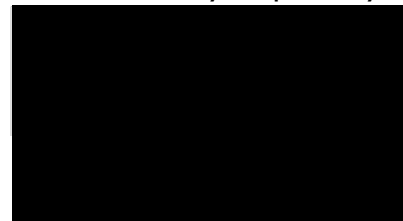


TABLE OF CONTENTS

██████████ Comments on the Section 106 Memorandum of Agreement (MOA) RE: EA-18G Growler Airfield Ops EIS.....	1
Table of Contents.....	3
Introduction	4
Some General Acute Thoughts.....	4
General Thoughts on the Draft MOA.....	4
Need A New Whereas for History of OLF, Please.....	4
Stipulation For Landscape Preservation.....	4
Cultural Landscape Inventory	5
Southern Gateway	5
Historic Preservation Easements	5
Navy Volunteer Collaboration	5
Boilerplate Signature Pages.....	5
Concluding Thoughts	5
What If This Agreement Requires More Resources?	5
Museum Quality Exhibit Why OLF.....	5
Sign on OLF Coupeville Property Advertising the OLF	5
Up the Investment in Easements and Eminent Domain?	6
Concluding Thoughts.....	6

INTRODUCTION

I appreciate very much the opportunity to comment on the Draft Memorandum of Agreement (MOA) on an expansion of EA-18G “Growler” Airfield Operations, Naval Air Station Whidbey Island, Island County, Washington to traditional Field Carrier Landing Practice (FCLP) levels. I am going to be acute and I need to mention at the outset, I am on the outside looking in with a *very limited* timetable to comment so I cannot expect a timely response to a public records request of discussions to clarify things so please be patient with me consulting parties and concurring parties – you may know something I do not. Ultimately, I perceive this MOA is being done by to Paul McCartney’s “Band on the Run” with limited resources, and my comments will reflect this.

SOME GENERAL ACUTE THOUGHTS

Below thoughts do not pertain to the MOA document itself. Therefore, posting here for discussion:

- Very happy to see collaboration between the US Navy, DAHP and Ebey’s NHR leadership
- Displeased neither Oak Harbor Navy League nor PBY Memorial Foundation are concurring parties while COER is a concurring party. Also pleased Ebey’s NHR leadership is at the table.
- Feel the final MOA could have the Island County Commissioners vote on to approve; there’s your public hearing COER/Sound Defense Alliance *assuming* your members can behave. My issue is security for all participants, period.
- Again, I am on the outside looking in with a *very limited* timetable to comment so I cannot expect a timely response to a public records request of discussions to clarify things so please be patient.

There you go.

GENERAL THOUGHTS ON THE DRAFT MOA

Need A New Whereas for History of OLF, Please

Moving forward into the MOA itself, I went over the “Whereas” intro of the MOA and was *displeased* at the lack of reference to the history of Outlying Field Coupeville (OLF). So, I am going to suggest one based on my historical research¹:

WHEREAS, Navy has been using OLF for Field Carrier Landing Practice (FCLP) since 1943 and jets such as all version of the A-6 Intruder, variants of the A-3 Skywarrior, all versions of the EA-6B Prowler, and all versions of the EA-18G Growler since January 5, 1967 as documented in the January 26, 1967 Whidbey News-Times. The Navy intends during the Undertaking to increase to historical norms of FCLP use at OLF, an increase with effects on **Ebey’s Landing National Historic Reserve (ELNHR)**.

My point being: Using OLF for jet FCLP is 100% *normal*. Please document in your MOA. Thanks.

Stipulation For Landscape Preservation

As to the stipulation for landscape preservation, I am not too sure this is really going to be helpful. I do not feel having watched many beautiful Field Carrier Landing Practice (FCLP) periods at OLF Coupeville that FCLP is going to do anything to the terrain of Central Whidbey. If this is to retrofit historic buildings, then I support this gift of peace to *that* specific end.

¹ One can review the 1967 Whidbey News-Times article at <https://bit.ly/2OMlwuo>.

Cultural Landscape Inventory

This quite frankly from the outside looking in I perceive as an Ebey's NHR responsibility, so if Ebey's NHR is so under resourced as to require this level of NAS Whidbey Island help – I have an expectation as a taxpayer paying for *this* that the tone towards NAS Whidbey Island please change from Ebey's NHR supporters. *Thank you.*

Southern Gateway

I am very happy with the current draft MOA as to, “The design, construction, and installation of a southern gateway entry sign to the ELNHR”. I feel having, “The gateway exhibit referencing Navy history and/or current aviation use at Outlying Field Coupeville with the goal to provide context to visitors explaining the presence of Navy lands and aircraft in the ELNHR” is a means of healing between Ebey's NHR & Navy supporters by presenting and publishing historical *truth*.

Historic Preservation Easements

I feel historic preservation easements is a very relevant effort at genuine mitigation and should be eagerly supported. This is a good tool of land use reform alongside Accident Potential Zones or APZs. I hope this element will also receive Ebey's NHR support, Congressional support and such *please*.

Navy Volunteer Collaboration

No comments on this for personal reasons. Thank you.

Boilerplate Signature Pages

Uh um, the boilerplate signature pages all date back to Barriergate days. As in, “THE SECURITY ENHANCEMENTS AT OUTLYING LANDING FIELD COUPEVILLE, NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON”. Seems worth prompt fixing, eh?

Concluding Thoughts

I generally am happy with the Draft MOA. Seems to strike the right balance. But...

WHAT IF THIS AGREEMENT REQUIRES MORE RESOURCES?

After reading a story published late on 23 October 2018 on the Whidbey News-Times website² and some additional *research*, it seems some seek to acquire more resources for mitigation. OK then, I am happy with the current agreement as it stands – and documented why. But if the other parties – some neutral, some anti-OLF – seek more resources... this is my response to making investments to reward the pro-OLF community for some *balance*:

Museum Quality Exhibit Why OLF

For pro-OLF balance to those new resources to appease Ebey's NHR; let's start with having NAS Whidbey Island prepare by 2021 a museum-quality exhibit why OLF to take on tour. Seems only appropriate.

Sign on OLF Coupeville Property Advertising the OLF

No seriously. Stick a big laminated sign saying, “Please enjoy **A** sound of freedom – EA-18G Growlers doing Field Carrier Landing Practice for all the other sounds of freedom like news, debate and family.” Then post the schedule and squadron bouncing below it. Make sure there is a community consultation process! There. I do *not* expect any more noise disclosure litigation after *that*.

² www.whidbeynewstimes.com/news/navy-seeking-public-comments-on-ea-18g-growler-impact-on-historic-properties/

Up the Investment in Easements and Eminent Domain?

Furthermore, the Navy could always up the investment in easements and eminent domain. Why? Let's start with one of the consulting parties in the Town of Coupeville who wrote earlier this year our local Congressional Delegation among other requests;

- A commitment from the Department of Defense and the Department of the Navy to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in Central Whidbey.
- A similar commitment for mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey area because of significant noise increases.

I agree with *these* requests, obviously. In part because I lobbied the Washington State Board of Health and the Island County Board of Health to really take a hard look at land use reforms in the wake of COER's complaints about health issues. Well, Island County Commissioners serving on the Island County Board of Health in their deliberations explored land use reform ideas but decided not to do much. Since COER was unsatisfied with the Island County Board of Health's rejection, they went to the State Board of Health. Only to find the State Board of Health was unable to act and two Board Members on their own recognizance recommended the following according to a transcript made of the August 2017 meeting:

- I want to point out that the Island County Board of Commissioners and Island County Board of Health have it within their power to address some of these issues if they so choose to do that. Their decisions to allow building to occur around aircraft have contributed to this. So, I'm not going to let them off the hook for that.
- The plan B and C are not health regulation but growth management, what do we do with growth management and engaging the representative and senators who represent Island County to work with Department of Defense to move this up in their priority.

My point being: The world would be a better place with more Central Whidbey easement investment, *period*.

CONCLUDING THOUGHTS

A day like today, it's not a day for sound bytes really. We can leave those at home. But I feel the hand of history upon our shoulder in respect to this, I really do. I just think we need to acknowledge that and respond to it.

Tony Blair, Former British Prime Minister

Somehow the above Tony Blair quotation seems appropriate. This MOA is hopefully being negotiated to bring Ebey's Reserve and OLF Coupeville together, not to further divide supporters of both. I generally support the current Draft MOA as I consider me a lukewarm supporter of Ebey's NHR and hearty supporter of OLF Coupeville – and feel a balance must be struck.

I ask all consulting parties and all concurring parties – hereafter you – *please* be serious, recognize you can make peace with Kendall Campbell or you can abuse this process to keep waging community conflict. I ask you take those longstanding conflicts regarding FCLP at OLF elsewhere as Kendall's ally and as someone who should be more on the receiving end of your anger as I am a dirtbag political activist and not a career professional public servant with kids at home who may or may not know their mom IS a hero. I suggest you make peace and understand if you ask for more so will I. If some of you want to roll the dice; then the stakes will up for the Ebey's NHR we all seek to protect... and I do not seek *that*. *Thank you.*

From: [REDACTED]
Sent: Thursday, October 25, 2018 7:29:51 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

No New Jets, No New Flights

We moved to Coupeville, WA in 2006 and built our new home in the Town at a location which to minimize the noise from OLF flight operations. This has worked well for us - even when the noise increased with Growler operations.

We have called in 1917 and 1918 to complain when the aircraft noise was too loud to have a conversation indoors. Several times this excessive noise has persisted for 15 - 30 minutes or more.

We are upset about the proposed four-fold increase in operations!!

We are opposed to increased flights at OLF!!

Thank you for considering our comments,

[REDACTED]
Coupeville, WA 98239

[REDACTED]

From: [REDACTED]
Sent: Saturday, October 27, 2018 7:29:40 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

Dear Navy,

We are big supporters of Naval Air Station Whidbey Island, its mission, and its general presence as an integral and appreciated part of our community. However, we are extremely concerned about the proposed nearly 400% increase in training flights at the separate Coupeville Outlying Field (OLF). This massive increase would produce very negative effects upon the Ebey's Landing National Historical Reserve, its historic setting, associated tourism, and all local community members in the area of its flight path. Our strong preference is that flight volume remain at current levels that everyone has long adapted to, and this will help maintain the historic nature of Ebey's Reserve while still providing only the most critical training opportunities for Navy pilots at OLF.

Thank you,



Coupeville, WA

From: [REDACTED]
Sent: Saturday, October 27, 2018 1:27:58 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

The introduction of a four-fold increase in FCLP adjacent to Ebey's Landing National Historical Reserve would be in direct violation of the National Historic Preservation Act, section 106. To suggest that merely insulating a few old buildings would lead to compliance is absurd. The act's intent is to preserve and protect our rural community and its' historic district. This includes trails, landscapes, natural features and historic activity such as farming. We have walked the beautiful Ebey's Landing trail while 4 jets were circling OLF, a considerable distance away. The entire prairie sounded like the depths of hell. The contrast couldn't be more stark: the bucolic natural landscape vs. ear-splitting, low-flying, threateningly dangerous activity. In war, such activity would send civilians to protective bomb shelters. At Ault Field the low flying is over Navy property. In Coupeville it is over private property and parks. Tourists come for the beauty and tranquility.

To compound the incompatibility of FCLP and a National Historical Reserve is the toxic environmental degradation resulting from irresponsible use of dangerous chemicals on the OLF. Civilian, life-giving wells are destroyed forever. The chemicals continue to wash along the single-source aquifer, out to Crockett Lake and into the Salish Sea. Now we read that the same destruction is occurring in Clover Valley and out into Dugalla Bay. Humans, consuming crab and fish, will ingest these 'forever chemicals' and be subject to all of the associated negative health effects.

Our community is at maximum tolerance with 6120 FCLP/year. The National Reserve is already compromised with that number. Please preserve the reserve.

Sincerely, [REDACTED]

From: [REDACTED]
Sent: Monday, October 29, 2018 11:09:53 AM
To: NAVFAC NW CR
Cc: [REDACTED]
Subject: [Non-DoD Source] Growler FEIS/ROD Comments Auto forwarded by a Rule

Dear Project Manager:

Attached please find a letter from [REDACTED] to you regarding Comments on Final Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex and an ESA Addendum and FEIS Addendum.

The originals are being mailed to you.

If you have any questions, please do not hesitate to contact [REDACTED].

Thank you for your attention to this matter.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Seattle WA 98101

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Spokane, WA 99201

CONFIDENTIALITY NOTICE: The information transmitted, including attachments, is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and destroy any copies of this information.



BRICKLIN & NEWMAN LLP
lawyers working for the environment

Reply to: Seattle Office

October 29, 2018

VIA E-MAIL TO [REDACTED]
AND VIA U.S. MAIL

EA-18G EIS Project Manager
Naval Facilities Engineering Command (NAVFAC)
Atlantic – Attn: Code EV21/SS
[REDACTED]
Norfolk, VA 23508

Re: Comments on Final Environmental Impact Statement for EA-18G Growler
Airfield Operations at Naval Air Station Whidbey Island Complex

Dear Project Manager:

We are submitting these comments on behalf of the Citizens of the Ebey's Reserves ("COER") regarding the publication of the Final Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex ("FEIS"). These comments are intended to help inform the Navy's decision in the expected Record of Decision for this matter. Despite extensive comments by state and federal agencies and the public, numerous identified and submitted studies, and well-documented concerns about the methodologies and information utilized within the DEIS, the Navy has still failed to adequately analyze and fully disclose the environmental consequences of increased Growler flight operations. COER has documented the shortcomings of the Navy's analysis in previous comment letters. Despite the Navy's repeated failures to meaningfully respond to these numerous shortcomings, COER is submitting detailed comments on the technical and scientific shortcomings of the Navy's analysis to this letter. However, the FEIS suffers from more generalized flaws that must be addressed to comply with NEPA's requirements, as detailed below.

First, the Navy improperly rejected the Environmental Protection Agency's ("EPA") and the Washington Department of Health's requests to undertake a Health Impact Assessment ("HIA"). As discussed by the EPA (and many others), the noise impacts, both auditory and non-auditory, from frequent Growler flight operations have not been studied and disclosed in any level that would meet NEPA's standards for a "hard look" at the consequences of a proposed action. Rather than fully evaluating the problem as required by NEPA, the Navy dismissed the requests for an

HIA on two bases: first, the Navy concluded that an HIA would be redundant of the NEPA analysis; and second, the Navy asserted that what the EPA, Washington Department of Health, and others were actually requesting was a “broader, long-term research study” that would be outside of the scope of the NEPA analysis. FEIS at I-17–I-18.

The Navy’s conclusions are wrong on both counts. An HIA is distinct from NEPA requirements, and it is intended to supplement — not reproduce — a NEPA analysis. The EPA has produced a memorandum that documents the way that an HIA can supplement and help inform an ongoing NEPA analysis.¹ The Navy’s assertions that an HIA cannot possibly inform the Navy’s decisions relating to the health impacts caused by its ongoing activities is wrong. Moreover, the Navy has not cited any authority for its assertion that a broader research study is outside of the scope of its NEPA analysis. The purpose of NEPA is to inform a decision-maker of the consequences of its actions before it undertakes that action. If information is missing that would inform the Navy of reasonably foreseeable adverse effects on the human environment, then the Navy must obtain that information if the costs of obtaining it are not exorbitant. 40 C.F.R. § 1502.22(a). The Navy has not claimed that obtaining the information here would entail exorbitant costs. Even if the Navy were to assert that the costs of obtaining the information were exorbitant, the Navy has not adequately disclosed the lack of information underpinning its analysis, as required by 40 C.F.R. § 1502.22(b).

Second, the Navy has repeatedly rejected conducting on the ground noise monitoring to verify its modelling and to ensure that the actual noise impacts are being considered. Yet, the Navy has provided no reasoned explanation for rejecting this approach. *See* FEIS at M-31. COER has documented the flaws within the Navy’s noise analysis, and those flaws still remain. Moreover, agencies with expertise, such as the EPA, have requested on the ground noise monitoring as well. Even with such well-documented and compelling requests for noise monitoring, the Navy has refused and has failed to take a hard look at the issue.

Third, the Navy has yet to fully comply with its duties under the National Historic Preservation Act § 106. There has been no memorandum of agreement finalized between the parties, and it does not appear that a potential memorandum of agreement is close to being resolved at this point. As COER has well documented, the area of effect for central Whidbey Island that has been analyzed as part of the § 106 process is much too small to fully evaluate the impacts of Growler operations on the surrounding area.

¹ “Promoting the Use of Health Impact Assessment to Address Human Health in Reviews Conducted Pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act,” EPA (November 10, 2015); accessible at: https://www.epa.gov/sites/production/files/2016-03/documents/hia_memo_from_bromm.pdf

EA-18G EIS Project Manager

October 29, 2018

Page 3

Please find attached to this letter detailed comments on the Navy's compliance with the Endangered Species Act for the proposed Growler Airfield Operations at NAS Whidbey Island and detailed comments upon the FEIS analysis of impacts upon residents of Whidbey Island and adjacent national parks.

Very truly yours,

BRICKLIN & NEWMAN, LLP

A handwritten signature in black ink that reads "Jacob Brooks". The signature is written in a cursive style with a large, sweeping initial "J".

Jacob Brooks

David A. Bricklin

DAB:JB:pse

From: [REDACTED]
Sent: Tuesday, October 30, 2018 9:56:22 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] "Growler 106 MOA comment"
Auto forwarded by a Rule

Sent from Mail <<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows
10

Dear Commanding Officer

I am so upset with the Navy's decision to increase the flights by such a large number at OLF in Coupeville. Coupeville is such a special historic treasure with our National reserve and our historic farms and buildings. We survive on tourism here and that will be destroyed with the growler flight increases. I own a Bed and Breakfast in town and I depend on the income to stay in my home. When we have such an increase of flights all day and night, people won't come, as they come to relax and enjoy the quiet respite away from the city. Our farmlands and historic buildings will be adversely affected and our property values will definitely go down. Please realize that we all are just trying to make a living here in this quaint wonderful place –don't ruin it! And what good will it do to have the Navy pay money to compensate for the damage done?

Thank You—

From: [REDACTED]
Sent: Wednesday, October 31, 2018 11:58:28 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA comment Auto forwarded by a Rule

Dear Commanding Officer, NAS Whidbey Island,

I am writing as a concerned citizen of Whidbey Island regarding the instillation of an abundance of additional Growlers and scheduled flights on our wonderful island. If this addition is so necessary I am wondering why there seems to have been a decrease in flights this past year? Where are the men getting the necessary training while this decision is being made? It's been outlined that the Coupeville field is the most ideal strip to simulate an aircraft carrier landing, but it seems with all the new technology the desert in Eastern Washington could be transformed to do the job without adding hazards and pollution to a populated area. I'm not suggesting stopping all testing on the island, but keeping the number of flights at a much more reasonable number 8-10,000.

Our island is still fairly pristine-why ruin something this beautiful? Noise pollution will drive away tourism and livelihoods for many islanders and make living conditions almost intolerable for many others. Please consider some kind of compromise - adding 36 planes and 4x the number of flights is not much of a compromise from the original plan.

Thank you for your consideration,



From: [REDACTED]
Sent: Wednesday, October 31, 2018 1:16:21 PM
To: NAVFAC NW CR
Cc: Executive Director
Subject: [Non-DoD Source] Port of Coupeville Comment on Growler 106 MOA Auto forwarded by a Rule

To NAS Whidbey Island:

We respectfully submit for your review the attached letter from the Port of Coupeville's Board of Commissioners in response to your request for public input on the impact of the expansion of flight operations at the Outlying Field in Coupeville on historic structures. Should you need any further input, comment or documentation from the Port of Coupeville, please don't hesitate to let us know. Thank you for your full consideration of the comments contained in the attached document.

Best regards,

[Redacted]

[Redacted]

Community Relations

[Redacted]

Learn more about our historic properties and programs at <http://portoc.org/>.



P.O Box 128, Greenbank, Washington 98253

October 31, 2018

Commanding Officer, NAS Whidbey Island
Attn: NASWI CR PM

[REDACTED]
Oak Harbor, WA 98278-5000

Re: Growler 106 MOA Comment

To the Department of the Navy,

The Port of Coupeville is a Washington State municipal corporation governed by an elected commission, responsible to their district electorate for economic development and management of its facilities. The Port District extends from north of Coupeville, to Greenbank, an area which includes Ebey's Landing National Historical Reserve and the Navy Outlying Field.

The Port of Coupeville is concerned that significant expansion of EA-18G Growler operations at OLF will have negative impacts to the district, including diminishment of tourism, devaluation of local real estate (which impacts tax revenues for municipalities), and risks to residents from jet noise and fuel emissions. The Port now appreciates the opportunity to review and provide feedback on the adverse effects of the proposed expansion to historic structures.

Coupeville, the second oldest town in Washington State, has a long record of preserving its historical and rural character. Many of our constituents choose to reside here because they value these qualities. The Port owns two heritage properties--the 1905 Coupeville Wharf and 1904 Greenbank Farm. Both are regional landmarks that generate significant direct and indirect income to Island County.

The Port is particularly concerned about adverse effects to the Coupeville Wharf. The Wharf is one of few local structures that symbolizes Whidbey's maritime past. With unobstructed views of Penn Cove, marine life and the Cascade skyline, it retains many original features and provides unique educational value to the public. Substantially-increased incidence of low-flying jets near and over the Wharf will have a number of adverse effects including:

- It undermines the cultural and historical importance of the structure and its setting.
- Increased noise levels will reduce the number of visitors to the Wharf who utilize it for education, recreation, shopping, eating, and as a community gathering space.
- With reduced traffic, it creates potential loss of income for business owners at the Wharf and downtown; as well as sales tax revenues for Island County.
- It harms the structure's future value and integrity for the public as a historic and cultural landmark.

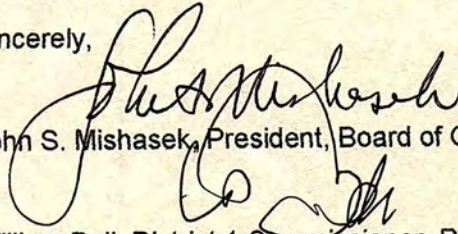
- Any reduction or lessening of the increase in local property values over time would financially impact the Port's ability to make infrastructure improvements to its historic properties.

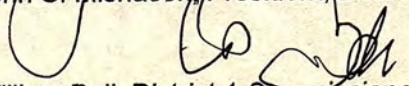
According to the National Historic Preservation Act, historic preservation is an important policy of the United States. It directs the federal government, including the Navy, to actively promote the preservation of historic resources through partnership with state and local governments. We urgently request the Navy to fully consider these adverse effects not only to the Wharf, but to all historic structures within Ebey's Landing National Historical Reserve; and to take steps to minimize and mitigate the effects including the following:

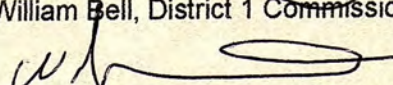
- Elect/implement a plan for increased flight operations well below the proposed four-fold increase.
- Limit flight operations to times of least impact to Coupeville's residents, businesses and critical tourism traffic, including weekends and evening hours.
- Take steps to contain flight traffic away from the Coupeville downtown area.
- Employ sound insulating and barrier technologies to minimize the effects of jet noise to surrounding communities.
- Work in partnership with the Trust Board of Ebey's Landing National Historical Reserve and other stakeholders to find mutually acceptable resolutions that minimize adverse effects to all historic structures contained within the Reserve.

The Port is a strong supporter of our nation's Armed Forces, especially the Navy and its operation on Whidbey Island. We recognize the vital contributions of service members to our Island County economy, work force, schools and community organizations and we are grateful for their service to our country. We are also grateful for the opportunity to share our views and comments on matters of vital importance to the present and future welfare of our Port district constituents.

Sincerely,


John S. Mishasek, President, Board of Commissioners, Port of Coupeville


William Bell, District 1 Commissioner, Port of Coupeville


Mohammad Mostafavinassab, District 3 Commissioner, Port of Coupeville

From: [REDACTED]
Sent: Wednesday, October 31, 2018 3:35:05 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

Living in Anacortes I am not bothered by the Jets, but spending some time at the Coupville ferry dock while the jets were doing their touch and goes, I can sympathize with residents of Whidbey Island. Perhaps the Navy could take an old carrier out of mothballs, anchor it in the middle of the Puget Sound, and use that as a practice field. Just an idea!!

Cheers

From: [REDACTED]
Sent: Wednesday, October 31, 2018 9:24:42 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

Commanding Officer,

We reside in Anacortes, a mini-heaven on earth. EXCEPT for one thing - the Navy Growler jets' teeth-wrenching, ear splitting noise. We ask "Why?" Why impact the islands, ocean and forest wildlife, and people of the area with increased noise? Why not put half in a more remote area, we have lots of desert in this country where such activity is already happening, why can't the increase happen there with less impact than having so much here at Whidbey Island and surrounding areas? Not only the deafening sound of the jets flying so low over our homes, but the impact of hundreds of more families moving here increasing traffic, pollution, population density. We have a limited number of resources for the already established small community. Stores, doctors, and

all other services are already impacted with over population for small islands. An island can only offer a limited amount of resources, such as water, sewer, garbage, electricity, medical professionals, products, and the list goes on.

Why do all the Growlers have to be stationed in one place? Can't half of them be stationed on the east coast? Right now, I ask you to consider limiting the amount of time, time of day and altitude of all jets. What about less flying over homes? Why do they have to fly so low over populated areas? This causes so much anxiety among people, pets, trees and wildlife. What about the veterans with PTSD? They should be high on your list of reasons to not fly over populated or park and forest areas. Everyone is impacted, we can't talk, teachers in schools and businesses have to stop talking til the screeching sound is gone. Phone conversations are also interrupted. It does not help with hearing health either, so many people have to cover their ears (or wear earplugs) when they are flying over. Unless I am able to cover my ears, the sound hurts my ears terribly. Isn't this a cause for hearing loss? This area is also popular with tourists. All of a sudden a loud deafening sound closely overhead scares the visitor not knowing about the activities of the Navy here, especially when driving.

Reading the "negotiating" with the National Park Service struck me as an unbelievable tiny bit of funding (pocket change) that you're offering them for "preserving" the landscape. No amount of money can replace or preserve nature. And certainly does nothing for the adverse effect of noise.

Please hear the people's, animal's and land's cries (over the jet interference?) to moving the increased Growler operations to a more suitable area of less impact. Thank you for reading our plea for peace and quiet.

[REDACTED]

(we speak for our many family members, neighbors, acquaintances and friends too. And for the wildlife and forests that have no voice)

From: [REDACTED]
Sent: Wednesday, October 31, 2018 11:59:54 PM
To: NAVFAC NW CR
Cc: [REDACTED]
[REDACTED]
[REDACTED]
Subject: [Non-DoD Source] 2018-10-31 [REDACTED] Growler 106 MOA Comment
Auto forwarded by a Rule

31 October 2018

Commanding Officer Captain Matthew Army, USN, NAS Whidbey Island,
Attn: CRPM

[REDACTED]
Oak Harbor, WA 98278
[REDACTED]

Dear Captain Arny (and CCs);

Attached is my 25 October 2018 commentary on the Memorandum of Agreement (MOA) regarding security EA-18G "Growler" Airfield Operations but also some questions I think the consulting and concurring parties need to ask themselves, respectfully. Why? I am so depressed after what I have learned about the Section 106 and the risk this peace process may be in that I feel a duty to a dear friend to issue a supplemental comment and pull this one out of the fire.

The supplemental comment begins with what I concluded my original letter with, "I ask all consulting parties and all concurring parties - hereafter you - please be serious, recognize you can make peace with Kendall Campbell or you can abuse this process to keep waging community conflict. I ask you take those longstanding conflicts regarding FCLP at OLF elsewhere as Kendall's ally and as someone who should be more on the receiving end of your anger as I am a dirtbag political activist and not a career professional public servant with kids at home who may or may not know their mom IS a hero. I suggest you make peace and understand if you ask for more so will I. If some of you want to roll the dice; then the stakes will up for the Ebey's NHR we all seek to protect. and I do not seek that. Thank you."

So I am asking before the next Section 106 meeting each party/person involved ask themselves this series of serious, thoughtful questions:

1. Are you OK with not signing this agreement and thereby risking the Navy Department doing absolutely nothing in mitigation because you don't like the current MOA or more use of OLF Coupeville?
2. If like me NO, then are you able to agree this MOA could be a Phase I and a future Phase II with more concurring parties as per my attached original comments (See: "What if this agreement requires more resources") be created to approach at a future date the Congressional delegation with a second mitigation package? Even if that Phase II has to be negotiated outside of the current Section 106 process and perhaps without the US Navy's direct involvement?

(This way, there is a plan to meet genuine needs regardless of what consulting & concurring parties can obtain out of this particular process.)

3. Are you able to understand the fact the National Park Service's proposal for an entryway kiosk with reference to OLF Coupeville's place in Ebey's NHR is an act of perceptible healing with OLF supporters that I deeply appreciate? That without us OLF supporters getting something in return from this and any future Section 106 process, OLF supporters will perceive any attempt at peace with Ebey's NHR at best. negatively?

(OLF supporters are really excited and are grateful for the historical report into OLF Coupeville when the eco-barrier security enhancement issue (aka Barriergate) arose.)

As before, thanks to you Captain and your Cultural Resources Manager Kendall Campbell for the opportunity to comment on this draft. We have a post-COER world to shape - and time is acute as we all feel the hand of history upon our shoulders. At least Dr. Allyson Brooks, Kendall Campbell and Roy Zipp understand this. Others, well I have been asked by aforementioned dear friend to NOT go there so I won't.

One last thing, my previous comments stand as-is and I am very grateful for Dr. Allyson Brooks & Kendall Campbell making time to help me - hopefully - help them in this process's most tenuous hour. As such, these combined comments are my last comments for this comment period. I sincerely wish all parties well and ask again they please take the time to consider thoughtfully my three questions before the next Section 106 meeting or teleconference.

Very respectfully;

[Redacted signature]

P.S. Irrelevant to the Section 106 process, but to lay down some ideological markers for [Redacted]: I feel I should tell SOME of the consulting parties I will be at Sound Transit Headquarters at 10:30 AM 1 November 2018 asking for a hate speech ban because of the virulent trolling of one Trump superfan in [Redacted]. I mention this to reassure you I am neither a hater nor a Trump supporter nor someone who thinks the Navy should do nothing nor a bully. No, I am a voice for a passionately reasonable solution out of this crisis based on data and not pontification who supports our troops and a post-COER World where we resolve our differences more collaboratively, less confrontationally. I want Ebey's NHR to survive, but I more importantly want to keep our troops safe landing on aircraft carriers.

**■■■■■ COMMENTS ON THE SECTION 106 MEMORANDUM
OF AGREEMENT (MOA) RE: EA-18G GROWLER AIRFIELD OPS EIS**



[Word to the wise: Document is written to be printed double-sided and lay flat. *Thanks.*]

25 October 2018

Commanding Officer Captain Matthew Army, USN,
NAS Whidbey Island,
Attn: CRPM

[REDACTED]
Oak Harbor, WA 98278
[REDACTED]

Dear Captain Army;

Attached is my commentary on the Memorandum of Agreement (MOA) regarding security EA-18G “Growler” Airfield Operations. Thanks to you and your Cultural Resources Manager Kendall Campbell for the opportunity to comment on this draft. Please accept these comments to have your staff address and get back to me *please* as appropriate. We have a post-COER world to shape – and time is acute as we feel the hand of history upon our shoulders while Team Whidbey works.

I also read, “The Navy will update the draft as consultation continues to provide the public opportunity to express their views on resolving the adverse effects of the undertaking.” Good, I hope these comments trigger *more than one* update.

Very respectfully;

[REDACTED]
[REDACTED]
[REDACTED]

TABLE OF CONTENTS

██████████ Comments on the Section 106 Memorandum of Agreement (MOA) RE: EA-18G Growler Airfield Ops EIS.....	1
Table of Contents.....	3
Introduction	4
Some General Acute Thoughts.....	4
General Thoughts on the Draft MOA.....	4
Need A New Whereas for History of OLF, Please.....	4
Stipulation For Landscape Preservation.....	4
Cultural Landscape Inventory	5
Southern Gateway	5
Historic Preservation Easements	5
Navy Volunteer Collaboration	5
Boilerplate Signature Pages.....	5
Concluding Thoughts	5
What If This Agreement Requires More Resources?	5
Museum Quality Exhibit Why OLF.....	5
Sign on OLF Coupeville Property Advertising the OLF	5
Up the Investment in Easements and Eminent Domain?	6
Concluding Thoughts.....	6

INTRODUCTION

I appreciate very much the opportunity to comment on the Draft Memorandum of Agreement (MOA) on an expansion of EA-18G “Growler” Airfield Operations, Naval Air Station Whidbey Island, Island County, Washington to traditional Field Carrier Landing Practice (FCLP) levels. I am going to be acute and I need to mention at the outset, I am on the outside looking in with a *very limited* timetable to comment so I cannot expect a timely response to a public records request of discussions to clarify things so please be patient with me consulting parties and concurring parties – you may know something I do not. Ultimately, I perceive this MOA is being done by to Paul McCartney’s “Band on the Run” with limited resources, and my comments will reflect this.

SOME GENERAL ACUTE THOUGHTS

Below thoughts do not pertain to the MOA document itself. Therefore, posting here for discussion:

- Very happy to see collaboration between the US Navy, DAHP and Ebey’s NHR leadership
- Displeased neither Oak Harbor Navy League nor PBY Memorial Foundation are concurring parties while COER is a concurring party. Also pleased Ebey’s NHR leadership is at the table.
- Feel the final MOA could have the Island County Commissioners vote on to approve; there’s your public hearing COER/Sound Defense Alliance *assuming* your members can behave. My issue is security for all participants, period.
- Again, I am on the outside looking in with a *very limited* timetable to comment so I cannot expect a timely response to a public records request of discussions to clarify things so please be patient.

There you go.

GENERAL THOUGHTS ON THE DRAFT MOA

Need A New Whereas for History of OLF, Please

Moving forward into the MOA itself, I went over the “Whereas” intro of the MOA and was *displeased* at the lack of reference to the history of Outlying Field Coupeville (OLF). So, I am going to suggest one based on my historical research¹:

WHEREAS, Navy has been using OLF for Field Carrier Landing Practice (FCLP) since 1943 and jets such as all version of the A-6 Intruder, variants of the A-3 Skywarrior, all versions of the EA-6B Prowler, and all versions of the EA-18G Growler since January 5, 1967 as documented in the January 26, 1967 Whidbey News-Times. The Navy intends during the Undertaking to increase to historical norms of FCLP use at OLF, an increase with effects on **Ebey’s Landing National Historic Reserve (ELNHR)**.

My point being: Using OLF for jet FCLP is 100% *normal*. Please document in your MOA. Thanks.

Stipulation For Landscape Preservation

As to the stipulation for landscape preservation, I am not too sure this is really going to be helpful. I do not feel having watched many beautiful Field Carrier Landing Practice (FCLP) periods at OLF Coupeville that FCLP is going to do anything to the terrain of Central Whidbey. If this is to retrofit historic buildings, then I support this gift of peace to *that* specific end.

¹ One can review the 1967 Whidbey News-Times article at <https://bit.ly/2OMlwuo>.

Cultural Landscape Inventory

This quite frankly from the outside looking in I perceive as an Ebey's NHR responsibility, so if Ebey's NHR is so under resourced as to require this level of NAS Whidbey Island help – I have an expectation as a taxpayer paying for *this* that the tone towards NAS Whidbey Island please change from Ebey's NHR supporters. *Thank you.*

Southern Gateway

I am very happy with the current draft MOA as to, “The design, construction, and installation of a southern gateway entry sign to the ELNHR”. I feel having, “The gateway exhibit referencing Navy history and/or current aviation use at Outlying Field Coupeville with the goal to provide context to visitors explaining the presence of Navy lands and aircraft in the ELNHR” is a means of healing between Ebey's NHR & Navy supporters by presenting and publishing historical *truth*.

Historic Preservation Easements

I feel historic preservation easements is a very relevant effort at genuine mitigation and should be eagerly supported. This is a good tool of land use reform alongside Accident Potential Zones or APZs. I hope this element will also receive Ebey's NHR support, Congressional support and such *please*.

Navy Volunteer Collaboration

No comments on this for personal reasons. Thank you.

Boilerplate Signature Pages

Uh um, the boilerplate signature pages all date back to Barriergate days. As in, “THE SECURITY ENHANCEMENTS AT OUTLYING LANDING FIELD COUPEVILLE, NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON”. Seems worth prompt fixing, eh?

Concluding Thoughts

I generally am happy with the Draft MOA. Seems to strike the right balance. But...

WHAT IF THIS AGREEMENT REQUIRES MORE RESOURCES?

After reading a story published late on 23 October 2018 on the Whidbey News-Times website² and some additional *research*, it seems some seek to acquire more resources for mitigation. OK then, I am happy with the current agreement as it stands – and documented why. But if the other parties – some neutral, some anti-OLF – seek more resources... this is my response to making investments to reward the pro-OLF community for some *balance*:

Museum Quality Exhibit Why OLF

For pro-OLF balance to those new resources to appease Ebey's NHR; let's start with having NAS Whidbey Island prepare by 2021 a museum-quality exhibit why OLF to take on tour. Seems only appropriate.

Sign on OLF Coupeville Property Advertising the OLF

No seriously. Stick a big laminated sign saying, “Please enjoy **A** sound of freedom – EA-18G Growlers doing Field Carrier Landing Practice for all the other sounds of freedom like news, debate and family.” Then post the schedule and squadron bouncing below it. Make sure there is a community consultation process! There. I do *not* expect any more noise disclosure litigation after *that*.

² www.whidbeynewstimes.com/news/navy-seeking-public-comments-on-ea-18g-growler-impact-on-historic-properties/

Up the Investment in Easements and Eminent Domain?

Furthermore, the Navy could always up the investment in easements and eminent domain. Why? Let's start with one of the consulting parties in the Town of Coupeville who wrote earlier this year our local Congressional Delegation among other requests;

- A commitment from the Department of Defense and the Department of the Navy to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in Central Whidbey.
- A similar commitment for mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey area because of significant noise increases.

I agree with *these* requests, obviously. In part because I lobbied the Washington State Board of Health and the Island County Board of Health to really take a hard look at land use reforms in the wake of COER's complaints about health issues. Well, Island County Commissioners serving on the Island County Board of Health in their deliberations explored land use reform ideas but decided not to do much. Since COER was unsatisfied with the Island County Board of Health's rejection, they went to the State Board of Health. Only to find the State Board of Health was unable to act and two Board Members on their own recognizance recommended the following according to a transcript made of the August 2017 meeting:

- I want to point out that the Island County Board of Commissioners and Island County Board of Health have it within their power to address some of these issues if they so choose to do that. Their decisions to allow building to occur around aircraft have contributed to this. So, I'm not going to let them off the hook for that.
- The plan B and C are not health regulation but growth management, what do we do with growth management and engaging the representative and senators who represent Island County to work with Department of Defense to move this up in their priority.

My point being: The world would be a better place with more Central Whidbey easement investment, *period*.

CONCLUDING THOUGHTS

A day like today, it's not a day for sound bytes really. We can leave those at home. But I feel the hand of history upon our shoulder in respect to this, I really do. I just think we need to acknowledge that and respond to it.

Tony Blair, Former British Prime Minister

Somehow the above Tony Blair quotation seems appropriate. This MOA is hopefully being negotiated to bring Ebey's Reserve and OLF Coupeville together, not to further divide supporters of both. I generally support the current Draft MOA as I consider me a lukewarm supporter of Ebey's NHR and hearty supporter of OLF Coupeville – and feel a balance must be struck.

I ask all consulting parties and all concurring parties – hereafter you – *please* be serious, recognize you can make peace with Kendall Campbell or you can abuse this process to keep waging community conflict. I ask you take those longstanding conflicts regarding FCLP at OLF elsewhere as Kendall's ally and as someone who should be more on the receiving end of your anger as I am a dirtbag political activist and not a career professional public servant with kids at home who may or may not know their mom IS a hero. I suggest you make peace and understand if you ask for more so will I. If some of you want to roll the dice; then the stakes will up for the Ebey's NHR we all seek to protect... and I do not seek *that*. *Thank you.*

From: [REDACTED]
Sent: Thursday, November 01, 2018 10:34:57 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] "Growler 106 MOA Comment"
Auto forwarded by a Rule

Dear Sir,
I am not opposed to the increase Growler training over the Olympic Peninsula.

To me the sound that is made is the sound of freedom!
[REDACTED]
Sequim Wa
[REDACTED]

From: [REDACTED]
Sent: Thursday, November 01, 2018 2:24:27 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Increased Growler Activity Auto forwarded by a Rule

Dear Commander,

While I appreciate the attempt to mitigate the negative effects that your increased growler flights will have on historic structures within and without the Fort Ebey National Historic Preserve, the reality is that no one will want to jeopardize their hearing or mental health by visiting these special places. These flights DO NOT BELONG in a peaceful residential community. Please move your training flights to a remote area in the desert as has been proposed and thus minimize your impact on innocent people trying to live in their homes and communities without a deafening roar overhead.

Sincerely,

[REDACTED]
Langley, WA
[REDACTED]

Sent from my iPad

From: [REDACTED]
Sent: Thursday, November 01, 2018 3:14:07 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

Dear Sir,

We are residents within Ebey's Reserve that will be affected by the potential increase in Growler flights at OLF. We live near OLF, and our home is pretty much directly under the flights, depending on which pattern is being flown.

We were informed and aware of the jet noise when we purchased our home. While it can be quite loud and disturbing, to date we have not found the frequency of the noise to be particularly objectionable. We are huge supporters of our country's military, and understand our pilots need training to be the best they can be, so we accept the noise graciously. We are not part of any small loud minority always calling for the closure of OLF.

We could also understand that due to the needs of the military the number of flights may need to be increased. However, quadrupling the number might be considered an over reach, and inconsistent with the relationship the Navy currently enjoys with the residents of Whidbey/Coupeville.

We do not know all the details of the reasons for the increase in flights, or all that has been discussed in your meetings with local government. From our perspective, however, the Navy is not being particularly understanding of the Coupeville resident's concerns, does not appreciate how we will be negatively impacted, seems to be acting in a heavy

handed manner, and seems unwilling to compromise. We hope that impression is wrong and will change. There must be a mutually acceptable solution.

We are afraid that if the proposed 4x number of flights is approved and implemented it will destroy the current cordial and warm relationship the Navy enjoys with central Whidbey. Residents that support the Navy may very well convert to opposition activists, and this will not be good for our community or the Navy.

Thank you for taking the time to read and appreciate our comments and concerns, and hopefully they will be positively received.

Respectfully,



Coupeville, WA

From: [REDACTED]
Sent: Thursday, November 01, 2018 3:34:48 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

The Navy needs to take into account the detrimental Growler noise impacts, not only on the human populations, wildlife, businesses and communities that depend on a healthy and peaceful environment, but also on the historical character and buildings of downtown Port Townsend and Coupeville. The Navy Growlers are far too loud for human conversation or even outside events and disrupt services and hurt profits for businesses that rely on the historic nature of the town and community.

The Growlers should fly over areas that do not have as high a population as North Central Puget Sound and the Olympic Peninsula. They should fly over Eastern Washington where there are far less people, with far less detrimental impacts to any businesses and historic districts. If they claim to save money by not flying for 10 minutes to Eastern Washington, then they should muffle those Growlers! It is simply unacceptable that the Navy flies such a destructively loud plane with detrimental effects to humans and wildlife!

We have lost all trust in the Navy.



From: [REDACTED]
Sent: Sunday, November 04, 2018 8:44:22 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] draft MOA for Growler expansion on central whidbey island Auto forwarded by a Rule

To whom it may concern:

Please enter these comments into the official record for this Section 106 review for growler expansion on central whidbey island.

My comments are as follows:


1. The Navy has taken no action to minimize the direct effects this expansion will have on the historic landscape of the reserve, it merely throws money at it. It acknowledges its actions will have both direct and indirect impacts on resources, but does not offer up any alternatives to the impacts these larger number of planes and landings will have on those resources. I suggest the Navy consider taking these planes and additional flights elsewhere, to another less populated area, and one that has not been set aside by Congress for future generations to enjoy because of its historical significance, and conducting its training in that location. Eastern Washington comes to mind, where landing fields already exist. The Navy is required by Section 106 to find alternatives to their proposal since adverse effects have been identified, and not simply state it will continue to operate as planned. The Navy needs to make a genuine effort to minimize the effects.

2. It is disingenuous for the Navy to come up with dollar figures for throwing money at projects in the reserve, for signs, or grant programs to fix up historic buildings, without negotiating this with its interested parties. Money is not the answer for addressing the adverse effects of this navy expansion with the growers. The Navy needs to consider doing this training elsewhere. THAT is one alternative for reducing the adverse effects on resources in the Reserve.

3. The Navy, under Section 106, may need to complete additional inventory work to determine any and all resources over 50 years of age, that may have architectural, historical, and/or cultural significance within the area of potential effects, if the existing inventories are not adequate. The state, county and NPS have not completed inventories for cultural resources outside of the Reserve, and with the Navy proposing this action resulting in adverse effects, this inventory work must be completed prior to the completion of an MOA, or any other agreement, in order to fully assess and evaluate what resources will be impacted. This work cannot be done after the Section 106 process: it needs to INFORM the Section 106 process, so the Navy understands all of the resources it is potentially impacting.

4. Even though tribal partners have not responded to requests from the Navy or have chosen not to participate in the Section 106 process for this growler expansion on whidbey island, I encourage the Navy to continue to keep tribal governments informed about the process and decisions throughout this Section 106 process.

Thank you for the opportunity to comment on this project which adversely impacts our nation's significant cultural resources.


Freeland, WA

From: [REDACTED]
Sent: Sunday, November 04, 2018 2:44:17 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Impacts of Proposed Growler Jet Expansion to Historic Properties: Section 106 Process Auto forwarded by a Rule

> Hello:

>

> Below are my comments regarding the Section 106 Process to address the impacts of proposed Growler jet expansion to Historic Properties.

>

> 1) Why did the Navy issue a misleading press release encouraging citizens to comment on a Memorandum of Agreement that has NOT, in fact, been agreed upon by the named partners? The Navy must withdraw this press release and apologize for spreading falsehoods.

> 2) Why wasn't the public invited to comment through a meaningful forum over an appropriate period of time, as required by Section 106 policy, on the noise impacts to historic properties, including those in Port Townsend as well as those in Ebey's Landing National Historical Reserve?

> 3) Why hasn't a plan for a real and measurable reduction of noise been developed with public input regarding the noise impacts to affected historic properties?

> 4) Until a public meeting is conducted in Central Whidbey, the Navy must delay any further mitigation meetings regarding this project.

>
> I am appalled at the level of deceit being exercised and promulgated by the Navy. I expect much higher standards and ethical behavior from our U.S. Military.
>
> I would appreciate being put on the mailing list for this proposed project, and I would like a response to my comments.
>
> Sincerely,
> [REDACTED]
> [REDACTED]
> Clinton, WA 98236

--
[REDACTED]

From: [REDACTED]
Sent: Sunday, November 04, 2018 2:37:16 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler Jet Expansion Program Auto forwarded by a Rule

Commanding Officer, NASWI:

I am writing to request that the Navy withdraw for its recent misleading press release, which invites citizens to comment on a document that has NOT been agreed upon. To call this document a "Memorandum of Agreement" is a fallacy.

Please invite the public to comment in a meaningful forum about Section 106 policy. Delay any further mitigation meetings until a public input meeting is held.

Develop a plan for a real and measurable reduction of noise in an authentic Memorandum of Agreement.

Thank you.

[REDACTED]
Seattle, WA 98144
[REDACTED]

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.
5. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
6. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
7. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
8. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties

From: [REDACTED]
Sent: Friday, November 02, 2018 9:54:52 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Ebey Landing National Historical Reserve Auto
forwarded by a Rule


Please see attached letter regarding the proposed increase of jet traffic
over the Ebey Landing National Historical Reserve.

Thanks,
[REDACTED]

November 2, 2018

Commanding Officer, NASWI

Attn: CRPM


Oak Harbor, WA 98278

Re: Ebey Landing National Historical Reserve

To Whom is May Concern,

My family and I have lived under the OLF flight pattern for 17 years. We are currently building another house under the flight pattern. We have never had any concerns regarding the OLF and the flights at their present level. The jets are part of the experience of living on Whidbey Island that we love. I have never met a service member on Whidbey Island that I did not like. They are a great asset to our community.

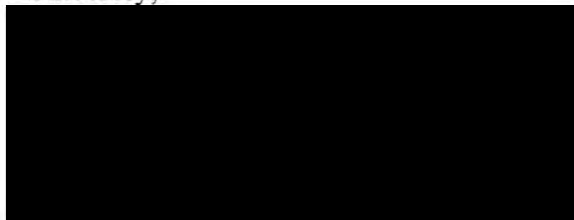
I am however very concerned with the proposed 4-fold increase of jet traffic over our home and the Ebey Landing National Historical Reserve. I think that the proposal is extreme and does not consider the effect that the jets will have on residents and the Ebey Landing National Historical Reserve.

The Ebey Landing National Historical Reserve is an absolute gem of Washington State. The residents of Coupeville have worked extremely hard over the last 40 years to maintain the historic culture of Central Whidbey Island. I am concerned that the Navy officials making the decision to increase the jets have not considered the amount of time, energy and perseverance it has taken the community to build this wonderful and unique place in Washington State. The Navy plans will quickly destroy what it has taken 40 years to build and grow.

I am also concerned that the increase will affect my family and our lives for the worse. I am also concerned that the Navy EIS does not include any decibel level information taken on the ground under a real, actual, Growler flying overhead. I think the conclusion of the EIS would be different if that information was included in the EIS.

I am opposed to the increase of jet traffic over the Ebey Landing National Historical Reserve. I believe the increase would be incredibly detrimental to the residents of Central Whidbey and the Historical Reserve. I do not believe that there is any way to mitigate the damage of any increased jet traffic over the residents of Central Whidbey Island and the Historical Reserve.

Sincerely,



From: [REDACTED]
Sent: Thursday, November 01, 2018 10:22:31 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] MOA comment
Auto forwarded by a Rule

This MOA is meaningless because has not been agreed to by any of the partners. I request that the Navy fully complete all requirements for drafting MOA including agreements from partners. Also do the following:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

[REDACTED]

Langley, WA

From: [REDACTED]
Sent: Thursday, November 01, 2018 11:59:33 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

To the Commanding Officer, NAS Whidbey Island,

My wife and I are owners of a historical property within Ebey's Landing National Historical Reserve. It is listed in the Navy's Section 106 consultation determination document as the [REDACTED]. In this letter I wish to bring to your attention an unexplored Indirect Effect of the Navy's proposal, to our property specifically, but also likely to other properties on the reserve.

Our property is just over 12 acres in size and contains a farmhouse, two large barns (eligible for but not yet on the Washington Heritage Barn Register), and a number of smaller outbuildings all listed as contributing structures in the Ebey's registry. It's a wonderful example of a farm cluster, with a history tied to the early years of Fort Casey.

Our property sits directly underneath the western leg of the flight path used

for carrier landing practice. We are categorized as Noise Zone 2. We are directly across the street from what is referred to in the Section 106 document as the Reuble Farmstead, at which peak sound pressure levels were measured by the Navy at 113 dBA. Jets frequently fly more directly over our property than this measurement point, so I would hazard that our peak dBA levels are a hair higher. As an experiential anecdote, when jets are flying over our farm during FCLP, it is difficult to be outside without hearing protection, outdoor conversation is impossible, and indoor conversation is difficult. Sleep is impossible. When a non-local guest happens to be on our property during FCLP, their memory of the visit is focused on the experience of the jet noise. To a visitor unfamiliar with the practice, the physical experience of it is shocking and notable, and highly discordant when contrasted with the beauty of the property and the landscape. I should note that as historical structures, our buildings lack modern soundproofing.

Since we first discovered it many years ago, my wife and I have been in love with the unique beauty of Ebey's Landing, and appreciative of the ongoing stewardship and preservation efforts that have maintained it as such a special place. When we discovered this property for sale, we were excited by the chance to contribute to the mission of Ebey's Landing.

Most of the structures on our farm were in dire need of repair, but we saw in them an opportunity to transform it in a way that would justify the expense of restoration, turning the property into a Country Inn and retreat center, preserving the historical buildings by using the economic resource of the visitors who want to spend time around them and in the reserve. We are in the early stages of this restoration now, having already invested a substantial amount of money in repairs to the property over this past year, but with years of work and further investment still ahead of us in order to reverse the pull of entropy, and a lifetime of stewardship after that to maintain it and pass it along to our children as a living place rather than as a deteriorating historical relic.

The plain fact of Ebey's Landing is that it exists within our National Park system not in order to be kept in stasis for its own sake, but because it is a resource that is meant to be inhabited and visited and enjoyed, and it's that fact that provides the economic resources and justifies the expense of this preservation and maintenance. Maintaining and preserving historic buildings is expensive. It's not a matter of just leaving them alone and making sure the noise doesn't damage them. The mission of Ebey's Landing demands continual participation and investment, investment that in some cases is only possible because of tourism, which seems to me to be an unsolvable conflict in regards to compatible use as expressed by the Navy. An Ebey's Landing kept in stasis without the visitors is not fulfilling its fundamental mission.

The Navy's plan, as recently expressed and with the currently proposed mitigation measures, threatens to deal a heavy blow to tourism in Ebey's Landing. It squanders the economic resource required to preserve and maintain this and other historic properties with similar models that rely on tourism, such as Jenne Farm and Crockett Barn. The overall increase in the number of flights may or may not be manageable as an experiential matter for residents, but a withdrawal of the Navy's previous courtesy of not flying on weekends

would utterly doom any tourism based business, because no tourist would ever willingly endure without complaint the noise we experience.

In your recent letter in the Whidbey News-Times, you said that at previous levels jets were operating about 1% of the time. Spread out evenly that means roughly 15 minutes a day, or an hour every 4 days or so. Quadrupling that to 4% doesn't sound so bad expressed as a percentage, but spread out evenly that becomes potentially an hour every single day.

The distribution of those flight hours matters enormously, and compromise and clarity about that distribution is the most meaningful mitigation I can think of outside of simply reducing the number of proposed flights. Every day the jets are flying is one that we couldn't reasonably schedule guests or events at our property. In our case, a commitment to not fly on weekends means the difference between being able to generate the resources to repair and maintain our historic structures, or not.

Thank you for your consideration.


Coupeville, WA 98239

From: [REDACTED]

Sent: Thursday, November 01, 2018 11:36:58 PM

To: NAVFAC NW CR

Subject: [Non-DoD Source] 106 Forum

Auto forwarded by a Rule

The public input is supposed to be an integral part of this process. This must take place before further action.

[REDACTED]

Coupeville WA
98239

From: [REDACTED]
Sent: Thursday, November 01, 2018 11:03:28 PM
To: NAVFAC NW CR
Cc: Rep. Rick Larsen
Subject: [Non-DoD Source] Growler jet expansion NAS Whidbey Island - proper agreements and impacted partners Auto forwarded by a Rule

Dear Commending Officer, NASWI,

It has come to my attention that you have releases a misleading draft Memorandum of Agreement that has not been agreed to by all parties concerning impact of your proposed Growler jet expansion the historic properties of Ebey's Landing National Historical Reserve (the Section 106 Process). Also, after many requests for the public process - there has been no response from you.

I am requesting that you withdraw your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon, hold a public comment forum concerning the historic properties, including those of Port Townsend, delay any further mitigation meetings until a public meeting occurs in Central Whidbey and Develop a plan for a real and measurable reduction of noise in an agreed MOA for our historic properties.

Please respond to my request.

Regards,

[REDACTED]

Coupeville, WA 98239

[REDACTED]

From: [REDACTED]
Sent: Thursday, November 01, 2018 6:29:01 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

To: Commander, NAS Whidbey Island and other interested Navy officials

I have read the draft MOA (Section 106 NASWI Growler Expansion) but can find no record of input from the other Federal and private signatories, and no offer from the Navy to mitigate the acknowledged adverse impacts, especially those which are related to excessive noise. This failure on the part of the Navy to consult in good faith to mitigate the acknowledged adverse impacts is particularly significant in this case because of the very essence of the Historic Reserve. What I mean is that even more than its natural and historic assets, it is the sensory ambiance associated with the Reserve, the sense of quiet that pervades the place, that sets the Reserve apart and makes it special.

If the residents of the Reserve were the only population adversely affected, then the Navy should at minimum agree to soundproof all of the structures included within the Reserve that fall within or border on the noise contours

in the EIS, as defined by actual, not modeled or averaged, noise levels. But those residents are not the only people adversely affected by the proposed expansion. Harmed as well will be the thousands of visitors who come to Coupeville precisely to experience the sensory ambiance described above. When the 36 new growlers take to the air, that experience will be shattered forever, and the purposes of the Reserve will be permanently undermined.

For these reasons, I would recommend the following:

1. Maintain operations at OLF Coupeville at current levels.
2. If FCLP operations need to be increased, conduct those additional operations at Ault Field. If this conflicts with other operations at Ault Field, move those operations and squadrons to other locations. (This is a safety as well as a noise issue).
3. Failing that, agree to thoroughly and effectively soundproof all structures in and out of the Reserve boundaries that fall within or border on the noise zones referred to above.
4. When conducting daytime operations at OLF Coupeville, do so only from 1100 to 1300 hours, when many visitors will likely be at lunch.
5. Agree not to fly at OLF Coupeville on Coupeville- and Reserve-designated special event days. In addition agree not to fly on any Sunday.
6. Construct and staff visitor centers at all major entrances to the Reserve for the purpose of distributing noise-cancelling headphones, equal in effectiveness to those used by Navy personnel in similarly loud environments, on the days when the planes fly.
7. Provide the same headphones to all residents - and to all workers - within the aforementioned noise zones.
8. Do not fly past 2200 hours.
9. Conduct psychological and physiological training and treatment as necessary for individuals living and/or working within or bordering on the aforementioned noise zones.

Doing these things - and others you no doubt can suggest - will go along way to helping the Navy be the good neighbor it wants to be.

██████████

Coupeville

From: [REDACTED]
Sent: Thursday, November 01, 2018 6:22:26 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

To Commanding Officer, NASWI -

I have read the MOA, which seems to be very much in draft form, and incomplete. I see no comments or agreements by any stakeholders other than the Navy.

By the Navy's own admission, significant noise impacts to the Reserve will occur with expansion of Growler operations.

The only honest mitigation of this impact is reduction of noise. Sound-proofing buildings does not address the impact on the sound ambience of the Reserve which is among its most important features.

Mitigations proposed by the Navy are irrelevant; it will make little difference when the thousands of visitors who now come to Central Whidbey will go elsewhere because of the noise. A "Cultural Landscape Inventory"? A "Southern Gateway Entry Sign"? Who will care if no one can be outside for any significant amount of time because of the noise. "Navy Volunteer Collaboration"? All these are meaningless tokens.

Instead, the Navy should keep the FCLP operations at OLF and Ault Field at current levels, and use other sites, also at tolerable levels, for additional operations as needed. Spread the responsibility around instead of over-burdening one region.

I appreciate the opportunity to comment. It's the Navy's turn, now, to do the right thing.

Respectfully,

A solid black rectangular box used to redact the signature of the sender.

Coupeville

From: [REDACTED]
Sent: Saturday, November 03, 2018 3:09:04 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Section 106 Process for Ebey's Landing, Whidbey Island Auto forwarded by a Rule

Dear Commanding Officer, NASWI

The Department of Defense must address the impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve through the "Section 106 Process." This process requires any federal agency to first REDUCE and MINIMIZE the impact of their proposal on historic structures. I am appalled that the Navy is attempting to circumvent this process by your underhanded and deceptive release of a draft Memorandum of Agreement (MOA) to which none of the affected partners have agreed.

Whidbey Island has put up with a lot to have the Navy as a neighbor with the relentless noise of your operations and the pollution of the water supply. You do not have the right to now destroy the historic and unique nature of this island. I am joining my neighbors in demanding that you:

1. Withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been developed with

all the affected parties and to which they have agreed.

2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties.

3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement for our historic properties.

Regards,



Coupeville, WA

From: [REDACTED]
Sent: Friday, November 02, 2018 8:47:31 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler Expansion of Operations at OLF Coupeville Auto forwarded by a Rule

I would like to express my experience with Growler operations while we lived temporarily (6 months) at North Whidbey RV Park from January 2016 to July 3016.

One of the approach patterns to NAS Whidbey Island took the aircraft directly over the RV Park and generated an incredibly loud noise level which required us to place our hands over our ears or use ear protection while outdoors. Indoors was not much different and required us to cease communications we were having or pause any TV or use of other audio devices for the duration of the operations. The noise level was so terribly high that the RV Park had to alert anyone planning to stay at the park of the noise levels they may encounter. I don't have any specific scientific noise level device measurement readings, but it was absolutely deafening beyond imagination. Personally our reaction to exposure to this noise level was increased irritability and headaches. Had we been able to relocate to another location in northern Whidbey Island while searching for a home, we most certainly would have, had options been available.

The consequence of our experience with Growler operations affected our home search in conjunction with other criteria. We settled in Coupeville at 339 Marine Drive. We do experience occasional Growler noise when operations at OLF Coupeville have their take off or landing patterns operate over our neighborhood. The frequency of this however is minuscule in comparison to my experience living at the RV Park. The noise level is however equivalent and is more

variable for reasons I am not certain. I've witnessed that on numerous occasions during practices, some Growlers make their landing approach much louder and the same is true for their take offs. Although weather conditions appear to be the same, their acceleration and subsequent noise levels vary greatly. This experience leads me to believe that there is an element of pilot choice happening which may or may not be required. Why during the same exercises are some approaches and departures generating notably higher noise levels? Where discretion is an option, I believe there are some pilots who enjoy "hot-dogging" (my term) on occasion without regard to those below who are affected.

A 4 fold increase in operations at OLF Coupeville can easily make our living experience in our home a nightmarish situation mimicking our experience at the RV Park. In addition, the indisputable severe decline in our home values makes this an extremely distressing eventuality for us.

We beg that you review this proposal with far greater detail given to impacts to our health (hearing) and our residential values. I've failed to read anything which suggests proactive measures proposed to establish operational standards for pilots to minimize noise level impacts to the residents. Nor have I seen any measurement devices proposed to be placed in the area that will be used on a proactive basis to ensure your pilots adhere to these standards.

I appreciate all that our Armed Forces do day in and day out to protect America and that such protection does come at a price. I am recommending that a proposed increase in Growler activity at OLF Coupeville more thoroughly include residential financial impact analysis, health concerns and a comprehensive proposal on what standards would be established with corresponding measurements to ensure pilot adherence. Furthermore, that all measurements, deviations from established standards and corrective actions be made public on a regular basis no less than quarterly to the residents or a representative council of all affected areas.

I greatly appreciate your time in reviewing this and look forward to more comprehensive discussions whereby all parties affected reach resolution to support both our needs.

Sent from my iPhone

From: [REDACTED]
Sent: Friday, November 02, 2018 6:06:09 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comments on Sec. 106 NHPA - NASWI Auto forwarded by a Rule

Dear Sirs:

With respect to the above MOA:

1. Withdraw and apologize for the Navy's recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs

in Central Whidbey.

4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Thank you.

[REDACTED]

[REDACTED]

Greenbank, WA 98253

[REDACTED]

From: [REDACTED]
Sent: Friday, November 02, 2018 5:25:41 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] ATTN: CRPM: Failure to honor Section 106 Auto forwarded by a Rule

Dear Commanding Officer, NASWI,
As a Federal Agency, the Navy is REQUIRED to first REDUCE and MINIMIZE the impact of their proposal on historic structures. You have failed to develop plans to do this. You have released a draft Memorandum of Agreement (MOA) that none of the partners have agreed to. Although you listed the partners, the publication was a total surprise to the partners and its contents outrageously misleading. The partners have not made any such agreement with you.

For months, all levels of leadership in our state have asked you repeatedly for a public meeting on the historic properties affected by the Section 106 Growler Expansion Plan, which is required by the federal process. Your response has been complete silence. No public meeting has been scheduled.

You need to:

1. Withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.




From: [REDACTED]
Sent: Friday, November 02, 2018 12:45:55 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve. This is called the "Section 106 Process".
Auto forwarded by a Rule

it seems that due process has been neglected. i ask that the navy:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

thank you for your compliance w our laws,

regards,


seattle, wa

From: [REDACTED]
Sent: Friday, November 02, 2018 1:33:36 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Expansion of Growler Program in Olympia Mountains
Auto forwarded by a Rule

We certainly understand how easily we all can be persuaded that our country faces imminent threats from abroad. However, an overly expanded military constitutes a threat from within our country.

The Olympic Mountains are a refuge not only for flora and fauna, but for citizens as well. We are backpackers and thoroughly enjoy the peace, quiet, and tranquility of the Olympia National Park. Now you are proposing to destroy even that last vestige of peace and quiet. Unfortunately, that reflects poorly on the military and places you in the category of the enemy.

How easily it all could be avoided. Use the firing ranges you already have. Do not force us to oppose you who are looking out for our security. Let's be friends.



From: [REDACTED]
Sent: Friday, November 02, 2018 12:14:41 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] MOA - National Historic Preservation Auto
forwarded by a Rule

To: Commanding Officer, NASWI

Dear Sir,

It is with a sad heart that I write this email. It was triggered by receiving an email from the Sound Defense Alliance regarding the release of a draft MOA by your staff which was not agreed to by your civilian partners, nor were they given prior notification of the release or contents of the MOA.

As the son of a 30 year career officer, the brother of one of his career officer sons who was killed in Vietnam, the uncle of a former commander of the Blue Angles, and a Vietnam era vet myself, I am very supportive of the military and the many men and women who have chosen to defend and protect our country. That said, I am greatly disappointed by the premature release of the MOA and the lack of your staff's apparent unwillingness to schedule a public meeting to discuss and receive input on the draft or the Growler Expansion Plan.

It is not respectful of the people who live in this community. Also presenting it in the de-facto manner that was used implies that your "partners" agree with the proposal, when they clearly do not. Even if it was done without any negative intent, the optics of a release of the draft MOA in this manner, creates the appearance of a lack of empathy and concern for the legitimate input from representative groups and the citizens of Whidbey Island, Anacortes, the San Juan Islands and beyond.

Please withdraw the MOA, and work a spirit of co-operation with your civilian partners just as you would with our military allies and partners. Teamwork is the anchor and hallmark of the US Military; please deal with our community in that spirit.

We all win if you do.

Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, November 02, 2018 12:06:17 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment Auto forwarded by a Rule

Commanding Officer

NAS Whidbey Island

Attn: NASWI CR PM

I am a Whidbey Island home owner and year-round resident. I strongly object to the Navy's plan to bring 32 new Growlers to the island and increase the Growler operations at Outlying Field Coupeville (OLF) Whidbey from 6,510 to 24,100 per year – a four fold increase.

OLF Whidbey resides on the edge of Ebey's Landing National Historic Reserve – an area designated to preserve the historical and agricultural traditions of this historic, working landscape. How and when can this area be enjoyed with at least 66 Growler operations per day occurring? I have been at Fort Casey with out-of-state visitors when Growlers were flying. The noise was so loud and painful we had to leave the park.

I am also concerned about safety. Civilians driving on the Highway 20 are put at grave risk from Growlers practicing aircraft carrier landings mere yards away. Also, chemicals used on OLF have already polluted local wells.

All in all, this new plan will have a negative impact on the quiet peaceful life Whidbey Island has afforded. Further, it will decrease property values. Who, other than Navy personnel, will be willing to buy a home in an area where they are subjected to 24,100 Growler operations a year!

I offer this suggestion: Use retired aircraft carriers for these practices. Take the noise and danger off the island out into the ocean for a truly realistic practice environment.

Thank you,

[REDACTED]

[REDACTED]

Freeland, WA 98249

[REDACTED]

From: [REDACTED]
Sent: Friday, November 02, 2018 11:24:20 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comment on Section 106 Policy Auto forwarded by a Rule

Hello,

I am greatly disturbed that the Navy did not follow the appropriate public process, ignoring the Section 106 process dealing with their plan to increase the number of Growler planes on Whidbey Island Navy base.

The Navy must reduce and minimize their impact of their Growler increase proposal in regard to historic structures, such as Ebey's Landing National Site and Port Townsend. None of the historic organizations, the collaborating partners agreed to the Navy's "Memorandum of Agreement". The partners must be involved in the process. Proper procedure must be followed by the Navy with the collaborating partners (historic organizations), including Port Townsend, in regard to Section 106 policy.

Thank you.



Lopez Island, WA

From: [REDACTED]
Sent: Friday, November 02, 2018 11:20:04 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comment on Section 106 Process for Growler increases on Central Whidbey Island Auto forwarded by a Rule

It is my understanding that the Navy has not properly followed and complied with requirements addressing the impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve with the Partners involved.

Please:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Thank You



Coupeville Resident

From: [REDACTED]
Sent: Monday, November 05, 2018 8:15:51 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] MOA plan. Must develop one for Whidbey Island Auto forwarded by a Rule

The Olympic Peninsula is a treasure and life all the way around is being threatened by Growler activities. Please desist and develop the MOA plan required by law!

Thank you for your effort to generate this plan.

[REDACTED]

Rainier, WA

From: [REDACTED]
Sent: Sunday, November 04, 2018 8:51:45 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comments Auto forwarded by a Rule

Please consider these comments as a general criticism of the Navy as a very poor neighbor. You have lacked transparency and been guilty of forging ahead with growler expansion despite local concerns over noise.

This proposal is totally insufficient as a repair plan or response to all the noise that current and future growlers produce. Please move this base to a place less populated and environmentally sensitive. No amount of money or manpower can repair the damage. The navy is ruining tourism and property values. Really ridiculous to even propose this lame plan.

[REDACTED]
Port Townsend Washington 98368

“Facts are stubborn things; and whatever may be our wishes, our inclinations, or the dictates of our passion, they cannot alter the state of facts and evidence.”

— John Adams

From: [REDACTED]
Sent: Sunday, November 04, 2018 5:02:25 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comment on Growler jets on Whidbey Island Auto forwarded by a Rule

I am writing to comment on the process that is being used to bring more Growler jets to Whidbey Island.

I urge you to engage in a fair and accepted practice to move forward in this process.

Recently the Navy has misled the public by asking them to comment on a document that has not been agreed upon by all relevant parties. I urge the Navy to withdraw this document and apologize for moving forward without negotiation and inclusion

I urge the Navy to schedule and invite the public to comment over an appropriate period of time and to include other appropriate properties such as Port Townsend.

I urge the Navy to develop real and measurable reduction of noise per MOA for our historic properties and hold public meetings for comment.

I have recently gone hiking in the Deception Pass area and have noticed a marked increase in noise. Please give us a fair chance to affect your decisions.

Thank you,



Custer, WA 98240

From: [REDACTED]
Sent: Monday, November 05, 2018 9:18:20 AM
To: NAVFAC NW CR
Cc: [REDACTED]
Subject: [Non-DoD Source] Section 106 Process Auto forwarded by a Rule

I am actively asking the Navy to reconsider the number of Growler flights that they are proposing on Whidbey Island. I am also asking you to:

Withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Sincerely,

[REDACTED]

[REDACTED] Coupeville

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Saturday, November 03, 2018 1:02:32 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Navy Growler operations Auto forwarded by a Rule

<<http://files.constantcontact.com/f1c93a4d401/4deb7570-97a1-4b95-8298-da931a3584e1.png>>

The Navy is trying to push through its Growler jet expansion program without proper agreements

<<http://files.constantcontact.com/f1c93a4d401/a89ecfd0-3b6b-4029-931f-1ec7edeafe55.jpg>>

The Department of Defense must address the impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve on Whidbey Island. This is called the "Section 106 Process". This process requires any federal agency to first REDUCE and MINIMIZE the impact of their proposal on historic structures. The Navy has failed to develop plans to do so.

In an unprecedented move, last week the Navy released a draft Memorandum of Agreement (MOA) that none of the partners have agreed to. Although the Navy listed the partners, the publication was a total surprise to the partners and its contents outrageously misleading.

The Collaborating Partners - State Historic Preservation Officer, Mayor of Coupeville, Mayor of Port Townsend, Reserve Manager, Ebey's Landing National Historical Reserve- the Ebey's Trust Board, the National Park Service, Island County Commissioner, and the President of Citizens of Ebey's Reserve (COER) – have not agreed to the Navy's "Memorandum of Agreement."

For months, all levels of leadership in our state have asked the Navy repeatedly for a public meeting on the historic properties affected by the Section 106 Growler Expansion Plan, which is required by the federal process. Silence. No meeting has taken place nor been scheduled.

The Navy has ignored the appropriate public process by not hosting a public meeting to explain the MOA or the purpose of a Section 106. They are currently asking the public to comment on a MOA that is meaningless because has not been agreed to by any of the partners. They are sending people to a website to comment on an irrelevant document. This action does not honor public process and cannot be allowed to go unchallenged.

PLEASE TAKE ACTION NOW

Join us in asking the Navy to:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

To Navy decision-makers-

I am writing to ask you to:

1. withdraw and apologize for your misleading press release that encourages citizens to comment on a non-agreed document.
2. invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in central Whidbey.
4. develop a plan for a real and measurable reduction in an agreed MOA for our historic properties.

Please act in a way that stewards our communities and environment!

[REDACTED]

From: [REDACTED]
Sent: Saturday, November 03, 2018 8:12:31 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler MOA
Auto forwarded by a Rule

Dear Madam/Sir,

It strongly appears that your Memorandum of Understanding regarding increased Growler use of Ebey's Landing Reserve is a total farce. No one except the Navy had any input much less "agreement" to your document. That is a false and misleading process by the Navy. Please withdraw and apologize for this coarse attempt at a required public process.

As a citizen, taxpayer and interested member of the community, I call on you to have the necessary public, open and publicized meeting as stipulated in Section 106.

Trampling citizen's rights is patently wrong. Please stop bullying and start acting like responsible adults.



Port Townsend, WA

From: [REDACTED]
Sent: Saturday, November 03, 2018 5:09:08 AM
To: NAVFAC NW CR
Cc: [REDACTED]
Subject: [Non-DoD Source] Section 106 National Historic Preservation Act Auto forwarded by a Rule

It is with great concern, and passion, that I submit this response to the Section 106 Process conducted in regards to the impact of the touch and go operations proposal for increased flights at OLF Coupeville addressing the impact of this proposal on historic structures in Ebey's Landing National Historical Reserve.

The deafness, and lack of regard and respect, to our community reflects poorly on the Navy that exists to protect the citizens of the United States. This process requires that all federal agencies must reduce and minimize the impact of their proposal on historic structures, you have not. As a lifelong resident of Coupeville I have devoted many years to "preserving and protecting" our community, history and National Historical Reserve. I will not abdicate that moral obligation and call to question what is happening in our Reserve is but an example of what is happening in our country. I expect more.

We advocates for the survival of our lives, community, and historic properties, in our sacred Reserve, ask that you:


*Withdraw and apologize for a recent misleading press release that encourages citizens too comment on a document that was not agreed upon.

*Invite the public to comment in a meaningful forum and over an appropriate period of time per kSection 1065 policy, on historic properties.

*Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

*Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement for our historic properties.

This violation of our legal process, and rights, is unacceptable.


Coupeville

* Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

* Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

* Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

* Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

* Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

* Invite the public to comment in a meaningful forum and over an appropriate period of time per

*

* Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

* Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

* Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

* Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

* jjWithdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

* Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

* Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

* Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Section 106 policy, on the historic properties, including those of Port Townsend.

* Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

* Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

From: [REDACTED]
Sent: Saturday, November 03, 2018 2:38:44 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comments on Navy's Draft National Historic Preservation Act Section 106 Memorandum of Agreement for EA-18G Growler Operations Increase at NAS Whidbey Island Auto forwarded by a Rule

The Department of Defense must address the impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve on Whidbey Island. This is called the "Section 106 Process". This process requires any federal agency to first REDUCE and MINIMIZE the impact of their proposal on historic structures. The Navy has failed to develop plans to do so.

In an unprecedented move, last week the Navy released a draft Memorandum of Agreement (MOA) that none of the partners have agreed to. Although the Navy

listed the partners, the publication was a total surprise to the partners and its contents outrageously misleading.

The Collaborating Partners - State Historic Preservation Officer, Mayor of Coupeville, Mayor of Port Townsend, Reserve Manager, Ebey's Landing National Historical Reserve- the Ebey's Trust Board, the National Park Service, Island County Commissioner, and the President of Citizens of Ebey's Reserve (COER) - have not agreed to the Navy's "Memorandum of Agreement." The Navy has ignored the appropriate public process by not hosting a public meeting to explain the MOA or the purpose of a Section 106. They are currently asking the public to comment on a MOA that is meaningless because has not been agreed to by any of the partners.

I want to ask the Navy to:


- . Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

- . Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

- . Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

- . Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties

Thank you for your attention to and rectification of these matters,


Penn Valley, CA

From: [REDACTED]
Sent: Friday, November 02, 2018 8:56:53 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] No more growlers Auto forwarded by a Rule

I'm commenting on the "Section 106 National Historic Preservation Act". This is no way allowing the public to participate in our country's vital aspects. The Navy has failed to make a plan to protect our historical structure (not to mention the noise destroying vital habitat and peoples homes). The Navy writes a MOA, but there is no agreement with any of the partners. The Navy should apologize and withdraw any such papers - this is a mockery of democracy. If you want to do it correctly - invite the public to truly participate; invite the partner to participate; delay any mitigation meetings until the process is complete with full participation (especially Whidby Island and Port Townsend) and most importantly the Navy needs to develop a REAL plan for measurable noise reduction and make it part of the MOA . Time for the navy to follow the rules of democracy, along with everyone else, otherwise our democracy is a sham.

[REDACTED]
Port Townsend

The Department of Defense must address the impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve on Whidbey Island. This is called the "Section 106 Process". This process requires any federal agency to first REDUCE and MINIMIZE the impact of their proposal on historic structures. The Navy has failed to develop plans to do so.

In an unprecedented move, last week the Navy released a draft Memorandum of Agreement (MOA) that none of the partners have agreed to. Although the Navy listed the partners, the publication was a total surprise to the partners and its contents outrageously misleading.

The Collaborating Partners - State Historic Preservation Officer, Mayor of Coupeville, Mayor of Port Townsend, Reserve Manager, Ebey's Landing National Historical Reserve- the Ebey's Trust Board, the National Park Service, Island County Commissioner, and the President of Citizens of Ebey's Reserve (COER) - have not agreed to the Navy's "Memorandum of Agreement."

For months, all levels of leadership in our state have asked the Navy repeatedly for a public meeting on the historic properties affected by the Section 106 Growler Expansion Plan, which is required by the federal process. Silence. No meeting has taken place nor been scheduled.

The Navy has ignored the appropriate public process by not hosting a public meeting to explain the MOA or the purpose of a Section 106. They are currently asking the public to comment on a MOA that is meaningless because has not been agreed to by any of the partners. They are sending people to a website to comment on an irrelevant document. This action does not honor public process and cannot be allowed to go unchallenged.

PLEASE TAKE ACTION NOW

Join us in asking the Navy to:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Click here to link to the MOA

<

NW Washington communities have been partners with the military in protecting our national security. The latest proposals by the DoD dramatically increase the number of Growler jets and flights - putting us all at risk. It's time we stand up for our communities. It is time to say no new jets, no new flights. For information: sounddefensealliance.org

<[3](http://r20.rs6.net/tn.jsp?f=001QHME7HnrddZZVswEnRgE6gTiVC8pFBqPxt5v0KLYXyNWPPmMdOgbUSYwrmNX2EBK8VeuLRdnoYcMhKhtf2Knc3alyHLg59cQzGSv0jO2EDllyoZTMZa6PkClq-1GNQNRspserfdJkERNc90JZnncCy4hdmvAQsQ&c=xlvqKg2J6kjm1kTuQYLrLtgjzvXGQdTqv0Nlz4OkvU5P-9ZuQXC4A==&ch=rMNVG4q1YJcqy3i8HnpO9iZFDILSrdUnJp-ic7OZjls2Er0qPo8CQw==> .</p></div><div data-bbox=)

From: [REDACTED]
Sent: Friday, November 02, 2018 6:53:51 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler Jet Expansion Program Auto forwarded by a Rule

Commanding Officer, NASWI

I live in western WA and am appalled at what the Navy is proposing to do with the growler jet expansion plan. I am against this plan in general and especially without including public input.

I respectfully request the Navy to:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including Port Townsend.

3. Delay any further mitigation meeting until a public meeting occurs in central Whidbey.


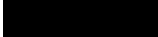
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

It is time for the Navy to be a good neighbor!

Sincerely,

A large black rectangular redaction box covering the signature area.

Creator of The Walking Way: Stepping Into Awareness (6-CD Audio Series)

P.S. I wanted to remind you of my weekly 
 Please see my Calendar page.

Notice of Confidentiality: This e-mail/fax message and any attachments are intended for use only by the addressee(s) and may contain privileged or confidential information. Any distribution, reading, copying or use of the communication and any attachments by anyone other than the addressee(s) is strictly prohibited and may be unlawful. If you have received the email in error, please immediately notify me by email; please permanently delete the original and destroy any copies or printouts of this email or attachments.

For Patients: When you choose to communicate Patient Identifiable Information by responding to this email, you are consenting to the associated email risks. Please note email is not secure, and I cannot guarantee that information transmitted will remain confidential.

From: [REDACTED]
Sent: Friday, November 02, 2018 4:50:56 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Do Not Deceive Auto forwarded by a Rule

I am referring to the MOA you recently released concerning your Growler expansion program. You released this MOA inferring that the Collaborating Partners had not only seen the contents of it but had agreed to it. Rather than being forthcoming with the public or even simply following the required regulations, you refuse to meet with the public or the Collaborating Partners on this issue. Please remember that you serve the public. You are public servants. I live in Port Townsend and have felt and heard the Growlers more than I like. But primarily I am concerned about the impact on historic monuments as well as the income to our town. We depend on tourist dollars and the increased noise is already bothersome.

Please at least follow the regulations and meet with the public or at least with the Collaborating Partners you pretend to be collaborating with. Try not to treat us with such disdain.

Yours truly,



Someone who feels like a pebble under your gigantic wheels.

From: [REDACTED]
Sent: Friday, November 02, 2018 4:39:22 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] comment on the Growler expansion program Auto forwarded by a Rule

To Commanding Officer, NASWI,

I am a concerned citizen who frequents the Olympic National Park and nearby islands as tourist, camper and hiker. I am dismayed and frankly infuriated by the navy's cavalier attitude and handling of the Growler expansion program.

I ask that they:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Thank you for your consideration,



Vashon, Wa
98070

From: [REDACTED]
Sent: Friday, November 02, 2018 4:29:17 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Section 106 Process for Ebey's Landing Auto forwarded by a Rule

Dear Department of Defense and U.S. Navy,

You have asked the public to comment on a MOA regarding the impact of the proposed Growler jet expansion on the historic properties of Ebey's Landing National Historical Reserve on Whidbey Island.

I was dismayed to learn that the MOU has not been agreed to by any of the Collaborating Partners - State Historic Preservation Officer, Mayor of Coupeville, Mayor of Port Townsend, Reserve Manager, Ebey's Landing National Historical Reserve- the Ebey's Trust Board, the National Park Service, Island County Commissioner, and the President of Citizens of Ebey's Reserve (COER). I am also greatly concerned that the Navy has ignored the appropriate public process by not hosting a public meeting to explain the MOA or the purpose of a Section 106.

I encourage you to withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon. I have followed this issue of the expansion of Growlers on Whidbey closely, and commented previously multiple times. It is essential for you to involve the public in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend. Although I and many others have written many letters and attended your forums expressing concerns about

the noise and the environmental effects of an expansion of Growlers on Whidbey Island, I do not believe these concerns have been heard.

It is very important to our communities that you develop a plan for a true and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties, wildlife, and local communities.

Sincerely,

A black rectangular redaction box covering the signature of the sender.

Port Townsend, WA 98368

cc. Representative Derek Kilmer
Senator Maria Cantwell
Senator Patty Murray

From: [REDACTED]
Sent: Friday, November 02, 2018 4:03:14 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] NOISE
Auto forwarded by a Rule

Hi:

Its pretty simple.....you the navy need to

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Appreciate your consideration in addressing these issues.

[REDACTED]

[Redacted]

Coupeville, WA
98239

[Redacted]

From: [REDACTED]
Sent: Friday, November 02, 2018 3:55:28 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Public Comment, Growler Airfield Operations, Coupeville NAS, Whidbey Island Auto forwarded by a Rule

Dear Commanding Officer, NASWI, Attn: CRPM

Is the Navy avoiding from public consultation on the proposed expansion of Growler flights from Coupeville NAS? Is the Navy trying to mislead folks into believing that a unilateral MOU was prepared in consultation and agreement of the apparent signatories? Does the Navy intend to steamroll the locals and expand Growler operations no matter what the public thinks? Does the Navy intend to violate the law? Sadly, it seems that the answer to all of these questions is "Yes."

I think the Navy should:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon;

2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend,
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey; and
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties

Thank you for considering my opinion.



From: [REDACTED]
Sent: Friday, November 02, 2018 3:55:28 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Public Comment, Growler Airfield Operations, Coupeville NAS, Whidbey Island Auto forwarded by a Rule

Dear Commanding Officer, NASWI, Attn: CRPM

Is the Navy avoiding from public consultation on the proposed expansion of Growler flights from Coupeville NAS? Is the Navy trying to mislead folks into believing that a unilateral MOU was prepared in consultation and agreement of the apparent signatories? Does the Navy intend to steamroll the locals and expand Growler operations no matter what the public thinks? Does the Navy intend to violate the law? Sadly, it seems that the answer to all of these questions is "Yes."

I think the Navy should:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon;

2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend,
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey; and
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties

Thank you for considering my opinion.



From: [REDACTED]
Sent: Friday, November 02, 2018 3:13:15 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comment on Section 106 Process for Growler increases on Central Whidbey Island Auto forwarded by a Rule

Please:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed

Memorandum of Agreement (MOA) for our historic properties.

Thank You



Coupeville Resident

From: [REDACTED]

Sent: Friday, November 02, 2018 2:59:40 PM

To: NAVFAC NW CR

Subject: [Non-DoD Source] Re: Memorandum of Agreement for EA-18G Growler Operations Increase at NAS Whidbey Island Auto forwarded by a Rule

To Whom It May Concern:

I am just writing because the recent announcement of an MOA regarding the PROPOSED Growler Operation Increase felt like a real missed opportunity to engage community stakeholders in the process—it was misleading, and it felt like the Navy is just planning to bully it's way. The effect is to cement opposition to the Navy's proposal for many community members who are earnestly trying to figure out how to partner with the Navy.

You ought to apologize and honor the process that is in place for making proposals. Start again and address the problems you need to actually address, particularly the requirement to reduce and minimize the impact of the expansion on Ebey's Landing National Historic Reserve.

Best Regards,
[REDACTED]

From: [REDACTED]
Sent: Friday, November 02, 2018 2:50:42 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Impacts of Proposed Growler Jet Expansion to Historic Properties: Section 106 Process Auto forwarded by a Rule

Hello:

Below are my comments regarding the Section 106 Process to address the impacts of proposed Growler jet expansion to Historic Properties.

- 1) Why did the Navy issue a misleading press release encouraging citizens to comment on a Memorandum of Agreement that has NOT, in fact, been agreed upon by the named partners? The Navy must withdraw this press release and apologize for spreading falsehoods.
- 2) Why wasn't the public invited to comment through a meaningful forum over an appropriate period of time, as required by Section 106 policy, on the noise impacts to historic properties, including those in Port Townsend as well as those in Ebey's Landing National Historical Reserve?
- 3) Why hasn't a plan for a real and measurable reduction of noise been developed with public input regarding the noise impacts to affected historic properties?
- 4) Until a public meeting is conducted in Central Whidbey, the Navy must delay any further mitigation meetings regarding this project.

I am appalled at the level of deceit being exercised and promulgated by the Navy. I expect much higher standards and ethical behavior from our U.S. Military.

I would appreciate being put on the mailing list for this proposed project, and I would like a response to my comments.

Sincerely,

A black rectangular redaction box covering the signature of the sender.

Clinton, WA 98236

From: [REDACTED]
Sent: Friday, November 02, 2018 2:48:11 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Section 106
Auto forwarded by a Rule

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend, and the San Juan Islands
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

How dare you put forward an incredibly incomplete MOA. Navy hubris as usual. You amaze me.



Coupeville WA
98239

From: [REDACTED]
Sent: Friday, November 02, 2018 2:40:59 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Comments: Navy's Draft National Historic
Preservation Act Section 106 Memorandum of Agreement for EA-18G Growler
Operations Increase at NAS Whidbey Island Auto forwarded by a Rule

Commanding Officer, NASWI

Attn: CRPM

[REDACTED]
Oak Harbor, WA 98278

Sir:

I ask that the Navy withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon. I further ask that you invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

In the meantime, please delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

The Navy needs to develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

██████████

Olympia WA

From: [REDACTED]
Sent: Friday, November 02, 2018 2:42:01 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Sound Assault weapons Auto forwarded by a Rule

It is time for the Navy to halt using sound assault weaponry on the people of this country, specifically the Growler jets. I ask that you:

1. Withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

You are harming the health and welfare of the people who live in this area. WE are not the ones you should be using your weapons on. WE are the ones who are paying for those jets which are to be used in warfare, not on the

peaceful residents of this area.

[REDACTED]

Port Ludlow, WA 989365

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, November 02, 2018 1:58:11 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] EA-18G Growler operations -- Comments on "Section 106 Process"
Auto forwarded by a Rule

Commanding Officer, NASWI
Attn: CRPM
[REDACTED]
Oak Harbor, WA 98278

Here are a few of my comment:

The "Section 106 Process" requires any federal agency to first REDUCE and MINIMIZE the impact of their proposal on historic structures. The Navy has failed to develop plans to do so.

Invite the public to comment in a meaningful forum and over an appropriate

period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties. [Note that the "Collaborating Partners" - State Historic Preservation Officer, Mayor of Coupeville, Mayor of Port Townsend, Reserve Manager, Ebey's Landing National Historical Reserve- the Ebey's Trust Board, the National Park Service, Island County Commissioner, and the President of Citizens of Ebey's Reserve (COER) - have not agreed to the Navy's preemptory "Memorandum of Agreement." This seems to be a shameful untimely action.]

WE must be aware of our impacts upon wildlife, & practice the precautionary principal, as we are rapidly and stupidly killing the life of the planet:

"Humanity has wiped out 60% of animal populations since 1970, report finds".

https://www.theguardian.com/environment/2018/oct/30/humanity-wiped-out-animals-since-1970-major-report-finds?utm_term=RWRpdG9yaWFsX0dyZWVuTGlnaHQtMTgxMTAy&utm_source=esp&utm_medium=Email&utm_campaign=GreenLight&CMP=greenlight_email

Sincerely,



Cerrillos, NM 87010

From: [REDACTED]
Sent: Friday, November 02, 2018 1:52:53 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Section 106 Requirement for Expanding Growler Fleet and Flights Auto forwarded by a Rule

The Navy has not met Section 106 requirements for preservation of historic properties in the rush to expand the Growler fleet and flights.

Go back to the drawing board, please, revisit the requirements, and comply with the process.

[REDACTED]
Langley WA 98260

From: [REDACTED]
Sent: Friday, November 02, 2018 1:34:30 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler Operations Increase at NAS Whidbey Island
Auto forwarded by a Rule

I ask that you:

- 1) Withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
- 2) Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
- 3) Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
- 4) Develop a plan for a real and measurable reduction of noise in an agreed

Memorandum of Agreement (MOA) for historic properties.

Sincerely,

[Redacted Signature]

1. S
SS
SS

From: [REDACTED]
Sent: Monday, November 05, 2018 10:48:42 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Use of Growler jets Auto forwarded by a Rule

These jets are extremely loud and obnoxious flying close to the ground. The Navy must amend it's expansion at Ebey's Landing and should always consider it's impacts environmentally and with respect to the visitors and residents of all areas it might wish to fly over.

[REDACTED]

From: [REDACTED]
Sent: Monday, November 05, 2018 10:57:41 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] growler jet expansion on Whidbey Island Auto
forwarded by a Rule

I request that the Navy:

1. Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.



98502

From: [REDACTED]
Sent: Tuesday, November 06, 2018 6:01:09 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler flights Auto forwarded by a Rule

Id like to comment on the section 106 and other impacts of growler flights from whidbey/ault in the areas if the san juan islands, hood canal and olympic peninsula. I am against any increase in these flights until scientific research has investigated the Impacts of these flights on wildlife in the national parks, forests and wildlife areas affected by the noise pollution, especially including marine life and the southern resident orcas and other endangered and threatened species in the areas of the flights.

[REDACTED]
Seattle, WA 98122

From: [REDACTED]
Sent: Monday, November 05, 2018 9:05:29 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] MOA
Auto forwarded by a Rule

Wouldn't you think that a memorandum of AGREEMENT would include agreements? You are the military you get to just pretend we've agreed to your outlandish proposal to increase growlers. We'll never agree.

[REDACTED]
Nordland, WA

From: [REDACTED]
Sent: Wednesday, November 07, 2018 11:22:53 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Navy's Draft National Historic Preservation Act
Section 106 Memorandum of Agreement for EA-18G Growler Operations Increase
at NAS Whidbey Island Public Comment Auto forwarded by a Rule

- * Please withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
- * Invite the public to comment in a meaningful forum and over an appropriate period of time, per Section 106 policy, on the historic properties, including those of Port Townsend.
- * Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

* Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

[REDACTED]

[REDACTED]

Port Angeles, WA 98362

From: [REDACTED]
Sent: Thursday, November 08, 2018 5:04:42 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Navy's Draft National Historic Preservation Act Section 106 Memorandum of Agreement for EA-18G Growler Operations Increase at NAS Whidbey Island Auto forwarded by a Rule

The Navy must:

Withdraw and apologize for their recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.

Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.

Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.

Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Sincerely,



ent from Yahoo Mail on Android <https://go.onelink.me/107872968?pid=InProduct&c=Global_Internal_YGrowth_AndroidEmailSig_AndroidUsers&af_wl=ym&af_sub1=Internal&af_sub2=Global_YGrowth&af_sub3=EmailSignature>

From: [REDACTED]
Sent: Wednesday, November 14, 2018 9:08:58 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] MOA on Section 106 Auto forwarded by a Rule

You are currently asking the public to comment on a MOA that is meaningless because it has not been agreed to by any of the partners. You are sending people to a website to comment on an irrelevant document.

This action does not honor public process.

We are asking you to:

1. Withdraw and apologize for your recent misleading press release that encourages citizens to comment on a document that has not been agreed upon.
2. Invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend.
3. Delay any further mitigation meetings until a public meeting occurs in Central Whidbey.
4. Develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

NW Washington communities have been partners with the military in protecting our national security. The latest proposals by the DoD dramatically increase the number of Growler jets and flights - putting us all at risk. This is no longer a partnership; you are making the public subordinate to the military, a direct refutation of Article 1, Section 18 of the Washington State Constitution which states that "The military shall be in strict subordination to civil power.

Sent from Mail <<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows
10



P.O Box 128, Greenbank, Washington 98253

October 31, 2018

Commanding Officer, NAS Whidbey Island
Attn: NASWI CR PM

[REDACTED]
Oak Harbor, WA 98278-5000

Re: Growler 106 MOA Comment

To the Department of the Navy,

The Port of Coupeville is a Washington State municipal corporation governed by an elected commission, responsible to their district electorate for economic development and management of its facilities. The Port District extends from north of Coupeville, to Greenbank, an area which includes Ebey's Landing National Historical Reserve and the Navy Outlying Field.

The Port of Coupeville is concerned that significant expansion of EA-18G Growler operations at OLF will have negative impacts to the district, including diminishment of tourism, devaluation of local real estate (which impacts tax revenues for municipalities), and risks to residents from jet noise and fuel emissions. The Port now appreciates the opportunity to review and provide feedback on the adverse effects of the proposed expansion to historic structures.

Coupeville, the second oldest town in Washington State, has a long record of preserving its historical and rural character. Many of our constituents choose to reside here because they value these qualities. The Port owns two heritage properties--the 1905 Coupeville Wharf and 1904 Greenbank Farm. Both are regional landmarks that generate significant direct and indirect income to Island County.

The Port is particularly concerned about adverse effects to the Coupeville Wharf. The Wharf is one of few local structures that symbolizes Whidbey's maritime past. With unobstructed views of Penn Cove, marine life and the Cascade skyline, it retains many original features and provides unique educational value to the public. Substantially-increased incidence of low-flying jets near and over the Wharf will have a number of adverse effects including:

- It undermines the cultural and historical importance of the structure and its setting.
- Increased noise levels will reduce the number of visitors to the Wharf who utilize it for education, recreation, shopping, eating, and as a community gathering space.
- With reduced traffic, it creates potential loss of income for business owners at the Wharf and downtown; as well as sales tax revenues for Island County.
- It harms the structure's future value and integrity for the public as a historic and cultural landmark.

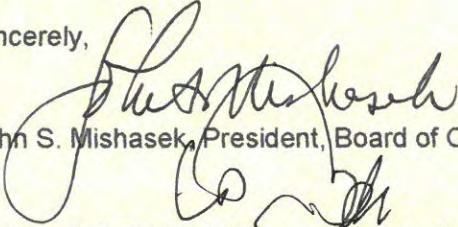
- Any reduction or lessening of the increase in local property values over time would financially impact the Port's ability to make infrastructure improvements to its historic properties.

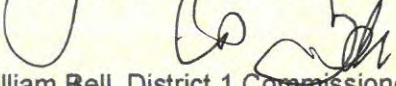
According to the National Historic Preservation Act, historic preservation is an important policy of the United States. It directs the federal government, including the Navy, to actively promote the preservation of historic resources through partnership with state and local governments. We urgently request the Navy to fully consider these adverse effects not only to the Wharf, but to all historic structures within Ebey's Landing National Historical Reserve; and to take steps to minimize and mitigate the effects including the following:

- Elect/implement a plan for increased flight operations well below the proposed four-fold increase.
- Limit flight operations to times of least impact to Coupeville's residents, businesses and critical tourism traffic, including weekends and evening hours.
- Take steps to contain flight traffic away from the Coupeville downtown area.
- Employ sound insulating and barrier technologies to minimize the effects of jet noise to surrounding communities.
- Work in partnership with the Trust Board of Ebey's Landing National Historical Reserve and other stakeholders to find mutually acceptable resolutions that minimize adverse effects to all historic structures contained within the Reserve.

The Port is a strong supporter of our nation's Armed Forces, especially the Navy and its operation on Whidbey Island. We recognize the vital contributions of service members to our Island County economy, work force, schools and community organizations and we are grateful for their service to our country. We are also grateful for the opportunity to share our views and comments on matters of vital importance to the present and future welfare of our Port district constituents.

Sincerely,


John S. Mishasek, President, Board of Commissioners, Port of Coupeville


William Bell, District 1 Commissioner, Port of Coupeville


Mohammad Mostafavinassab, District 3 Commissioner, Port of Coupeville



April 10, 2018

Kendall Campbell
NASWU Cultural Resource Program Manager
Naval Air Station, Whidbey Island
[REDACTED]
Oak Harbor, WA 98278-5000

Dear Kendal Campbell

Please find attached a copy of the letter the Coupeville Chamber of Commerce has sent to Congressman Larsen and Senators Cantwell and Murray regarding the increase in flights over Coupeville.

As I am sure you are aware, Coupeville is a tourist driven community, we are unique as we sit in the heart of Ebey's Landing National Historic Reserve. Visitors come from all over the country and the world to experience our unique area and enjoy our history, hiking and walking trails and so much more. Our concern as a Chamber of Commerce is for our businesses and Coupeville as a whole as it relates to the increase in flights over our area, this could seriously hurt the livelihoods of so many here in our community.

I look forward to meeting you in the near future.

Sincerely,

A handwritten signature in black ink that reads "Lynda Eccles". The signature is written in a cursive style and is positioned over the printed name.

Lynda Eccles
Executive Director
Coupeville Chamber of Commerce



August 30, 2018

Dear Congressman Larson, Senator Cantwell and Senator Murray

The Coupeville Chamber of Commerce and its Board of Directors have concerns about the potential impacts to historic Coupeville, our history, our businesses and our community, along with the potential adverse effects to Central Whidbey and surrounding area due to the possibility of increased operations of Growler aircraft.

Coupeville sits in the heart of the Ebey's Landing National Historical Reserve which was established by Congress in 1978 to "preserve and protect a rural community which provides an unbroken historical record from the 19th century exploration and settlement in Puget Sound to the present time". The Reserve is our nation's first and only historic reserve, and includes prairies, woodlands, Penn Cove, Coupeville, agricultural land, historic buildings, and so much more. It is visited by millions of visitors from all over the United States, Europe, the United Kingdom, Australia and beyond each year.

A significant part of the Reserve is preservation of agricultural areas in active use. The loss of farming activities would result in a cultural change in our landscape and compromise its very foundation, not to mention the impact on farmers and their employees working outdoors and its potential health issues.

Our community is passionate and proud of our Reserve and we work hard to protect it. Visitors come to enjoy our farms, hiking and walking trails, show their children what life was once like and where the produce they buy from stores is grown. It is devastating to think that the character of Central Whidbey that we have all worked so hard to protect could be changed forever and that visitors to our beautiful island will no longer be able to learn and appreciate how life used to be.

Coupeville

Tourism is our major source of income in Central Whidbey Island, we have no major manufacturing, we are the County Seat of Island County and home to Whidbey Health Medical Center, Island County Seat and numerous small businesses, lodgings and restaurants. Our businesses rely heavily on tourism to sustain them April through October, the majority are retail, small bed and breakfasts, vacation rentals, restaurants, construction and service industry. We hold major events throughout the year to bring tourists to our unique community and promote our community through major marketing and promotion.

A large number of tourists come for the hiking and walking Trails, kayaking the pristine waters of Penn Cove, walking our beaches, cycling our backroads or simply to enjoy our historic community, wonderful sunsets and views. It can even be as simple as watching the eagles hover over the tractors as they farm the fields. All of this will change forever if the increase in Growler's from NASWI comes to fruition.

Please understand that we are not anti-Navy, we have a large number of business owners who are retired Navy personnel or wives of retired Navy. We are concerned about the economic impact of tourism in our community and our treasured quality of life.

As a Chamber of Commerce representing our business community who are committed to the success of our community, it is my sincere hope that you will take a long hard look at what could transpire here if the Navy disproportionately burden Coupeville by increasing the flights by 288%. As our representatives I humbly request you make every effort to talk to the Navy and attempt to dissuade them from changing our community and landscape.

Sincerely,

Lynda Eccles

Executive Director
Coupeville & Central Whidbey
Chamber of Commerce & Visitor
Information Center

Janet Burchfield

President, Board of Directors
Coupeville & Central Whidbey
Chamber of Commerce & Visitor
Information Center

Cc: Captain Arny, NASWI
Kendall Campbell NASWI Cultural Resource Program Manager
Governor Jay Inslee

November 2, 2018

Commanding Officer, NASWI

Attn: CRPM

[REDACTED]
Oak Harbor, WA 98278

Re: Ebey Landing National Historical Reserve

To Whom it May Concern,

My family and I have lived under the OLF flight pattern for 17 years. We are currently building another house under the flight pattern. We have never had any concerns regarding the OLF and the flights at their present level. The jets are part of the experience of living on Whidbey Island that we love. I have never met a service member on Whidbey Island that I did not like. They are a great asset to our community.

I am however very concerned with the proposed 4-fold increase of jet traffic over our home and the Ebey Landing National Historical Reserve. I think that the proposal is extreme and does not consider the effect that the jets will have on residents and the Ebey Landing National Historical Reserve.

The Ebey Landing National Historical Reserve is an absolute gem of Washington State. The residents of Coupeville have worked extremely hard over the last 40 years to maintain the historic culture of Central Whidbey Island. I am concerned that the Navy officials making the decision to increase the jets have not considered the amount of time, energy and perseverance it has taken the community to build this wonderful and unique place in Washington State. The Navy plans will quickly destroy what it has taken 40 years to build and grow.

I am also concerned that the increase will affect my family and our lives for the worse. I am also concerned that the Navy EIS does not include any decibel level information taken on the ground under a real, actual, Growler flying overhead. I think the conclusion of the EIS would be different if that information was included in the EIS.

I am opposed to the increase of jet traffic over the Ebey Landing National Historical Reserve. I believe the increase would be incredibly detrimental to the residents of Central Whidbey and the Historical Reserve. I do not believe that there is any way to mitigate the damage of any increased jet traffic over the residents of Central Whidbey Island and the Historical Reserve.

Sincerely,

[REDACTED]

Coupeville, WA. 98239

[REDACTED] (Coupeville, WA. 98239)

October 25, 2018

To: Commanding Officer, NAS Whidbey Island
Attn: NASWI CR PM, [REDACTED]
[REDACTED] Oak Harbor, Washington
From: [REDACTED]
Coupeville, Wa. 98239

Subject: Growler 106 MOA Comment

Dear Sir, I am a long time property owner on Whidbey Island. Our property, which we have owned for more than 40 years, is located within the Whidbey Ebey's Landing National Historical Reserve. Also, it was part of the original Fort Casey property. The Historical Reserve is a true national treasure and deserves to be protected, as such, now and in the long term.

I spent more than 35 years planning and developing airports across the United States. For 13 years I was head of the FAA's airport program for the northwestern part of the United States.

There is no good reason for conducting more than 24,000 operations of touch and go activity in the National Historic Reserve, thereby destroying that national treasure. A large portion of that practice/activity could be conducted at Fallon, Nevada in a very low population environment with no nearby national treasures.

The time has come for the Navy to use some common sense and come up with a reasonable solution. If it is necessary to have a very dark area to practice in, you could go to an empty valley about 10-15 miles from the Fallon Navy Base and build a bounce field in such a empty valley, and practice in a very dark area. When one considers the cost of these Growler aircraft, the cost of a simple bounce field in such a dark location would be considerably less than the cost of one Growler aircraft.

Your consideration of these comments is appreciated.

Best personal regards,

[REDACTED]

*For your info - This letter was sent in August
to our elected representatives.*

August 17, 2018

To: Governor Jay Inslee
Senator Patty Murray
Senator Maria Cantwell
Representative Rick Larsen

FROM: [REDACTED]

SUBJECT: NAVY EXPANDED USE OF COUPEVILLE OLF

We have owned a five acre property several miles west of Coupeville OLF since 1977. The land was originally part of Fort Casey. At the time of purchase I was the head of FAA's airport program for the northwestern part of the United States. This work involved, among other things, providing funds for the development of publicly owned airports and assurance of compatible land use in the areas surrounding those airports. As we had the noise contours for Coupeville OLF in my office, I reviewed them and determined that the property would not be significantly impacted by Navy operations at OLF. This proved to be the case at our home for many years. The Prowler aircraft flew the prescribed traffic patterns and all was well. Unfortunately, these aircraft were replaced by the Growler aircraft which generate significantly more noise. The pilots seem unable to fly the old traffic pattern. Thus, they generate much greater noise over a far larger area.

Now, the Navy proposes to increase operations at the Coupeville OLF by 400 %. This will destroy a way of life for thousands of people in the area. The National Historic Reserve, the first of its kind in the nation, will also be destroyed. It should be understood by all that the northern half of Whidbey Island and the nearby San Juan Islands are a true National Treasure and are worth preserving. This may be the most beautiful natural area in the United States and the Navy should not be allowed to destroy it. Additionally, the service the Navy provides with the Growler aircraft is now provided to all other elements of the military. It does not seem to make sense to put it all in one place. By doing this, a future enemy could take out this national defense with one well placed nuclear missile.

There is a simple solution to this issue. The Navy could place about 20 Growlers at their Naval Air Station in Fallon, Nevada which is located in the "middle of nowhere". About 80% of flight training activity could be located there and Coupeville OLF would not be needed at all. If they felt a separate bounce field was needed, one could be built in a nearby unpopulated valley for a fraction of the cost of one Growler aircraft.

The other benefit of locating touch and go traffic there would be that about 20 aircraft would survive a nuclear missile on Whidbey Naval Air Station.

In conclusion, it is clear that someone with some authority, such as yourself, has got to start some intelligent discussion of this issue.

Many thanks for your help,

[REDACTED]
Coupeville, Washington 98239

Commanding Officer, NAS Whidbey Island

November 2, 2018

Attn: NASWI CR PM


Oak Harbor, WA 98278-5000

Re: Growler 106 MOA Comment

Dear Commander Moore,

This letter is in response to the request for comments on the draft Memorandum of Agreement (MOA) to address the impact of additional EA-18G Growler training flights on historic properties on Whidbey Island. Under the Navy's preferred alternative as identified in the final Environmental Impact Statement (EIS), the number of Growler operations at OLF Whidbey will increase from 6,510 to 24,100 a year. The MOA proposes mitigation strategies for impacts due to visual, atmospheric, and audible elements that occur when aircraft are seen or heard flying in the vicinity.

Ebey's Landing National Historical Reserve (ELNHR) was created to preserve a cultural landscape, a way of life that includes working family farms, a historic town, and a number of historic buildings. The EIS states that the impact of the additional flights will be from "increased occurrence of noise exposure affecting certain cultural landscape components in the historic district – specifically, the perceptual qualities of five locations that contribute to the significance of the landscape." This implies that views are what is important about preserving ELNHR. The EIS and the MOA completely ignore the impacts to people who live and work on the prairie and are attempting to preserve the agricultural traditions that go back many generations in their families.

The MOA addresses impact to historic buildings by offering compensation for retrofits, and offers funds to purchase additional properties to be added to the reserve. There is no mitigation strategy proposed to address the impact of a four-fold increase in noise exposure to these people and their way of life. There is also no mention of providing compensation to the owners of property lying within the Accident Potential Zone (APZ). If they are required to move, will they be compensated for their property?

It is understood that the additional Growler aircraft need additional pilots, who must be adequately trained to perform their very challenging mission. The preferred alternative was selected because it provides the closest approximation to a carrier landing. However, the impact of the additional training flights to the town of Coupeville and the rural farmers is too great. The Navy should find other alternatives for carrier landing practice, including use of other Navy facilities or perhaps even a new landing strip in a more remote location that can be zoned to take the APZs into account. The pilots can fly their aircraft to other locations for landing practice, but the farmers are tied to their land.

Sincerely,



Ireland, WA

From: [REDACTED]
Sent: Wednesday, November 14, 2018 2:52:53 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] olf
Auto forwarded by a Rule

Sir my wife and I live in Coupeville and we say BRING THEM we have no problem with the increased flights, thanks for your time. [REDACTED]
[REDACTED]

Sent from Mail <<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows
10

From: [REDACTED]
Sent: Friday, November 16, 2018 2:05:53 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] growler 106 MOA Auto forwarded by a Rule

Hello,

I am a member of the Whidbey Island Community and part of the Sound Defense Alliance.

While I understand that you will go ahead with the expansion even without an MOA, I want to voice my concerns.

I am the author of *Blessing the Hands that Feed Us*, a book about local food on Whidbey Island and local food systems. Writing that book I saw vividly how fractured our local food systems are worldwide and how hard it is to rebuild them given the global supply chains, subsidies and preferential treatment offered to industrial scale producers. Being a student of climate disruptions and geologic pressures I also know that those supply chains are fragile and sea level rise/the Big One together might throw our island back on our own resources. Given that possibility, I have worked to knit together and enrich local producers and build consumer preference for local foods. Ebey's Prairie, along with being a unique landscape, a product of long hard work for preservation, a tourist destination, and infinitely beautiful is Whidbey Island's bread basket. It is what will feed us in case of any sort of disruptions. It's my opinion that you can't just bring in remediation later

for any damage done. This area must remain in farming and if you go ahead local farmers may not be able to farm with the 4-fold increase in flights. Farming is not something you can drop for a few years and take up again. Land needs to be worked with even when fallow. Your plan will severely disrupt our whole island's ability to feed itself if necessary.

A hundred years ago that prairie produced the greatest tonnage of wheat per acre of anywhere in the US. It is deep rich topsoil.

I can't imagine a letter from a local writer and local food advocate would sway the Navy in its intention to ruin our rural community when other air stations far from productive farmland, tourist destinations and thriving communities could work, but integrity says I have to speak. Perhaps you who are reading this are also from a farming family or a small town and can understand what happens when a giant industry comes in, promising prosperity but rendering your land and community diminished.

With respect and a prayer

[Redacted signature]

--

~~~~~

[Large redacted block]

~~~~~

From: [REDACTED]
Sent: Monday, November 19, 2018 11:34:07 AM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Whidbey Island Auto forwarded by a Rule

To the Commanding Officer:

I am writing to oppose the Navy's increased presence on Whidbey Island.

I am writing to ask the Navy to:

- 1) withdraw its recent misleading press release that encourages citizens to comment on a document that has not been agreed upon;
- 2) acknowledge/apologize publicly for its misleading press release;
- 3) invite the public to comment in a meaningful forum and over an appropriate period of time per Section 106 policy, on the historic properties, including those of Port Townsend;
- 4) delay any further mitigation meetings until a public meeting occurs in Central Whidbey;
- 5) develop a plan for a real and measurable reduction of noise in an agreed Memorandum of Agreement (MOA) for our historic properties.

Thank you for your consideration.

Sincerely,

[REDACTED]

Portland, OR 97201

From: [REDACTED]
Sent: Wednesday, November 21, 2018 11:07:25 PM
To: NAVFAC NW CR
Subject: [Non-DoD Source] Growler 106 MOA Comment -- How would YOU like this happening to you?
Auto forwarded by a Rule

Dear Commanding Officer,

Growlers greatly degrade the quality of visitors' experience of Ebey's Landing National Historical Reserve. The reserve was established to preserve the ambience and historical and agricultural traditions of this unique landscape, BUT when I took my mother-in-law to visit this wonderful setting, Growlers buzzed my car so loudly that my mother-in-law went into tachycardia, and I had to take her to the emergency room. Thanks a lot!

On other occasions, by myself or with friends, I have had my time at Ebey's Landing profoundly disturbed by the Growler's ear-splitting racket. Having them fly low over one's car is a terrifying experience! Can you get how scary it is to never know when your car is going to be blasted by one of these planes? The last time it happened, I almost ran off the road.

This is hardly a safe situation, in fact it's quite dangerous. Can you get that you are trying to stuff all these planes and their practice fields into a residential community? We are not out in the middle of nowhere. Your EIS is seriously unreal in not acknowledging the true effect that these Growlers are having on our island. Whidbey Island is NOT a safe or appropriate place to be preparing for war games!

Please don't wreck out community, it means so much to us.

Very sincerely,

[Redacted signature]

Clinton, WA 98236

[Redacted address]