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1.0 INTRODUCTION

The appendix contains comments received from federal, state, and local agencies, and the general public during the public comment period for the NAS Key West Airfield Operations Draft EIS. The 45-day public comment period began on June 29, 2012 with the Draft EIS Notice of Availability (NOA) published in the *Federal Register*. Public meetings were held over two days (August 1 and 2, 2012) at two locations in the Key West community during the public comment period. However, due to a request from the Monroe County Board of County Commissioners, the public comment period was extended another 15 days to August 28, 2012. In total, the public comment period comprised 60 days.

In accordance with the National Environmental Policy Act (NEPA), all comments have been reviewed, incorporated as appropriate into this Final EIS, and written responses have been provided for all substantive comments. Section 2 details the comment receipt and review process. All comments received during the 60-day public comment period, and Navy responses to those comments, are included in Section 3.

2.0 COMMENT RECEIPT AND REVIEW

Comments on the Draft EIS included both written correspondence via U.S. Postal Service letters, comment forms received at the public meetings, oral testimony received during the public meetings, and comments submitted via the project website. In accordance with 40 Code of Federal Regulations (CFR) 1503.4, comments were assessed and considered as follows:

- Each letter or testimony was assigned an identification number and all comment letters and testimony were read and reviewed carefully.
- Within each comment letter or testimony, substantive comments were identified and bracketed. Three guidelines were used for determining substantive comments:
 1. The comment questioned the Proposed Action, alternatives, or other components of NAS Key West airfield operations.
 2. The methodology of the analysis or results was questioned.
 3. The use, adequacy, and/or accuracy of data were questioned.
- The bracketed comments were reviewed by environmental resource specialists who draft the responses.
- In some cases, similar comments were assigned the same response. If the same comment was repeated within the same letter or testimony, it was bracketed the first time it appeared.
- Individual bracketed comments were assigned a number/letter combination and a response was provided.
- The EIS was modified to make corrections and improve or clarify the analysis.

3.0 COMMENTS AND RESPONSES

The comments and responses to comments are presented by commenter category as listed in in Table B-1. Comments beginning with M indicate that the comment was received by mail. Comments beginning with PM indicate that the comment was received at one of the public meetings on the Draft EIS. Comments beginning with W indicate that the comment was received on the project website.

Table B-1 Comments by Category and Comment Numbers

Comments by Category	Comment Numbers
Elected Officials	M-01
Local	M-01
Monroe County Board of County Commissioners	
Agencies	M-02 to M-05
Federal	M-02 to M-03
U.S. Department of the Interior	M-02
U.S. Environmental Protection Agency	M-03
State	M-04 to M-05
Florida Department of Environmental Protection	M-04
Florida Department of Economic Opportunity	M-05
Individuals	PM-01 to PM-06 and W-01 to W-26
Ed Swift III	PM-01
Anonymous	PM-02
John Abbott	PM-03
Anonymous	PM-04
R.L. Blazevic	PM-05
Judy Martinez	PM-06
Anonymous	W-01
Arleen Knight	W-02
John Walsh	W-03
Anonymous	W-04
Joseph Stone	W-05
Anonymous	W-06
Charlotte Annyce Brauch	W-07
Daniel Simpson	W-08
John Jones	W-09
Bert Lee	W-10
Robert Oneal	W-11
Anonymous	W-12
Anonymous	W-13
Gwenn Smith	W-14
Anonymous	W-15
Anonymous	W-16
Bill Bean	W-17
Tony Marra	W-18
Rosario Scavelli	W-19
Rose Jones	W-20
Anonymous	W-21
Brigette Hansen	W-22
Anonymous	W-23
Anonymous	W-24
Bill Hunter	W-25
Anonymous	W-26

M-01

Navy Response

No substantive comments on this page.



BOARD OF COUNTY COMMISSIONERS

Mayor David Rice, District 4
Mayor Pro Tem Kim Wigington, District 1
George Neugent, District 2
Heather Carruthers, District 3
Sylvia J. Murphy, District 5



District 4 Commission Office
Marathon Airport Terminal Bldg.
9400 Overseas Hwy. Suite 210
Marathon, FL 33050
Ph: 305-289-6000
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August 15, 2012

Naval Facilities Engineering Command Southeast
NAS Key West Air Operations EIS Project Manager
P.O. Box 30, Building 903
NAS Jacksonville, FL 32212

Subject: Comments by Monroe County, Florida on the NAS Key West Airfield Operations Draft EIS

Dear EIS Project Manager:

This letter represents Monroe County's response to the U.S. Navy's NAS Key West Airfield Operations Draft Environmental Impact Statement (DEIS) dated June 2012. We appreciate the opportunity to provide comments on activities proposed by the Navy that could affect our citizens, economy and environment.

Our elected officials and citizens support our military and recognize the importance of the training missions the military must undertake. In fact, we have just recently adopted Military Compatibility goals, objections and policies including a Military Installation Area of Impact policy that provides for a fair and effective approach on how the Naval Air Station Key West (NASKW) and Monroe County will coordinate on growth and operational issues. This policy reflects years of effort and negotiation between NASKW, the County, and the State of Florida. This Comprehensive Plan amendment also included a policy discouraging an increase in operations that would negatively impact the surrounding community. Policy 108.1.6 of our 2010 Comprehensive Plan reads:

"The Navy is undertaking an Environmental Impact Statement (EIS) to evaluate alternatives for future airfield operations at Naval Air Station Key West. Monroe County shall work closely with the Navy throughout the process of the EIS and shall discourage the Navy from increasing its operations at NASKW that negatively impact the surrounding community."

<p style="text-align: right;">M-01</p> <p>It is within that context of the above amendment that we strive to work with the Navy to ensure important national defense objectives are met and that the interests and well being of our residents, visitors and natural environment are protected. It is the County's belief that both of these important objectives can be met with proper analysis, planning and a willingness by the Navy to acknowledge fully the impacts of its operations.</p> <p>We have reviewed the DEIS and are very concerned about the potential impacts of Alternatives 1, 2, or 3 on our citizens. The DEIS does not provide detail for us to sufficiently assess the impacts and we are concerned that the baseline condition (No Action Alternative) does not accurately reflect current conditions. Without an accurate baseline condition, the analysis of the proposed alternative is flawed.</p> <p>In particular, we believe that there are substantial flaws in the noise analyses. As such Monroe County does not agree with the DEIS conclusion that increases in noise are not significant. We believe the noise increases are significant, and that, if an action alternative is selected, the Navy should implement mitigation to offset the projected impacts.</p> <p>In light of our concerns, Monroe County cannot support any of the action alternatives at this time. Therefore, we respectfully request that the Navy withdraw the DEIS and address fully the deficiencies and questions identified below. Once these deficiencies and questions are addressed the Navy should republish the DEIS for public review and comment.</p> <p style="text-align: right;">M-01-A</p> <p>Specific Questions and Comments:</p> <ol style="list-style-type: none"> Revise the Baseline (No Action Alternative) to Exclude the FA-18E/F Super Hornet and Evaluate the Super Hornet as a Next Generation Aircraft in the Alternatives. Section 1.3.1 (page 1-4) states that the Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements at NASKW (DoN 2003a) addressed the Navy's transition from the F-14 Tomcat aircraft to the FA-18E/F Super Hornet. Despite this claim, there has been no adequate NEPA evaluation done of the impacts associated with the introduction of F/A-18E/F Super Hornet to NASKW. The Navy has claimed that the 2003 EA for Fleet Support and Infrastructure Improvements and the April 14, 2003 Finding of No Significant Impact (FONSI) satisfies their obligations to evaluate the introduction of the Super Hornet to NASKW, despite the fact that there is no mention of the Super Hornet in any of the documents leading up to the Final EA, and no mention of the aircraft in the Proposed Actions, nor the Alternatives, nor in the FONSI. Among the 400+ pages of NEPA documentation surrounding that EA, the Super Hornet is mentioned in only three pages. The official statement from the Navy regarding this matter was made by Honorable B.J. Penn, Assistant Secretary of the Navy for Installations and Environment, who stated in a December, 2007 letter "... the Navy complied with NEPA for transient aircraft operations at NAS Key West by completing the [2003] Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements. That EA, and its incorporated references, analyzed impacts to the human environment, including noise and flight paths resulting from all transient aircraft operations, including the F/A-18E/F. As a result of that analysis, the Navy reached a Finding of No Significant Impact which addressed off-base noise exposure from aircraft operating at NAS Key West." There is one "reference" in the EA that discusses the Super Hornet. The creation date of that document was <i>after</i> the date of the FONSI. <p style="text-align: center;">Page 2 of 12</p>	<p>Navy Response</p> <p>M-01-A</p> <p>The Navy is committed to continuing its work with the Monroe County Board of County Commissioners to address all concerns through the Military Influence Area analysis, Air Installations Compatible Use Zones (AICUZ) process, and Community Plans and Liaison Office program, as well as responses to comments outlined in this letter. Additional detail was added to Section 1.1. to clarify that the EIS is a "forward looking" document and that the current condition, or No Action Alternative, is representative of airfield operations that are conducted today (a 10-year average was utilized to determine the annual number of airfield operations and the specific details and nature of today's flight operations was defined based on a detailed examination of 2009 and 2010 flight operations, which were validated through 2011). The current condition includes FA-18E/F aircraft and other aircraft operating at NAS Key West today. The environmental effects of existing aircraft operations are analyzed in detail as part of the No Action Alternative, which serves as a baseline for comparison for the future conditions or alternatives under consideration.</p> <p>The analytical methodology and results presented in this EIS for noise are consistent with current Navy policy regarding the modeling of aircraft noise. The Navy has determined the noise analyses presented in this EIS is an accurate representation of the current and future noise environment.</p>
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<p>M-01</p> <p>It is within that context of the above amendment that we strive to work with the Navy to ensure important national defense objectives are met and that the interests and well being of our residents, visitors and natural environment are protected. It is the County's belief that both of these important objectives can be met with proper analysis, planning and a willingness by the Navy to acknowledge fully the impacts of its operations.</p> <p>We have reviewed the DEIS and are very concerned about the potential impacts of Alternatives 1, 2, or 3 on our citizens. The DEIS does not provide detail for us to sufficiently assess the impacts and we are concerned that the baseline condition (No Action Alternative) does not accurately reflect current conditions. Without an accurate baseline condition, the analysis of the proposed alternative is flawed.</p> <p>In particular, we believe that there are substantial flaws in the noise analyses. As such Monroe County does not agree with the DEIS conclusion that increases in noise are not significant. We believe the noise increases are significant, and that, if an action alternative is selected, the Navy should implement mitigation to offset the projected impacts.</p> <p>In light of our concerns, Monroe County cannot support any of the action alternatives at this time. Therefore, we respectfully request that the Navy withdraw the DEIS and address fully the deficiencies and questions identified below. Once these deficiencies and questions are addressed the Navy should republish the DEIS for public review and comment.</p> <p>Specific Questions and Comments:</p> <p>1. Revise the Baseline (No Action Alternative) to Exclude the FA-18E/F Super Hornet and Evaluate the Super Hornet as a Next Generation Aircraft in the Alternatives. Section 1.3.1 (page 1-4) states that the Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements at NASKW (DoN 2003a) addressed the Navy's transition from the F-14 Tomcat aircraft to the FA-18E/F Super Hornet. Despite this claim, there has been no adequate NEPA evaluation done of the impacts associated with the introduction of F/A-18E/F Super Hornet to NASKW. The Navy has claimed that the 2003 EA for Fleet Support and Infrastructure Improvements and the April 14, 2003 Finding of No Significant Impact (FONSI) satisfies their obligations to evaluate the introduction of the Super Hornet to NASKW, despite the fact that there is no mention of the Super Hornet in any of the documents leading up to the Final EA, and no mention of the aircraft in the Proposed Actions, nor the Alternatives, nor in the FONSI. Among the 400+ pages of NEPA documentation surrounding that EA, the Super Hornet is mentioned in only three pages. The official statement from the Navy regarding this matter was made by Honorable B.J. Penn, Assistant Secretary of the Navy for Installations and Environment, who stated in a December, 2007 letter "... the Navy complied with NEPA for transient aircraft operations at NAS Key West by completing the [2003] Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements. That EA, and its incorporated references, analyzed impacts to the human environment, including noise and flight paths resulting from all transient aircraft operations, including the F/A-18E/F. As a result of that analysis, the Navy reached a Finding of No Significant Impact which addressed off-base noise exposure from aircraft operating at NAS Key West." There is one "reference" in the EA that discusses the Super Hornet. The creation date of that document was <i>after</i> the date of the FONSI.</p> <p>Page 2 of 12</p> <p>M-01-A</p> <p>M-01-B</p>	<p>Navy Response</p> <p>M-01-A (Continued)</p> <p>Chapter 7 of the EIS addresses management actions and mitigation measures for all resource areas for all alternatives (no action and action) analyzed, and Section 7.3.1.2 outlines existing management measures for noise such as the NAS Key West airfield course rules and noise abatement procedures.</p> <p>The Navy has addressed all specific questions and comments received on the Draft Environmental Impact Statement (DEIS) fully, including those submitted by Monroe County. None of the comments submitted to the Navy identified significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts, which would require reissuance or a supplement of the DEIS in accordance with 40 Code of Federal Regulations (CFR) 1502.9. The Navy encourages Monroe County to review the Final Environmental Impact Statement (FEIS).</p> <p>M-01-B</p> <p>The No Action Alternative, as detailed in Section 2.4.1, provides a benchmark that enables decision makers to evaluate the environmental consequences of the proposed alternatives consistent with Council on Environmental Quality (CEQ) guidance entitled "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations"(CEQ 1981).</p>
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<p style="text-align: right;">M-01</p> <p>It is within that context of the above amendment that we strive to work with the Navy to ensure important national defense objectives are met and that the interests and well being of our residents, visitors and natural environment are protected. It is the County's belief that both of these important objectives can be met with proper analysis, planning and a willingness by the Navy to acknowledge fully the impacts of its operations.</p> <p>We have reviewed the DEIS and are very concerned about the potential impacts of Alternatives 1, 2, or 3 on our citizens. The DEIS does not provide detail for us to sufficiently assess the impacts and we are concerned that the baseline condition (No Action Alternative) does not accurately reflect current conditions. Without an accurate baseline condition, the analysis of the proposed alternative is flawed.</p> <p>In particular, we believe that there are substantial flaws in the noise analyses. As such Monroe County does not agree with the DEIS conclusion that increases in noise are not significant. We believe the noise increases are significant, and that, if an action alternative is selected, the Navy should implement mitigation to offset the projected impacts.</p> <p>In light of our concerns, Monroe County cannot support any of the action alternatives at this time. Therefore, we respectfully request that the Navy withdraw the DEIS and address fully the deficiencies and questions identified below. Once these deficiencies and questions are addressed the Navy should republish the DEIS for public review and comment.</p> <p>Specific Questions and Comments:</p> <ol style="list-style-type: none"> 1. Revise the Baseline (No Action Alternative) to Exclude the FA-18E/F Super Hornet and Evaluate the Super Hornet as a Next Generation Aircraft in the Alternatives. Section 1.3.1 (page 1-4) states that the Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements at NASKW (DoN 2003a) addressed the Navy's transition from the F-14 Tomcat aircraft to the FA-18E/F Super Hornet. Despite this claim, there has been no adequate NEPA evaluation done of the impacts associated with the introduction of F/A-18E/F Super Hornet to NASKW. The Navy has claimed that the 2003 EA for Fleet Support and Infrastructure Improvements and the April 14, 2003 Finding of No Significant Impact (FONSI) satisfies their obligations to evaluate the introduction of the Super Hornet to NASKW, despite the fact that there is no mention of the Super Hornet in any of the documents leading up to the Final EA, and no mention of the aircraft in the Proposed Actions, nor the Alternatives, nor in the FONSI. Among the 400+ pages of NEPA documentation surrounding that EA, the Super Hornet is mentioned in only three pages. The official statement from the Navy regarding this matter was made by Honorable B.J. Penn, Assistant Secretary of the Navy for Installations and Environment, who stated in a December, 2007 letter "... the Navy complied with NEPA for transient aircraft operations at NAS Key West by completing the [2003] Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements. That EA, and its incorporated references, analyzed impacts to the human environment, including noise and flight paths resulting from all transient aircraft operations, including the F/A-18E/F. As a result of that analysis, the Navy reached a Finding of No Significant Impact which addressed off-base noise exposure from aircraft operating at NAS Key West." There is one "reference" in the EA that discusses the Super Hornet. The creation date of that document was <i>after</i> the date of the FONSI. <p style="text-align: center;">Page 2 of 12</p> <p style="text-align: right;">M-01-B</p>	<p>Navy Response</p> <p>M-01-B (Continued)</p> <p>The Navy's position regarding the 2003 Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements at NAS Key West remains as cited in your comment letter. The environmental analysis required under the National Environmental Policy Act (NEPA) is "forward looking," in that it focuses on the potential impacts of the proposed action that an agency is considering (CEQ 2005). Accordingly, Section 1.1 was modified to provide clarification that this EIS is a "forward looking" examination of potential future conditions associated with NAS Key West airfield operations and that the environmental effects of existing aircraft operations are analyzed in detail as part of the No Action Alternative, which serves as baseline for comparison for the future conditions or alternatives under consideration. FA-18E/Fs are part of the current inventory of aircraft operating at NAS Key West and comprise approximately 25 percent of the existing annual airfield operations (see Table 2.8-1). Therefore, no revision was made to the baseline or noise analysis in response to this comment.</p>
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<p>In the Navy's 2003 Final Environmental Impact Statement for the Introduction of the F/A-18E/F Super Hornet Aircraft to the East Coast of the United States, the impacts resulting from F/A-18E/F Super Hornet operations at NASKW were not discussed. The Navy has failed to fulfill its NEPA obligations by virtue of not having completed a thorough analysis of the impacts of the Super Hornet. This is very important, since according to the DEIS (Draft Aircraft Noise Study for NAS Key West - WR-12-13; June, 2012, page 61, Table 7-1), the Super Hornet is approximately twice as loud as the F-35 in the Non-Break Arrival, Touch and Go, FCLP and GCA Box patterns. Since it has not been adequately evaluated in an EA or EIS, the impacts of the Super Hornet should be removed from the existing baseline / No Action Alternative, and added as an introduced next generation aircraft in Alternatives 1, 2, and 3. The noise analysis should be revised to show all effects of introducing the Super Hornet, including but not limited to: increases in acreages in noise zones (Table 4.1-1), increases in population and housing units in noise zones (Table 4.1-2), increases in average noise levels at representative receptors (Table 4.1-3), increases in indoor speech interference (Table 4.1-5), and increases in sleep disturbance (Table 4.1-6).</p> <p>2. Provide a Statement that Annual Operations will not be Exceeded, or Provide Noise Analyses for Maximum, Not Average, Years. As depicted on page 2-8 of the DEIS, the noise study used a ten year period (2000-2009) to establish average annual airfield operations of 47,500. Some years within that 10-year period were substantially above the average; for example, year 2003 had 72,777 operations which is approximately 53% above the average. The baseline of 47,500 average annual airfield operations is used on Table 2.3-1 and throughout the DEIS as the baseline for the No Action Alternative. Table 2.3-1 identifies Alternative 1 as 47,500, Alternative 2 as 52,000 (+10%), and Alternative 3 as 57,000 (+20%) annual airfield operations, and these numbers are used as the basis of the noise analyses. At the July 31, 2012 Joint Workshop between the Monroe County Board of County Commissioners, City of Key West, and the Navy, the Navy stated that the Alternative 2 number of 52,000 operations is a maximum number (ceiling) that is not likely to be reached, and that the Alternative 3 number of 57,000 operations is a maximum number (ceiling) that is not likely to be reached. This was verified by Navy staff at the August 1, 2012 Public Meeting in Key West.</p> <p>If the annual operations of 47,500, 52,000, or 57,000 will not be exceeded as indicated above, provide a statement in the EIS that these are maximum numbers that will not be exceeded without a re-evaluation of the EIS. If higher-than-average years are anticipated, the EIS should address potential impacts and mitigation with the higher-than-average years; modeling should be done for the highest operational year of the ten-year period (2003), and for the highest operational year projected under Alternatives 2 and 3.</p> <p style="text-align: center;">Page 3 of 12</p>	<p>Navy Response</p> <p>M-01</p> <p>M-01-C</p> <p>This EIS is evaluating the maximum number of annual airfield operations under each of the alternatives based on a careful assessment of both historic use levels and reasonably foreseeable factors potentially influencing future annual airfield operation levels at NAS Key West. Throughout the EIS, clarifications were made that the alternatives are evaluating an "up to" level of annual operations. Should an unforeseen increase in operations require annual airfield operational levels greater than evaluated under the preferred alternative, Alternative 2, the Navy would conduct additional NEPA analysis in accordance with 32 CFR 775.</p> <p>M-01-C</p>
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<p>3. Justify the Baseline of 500 Annual Field Carrier Landing Practices (FCLPs). Table ES-1 footnote states that the existing condition / No Action Alternative assumes up to 500 annual tactical aircraft FCLP operations, but there is no justification in the DEIS for this number. At the August 2, 2012 Public Meeting, Navy staff indicated that there has been a wide range of annual FCLPs in recent years. The DEIS should provide a chart of the number of the past FCLP operations (similar to Table 2.3-2 on page 2-8) and include an explanation of the basis for using 500 as the baseline. If 500 is not a reasonable baseline, provide a noise analysis for each alternative using an appropriate baseline. The baseline should not include the Super Hornet (per comment #1).</p> <p>4. Provide Documentation of Past Night Operations. Section 4.1.2 (page 4-2) states that for the baseline existing condition and Alternative 1, acoustic night operations (10 pm to 7 am) were conservatively estimated to be at 2.6% of annual operations. The DEIS should provide actual numbers of night operations for the years 2000 to present (similar to Table 2.3-2) for FCLP and non-FLCP operations.</p> <p>5. Provide Validation of the Noise Modeling. The DEIS provides DNL noise levels as calculated from the model, but does not provide actual field-measured DNL values of ambient conditions. It is not clear in the DEIS whether the model is accurate or how it was verified. Explain the expected level of accuracy of NOISEMAP. The DEIS should explain the validation process of the noise study, and identify whether the modeling results were independently verified. Include an assessment of calculated noise levels against actual field-measured DNL values.</p> <p>6. Provide a Noise Analysis for Rotary Wing Aircraft. Table ES-2 indicates rotary wing aircraft could increase from 1831 operations/yr to 2030 operations/yr under Alternative 3. In the Aircraft Noise Study for NASKW (Wyle, 2012), page 17 states rotary wing aircraft were not modeled. The DEIS should provide a noise assessment that includes rotary wing aircraft under each alternative.</p> <p>7. Verify Best Available SEL Noise Data for the F-35. Table 4.1-4 (page 4-12) provides SEL noise values for the F-35C. Footnote 4 states it is based on F-35A noise data measured at Edwards Air Force Base on October 22, 2008 and states that this is best available data on SEL for the F-35. Given that these data are nearly four years old and there has been much controversy since then on the actual noise levels of the F-35, provide documentation that this remains the best available data, or provide and analyze new data. Also, the DEIS should provide documentation that these noise levels are appropriate for all F-35 variants (A, B, and C).</p> <p>8. Provide SEL Values for All Aircraft. Table 4.1-4 (page 4-12) provides SEL values for some legacy and some next generation aircraft, but not all of them. Add SEL values for all aircraft shown on Table ES-2 (page ES-6) and for the range of flight conditions in Table 7-1 (page 61) of Draft WR 12-13: NAS Key West Noise Study.</p> <p>9. Add SEL at Receptor Locations. Add tables of SEL values for each representative receptor for each type of legacy and next-generation aircraft.</p> <p style="text-align: center;">Page 4 of 12</p>	<p>M-01</p> <p>Navy Response</p> <p>M-01-D</p> <p>The types of airfield operations that comprise the existing operational environment are based on 2009-2010 annual data, which are consistent with airfield operations data available for 2010 and 2011. Of these operations, approximately 3 percent are Field Carrier Landing Practice (FCLP) patterns or 1,200 annual FCLP pattern operations by all aircraft types. Of these, approximately 500 annual FCLP pattern operations are conducted by tactical aircraft on a non-routine basis. Historically, 1 to 2 squadrons conduct FCLP training at NAS Key West annually. Section 2.4.3 was modified to provide clarification regarding the existing FCLP pattern operations.</p> <p>M-01-E</p> <p>As stated in Section 2.4.1, annual airfield operations data from 2000 to 2009 was used for the baseline of number of annual airfield operations. Clarification has been added to Section 2.4.3 to indicate that the types of airfield operations that comprise the existing operational environment, which are based on 2009-2010 annual data validated through 2011, include data on operations conducted during and outside of normal airfield operating hours (7 a.m. to 10 p.m.).</p>
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<p style="text-align: right;">M-01</p> <p>3. Justify the Baseline of 500 Annual Field Carrier Landing Practices (FCLPs). Table ES-1 footnote states that the existing condition / No Action Alternative assumes up to 500 annual tactical aircraft FCLP operations, but there is no justification in the DEIS for this number. At the August 2, 2012 Public Meeting, Navy staff indicated that there has been a wide range of annual FCLPs in recent years. The DEIS should provide a chart of the number of the past FCLP operations (similar to Table 2.3-2 on page 2-8) and include an explanation of the basis for using 500 as the baseline. If 500 is not a reasonable baseline, provide a noise analysis for each alternative using an appropriate baseline. The baseline should not include the Super Hornet (per comment #1).</p> <p>4. Provide Documentation of Past Night Operations. Section 4.1.2 (page 4-2) states that for the baseline existing condition and Alternative 1, acoustic night operations (10 pm to 7 am) were conservatively estimated to be at 2.6% of annual operations. The DEIS should provide actual numbers of night operations for the years 2000 to present (similar to Table 2.3-2) for FCLP and non-FCLP operations.</p> <p>5. Provide Validation of the Noise Modeling. The DEIS provides DNL noise levels as calculated from the model, but does not provide actual field-measured DNL values of ambient conditions. It is not clear in the DEIS whether the model is accurate or how it was verified. Explain the expected level of accuracy of NOISEMAP. The DEIS should explain the validation process of the noise study, and identify whether the modeling results were independently verified. Include an assessment of calculated noise levels against actual field-measured DNL values.</p> <p style="text-align: right;">M-01-F</p> <p>6. Provide a Noise Analysis for Rotary Wing Aircraft. Table ES-2 indicates rotary wing aircraft could increase from 1831 operations/yr to 2030 operations/yr under Alternative 3. In the Aircraft Noise Study for NASKW (Wyle, 2012), page 17 states rotary wing aircraft were not modeled. The DEIS should provide a noise assessment that includes rotary wing aircraft under each alternative.</p> <p>7. Verify Best Available SEL Noise Data for the F-35. Table 4.1-4 (page 4-12) provides SEL noise values for the F-35C. Footnote 4 states it is based on F-35A noise data measured at Edwards Air Force Base on October 22, 2008 and states that this is best available data on SEL for the F-35. Given that these data are nearly four years old and there has been much controversy since then on the actual noise levels of the F-35, provide documentation that this remains the best available data, or provide and analyze new data. Also, the DEIS should provide documentation that these noise levels are appropriate for all F-35 variants (A, B, and C).</p> <p>8. Provide SEL Values for All Aircraft. Table 4.1-4 (page 4-12) provides SEL values for some legacy and some next generation aircraft, but not all of them. Add SEL values for all aircraft shown on Table ES-2 (page ES-6) and for the range of flight conditions in Table 7-1 (page 61) of Draft WR 12-13: NAS Key West Noise Study.</p> <p>9. Add SEL at Receptor Locations. Add tables of SEL values for each representative receptor for each type of legacy and next-generation aircraft.</p> <p style="text-align: center;">Page 4 of 12</p>	<p>Navy Response</p> <p>M-01-F</p> <p>As noted in Section 3.1.2.5, the noise environment at the NAS Key West airfield was modeled using NOISEMAP software suite. To produce the DNL contours, NOISEMAP utilizes a library of actual aircraft noise measurements, adjusted to local meteorological conditions, to produce noise contours based on an average annual day of operations. NOISEMAP represents the best noise modeling science available today for military airfields. NOISEMAP has been validated through extensive study (Lunburg 1991, Speakman 1989, Lee 1982, Seidman and Bennett 1981, Rentz and Seidman 1980, Bishop et al. 1977, and Dundordale et al. 1976). NOISEMAP is used by DOD and other federal agencies to model noise exposure at and around military air stations for noise associated with aircraft flight operations, aircraft engine run-up activities, and on-ground testing.</p>
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<p style="text-align: right;">M-01</p> <p>3. Justify the Baseline of 500 Annual Field Carrier Landing Practices (FCLPs). Table ES-1 footnote states that the existing condition / No Action Alternative assumes up to 500 annual tactical aircraft FCLP operations, but there is no justification in the DEIS for this number. At the August 2, 2012 Public Meeting, Navy staff indicated that there has been a wide range of annual FCLPs in recent years. The DEIS should provide a chart of the number of the past FCLP operations (similar to Table 2.3-2 on page 2-8) and include an explanation of the basis for using 500 as the baseline. If 500 is not a reasonable baseline, provide a noise analysis for each alternative using an appropriate baseline. The baseline should not include the Super Hornet (per comment #1).</p> <p>4. Provide Documentation of Past Night Operations. Section 4.1.2 (page 4-2) states that for the baseline existing condition and Alternative 1, acoustic night operations (10 pm to 7 am) were conservatively estimated to be at 2.6% of annual operations. The DEIS should provide actual numbers of night operations for the years 2000 to present (similar to Table 2.3-2) for FCLP and non-FCLP operations.</p> <p>5. Provide Validation of the Noise Modeling. The DEIS provides DNL noise levels as calculated from the model, but does not provide actual field-measured DNL values of ambient conditions. It is not clear in the DEIS whether the model is accurate or how it was verified. Explain the expected level of accuracy of NOISEMAP. The DEIS should explain the validation process of the noise study, and identify whether the modeling results were independently verified. Include an assessment of calculated noise levels against actual field-measured DNL values.</p> <p>6. Provide a Noise Analysis for Rotary Wing Aircraft. Table ES-2 indicates rotary wing aircraft could increase from 1831 operations/yr to 2030 operations/yr under Alternative 3. In the Aircraft Noise Study for NASKW (Wyle, 2012), page 17 states rotary wing aircraft were not modeled. The DEIS should provide a noise assessment that includes rotary wing aircraft under each alternative.</p> <p style="text-align: right;">} M-01-G</p> <p>7. Verify Best Available SEL Noise Data for the F-35. Table 4.1-4 (page 4-12) provides SEL noise values for the F-35C. Footnote 4 states it is based on F-35A noise data measured at Edwards Air Force Base on October 22, 2008 and states that this is best available data on SEL for the F-35. Given that these data are nearly four years old and there has been much controversy since then on the actual noise levels of the F-35, provide documentation that this remains the best available data, or provide and analyze new data. Also, the DEIS should provide documentation that these noise levels are appropriate for all F-35 variants (A, B, and C).</p> <p>8. Provide SEL Values for All Aircraft. Table 4.1-4 (page 4-12) provides SEL values for some legacy and some next generation aircraft, but not all of them. Add SEL values for all aircraft shown on Table ES-2 (page ES-6) and for the range of flight conditions in Table 7-1 (page 61) of Draft WR 12-13: NAS Key West Noise Study.</p> <p>9. Add SEL at Receptor Locations. Add tables of SEL values for each representative receptor for each type of legacy and next-generation aircraft.</p> <p style="text-align: center;">Page 4 of 12</p>	<p>Navy Response</p> <p>M-01-G</p> <p>Rotary-wing aircraft were not modeled for this noise study because their inclusion would have a negligible effect on the overall DNLs. At airfields where the majority of operations are generated by fixed-wing jet engine aircraft, rotary wing aircraft do not typically generate enough acoustic energy to discernibly affect DNLs. In such cases, it is common practice to exclude rotary-wing aircraft from the airfield noise modeling. Evidence to support this assertion for the NAS Key West EIS is found by inspection of the data used in the Point of Interest analysis conducted for the representative receptor locations. Annual rotary-wing flight operations would total 2,030 under any alternative, (i.e., less than 5 percent of the total flight operations under any alternative). As explained in the noise study available at the project website: www.keywesteis.com, rotary-wing aircraft would contribute less than 0.6 decibels (dB) to the overall DNL at the receptor locations.</p> <p>A direct comparison of rotary- and fixed-wing single-event noise levels provides further support for this conclusion. The table below presents the Sound Exposure Levels (SELs) generated by 600 ft Above Ground Level (AGL) straight and level flyovers of the SH-60B helicopter and the four aforementioned fixed-wing aircraft types.</p>
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Navy Response

M-01-G (Continued)

The SELs are used to calculate the acoustic energy fraction of an SH-60B flyover compared to the fixed wing flyovers, and the number of SH-60B flyovers required to equal the acoustic energy of the fixed-wing aircraft flyovers. As can be seen in the table, one FA-18E/F flyover acoustically equates to approximately 1,200 SH-60B flyovers for the given flight conditions. The maximum annual number of rotary wing aircraft operations under any EIS alternative would be 2,030 (Alternative 3). In this example, two FA-18E/F flyovers acoustically equate to a greater number of SH-60B flyovers than there are total annual rotary-wing operations under any EIS alternative.

Comparison of a Rotary Wing and Fixed Wing 600 ft AGL Flyovers

Metric	600' AGL Flyover ¹				
	SH-60B (140 kts)	FA-18 E/F (140 kts, 87% NC) ⁴	FA-18C/D (140 kts, 87% NC) ⁴	F-35C (145 kts, 50% ETR) ^{4,5}	F-5E (180 kts, 82% RPM) ⁴
SEL (dBA)	88	119	111	108	96
SH-60B Energy Fraction ²	-	0.09%	0.51%	0.98%	18.35%
Energy Equivalent Number of SH-60B Operations ³	-	1163	198	102	5

Notes: SEL = Sound Exposure Level in A-weighted decibels (dB)

SEL values based on modeled weather conditions of: 77.9° F, 68.1% relative humidity, and 30.02 in HG atmospheric pressure

SEL values are for flights passing directly overhead at the given altitude

ETR = Engine Thrust Request

NC = Compressor Stage RPM

¹ Based on flight conditions for the downwind leg of a 600ft AGL VFR Pattern (hypothetical for SH-60B)

² Acoustic energy fraction of the SH-60B flyover compared to the fixed wing flyovers

³ Number of SH-60B flyovers that would produce an equivalent amount of acoustic energy to one of the fixed wing flyovers

⁴ Aircraft in 'dirty' configuration, i.e., gear and flaps down.

⁵ Based on F-35A noise data measured October 22, 2008 at Edwards Air Force Base

<p style="text-align: right;">M-01</p> <p>3. Justify the Baseline of 500 Annual Field Carrier Landing Practices (FCLPs). Table ES-1 footnote states that the existing condition / No Action Alternative assumes up to 500 annual tactical aircraft FCLP operations, but there is no justification in the DEIS for this number. At the August 2, 2012 Public Meeting, Navy staff indicated that there has been a wide range of annual FCLPs in recent years. The DEIS should provide a chart of the number of the past FCLP operations (similar to Table 2.3-2 on page 2-8) and include an explanation of the basis for using 500 as the baseline. If 500 is not a reasonable baseline, provide a noise analysis for each alternative using an appropriate baseline. The baseline should not include the Super Hornet (per comment #1).</p> <p>4. Provide Documentation of Past Night Operations. Section 4.1.2 (page 4-2) states that for the baseline existing condition and Alternative 1, acoustic night operations (10 pm to 7 am) were conservatively estimated to be at 2.6% of annual operations. The DEIS should provide actual numbers of night operations for the years 2000 to present (similar to Table 2.3-2) for FCLP and non-FCLP operations.</p> <p>5. Provide Validation of the Noise Modeling. The DEIS provides DNL noise levels as calculated from the model, but does not provide actual field-measured DNL values of ambient conditions. It is not clear in the DEIS whether the model is accurate or how it was verified. Explain the expected level of accuracy of NOISEMAP. The DEIS should explain the validation process of the noise study, and identify whether the modeling results were independently verified. Include an assessment of calculated noise levels against actual field-measured DNL values.</p> <p>6. Provide a Noise Analysis for Rotary Wing Aircraft. Table ES-2 indicates rotary wing aircraft could increase from 1831 operations/yr to 2030 operations/yr under Alternative 3. In the Aircraft Noise Study for NASKW (Wyle, 2012), page 17 states rotary wing aircraft were not modeled. The DEIS should provide a noise assessment that includes rotary wing aircraft under each alternative.</p> <p>7. Verify Best Available SEL Noise Data for the F-35. Table 4.1-4 (page 4-12) provides SEL noise values for the F-35C. Footnote 4 states it is based on F-35A noise data measured at Edwards Air Force Base on October 22, 2008 and states that this is best available data on SEL for the F-35. Given that these data are nearly four years old and there has been much controversy since then on the actual noise levels of the F-35, provide documentation that this remains the best available data, or provide and analyze new data. Also, the DEIS should provide documentation that these noise levels are appropriate for all F-35 variants (A, B, and C).</p> <p>8. Provide SEL Values for All Aircraft. Table 4.1-4 (page 4-12) provides SEL values for some legacy and some next generation aircraft, but not all of them. Add SEL values for all aircraft shown on Table ES-2 (page ES-6) and for the range of flight conditions in Table 7-1 (page 61) of Draft WR 12-13: NAS Key West Noise Study.</p> <p>9. Add SEL at Receptor Locations. Add tables of SEL values for each representative receptor for each type of legacy and next-generation aircraft.</p> <p style="text-align: center;">Page 4 of 12</p>	<p>Navy Response</p> <p>M-01-H</p> <p>The Sound Exposure Level (SEL) for F-35A measured at Edwards Air Force Base on October 22, 2008 remains the best available data on SEL for all variants of the F-35.</p> <p>M-01-I</p> <p>Section 4.1.2.2 was modified to include additional aircraft and these data were appended to the Final NAS Key West Noise Study.</p> <p>M-01-J</p> <p>Table 4.1-3 and associated analysis in Section 4.1 were modified to include highest SEL values at representative receptors and Section E.5 of Appendix E was modified to include detailed backup data.</p>
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<p style="text-align: right;">M-01</p> <p>10. Justify Speech Interference and Sleep Disturbance Assumptions. Tables 4.1-5 (page 4-12) and 4.1-6 (page 4-14) identify speech interference and sleep disturbance under each alternative. Are these numbers based on an assumption that pilots are always on the standard flightpaths, or is there an assumption that pilots deviate sometimes (e.g., for other air traffic, weather, mishaps, pilot error, etc) which may take them closer to residential areas and which may increase speech interference and sleep disturbance? If the latter, the DEIS should provide and justify the assumptions. If the former, the DEIS should provide a noise analysis that accounts for the occasional deviations in standard flightpaths. Since the majority of flight operations are flown by pilots in training whose aircraft are not based at NASKW, the assumption of strict course rule compliance does not seem justified. Provide for a reasonable amount of course deviations in the noise analysis.</p> <p style="text-align: right;">M-01-K</p> <p>11. Evaluate and Implement New Noise Reduction Optimization Software. New tools are continually being developed to improve the military's capabilities to assess and to potentially reduce operational noise. One example is the Advanced Acoustic Model (AAM), which has the potential to more accurately depict non-linear propagation of noise from aircraft such as the F-35. Another example is the Trajectory Optimization and Noise Evaluator (TONE) software package (currently being developed by AVID, LLC), which has the potential to optimize operational flight procedures to reduce community noise exposure. NASKW should evaluate such optimization tools for the DEIS and provide an annual status to the County that identifies the optimization tools evaluated, identifies positive steps taken to implement new optimization tools, and quantifies any resulting noise reduction.</p> <p style="text-align: right;">M-01-L</p> <p>12. Describe the Timing of Increases at NASKW: NASKW should describe when the increase in takeoffs and landings would occur, including the time of day that the increased flights would occur (morning, day, evening, night), the days of the week that the increased flights would occur (weekdays, weekends), and the seasons that the increased flights would occur. Section 2.4.4 (page 2-18) states that operational requirements may necessitate operations outside of normal hours of operation. The DEIS should clarify under what circumstances and during which hours would operations be necessary between 10 pm and 7 am.</p> <p>13. Provide Mitigation for Affected Residents. The County understands and appreciates the important mission of NASKW. It is also important that County residents are treated fairly as it relates to impacts from NASKW operations, in particular, when NASKW operational changes negatively affect their lives and property values. According to Table 4.1-2 (page 4-7) under Alternatives 1, 2, and 3, the number of off-station people exposed to noise levels 65 DNL and greater would increase by 13, 366, and 533 people respectively, and the number of housing units within the 65 DNL and greater noise zone would increase by 14, 184, and 271 housing units, respectively. According to Tables 4.1-5 (page 4-12) and 4.1-6 (page 4-14), indoor speech interference and sleep disturbance will also increase under Alternatives 2 and 3.</p> <p style="text-align: center;">Page 5 of 12</p>	<p>Navy Response</p> <p>M-01-K</p> <p>Section 3.1.2.5 was modified to include a statement similar to that provided in Section 2.4.3, indicating that a flight track is representative of the route an aircraft follows over the ground while conducting operations at the airfield. Flight tracks typically depict departure and arrival, touch and go, and FCLP patterns to demonstrate how the aircraft flies in relation to the airfield. Flight tracks provide safety, consistency, and control of air traffic around an airfield. Flight tracks are graphically represented as single lines, although flights vary due to aircraft performance, pilot technique, weather conditions, and air traffic control variables, such that the actual flight track is most accurately represented as a band, often half a mile to several miles wide. This is standard DOD-approved methodology for noise analysis and provides a reasonable and typical amount of variability in flight paths.</p> <p>M-01-L</p> <p>As noted in Section 3.1.2.5, Advanced Acoustic Model (AAM) has not yet been approved for use by the DOD. Trajectory Optimization and Noise Evaluator software is not appropriate for the analysis of environmental effects under NEPA. As noted in Sections 4.4 and 7.3.1.2, the Navy remains dedicated to working with the community to minimize noise effects from airfield operations.</p>
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<p>M-01</p> <p>10. Justify Speech Interference and Sleep Disturbance Assumptions. Tables 4.1-5 (page 4-12) and 4.1-6 (page 4-14) identify speech interference and sleep disturbance under each alternative. Are these numbers based on an assumption that pilots are always on the standard flightpaths, or is there an assumption that pilots deviate sometimes (e.g., for other air traffic, weather, mishaps, pilot error, etc) which may take them closer to residential areas and which may increase speech interference and sleep disturbance? If the latter, the DEIS should provide and justify the assumptions. If the former, the DEIS should provide a noise analysis that accounts for the occasional deviations in standard flightpaths. Since the majority of flight operations are flown by pilots in training whose aircraft are not based at NASKW, the assumption of strict course rule compliance does not seem justified. Provide for a reasonable amount of course deviations in the noise analysis.</p> <p>11. Evaluate and Implement New Noise Reduction Optimization Software. New tools are continually being developed to improve the military's capabilities to assess and to potentially reduce operational noise. One example is the Advanced Acoustic Model (AAM), which has the potential to more accurately depict non-linear propagation of noise from aircraft such as the F-35. Another example is the Trajectory Optimization and Noise Evaluator (TONE) software package (currently being developed by AVID, LLC), which has the potential to optimize operational flight procedures to reduce community noise exposure. NASKW should evaluate such optimization tools for the DEIS and provide an annual status to the County that identifies the optimization tools evaluated, identifies positive steps taken to implement new optimization tools, and quantifies any resulting noise reduction.</p> <p>12. Describe the Timing of Increases at NASKW: NASKW should describe when the increase in takeoffs and landings would occur, including the time of day that the increased flights would occur (morning, day, evening, night), the days of the week that the increased flights would occur (weekdays, weekends), and the seasons that the increased flights would occur. Section 2.4.4 (page 2-18) states that operational requirements may necessitate operations outside of normal hours of operation. The DEIS should clarify under what circumstances and during which hours would operations be necessary between 10 pm and 7 am.</p> <p>13. Provide Mitigation for Affected Residents. The County understands and appreciates the important mission of NASKW. It is also important that County residents are treated fairly as it relates to impacts from NASKW operations, in particular, when NASKW operational changes negatively affect their lives and property values. According to Table 4.1-2 (page 4-7) under Alternatives 1, 2, and 3, the number of off-station people exposed to noise levels 65 DNL and greater would increase by 13, 366, and 533 people respectively, and the number of housing units within the 65 DNL and greater noise zone would increase by 14, 184, and 271 housing units, respectively. According to Tables 4.1-5 (page 4-12) and 4.1-6 (page 4-14), indoor speech interference and sleep disturbance will also increase under Alternatives 2 and 3.</p> <p>M-01-M</p> <p>M-01-N</p> <p>Page 5 of 12</p>	<p>Navy Response</p> <p>M-01-M</p> <p>Under Alternatives 2 and 3, FCLPs are a contingency operation that would only be conducted at NAS Key West when other primary locations are unavailable. As stated in Section 4.1.3, although a portion of FCLP training requires dark conditions, it is anticipated that these operations would be normally be completed within the normal operating hours of the airfield (prior to 10 p.m.). In the event of a carrier air wing detachment during the summer months when there is extended daylight, there is an increased potential for FCLP operations to occur past 10 p.m. Such operations would be limited to those in support of critical mission requirements and would be completed as early possible.</p> <p>M-01-N</p> <p>The Navy recognizes the importance of being good neighbors with local communities and makes every effort to balance noise abatement with the need to train Navy pilots. The Navy will continue to make every attempt to minimize its noise impacts to nearby communities through the continued use of designated flight paths, procedures, and noise abatement measures for military aircraft operating from NAS Key West. These measures include restricting the manner in which aircraft climb, limiting late night flying to only mission essential activities, minimizing flights over heavily populated areas, and accepting input from the public to ensure these measures remain as effective as</p>
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<p>Even without the Super Hornet treated as a new aircraft (see comment #1), the Navy's proposed action will result in a discernible and significant increase in noise and associated impacts to Monroe citizens. The Navy should treat these affected residents fairly by mitigating for the projected impacts. In this regard, the Navy should provide mitigation options for affected residents in the DEIS. This should include, but is not limited to, sound insulation, proposed changes to the Course Rules, and purchasing property from willing sellers. Further, the DEIS should include a discussion of the anticipated costs of each option. Mitigation should be evaluated in the DEIS for all potential impacts, including impacts related to the introduction of the Super Hornet (see comment #1).</p> <p>14. Clarify the Navy's Authority to Implement Mitigation. The DEIS states on page 7-1 that "no mitigation measures are proposed in the DEIS". At the July 31, 2012 Joint Workshop between the Monroe County Board of County Commissioners, City of Key West, and the Navy, Navy staff stated the Navy does not have the authority to insulate homes or the authority to purchase property. The DEIS should provide references to all Navy regulations, policy, and guidance related to Navy mitigation, including but not limited to noise mitigation. Also, the DEIS should summarize the Navy's authorities and regulatory obligations for mitigation, including but not limited to noise mitigation. These references should be included in the DEIS.</p> <p>15. Identify Past Mitigation at Other Installations. Has the Navy ever, at any installation, undertaken mitigation to compensate for impacts resulting from Navy operations, including but not limited to noise impacts? If so, the DEIS should provide details. Have other branches of the military (e.g., Air Force) ever provided such mitigation? Include Course Rule changes such as those used at NALF Fentress and alternative runway use.</p> <p>16. Implementation of Guidelines for Sound Insulation. In April 2005, the Navy issued "Guidelines for Sound Insulation of Residences Exposed to Aircraft Operations". Has this guidance been adopted by the Navy? Has the Navy implemented this guidance at any installation?</p> <p>17. Explain Relevance of Changes to Environmental Readiness Program Manual. The DEIS should discuss the difference between the October 2007 guidance in OPNAVINST 5090.1C (Environmental Readiness Program Manual) and the revised July 2011 guidance, and how these changes apply to this EIS. In particular, Chapter 5 was replaced completely. The discussion of mitigation seems to have been substantially changed in 2011.</p> <p style="text-align: center;">Page 6 of 12</p>	<p>M-01</p> <p>Navy Response</p> <p>M-01-N (Continued)</p> <p>practicable. As further detailed in the response below, Congress has not given the military services the authority to install soundproofing in homes and buildings that are not owned by the federal government. The management actions included in the impact analysis in Chapter 4 and summarized in Section 7.3 consist of existing best management practices and standard operating procedures that will continue to mitigate the proposed action. Section 7.3.1.2 specifically outlines such management measures for noise such as the NAS Key West airfield course rules and noise abatement procedures. As also noted in Section 7.2, local governments could adopt the land use compatibility recommendations to ensure the impact on existing and future land use compatibility is minimized.</p> <p>M-01-O</p> <p>Congress has not given the military services the authority to install soundproofing in homes and buildings that are not owned by the federal government. However, the Navy has the authority to request funds for the purchase of real property and development rights as well as provide specific relocation assistance, payments, and services to eligible persons displaced as a result of a Navy acquisition project. In fact, the Navy has acquired approximately 900 acres of undeveloped tracts of land in the immediate vicinity just north, south, and east of the NAS Key West airfield (all south of U.S. Route 1).</p>
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<p>Even without the Super Hornet treated as a new aircraft (see comment #1), the Navy's proposed action will result in a discernible and significant increase in noise and associated impacts to Monroe citizens. The Navy should treat these affected residents fairly by mitigating for the projected impacts. In this regard, the Navy should provide mitigation options for affected residents in the DEIS. This should include, but is not limited to, sound insulation, proposed changes to the Course Rules, and purchasing property from willing sellers. Further, the DEIS should include a discussion of the anticipated costs of each option. Mitigation should be evaluated in the DEIS for all potential impacts, including impacts related to the introduction of the Super Hornet (see comment #1).</p> <p>14. Clarify the Navy's Authority to Implement Mitigation. The DEIS states on page 7-1 that "no mitigation measures are proposed in the DEIS". At the July 31, 2012 Joint Workshop between the Monroe County Board of County Commissioners, City of Key West, and the Navy, Navy staff stated the Navy does not have the authority to insulate homes or the authority to purchase property. The DEIS should provide references to all Navy regulations, policy, and guidance related to Navy mitigation, including but not limited to noise mitigation. Also, the DEIS should summarize the Navy's authorities and regulatory obligations for mitigation, including but not limited to noise mitigation. These references should be included in the DEIS.</p> <p>15. Identify Past Mitigation at Other Installations. Has the Navy ever, at any installation, undertaken mitigation to compensate for impacts resulting from Navy operations, including but not limited to noise impacts? If so, the DEIS should provide details. Have other branches of the military (e.g., Air Force) ever provided such mitigation? Include Course Rule changes such as those used at NALF Fentress and alternative runway use.</p> <p>16. Implementation of Guidelines for Sound Insulation. In April 2005, the Navy issued "Guidelines for Sound Insulation of Residences Exposed to Aircraft Operations". Has this guidance been adopted by the Navy? Has the Navy implemented this guidance at any installation?</p> <p>17. Explain Relevance of Changes to Environmental Readiness Program Manual. The DEIS should discuss the difference between the October 2007 guidance in OPNAVINST 5090.1C (Environmental Readiness Program Manual) and the revised July 2011 guidance, and how these changes apply to this EIS. In particular, Chapter 5 was replaced completely. The discussion of mitigation seems to have been substantially changed in 2011.</p> <p style="text-align: center;">Page 6 of 12</p>	<p>M-01</p> <p>Navy Response</p> <p>M-01-O (Continued)</p> <p>These areas were identified in the NAS Key West 1977 AICUZ Study as areas of significance for protection of airfield assets and the public.</p> <p>The Navy's real property acquisition authorities are set forth under 42 U.S. Code 4601 et seq. and Secretary of the Navy Instruction (SECNAVINST) 11011.47B; policies and procedures are provided in Naval Facilities Engineering Command Publication P-73. In addition, authority under 10 U.S. Code Section 2684a allows the Navy to partner with state and local governments or private conservation groups to cost share the acquisition of easements and other real property interests for encroachment.</p> <p>In accordance with today's AICUZ guidelines (DOD Instruction 4165.57 and Office of the Chief of Naval Operations Instruction [OPNAVINST] 11010.36C), the acquisition of restrictive use easements or interests in land outside the clear zone, such as Accident Potential Zones (APZs) and noise zones, should only be pursued when state and local governments are unwilling or unable to enact land use controls to achieve land use compatibility in accordance with AICUZ guidelines and the operational integrity of the air installation is manifestly threatened. As noted in Section 7.3.4.2, the Navy would continue coordination with local elected officials, planners, and citizens in protecting the health, safety, and welfare of individuals living near the NAS Key West airfield while preserving the operational capability of the airfield.</p>
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<p>Even without the Super Hornet treated as a new aircraft (see comment #1), the Navy's proposed action will result in a discernible and significant increase in noise and associated impacts to Monroe citizens. The Navy should treat these affected residents fairly by mitigating for the projected impacts. In this regard, the Navy should provide mitigation options for affected residents in the DEIS. This should include, but is not limited to, sound insulation, proposed changes to the Course Rules, and purchasing property from willing sellers. Further, the DEIS should include a discussion of the anticipated costs of each option. Mitigation should be evaluated in the DEIS for all potential impacts, including impacts related to the introduction of the Super Hornet (see comment #1).</p> <p>14. Clarify the Navy's Authority to Implement Mitigation. The DEIS states on page 7-1 that "no mitigation measures are proposed in the DEIS". At the July 31, 2012 Joint Workshop between the Monroe County Board of County Commissioners, City of Key West, and the Navy, Navy staff stated the Navy does not have the authority to insulate homes or the authority to purchase property. The DEIS should provide references to all Navy regulations, policy, and guidance related to Navy mitigation, including but not limited to noise mitigation. Also, the DEIS should summarize the Navy's authorities and regulatory obligations for mitigation, including but not limited to noise mitigation. These references should be included in the DEIS.</p> <p>15. Identify Past Mitigation at Other Installations. Has the Navy ever, at any installation, undertaken mitigation to compensate for impacts resulting from Navy operations, including but not limited to noise impacts? If so, the DEIS should provide details. Have other branches of the military (e.g., Air Force) ever provided such mitigation? Include Course Rule changes such as those used at NALF Fentress and alternative runway use.</p> <p>16. Implementation of Guidelines for Sound Insulation. In April 2005, the Navy issued "Guidelines for Sound Insulation of Residences Exposed to Aircraft Operations". Has this guidance been adopted by the Navy? Has the Navy implemented this guidance at any installation?</p> <p>17. Explain Relevance of Changes to Environmental Readiness Program Manual. The DEIS should discuss the difference between the October 2007 guidance in OPNAVINST 5090.1C (Environmental Readiness Program Manual) and the revised July 2011 guidance, and how these changes apply to this EIS. In particular, Chapter 5 was replaced completely. The discussion of mitigation seems to have been substantially changed in 2011.</p> <p style="text-align: center;">Page 6 of 12</p>	<p>Navy Response</p> <p>M-01-P</p> <p>Section 7.3.1.2 specifically outlines existing management measures for noise such as the NAS Key West airfield course rules and noise abatement procedures. Providing the details suggested in your comment is not relevant to making a reasoned choice among alternatives to meet the purpose and need for the proposed action and guidance provided in Chief of Naval Operations Instruction 5090.1C, Change 1 <i>Environmental Readiness Program Manual</i>, Chapter 5 which restricts the document only to pertinent facts and exclude material that is not directly applicable.</p> <p>M-01-Q</p> <p>The document referenced in your comment (Naval Facilities Engineering Command [NAVFAC] Washington 2005), provides a comprehensive overview of sound insulation techniques for homeowners and builders concerned with modifying an existing home or constructing a new one that incorporates sound insulation principles. It also provides guidance to planning, zoning, and building code officials who may want to incorporate zoning overlays and model building codes for residences near airports and military air installations. The document was not intended as Navy guidance and, accordingly, no associated adoption and/or implementation is proposed or anticipated.</p>
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<p>18. Correct the Errors in the Report. There are numerous errors in the report; the numbers reported on one page do not match those on another page. For example, on page ES-9 (Section ES.4.1) it states under Alternative 1 the estimated number of off-Station people exposed to noise levels 65 DNL and greater would increase by 13 people. This matches Table 4.1-2, but Section 4.1.2.1 (page 4-3) states than an estimated 14 people would be within the 65 DNL and greater noise zone. Not only should 14 be 13, but the sentence needs to be clarified that these are <i>additional</i> people. In the same sentence in Section 4.1.2.1, the number of housing units is also wrong according to Table 4.1-2: it should be 14, not 15, <i>additional</i> housing units. Similarly, in Section 4.1.2.1 second paragraph, the acreages do not precisely match Table 4.1-1. Section 4.1.3.1 has at least three similar errors, and Section 4.1.4.1 has at least four similar errors. Table 2.8-3 has similar problems. Page 1-3 states that NASKW supports approximately 50,000 operations per year, whereas the rest of the document uses 47,500. These are just some examples; there are many others throughout the DEIS. Some of these discrepancies are minor and may be due to rounding, but the DEIS is very hard to read with so many discrepancies. Please review the entire DEIS and fix the discrepancies.</p>	M-01	Navy Response
<p>19. Provide a Summary of Noise Complaints. For this DEIS, an important metric is the amount of annoyance that the public has with NASKW noise. Given that the Navy has a noise hotline and follows up on noise complaints (Section 2.4.4), there are data to assess this metric. The DEIS should provide noise complaints for the period 2000 to present, including the Navy's assessment of, and response to, each complaint. This should be included in an appendix to the DEIS.</p>	M-01-S	M-01-S
<p>20. Compare NASKW Operations to AFTT Events. The Navy is currently working on the Atlantic Fleet Training and Testing EIS/OEIS (Draft dated May 2012) (page 5-7). The AFTT Draft EIS/OEIS cites baseline and proposed numbers of aircraft events in the Key West Range Complex. The AFTT EIS/OEIS describes the numbers in terms of aircraft "events" (which may include multiple takeoffs and landings) whereas the NASKW Airfield Operations DEIS describes the numbers in terms of "operations" (single takeoffs or landings). Because the unit of measurement is different between the two documents, it is difficult to compare the documents. The County prefers the numbers in terms of "operations". NASKW should provide the AFTT Key West Range Complex numbers for all AFTT alternatives in terms of operations.</p>	M-01-T	<p>These errors have been corrected and changes made to ensure consistency and simplify presentation of some data, as appropriate.</p>
<p>21. Explain how this DEIS Relates to the AFTT EIS/OEIS. The Navy is currently working on the Atlantic Fleet Training and Testing EIS/OEIS (Draft dated May 2012) (page 5-7). At the July 31, 2012 Joint Workshop, Navy staff indicated that the NASKW Airfield Operations EIS will take precedent over the AFTT EIS/OEIS. The DEIS should explain how the two documents relate to each other. For each alternative in each document, explain how, if it were selected, it would affect the selected alternative in the other document. For example, if the NASKW Airfield Operations EIS selects Alternative 2 but the AFTT EIS/OEIS selects No Action, what would be the result at NASKW? Similarly, if NASKW Airfield Operations EIS selects Alternative 1 but the AFTT EIS/OEIS selects Alternative 2, what would be the result at NASKW? This should be added to Cumulative Impacts (Chapter 5) in the DEIS.</p>	M-01-U	M-01-T
<p>22. Confirm no STOVL. Section 2.5.1.3 (page 2-21) states that short takeoff / vertical landing (STOVL) training operations would not occur at NASKW. Confirm this statement in the DEIS.</p>		<p>Section 3.1.1 was modified and Section E.5.3 was added to Appendix E to include additional data on noise complaints from 2008 to 2012. Prior to 2008, a different system was used for comment tracking. Sections 2.4.4 and 7.3.1.2 were modified to clarify how NAS Key West responds to noise complaints.</p>
<p>Page 7 of 12</p>		M-01-U
		<p>Due to their distinct differences, DOD typically analyzes range operations in terms of "events" and airfield operations in terms of "operations." Although some training events that occur within the Key West Range Complex include detached aircraft operations originating at NAS Key West, Key West Range Complex training events are evaluated in the AFTT EIS/OEIS, which is a separate and distinct action from this EIS. The relationship between airfield operations at NAS Key West and range training events at the offshore range complex have independent utility and significance, as sorties associated with a range training event could originate from another airfield or an aircraft carrier.</p>

<p>M-01</p> <p>18. Correct the Errors in the Report. There are numerous errors in the report; the numbers reported on one page do not match those on another page. For example, on page ES-9 (Section ES.4.1) it states under Alternative 1 the estimated number of off-Station people exposed to noise levels 65 DNL and greater would increase by 13 people. This matches Table 4.1-2, but Section 4.1.2.1 (page 4-3) states than an estimated 14 people would be within the 65 DNL and greater noise zone. Not only should 14 be 13, but the sentence needs to be clarified that these are <i>additional</i> people. In the same sentence in Section 4.1.2.1, the number of housing units is also wrong according to Table 4.1-2: it should be 14, not 15, <i>additional</i> housing units. Similarly, in Section 4.1.2.1 second paragraph, the acreages do not precisely match Table 4.1-1. Section 4.1.3.1 has at least three similar errors, and Section 4.1.4.1 has at least four similar errors. 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Confirm this statement in the DEIS.</p> <p>Page 7 of 12</p>	<p>Navy Response</p> <p>M-01-V</p> <p>The AFTT EIS/OEIS focuses on events that occur and may potentially occur within existing at-sea ranges, to include the Key West Range Complex. The AFTT EIS/OEIS does not include any activities occurring at Boca Chica Field, which are analyzed in this EIS. Since the Navy's preferred alternative for this EIS is Alternative 2, any increase in training events in the Key West Range Complex that involve aircraft taking off or landing at Boca Chica Field, are captured in the discussion of aircraft operations in Chapter 2. Please note that the action alternatives described in the AFTT EIS/OEIS expand training and testing capabilities, but there is no direct correlation to NAS Key West aircraft operations. All training described in the AFTT EIS/OEIS and this EIS will continue to be performed in accordance with the Fleet Response Training Plan. The AFTT EIS/OEIS has analyzed alternatives that would address the largest potential use of the range. This will ensure all applicable permit coverage for whatever alternative is implemented from this EIS. AFTT EIS/OEIS analysis efforts do not pre-select an alternative for this EIS, and a decision on this EIS is expected to be reached by the Navy prior to a decision on the AFTT EIS/OEIS.</p> <p>M-01-W</p> <p>The referenced statement is confirmed, the F-35B variant will operate conventionally while operating at NAS Key West.</p>
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<p style="text-align: right;">M-01</p> <p>23. Evaluate the Alternative to Shift Training to Another Location. Section 2.6.2 (page 2-25) identifies an alternative that was considered but eliminated from further analysis: shift Navy aviation detachment training to an alternate location. Under this alternative, detachment training currently based out of NASKW would instead be conducted at another airfield. The first reason cited to eliminate the alternative is “aircraft detaching from an alternate location would have to travel greater distances to and from the Key West Range Complex”. This alternative should not have evaluated continued use of the Key West Range Complex, but rather a range complex that is closer to the alternate location. The alternative should transfer both the airfield activity <i>and</i> the associated training to another location. The other reasons for eliminating the alternative are unsubstantiated. For example, the text cites such an alternative could potentially require the construction of additional support facilities. Is this actually the case? What would be the cost of these facilities? Where is this analysis in the DEIS? Justify these unsubstantiated reasons for eliminating this alternative in the DEIS. The DEIS should redefine and re-evaluate this alternative.</p> <p style="text-align: right;">M-01-X</p> <p>24. Identify Runway Length Criteria. Section 7.4 (page 7-7) states that Runway 07/25 meets required airfield safety and planning criteria, but the length of 03/21 and 13/31 does not meet the primary runway length criteria for the majority of aircraft at NASKW. For which types of aircraft do these runways not meet the primary runway length criteria? Also identify the length and width criteria for each type of aircraft at NASKW in the DEIS.</p> <p>25. Shift Operations to Runway 13/31 Without Lengthening. Section 7.4.2 (page 7-8) acknowledges that wind conditions for Runway 13/31 are not unfavorable and that shifting utilization from 07/25 to 13/31 would potentially lessen community noise, but this alternative is rejected due to several challenges with lengthening 13/31. Given that 13/31 is approximately seven times the length of an aircraft carrier, it seems that some operations could be shifted to 13/31 without lengthening the runway. NASKW should provide a thorough analysis of this alternative.</p> <p>26. Evaluate Lengthening Runway 13/31. Section 7.4.2.1 (page 7-8) cites five reasons why Runway 13/31 cannot be lengthened to 10,000 feet. None of the reasons prevent the runway from being lengthened: (1) impacts to species and habitat can be mitigated for, even providing an overall positive environmental effect, (2) it is possible to consult with FKNMS, (3) the electrical transmission line could be relocated, (4) the on-Station infrastructure could be modified, and (5) the previous ESA Section 7 consultations could be re-examined. This alternative remains viable. Provide a thorough analysis of this alternative in the DEIS.</p> <p>27. Provide Agency Coordination for Runway Extensions. The DEIS chapter 7 indicates that the Navy has considered extending the length of the secondary runways and shifting some flights from 07/25 to the secondary runways. Has the Navy discussed runway extension options with the environmental agencies including but not limited to USFWS, USACE, FFWCC, and NMFS? If so, provide a summary of each agency’s comments in the DEIS.</p> <p>28. Minimize FLCP Operations at Night. Section 4.1.3 (page 4-15) indicates that an estimated 12% of FCLP operations (under Alternatives 2 and 3) would be conducted during acoustic night (10 pm to 7 am). The Navy should provide an approach that will avoid or minimize FCLPs at night. Also, the DEIS should confirm that the Navy will re-evaluate the EIS if more than 12% of FCLPs occur at night.</p> <p style="text-align: center;">Page 8 of 12</p>	<p>Navy Response</p> <p>M-01-X</p> <p>Title 10 Section 5062 of the U.S. Code requires the Navy to be trained and equipped for prompt and sustained combat incident to operations at sea. To ensure Naval forces are ready for a variety of military operations, the Navy must train in a variety of realistic environments. The mission of the Key West Range Complex is to provide sustainable and modernized ocean operating areas, airspace, ranges, range infrastructure, training facilities, and resources to fully support Navy training requirements. The Key West Complex provides critical support for Navy operational readiness training, and is of particular importance because of its supporting infrastructure and unobstructed airspace with favorable weather. These unique conditions allow for all levels of training and the efficient use of resources. Therefore, even if detachment training currently conducted at NAS Key West was conducted at another airfield, detached units would continue to train at the Key West Range Complex. Due to the need to train, the transit time for detachments is high priority. Any additional infrastructure requirements would be secondary and were not considered necessary to eliminate the alternative from further consideration.</p>
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Shifting operations from the primary runway would provide no gains with respect to the Navy’s ability to support and conduct aircraft training operations and capabilities, including support of the Fleet Response Training Plan and introduction of next generation aircraft at NAS Key West. Selection of which runway is to be used at any given time is primarily determined by the local winds due to safety and aircraft performance. Runway 07 is used 58 percent of the time and Runway 25 is used 9 percent of the time, thus the alternate runways (Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time (see Section 2.4.5). Based on the prevailing wind conditions favoring Runway 07/25 (see Section 3.3.1), there is a limitation in the volume of operations that could be shifted to the alternate runways.</p>
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None of the reasons prevent the runway from being lengthened: (1) impacts to species and habitat can be mitigated for, even providing an overall positive environmental effect, (2) it is possible to consult with FKNMS, (3) the electrical transmission line could be relocated, (4) the on-Station infrastructure could be modified, and (5) the previous ESA Section 7 consultations could be re-examined. This alternative remains viable. Provide a thorough analysis of this alternative in the DEIS.</p> <p>27. Provide Agency Coordination for Runway Extensions. The DEIS chapter 7 indicates that the Navy has considered extending the length of the secondary runways and shifting some flights from 07/25 to the secondary runways. Has the Navy discussed runway extension options with the environmental agencies including but not limited to USFWS, USACE, FFWCC, and NMFS? If so, provide a summary of each agency’s comments in the DEIS.</p> <p>28. Minimize FLCP Operations at Night. Section 4.1.3 (page 4-15) indicates that an estimated 12% of FCLP operations (under Alternatives 2 and 3) would be conducted during acoustic night (10 pm to 7 am). The Navy should provide an approach that will avoid or minimize FCLPs at night. Also, the DEIS should confirm that the Navy will re-evaluate the EIS if more than 12% of FCLPs occur at night.</p> <p style="text-align: center;">Page 8 of 12</p>	<p>Navy Response</p> <p>M-01-Z (Continued)</p> <p>As noted in Section 3.3.1, an increased safety margin for both takeoffs and landings is correlated with greater runway lengths. As noted in Section 3.4.6 and 7.4, a 7,000 ft by 150 ft runway does not meet the airfield planning criteria for majority of the aircraft that operate at NAS Key West. Although many of the aircraft flown at NAS Key West are capable of landing on an aircraft carrier, airfield operations are performed under a different set of operating criteria than aircraft carrier operations. Standard airfield arrival, departure, and pattern operations require greater runway lengths. The FCLP training exercises that are conducted at NAS Key West are required flight training that immediately precedes (and qualifies) pilots for carrier-landing operations. These exercises train pilots for landing on aircraft carriers and are conducted on a runway that simulates an aircraft carrier deck. Landing aircraft on a carrier deck provides little margin for error. Carrier landings involve the use of arresting gear, which is operationally impractical for everyday training. Air Stations are not built or equipped for that, aircraft service life does not allow for it, and pilot training does not allow it. Pilots are required to demonstrate mastery of the skills in carrier landings at an airfield prior to each period of carrier operations.</p>
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<p style="text-align: right;">M-01</p> <p>23. Evaluate the Alternative to Shift Training to Another Location. Section 2.6.2 (page 2-25) identifies an alternative that was considered but eliminated from further analysis: shift Navy aviation detachment training to an alternate location. Under this alternative, detachment training currently based out of NASKW would instead be conducted at another airfield. The first reason cited to eliminate the alternative is “aircraft detaching from an alternate location would have to travel greater distances to and from the Key West Range Complex”. This alternative should not have evaluated continued use of the Key West Range Complex, but rather a range complex that is closer to the alternate location. The alternative should transfer both the airfield activity <i>and</i> the associated training to another location. The other reasons for eliminating the alternative are unsubstantiated. For example, the text cites such an alternative could potentially require the construction of additional support facilities. Is this actually the case? What would be the cost of these facilities? Where is this analysis in the DEIS? Justify these unsubstantiated reasons for eliminating this alternative in the DEIS. The DEIS should redefine and re-evaluate this alternative.</p> <p>24. Identify Runway Length Criteria. Section 7.4 (page 7-7) states that Runway 07/25 meets required airfield safety and planning criteria, but the length of 03/21 and 13/31 does not meet the primary runway length criteria for the majority of aircraft at NASKW. For which types of aircraft do these runways not meet the primary runway length criteria? Also identify the length and width criteria for each type of aircraft at NASKW in the DEIS.</p> <p>25. Shift Operations to Runway 13/31 Without Lengthening. Section 7.4.2 (page 7-8) acknowledges that wind conditions for Runway 13/31 are not unfavorable and that shifting utilization from 07/25 to 13/31 would potentially lessen community noise, but this alternative is rejected due to several challenges with lengthening 13/31. Given that 13/31 is approximately seven times the length of an aircraft carrier, it seems that some operations could be shifted to 13/31 without lengthening the runway. NASKW should provide a thorough analysis of this alternative.</p> <p>26. Evaluate Lengthening Runway 13/31. Section 7.4.2.1 (page 7-8) cites five reasons why Runway 13/31 cannot be lengthened to 10,000 feet. None of the reasons prevent the runway from being lengthened: (1) impacts to species and habitat can be mitigated for, even providing an overall positive environmental effect, (2) it is possible to consult with FKNMS, (3) the electrical transmission line could be relocated, (4) the on-Station infrastructure could be modified, and (5) the previous ESA Section 7 consultations could be re-examined. This alternative remains viable. Provide a thorough analysis of this alternative in the DEIS.</p> <p style="text-align: right;">M-01-AA</p> <p>27. Provide Agency Coordination for Runway Extensions. The DEIS chapter 7 indicates that the Navy has considered extending the length of the secondary runways and shifting some flights from 07/25 to the secondary runways. Has the Navy discussed runway extension options with the environmental agencies including but not limited to USFWS, USACE, FFWCC, and NMFS? If so, provide a summary of each agency’s comments in the DEIS.</p> <p>28. Minimize FLCP Operations at Night. Section 4.1.3 (page 4-15) indicates that an estimated 12% of FCLP operations (under Alternatives 2 and 3) would be conducted during acoustic night (10 pm to 7 am). The Navy should provide an approach that will avoid or minimize FCLPs at night. Also, the DEIS should confirm that the Navy will re-evaluate the EIS if more than 12% of FCLPs occur at night.</p> <p style="text-align: center;">Page 8 of 12</p>	<p>Navy Response</p> <p>M-01-AA</p> <p>Clarification has been added to Section 7.4 noting that such an operational change is addressed in terms of a mitigation considered and not carried forward rather than in Chapter 2 because such an action would be inconsistent with the proposed action and associated purpose and need being evaluated in this EIS. Shifting operations from the primary runway would provide no gains with respect to the Navy’s ability to support and conduct aircraft training operations and capabilities, including support of the Fleet Response Training Plan and introduction of next generation aircraft at NAS Key West. Selection of which runway is to be used at any given time is primarily determined by the local winds due to safety and aircraft performance. Runway 07 is used 58 percent of the time and Runway 25 is used 9 percent of the time, thus the alternate runways (Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time (see Section 2.4.5). Based on the prevailing wind conditions favoring Runway 07/25 (see Section 3.3.1), there is a limitation in the volume of operations that could be shifted to the alternate runways. As noted in Section 3.3.1, an increased safety margin for both takeoffs and landings is correlated with greater runway lengths. As noted in Section 3.4.6 and 7.4, a 7,000 ft by 150 ft runway does not meet the airfield planning criteria for majority of the aircraft that operate at NAS Key West. Although many of the aircraft flown at NAS Key West are capable of landing on an aircraft carrier, airfield operations are performed under a different set of</p>
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<p style="text-align: right;">M-01</p> <p>23. Evaluate the Alternative to Shift Training to Another Location. Section 2.6.2 (page 2-25) identifies an alternative that was considered but eliminated from further analysis: shift Navy aviation detachment training to an alternate location. Under this alternative, detachment training currently based out of NASKW would instead be conducted at another airfield. The first reason cited to eliminate the alternative is “aircraft detaching from an alternate location would have to travel greater distances to and from the Key West Range Complex”. This alternative should not have evaluated continued use of the Key West Range Complex, but rather a range complex that is closer to the alternate location. The alternative should transfer both the airfield activity <i>and</i> the associated training to another location. The other reasons for eliminating the alternative are unsubstantiated. For example, the text cites such an alternative could potentially require the construction of additional support facilities. Is this actually the case? What would be the cost of these facilities? Where is this analysis in the DEIS? Justify these unsubstantiated reasons for eliminating this alternative in the DEIS. The DEIS should redefine and re-evaluate this alternative.</p> <p>24. Identify Runway Length Criteria. Section 7.4 (page 7-7) states that Runway 07/25 meets required airfield safety and planning criteria, but the length of 03/21 and 13/31 does not meet the primary runway length criteria for the majority of aircraft at NASKW. For which types of aircraft do these runways not meet the primary runway length criteria? Also identify the length and width criteria for each type of aircraft at NASKW in the DEIS.</p> <p>25. Shift Operations to Runway 13/31 Without Lengthening. Section 7.4.2 (page 7-8) acknowledges that wind conditions for Runway 13/31 are not unfavorable and that shifting utilization from 07/25 to 13/31 would potentially lessen community noise, but this alternative is rejected due to several challenges with lengthening 13/31. Given that 13/31 is approximately seven times the length of an aircraft carrier, it seems that some operations could be shifted to 13/31 without lengthening the runway. NASKW should provide a thorough analysis of this alternative.</p> <p>26. Evaluate Lengthening Runway 13/31. Section 7.4.2.1 (page 7-8) cites five reasons why Runway 13/31 cannot be lengthened to 10,000 feet. None of the reasons prevent the runway from being lengthened: (1) impacts to species and habitat can be mitigated for, even providing an overall positive environmental effect, (2) it is possible to consult with FKNMS, (3) the electrical transmission line could be relocated, (4) the on-Station infrastructure could be modified, and (5) the previous ESA Section 7 consultations could be re-examined. This alternative remains viable. Provide a thorough analysis of this alternative in the DEIS.</p> <p style="text-align: right;">M-01-AA</p> <p>27. Provide Agency Coordination for Runway Extensions. The DEIS chapter 7 indicates that the Navy has considered extending the length of the secondary runways and shifting some flights from 07/25 to the secondary runways. Has the Navy discussed runway extension options with the environmental agencies including but not limited to USFWS, USACE, FFWCC, and NMFS? If so, provide a summary of each agency’s comments in the DEIS.</p> <p>28. Minimize FLCP Operations at Night. Section 4.1.3 (page 4-15) indicates that an estimated 12% of FCLP operations (under Alternatives 2 and 3) would be conducted during acoustic night (10 pm to 7 am). The Navy should provide an approach that will avoid or minimize FCLPs at night. Also, the DEIS should confirm that the Navy will re-evaluate the EIS if more than 12% of FCLPs occur at night.</p> <p style="text-align: center;">Page 8 of 12</p>	<p>Navy Response</p> <p>M-01-AA (Continued)</p> <p>operating criteria than aircraft carrier operations. Standard airfield arrival, departure, and pattern operations require greater runway lengths. The FCLP training exercises that are conducted at NAS Key West are required flight training that immediately precedes (and qualifies) pilots for carrier-landing operations. These exercises train pilots for landing on aircraft carriers and are conducted on a runway that simulates an aircraft carrier deck. Landing aircraft on a carrier deck provides little margin for error. Carrier landings involve the use of arresting gear, which is operationally impractical for everyday training. Air Stations are not built or equipped for that, aircraft service life does not allow for it, and pilot training does not allow it. Pilots are required to demonstrate mastery of the skills in carrier landings at an airfield prior to each period of carrier operations.</p>
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Section 7.4.2 (page 7-8) acknowledges that wind conditions for Runway 13/31 are not unfavorable and that shifting utilization from 07/25 to 13/31 would potentially lessen community noise, but this alternative is rejected due to several challenges with lengthening 13/31. Given that 13/31 is approximately seven times the length of an aircraft carrier, it seems that some operations could be shifted to 13/31 without lengthening the runway. NASKW should provide a thorough analysis of this alternative.</p> <p>26. Evaluate Lengthening Runway 13/31. Section 7.4.2.1 (page 7-8) cites five reasons why Runway 13/31 cannot be lengthened to 10,000 feet. None of the reasons prevent the runway from being lengthened: (1) impacts to species and habitat can be mitigated for, even providing an overall positive environmental effect, (2) it is possible to consult with FKNMS, (3) the electrical transmission line could be relocated, (4) the on-Station infrastructure could be modified, and (5) the previous ESA Section 7 consultations could be re-examined. This alternative remains viable. Provide a thorough analysis of this alternative in the DEIS.</p> <p>27. Provide Agency Coordination for Runway Extensions. The DEIS chapter 7 indicates that the Navy has considered extending the length of the secondary runways and shifting some flights from 07/25 to the secondary runways. Has the Navy discussed runway extension options with the environmental agencies including but not limited to USFWS, USACE, FFWCC, and NMFS? If so, provide a summary of each agency’s comments in the DEIS.</p> <p>28. Minimize FLCP Operations at Night. 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Many agency representatives were familiar with the environmental issues in the vicinity of the runway due to the Navy’s EIS for the Restoration of Clear Zones and Stormwater Drainage Systems at Boca Chica Field, which addressed environmental impacts and mitigations necessary to remove vegetation from adjacent runway areas to meet airfield clear zone requirements (see Section 1.3.2). In addition, there is a high level of regulatory interest in potential impacts to the Florida Keys National Marine Sanctuary. However, no formal agency coordination or consultation regarding runway extension occurred, as there was no formal proposal or concept for runway extension under consideration. The appropriate agencies have reviewed and commented on the proposed action and alternatives analyzed in this EIS.</p> <p>M-01-CC</p> <p>As noted in Section 4.1.2, 4.1.3, and 4.1.4, any acoustic night operations that occur after 10:00 p.m. would be in support of critical mission requirements and completed as early as possible. Should an</p>
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<p style="text-align: right;">M-01</p> <p>23. Evaluate the Alternative to Shift Training to Another Location. Section 2.6.2 (page 2-25) identifies an alternative that was considered but eliminated from further analysis: shift Navy aviation detachment training to an alternate location. Under this alternative, detachment training currently based out of NASKW would instead be conducted at another airfield. The first reason cited to eliminate the alternative is “aircraft detaching from an alternate location would have to travel greater distances to and from the Key West Range Complex”. This alternative should not have evaluated continued use of the Key West Range Complex, but rather a range complex that is closer to the alternate location. The alternative should transfer both the airfield activity <i>and</i> the associated training to another location. The other reasons for eliminating the alternative are unsubstantiated. For example, the text cites such an alternative could potentially require the construction of additional support facilities. Is this actually the case? What would be the cost of these facilities? Where is this analysis in the DEIS? Justify these unsubstantiated reasons for eliminating this alternative in the DEIS. The DEIS should redefine and re-evaluate this alternative.</p> <p>24. Identify Runway Length Criteria. Section 7.4 (page 7-7) states that Runway 07/25 meets required airfield safety and planning criteria, but the length of 03/21 and 13/31 does not meet the primary runway length criteria for the majority of aircraft at NASKW. For which types of aircraft do these runways not meet the primary runway length criteria? Also identify the length and width criteria for each type of aircraft at NASKW in the DEIS.</p> <p>25. Shift Operations to Runway 13/31 Without Lengthening. Section 7.4.2 (page 7-8) acknowledges that wind conditions for Runway 13/31 are not unfavorable and that shifting utilization from 07/25 to 13/31 would potentially lessen community noise, but this alternative is rejected due to several challenges with lengthening 13/31. Given that 13/31 is approximately seven times the length of an aircraft carrier, it seems that some operations could be shifted to 13/31 without lengthening the runway. NASKW should provide a thorough analysis of this alternative.</p> <p>26. Evaluate Lengthening Runway 13/31. Section 7.4.2.1 (page 7-8) cites five reasons why Runway 13/31 cannot be lengthened to 10,000 feet. None of the reasons prevent the runway from being lengthened: (1) impacts to species and habitat can be mitigated for, even providing an overall positive environmental effect, (2) it is possible to consult with FKNMS, (3) the electrical transmission line could be relocated, (4) the on-Station infrastructure could be modified, and (5) the previous ESA Section 7 consultations could be re-examined. This alternative remains viable. Provide a thorough analysis of this alternative in the DEIS.</p> <p>27. Provide Agency Coordination for Runway Extensions. The DEIS chapter 7 indicates that the Navy has considered extending the length of the secondary runways and shifting some flights from 07/25 to the secondary runways. Has the Navy discussed runway extension options with the environmental agencies including but not limited to USFWS, USACE, FFWCC, and NMFS? If so, provide a summary of each agency’s comments in the DEIS.</p> <p>28. Minimize FLCP Operations at Night. Section 4.1.3 (page 4-15) indicates that an estimated 12% of FCLP operations (under Alternatives 2 and 3) would be conducted during acoustic night (10 pm to 7 am). The Navy should provide an approach that will avoid or minimize FCLPs at night. Also, the DEIS should confirm that the Navy will re-evaluate the EIS if more than 12% of FCLPs occur at night.</p> <p style="text-align: center;">Page 8 of 12</p>	<p>Navy Response</p> <p>M-01-CC (Continued)</p> <p>unforeseen increase in operations require more than 12 percent annual FCLP operations during acoustic night (between 10 pm and 7 am) under the Navy’s preferred alternative, Alternative 2, the Navy would conduct additional NEPA analysis as required in accordance with 32 CFR 775. Under Alternatives 2 or 3, FCLPs are a contingency operation that would only be conducted at NAS Key West when primary locations around the United States are unavailable.</p> <p style="text-align: right;">M-01-CC</p>
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<p>29. Shift Location of Engine Maintenance Run-up Events: Table 2.8-2 (page 2-29) indicates the number of annual engine maintenance run-up events would increase. For example, run-up events under Alternative 3 could increase 29.1% for FA-18E/F, 10.9% for F-5N, and 37.2% for F-35C (compared to Alternative 1). Section 2.4.6 (page 2-19) states that in order to reduce community noise exposure, the maintenance run-up location more interior to the Station (H1 near the terminus of Runway 03) is currently used for the majority (approximately 80 percent) of maintenance engine run-ups and Section 2.5.2.6 (page 2-23) states that the maintenance run-up location at the terminus of Runway 03 would continue to be used for approximately 80 percent of all run-ups to reduce community noise impacts. To offset the potential increase in the number of engine maintenance run-up events, please evaluate whether 100% of the run-ups can be done at the H1 location more interior to the Station (near the terminus of Runway 03), and provide the associated avoidance and minimization analysis to justify any run-up events at the H2 location near the terminus of Runway 31. Also, the DEIS should consider the installation of a “hush house” noise suppression facility that could minimize noise impacts and possibly enable 24/7 engine testing.</p> <p>30. Expand Socioeconomics, Environmental Justice, and Protection of Children. The DEIS purports to comply with Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority and Low-Income Populations,” which requires the agency to “identify and avoid disproportionate impacts on minority populations.” However, the DEIS merely purports to identify those populations, but does not describe how disproportionate impacts will be avoided. Similarly, the DEIS does not demonstrate compliance with Executive Order 13045, “Protection of Children from Environmental Health Risks and Safety Risks,” which requires the agency to “identify, assess, and address disproportionate environmental health and safety risks” to these populations. Rather, despite acknowledging these potential risks, the DEIS merely notes that they have been subject to limited investigation. This analysis should be expanded in the DEIS.</p> <p>31. Update to Include Military Compatibility Overlay. Section 5.3.1, Monroe County Comprehensive Plan paragraph, states “The Comprehensive Plan does not address compatible land use adjacent to the NAS Key West airfield”. This is an incorrect statement since the County has adopted Military Compatibility Goals, Objectives and Policies as well as a Future Land Use Map (FLUM) Overlay that promotes land use compatibility between NAS Key West and the surrounding land uses. This is acknowledged in Section 5.4.5.3 (paragraph 3 on page 5-34), which states that Monroe County has drafted a Proposed Military Compatibility Amendment and that the program would be generally consistent with the OPNAVISNT 11010.36C (Appendix G). This internal inconsistency needs to be resolved in the DEIS.</p> <p>Note: Monroe County transmitted these amendments to the State in December 2011. The Military Installation Area of Impact FLUM Overlay and associated text amendments were then adopted on May 22, 2012, by Ordinance Numbers 012-2012 and 013-2012, and the State Land Planning Agency (or the Department of Economic Opportunity) has issued a Notice of Intent finding the comprehensive plan amendment “In Compliance.”</p> <p style="text-align: center;">Page 9 of 12</p>	<p>Navy Response</p> <p>M-01-DD</p> <p>The Navy requires retention of both current run-up locations at NAS Key West for operational flexibility. Due to the configuration of the NAS Key West runways and taxiways, use of the H1 (located near the departure end of Runway 03) requires temporary runway closures, which is not practical under all airfield operating conditions thereby necessitating the option of the use of H2 (located near the departure end of Runway 31). Any other location would require infrastructure buildup within sensitive habitat and wetland areas.</p> <p>M-01-EE</p> <p>As noted in Sections 4.7.2.2, 4.7.3.2, and 4.7.4.2, the Navy would continue to meet the obligations under EO 12898, <i>Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations</i>, as NAS Key West airfield operations would continue to be conducted according to operational and safety requirements and wind conditions and controlled as practicable to reduce community noise exposure in accordance with the flight operational procedures, course rules, and noise abatement measures detailed in Sections 2.4.4 and 7.2.1.2.</p> <p>A thorough analysis of the human health and environmental effects of the proposed action has been conducted (see Sections 4.1, 4.3, 4.7, and 5.0, among others). With respect to impacts on minority</p>
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<p style="text-align: right;">M-01</p> <p>29. Shift Location of Engine Maintenance Run-up Events: Table 2.8-2 (page 2-29) indicates the number of annual engine maintenance run-up events would increase. For example, run-up events under Alternative 3 could increase 29.1% for FA-18E/F, 10.9% for F-5N, and 37.2% for F-35C (compared to Alternative 1). Section 2.4.6 (page 2-19) states that in order to reduce community noise exposure, the maintenance run-up location more interior to the Station (H1 near the terminus of Runway 03) is currently used for the majority (approximately 80 percent) of maintenance engine run-ups and Section 2.5.2.6 (page 2-23) states that the maintenance run-up location at the terminus of Runway 03 would continue to be used for approximately 80 percent of all run-ups to reduce community noise impacts. 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This is acknowledged in Section 5.4.5.3 (paragraph 3 on page 5-34), which states that Monroe County has drafted a Proposed Military Compatibility Amendment and that the program would be generally consistent with the OPNAVISNT 11010.36C (Appendix G). This internal inconsistency needs to be resolved in the DEIS.</p> <p>Note: Monroe County transmitted these amendments to the State in December 2011. The Military Installation Area of Impact FLUM Overlay and associated text amendments were then adopted on May 22, 2012, by Ordinance Numbers 012-2012 and 013-2012, and the State Land Planning Agency (or the Department of Economic Opportunity) has issued a Notice of Intent finding the comprehensive plan amendment “In Compliance.”</p> <p style="text-align: center;">Page 9 of 12</p>	<p>Navy Response</p> <p>M-01-EE (Continued)</p> <p>and low income populations, there are no appreciable differences between existing conditions and implementation of any of the alternatives (see Section 4.7). In all cases, about 35 percent of the estimated population within the greater than 65 DNL noise zone would be comprised of those categorized as minorities and about 10 percent of the estimated population within the greater than 65 DNL noise zone would be comprised of those categorized as low income. As noted in Section 4.1, under the existing condition and all alternatives, there would be no population at risk for hearing loss (i.e., within 80 DNL and greater noise zone). As detailed in Section E.3.5 of Appendix E, the results of studies on non-auditory health effects conducted in the U.S., primarily concentrating on cardiovascular response to noise, have been contradictory. There is no scientific evidence that definitively correlates potential health effects to aircraft noise exposure levels below 75 dB DNL. Physiological effects in children exposed to aircraft noise and the potential for health effects have been the focus of limited investigation. Sections 3.7.2.2, 4.7.2.2, 4.7.3.2, and 4.7.4.2 were modified to include additional analysis of the population under age 18 within the study area an estimated within the 65 DNL and greater noise zone for all alternatives. As shown in Table 4.7-2, there is little difference between the estimated population under age 18 within the 65 DNL and greater noise zone under the existing condition and all alternatives.</p>
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<p>M-01</p> <p>29. Shift Location of Engine Maintenance Run-up Events: Table 2.8-2 (page 2-29) indicates the number of annual engine maintenance run-up events would increase. For example, run-up events under Alternative 3 could increase 29.1% for FA-18E/F, 10.9% for F-5N, and 37.2% for F-35C (compared to Alternative 1). Section 2.4.6 (page 2-19) states that in order to reduce community noise exposure, the maintenance run-up location more interior to the Station (H1 near the terminus of Runway 03) is currently used for the majority (approximately 80 percent) of maintenance engine run-ups and Section 2.5.2.6 (page 2-23) states that the maintenance run-up location at the terminus of Runway 03 would continue to be used for approximately 80 percent of all run-ups to reduce community noise impacts. To offset the potential increase in the number of engine maintenance run-up events, please evaluate whether 100% of the run-ups can be done at the H1 location more interior to the Station (near the terminus of Runway 03), and provide the associated avoidance and minimization analysis to justify any run-up events at the H2 location near the terminus of Runway 31. Also, the DEIS should consider the installation of a “hush house” noise suppression facility that could minimize noise impacts and possibly enable 24/7 engine testing.</p> <p>30. Expand Socioeconomics, Environmental Justice, and Protection of Children. The DEIS purports to comply with Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority and Low-Income Populations,” which requires the agency to “identify and avoid disproportionate impacts on minority populations.” However, the DEIS merely purports to identify those populations, but does not describe how disproportionate impacts will be avoided. Similarly, the DEIS does not demonstrate compliance with Executive Order 13045, “Protection of Children from Environmental Health Risks and Safety Risks,” which requires the agency to “identify, assess, and address disproportionate environmental health and safety risks” to these populations. Rather, despite acknowledging these potential risks, the DEIS merely notes that they have been subject to limited investigation. This analysis should be expanded in the DEIS.</p> <p>31. Update to Include Military Compatibility Overlay. Section 5.3.1, Monroe County Comprehensive Plan paragraph, states “The Comprehensive Plan does not address compatible land use adjacent to the NAS Key West airfield”. This is an incorrect statement since the County has adopted Military Compatibility Goals, Objectives and Policies as well as a Future Land Use Map (FLUM) Overlay that promotes land use compatibility between NAS Key West and the surrounding land uses. This is acknowledged in Section 5.4.5.3 (paragraph 3 on page 5-34), which states that Monroe County has drafted a Proposed Military Compatibility Amendment and that the program would be generally consistent with the OPNAVISNT 11010.36C (Appendix G). This internal inconsistency needs to be resolved in the DEIS.</p> <p>Note: Monroe County transmitted these amendments to the State in December 2011. The Military Installation Area of Impact FLUM Overlay and associated text amendments were then adopted on May 22, 2012, by Ordinance Numbers 012-2012 and 013-2012, and the State Land Planning Agency (or the Department of Economic Opportunity) has issued a Notice of Intent finding the comprehensive plan amendment “In Compliance.”</p> <p>Page 9 of 12</p>	<p>Navy Response</p> <p>M-01-EE (Continued)</p> <p>There are no schools within the 65 DNL and greater noise zone under the existing condition or any of the alternatives.</p> <p>M-01-FF</p> <p>Sections 3.4, 4.4.1, 4.4.2, 4.4.3, 5.3.1, and 5.4.5.3 have been updated to reflect the Monroe County Comprehensive Plan developments that occurred between the issuance of the DEIS and FEIS.</p>
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<p>32. Correct the Names of Key Statutory Planning Guidance. In Section 3.4.7 (page 3-42), the last sentence of the first paragraph should read: Key statutory guidance for the planning activities in Florida is included in the Environmental Land and Water Management Act of 1972, the Local Government Comprehensive Planning Act of 1975, the Local Government Comprehensive and Land Development Act of 1985, and the Community Planning Act of 2011.</p>	<p>M-01 M-01-GG</p>	<p>Navy Response</p> <p>M-01-GG</p> <p>Section 3.4.7 has been changed as suggested.</p> <p>M-01-HH</p> <p>Section 3.6.1 has been modified to state that, although it is inconsistent with current AICUZ land use compatibility guidelines for a transmission line to be located with APZ I extensive coordination between the Navy, FAA, and KEYS occurred in the design and construction of the transmission line. Within the APZ, the height of the line and poles were lowered to meet FAA minimum height requirements.</p> <p>M-01-II</p> <p>Section 5.3.2 has been changed as suggested.</p> <p>M-01-JJ</p> <p>The text has been revised based on minutes of the Monroe County Board of County Commissioners held on September 21, 2012 in which Ordinance No. 032-2012 was adopted.</p>
<p>33. Clarify the Transmission Line is Within APZ 1. In Section 3.6.1 (page 3-51), it should be noted that the Keys Energy Services transmission line is located within APZ 1 and is not identified or addressed as a land use or operation conflict. Table G-2, footnote 5 on page G-9 states that no major aboveground transmission lines are allowed in APZ 1.</p>	<p>M-01-HH</p>	
<p>34. Change DCA to DEO. Page 5-12, paragraph 1, External Regulatory Compliance: In Section 5.3.2, External Regulatory Compliance bullet (page 5-12), Florida DCA should be changed to read Florida DEO (Department of Economic Opportunity).</p>	<p>M-01-II</p>	
<p>35. Correct the Statements about Safe Harbor Redevelopment: In Section 5.3.2, Safe Harbor Redevelopment bullet (page 5-14), the statement "On February 12, 2012, the Monroe County Commission agreed to land use regulation changes that would allow the development of Safe Harbor" is incorrect. On February 13, 2012, the Monroe County Commission agreed to continue the review of a proposed Comprehensive Plan Future Land Use Map amendment submitted by a private applicant for three (3) parcels on Stock Island from Industrial (I) to Mixed Use/Commercial (MC). These proposed changes were; therefore, not forwarded to the Florida Department of Economic Opportunity as stated.</p>	<p>M-01-JJ</p>	

<p style="text-align: right;">M-01</p> <p>36. Revise the Conclusion that there is No Significant Cumulative Noise Impacts with KWIA and NASKW. Section 5.4.2.3 second paragraph (page 5-20) states that the total number of housing units and population within the KWIA 65 dB DNL contour and greater would increase by 16.5% resulting in an approximate increase of 157 additional total housing units and 353 people exposed to noise 65 dB DNL or greater. The next paragraph concludes the additive effect would be minimal and there would not be significant cumulative noise impacts. This conclusion is not substantiated by the data presented and needs to be revised in the DEIS. Monroe County believes this is a significant impact. Similarly, in Section 5.4.5.3 (fourth paragraph on page 5-34), it states: "The proposed Safe Harbor marina is not currently located in the 65 DNL and greater noise contour for NASKW airfield operations, nor would it be under Alternatives 1, 2, or 3; however, when the existing NASKW noise contours are combined with the projected KWIA 2013 noise contours, portions of the Safe Harbor shoreline fall within the 65-70 dB DNL noise contour." This appears to contradict the conclusion of no significant cumulative noise impact. Also, on page 5-35, the second paragraph states: "The cumulative noise exposure from KWIA and NASKW operations (i.e., where the noise exposure is greater than 65 dB DNL) under Alternatives 1, 2 and 3 would occur over water and, therefore, would not impact land use." This is a false statement, since the DEIS presents data that confirms measurable increases in land use impact. Section 7.3.1.1 Unavoidable Adverse Impacts (page 7-2), states that Alternative 1 would result in an increase of 12 additional acres of land, 13 additional people and 14 additional housing units within the 65 dB DNL or greater noise contour; Alternative 2 would result in an increase of 93 additional acres of land, 366 additional people and 184 additional housing units within the 65 dB DNL or greater noise contour; Alternative 3 would result in an increase of 155 additional acres of land, 533 additional people and 271 additional housing units within the 65 dB DNL or greater noise contour. Even without the Super Hornet treated as a new aircraft (see comment #1), the County believes that there are significant impacts that warrant avoidance and mitigation.</p> <p style="text-align: right;">M-01-KK</p> <p>37. Assess Impact on Hurricane Evacuation Time: Monroe County citizens are under a State mandate to evacuate the Florida Keys within 24 hours in the event of an approaching hurricane. Our ability to do so requires Monroe County and its municipalities to limit growth and development each year. The State's traffic models include the evacuation of military personnel. Therefore, to the extent Alternatives 1, 2, or 3 of the DEIS would increase personnel in the Keys, the ability to evacuate our citizens and military personnel in a safe and timely manner will be affected. The DEIS does not indicate the anticipated increase in evacuation time due to local military personnel associated with Alternatives 1, 2, or 3. The Navy should assess the impact of the alternatives on this critical public safety issue.</p> <p style="text-align: right;">M-01-LL</p> <p>38. Identify Designated Critical Habitat. The DEIS on page ES-15 states "designated critical habitat for federally listed species does not occur within the area of potential biological resource effect; therefore, the implementation of Alternatives 1, 2, or 3 would have no effect on critical habitat." But the DEIS identifies critical habitat for federally listed species on Figure 3.11-2, page 3-75. This figure identifies LKMR habitat and potential sea turtle nesting habitat within the NASKW boundary and within areas that are predicted to experience higher noise levels. It would therefore appear that the statement in the DEIS may not be entirely true. The DEIS also does not identify threatened or endangered species habitat for areas that are predicted to experience higher noise levels under each alternative.</p> <p style="text-align: center;">Page 11 of 12</p>	<p>Navy Response</p> <p>M-01-KK</p> <p>Section 5.4.5.3 has been modified to clarify the potential cumulative impact related to the Safe Harbor proposal. In addition to estimating the acreage, population, and housing units within the 65 DNL and greater noise zone, the noise analysis concluded that, compared to the existing conditions, average noise levels, single event noise, speech interference, and sleep disturbance would be imperceptible under Alternative 1 and imperceptible to slight under Alternatives 2 and 3, and that no population would be at risk for hearing loss. Table 4.1-5 in Section 4.1.2.2 provides a comparison of the single event noise exposure data for overflight events for the legacy and next generation aircraft, including the F-35. The Navy variant of the F-35 (the F-35C) is estimated to produce noise levels that are similar to those of the aircraft it is replacing, the FA-18C/D. In addition, as discussed in Section 4.1, any changes in average noise levels, single event noise, speech interference, or sleep disturbance would be imperceptible under Alternative 1 and imperceptible to slight under Alternatives 2 and 3, and no population would be at risk for hearing loss.</p> <p>M-01-LL</p> <p>Section 3.3.4 and 4.3.2.4, 4.3.3.4, and 4.3.4.4 have been modified to describe the Navy's procedures for hurricane preparedness and how the community's hurricane preparedness is not affected by the</p>
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<p style="text-align: right;">M-01</p> <p>36. Revise the Conclusion that there is No Significant Cumulative Noise Impacts with KWIA and NASKW. Section 5.4.2.3 second paragraph (page 5-20) states that the total number of housing units and population within the KWIA 65 dB DNL contour and greater would increase by 16.5% resulting in an approximate increase of 157 additional total housing units and 353 people exposed to noise 65 dB DNL or greater. The next paragraph concludes the additive effect would be minimal and there would not be significant cumulative noise impacts. This conclusion is not substantiated by the data presented and needs to be revised in the DEIS. Monroe County believes this is a significant impact. Similarly, in Section 5.4.5.3 (fourth paragraph on page 5-34), it states: "The proposed Safe Harbor marina is not currently located in the 65 DNL and greater noise contour for NASKW airfield operations, nor would it be under Alternatives 1, 2, or 3; however, when the existing NASKW noise contours are combined with the projected KWIA 2013 noise contours, portions of the Safe Harbor shoreline fall within the 65-70 dB DNL noise contour." This appears to contradict the conclusion of no significant cumulative noise impact. Also, on page 5-35, the second paragraph states: "The cumulative noise exposure from KWIA and NASKW operations (i.e., where the noise exposure is greater than 65 dB DNL) under Alternatives 1, 2 and 3 would occur over water and, therefore, would not impact land use." This is a false statement, since the DEIS presents data that confirms measurable increases in land use impact. Section 7.3.1.1 Unavoidable Adverse Impacts (page 7-2), states that Alternative 1 would result in an increase of 12 additional acres of land, 13 additional people and 14 additional housing units within the 65 dB DNL or greater noise contour; Alternative 2 would result in an increase of 93 additional acres of land, 366 additional people and 184 additional housing units within the 65 dB DNL or greater noise contour; Alternative 3 would result in an increase of 155 additional acres of land, 533 additional people and 271 additional housing units within the 65 dB DNL or greater noise contour. Even without the Super Hornet treated as a new aircraft (see comment #1), the County believes that there are significant impacts that warrant avoidance and mitigation.</p> <p>37. Assess Impact on Hurricane Evacuation Time: Monroe County citizens are under a State mandate to evacuate the Florida Keys within 24 hours in the event of an approaching hurricane. Our ability to do so requires Monroe County and its municipalities to limit growth and development each year. The State's traffic models include the evacuation of military personnel. Therefore, to the extent Alternatives 1, 2, or 3 of the DEIS would increase personnel in the Keys, the ability to evacuate our citizens and military personnel in a safe and timely manner will be affected. The DEIS does not indicate the anticipated increase in evacuation time due to local military personnel associated with Alternatives 1, 2, or 3. The Navy should assess the impact of the alternatives on this critical public safety issue.</p> <p style="text-align: right;">M-01-LL</p> <p>38. Identify Designated Critical Habitat. The DEIS on page ES-15 states "designated critical habitat for federally listed species does not occur within the area of potential biological resource effect; therefore, the implementation of Alternatives 1, 2, or 3 would have no effect on critical habitat." But the DEIS identifies critical habitat for federally listed species on Figure 3.11-2, page 3-75. This figure identifies LKMR habitat and potential sea turtle nesting habitat within the NASKW boundary and within areas that are predicted to experience higher noise levels. It would therefore appear that the statement in the DEIS may not be entirely true. The DEIS also does not identify threatened or endangered species habitat for areas that are predicted to experience higher noise levels under each alternative.</p> <p style="text-align: right;">M-01-MM</p> <p style="text-align: center;">Page 11 of 12</p>	<p>Navy Response</p> <p>M-01-LL (Continued)</p> <p>transient personnel that detach to NAS Key West for air operations training due to actions taken on scheduling in the event of tropical cyclone conditions and the use of Boca Chica Field as the primary means of transit of these personnel out of the area.</p> <p>M-01-MM</p> <p>Figure 3.11-2 does not identify critical habitat for federally listed species, but rather the figure depicts occurrence of threatened and/or endangered species near Boca Chica Field. Please note only the federally endangered Florida manatee, federally endangered Lower Keys marsh rabbit, and federally threatened loggerhead sea turtle are known or likely to occur near Boca Chica Field. As stated in Section 3.1.4, no critical habitat is located on or around Boca Chica Key for these three species. Moreover, as stated in Sections 4.11.2.4, 4.11.3.4, and 4.11.4.4, "designated critical habitat for federally listed species does not occur within the area of potential biological resource effect..." Also note that consultation with the National Marine Fisheries Service and U.S. Fish and Wildlife Service has occurred in accordance with the Endangered Species Act (see Appendix D).</p>
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<p>39. Re-Evaluate Whether Bird Aircraft Strike Hazard (BASH) Increase is Discernable. Section 4.3.3.3 (page 4-33) and Section 4.3.4.3 (page 4-33) states that it is anticipated there would be an increased risk for BASH potential under Alternatives 2 and 3. Given that flight operations could increase by 10% (Alternative 2) or 20% (Alternative 3), it would not be unreasonable to assume bird strikes would increase by 10% or 20%. But Section 4.11.3.3 (page 4-74) and Section 4.11.4.3 (page 4-75) states no discernible increase in aircraft-bird strikes is expected. Table 6.1-1 (page 6-3) has a similar statement. The County believes a 10% or 20% increase is discernible and these statements should be revised in the DEIS.</p>	<p>M-01 M-01-NN</p>	<p>Navy Response</p> <p>M-01-NN</p> <p>Section 4.11.3.3, 4.11.4.3, and Table 6.1-1 have been modified to note the increased potential for bird-aircraft strikes with the potential for increased airfield operations under Alternatives 2 and 3.</p> <p>M-01-OO</p> <p>Please refer to Section 4.11. NAS Key West has an active and effective Bird/Wildlife Aircraft Strike Hazard (BASH) program in addition to a Bird Hazard Working Group. NAS Key West's Integrated Natural Resources Management Plan (INRMP) is updated every 5 years per regulations. Regardless of alternative selected, NAS Key West would continue to manage migratory birds and BASH risk in accordance with the installation's INRMP and BASH control program, as well as maintain a Bird Hazard Working Group.</p> <p>M-01-PP</p> <p>Concurrent with the release of the FEIS, the requested documents have been posted at the project website www.keywesteis.com.</p>
<p>40. Improve the NASKW BASH Program. Section 3.3.3 (page 3-27) refers to the NASKW BASH program. The DEIS should explain what adjustments the Navy will make to the NASKW BASH program and/or the Integrated Natural Resource Management Plan (INRMP) to offset the anticipated increase in bird strikes.</p>	<p>M-01-OO</p>	
<p>41. Provide Supporting Documents. Several of the documents referred to in the DEIS were not readily available during much or all of the public comment period. This included the INRMP (NAVFAC 2007b), NASKW Master Plan (NAVFAC 2011), Air Activity Reports (DoN 2007a et al.), and the Environmental Assessment for Fleet Support and Infrastructure Improvements at NAS Key West (DoN 2003). The Navy should make these and other key support documents available.</p>	<p>M-01-PP</p>	
<p>We appreciate the opportunity to comment on the DEIS, and, as noted in our Comprehensive Plan, we are eager to work with the Navy on our shared goal of avoiding detrimental impacts to the unique character of the Florida Keys. Questions or comments may be directed to Mr. Michael L. Davis at (954) 776-1616 (mdavis@keithandschnars.com) or Ms. Mayté Santamaria at (305) 289-2500 (Santamaria-Mayte@MonroeCounty-FL.Gov).</p>		
<p>Sincerely,</p>  <p>_____ David Rice Mayor</p>		
<p>Cc: Monroe County Board of County Commissioners Roman Gastesi, County Administrator Christine Hurley, Director, Monroe County Growth Management Division Michael L. Davis, Vice President, Keith and Schnars, P.A.</p>		
<p>Page 12 of 12</p>		

M-02



United States Department of the Interior

OFFICE OF THE SECRETARY
 Office of Environmental Policy and Compliance
 Richard B. Russell Federal Building
 75 Spring Street, S.W.
 Atlanta, Georgia 30303



August 8, 2012

C.R. Destafney, PE
 Regional Environmental Director
 Department of the Navy
 Box 102, Naval Air Station
 Jacksonville, Florida 32960

Re: Comments and Recommendations on the Draft Environmental Impact Statement (DEIS) for Naval Air Station Key West Airfield Operations; Service Federal Activity Code: 2012-CPA-0199; Service Consultation Code: 2012-I-0124

Dear Mr. Destafney:

The U. S. Department of the Interior (Department) has reviewed the DEIS for the Naval Air Station Key West Airfield Operations Draft Environmental Impact Statement (DEIS) in Monroe County, Florida. Our comments are submitted in accordance with section 7 of the Endangered Species Act of 1973, as amended (87 Stat. 884; 16 U.S.C. 1531 *et seq.*) and the Marine Mammal Protection Act of 1972, as amended (MMPA) (16 U.S.C. 1361 *et seq.*).

Project Description

The Navy has submitted its DEIS, evaluating four alternatives to support and conduct continuing airfield operations and capabilities at the Naval Air Station Key West (NASKW) by maintaining current training operations, supporting airfield operations with new types of aircraft, and modifying airfield operations as necessary in support of the Navy's Fleet Response Training Plan. No preferred alternative has yet been selected.

Under the Alternatives, annual airfield operations could vary from the current 47,500 (averaging about 130 per day) to 57,500 (about 158 per day, a 22 percent increase). An airfield operation is one takeoff or one landing from the airfield. An aircraft may perform several operations during a single flight.

Associated development would be minor interior renovations and utilities upgrades of existing infrastructure to meet secured space and utility requirements. All construction would occur on existing, disturbed lands. The proposed activities occur at the naval air station on Boca Chica Key, Monroe County, Florida (Latitude: 24.575484°; Longitude -81.689165°).

M-02

Naval Air Station Key West Airfield Operations – ER 12-476

Threatened and Endangered Species

The Navy made a determination the project will have “no effect” on the endangered silver rice rat (*Oryzomys palustris natator*) and its designated critical habitat, the threatened roseate tern (*Sterna dougallii dougallii*), the endangered green sea turtle (*Chelonia mydas*), the endangered hawksbill sea turtle (*Eretmochelys imbricata*), the threatened leatherback sea turtle (*Dermodochelys coriacea*), the threatened American crocodile (*Crocodylus acutus*), the threatened eastern indigo snake (*Drymarchon corais couperi*), the endangered Schaus swallowtail butterfly (*Heracles aristodemus ponceanus*), the threatened Garber’s spurge (*Chamaesyce garberi*), and the candidate Blodgett’s silverbush (*Argythamnia blodgettii*), also known as Blodgett’s wild mercury. In addition, the Navy made a determination that the proposed action “may affect, but is not likely to adversely affect” the endangered Lower Keys (=marsh) rabbit (*Sylvilagus palustris hefneri*; LKMR), the threatened loggerhead sea turtle (*Caretta caretta*), and the West Indian manatee (*Trichechus manatus*).

The primary direct effects of the action will be noise and visual disturbance. The Navy based its noise analysis on a model of existing noise contours around the airfield that range from 60 to 85 decibels (dB). The Navy pointed out in its DEIS: “Aircraft noise is generally thought to be the most detrimental during periods of stress such as winter, gestation, and calving/nesting (Pepper *et al.* 2003; DeForge 1981). Studies on the effects of aircraft noise on wildlife have been predominantly conducted on mammals and birds. Some studies have shown that the responses of large mammals to aircraft noise are transient and of short duration and suggest that animals acclimate to the sounds (Workman *et al.* 1992; Krausman *et al.* 1993, 1998; Weisenberger *et al.* 1996). Similarly, the effects on raptors and other non-migratory birds (*e.g.*, waterfowl, grebes) from aircraft low-level flights were found to be brief and not detrimental to reproductive success (Smith *et al.* 1988, Lamp 1989, Ellis *et al.* 1991; Grubb and Bowerman 1997).” The effects of noise on marine mammals depend on the angle of the arriving sound waves (the direct sound path is totally reflected if the sound reaches the surface at an angle more than 13 degrees from vertical) and the depth of the mammal. The sound levels of aircraft noise propagating through the water are greatly affected by water depth and the seafloor properties. Under the alternatives, average noise levels could decrease by -1 dB from current existing levels under Alternative 1, to an increase of +4 dB under Alternative 3, depending on the location (distance) from the airfield. Resident terrestrial and marine species have likely already acclimated to the noise and visual disturbance generated by overflying aircraft, which are temporary and short in duration, since aircraft have been flying out NASKW since 1917, when the air station was first commissioned.

NASKW will continue to manage birds and animals in accordance with the installation’s Bird/Wildlife Aircraft Strike Hazards (BASH) program and Integrated Natural Resources Management Plan (INRMP).

With the above, salient aspects of the DEIS in mind, we make the following determinations:

Silver Rice Rat and its Designated Critical Habitat

<p>Naval Air Station Key West Airfield Operations – ER 12-476</p> <p>The silver rice rat has not been documented in surveys conducted in 1996, 1997, 2004, and 2010 on NASKW. Generally, we consider 2 years of surveys to be sufficient to document absence of a species. Critical habitat for the silver rice rat had not been designated on NASKW; consequently, none will be affected. Therefore, the Department supports the Navy’s determination of “no effect” for this species and its designated critical habitat.</p> <p>Roseate Tern</p> <p>Roseate terns occasionally nest on gravel roof tops on the base, apparently undeterred by existing operation noise and visual disturbance. NASKW monitors nesting of roseate and least terns on rooftops annually. Should a roseate tern be identified, any construction activities would be conducted in accordance with ongoing protocols to avoid impacts to this species. BASH incidents at NASKW average about 7 to 10 reported bird strikes per year. No aircraft-bird strikes of roseate terns have been recorded since species-specific record keeping began in 2008. In addition, no discernible increase in aircraft-bird strikes is expected due to effective BASH program management. Therefore, the Department supports the Navy’s determination of “no effect” for the roseate tern.</p> <p>Green Sea Turtle, Hawksbill Sea Turtle, and Leatherback Sea Turtle</p> <p>These sea turtle species are not known to nest in the NASKW area. Therefore, the Department supports the Navy’s determination of “no effect” for these species.</p> <p>American Crocodile</p> <p>The NASKW area is at the extreme southern range of the American crocodile, where it is an occasional and transient visitor. Any crocodiles in the area are likely not bothered by, or are accustomed to, existing conditions. No shoreline or in-water work will occur. Therefore, the Department supports the Navy’s determination of “no effect” for this species.</p> <p>Eastern Indigo Snake and Schaus Swallowtail Butterfly</p> <p>These species are not known to occur within the area of consideration. Therefore, the Department supports the Navy’s determination of “no effect” for these species.</p> <p>Garber’s Spurge and Blodgett’s Silverbush</p> <p>Garber’s spurge has been found at two locations on Boca Chica Key, including the airfield. Blodgett’s silverbush has also been found on Boca Chica Key, but is outside the area associated with the proposed action. No surface disturbing activities will result from infrastructure upgrades; consequently, these plants will not be affected by the proposed action. Therefore, the Department supports the Navy’s determination of “no effect” for these species.</p> <p style="text-align: center;">Page 3</p>	<p>M-02</p> <p>Navy Response</p> <p>M-02-A</p> <p>Sections ES.4.11, 4.11.2.4, 4.11.3.4, and 4.11.4.4 have been modified to note the Department’s support of the Navy’s “no effect” Endangered Species Act determinations for the silver rice rat and its designated habitat, roseate tern, green sea turtle, Hawksbill sea turtle, leatherback sea turtle, American crocodile, eastern indigo snake, Schaus swallowtail butterfly, Garber’s spurge, and Blodgett’s wild mercury.</p> <p>M-02-A</p>
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<p style="text-align: right;">M-02</p> <p>Naval Air Station Key West Airfield Operations – ER 12-476</p> <p>Lower Keys Rabbit, Loggerhead Sea Turtle, and West Indian Manatee</p> <p>The area impacted by the airfield operations contains over one-half of the entire estimated LKMR population. Resident LKMRs are likely acclimated to the noise and visual disturbance generated by existing overflying aircraft and maintenance activities. Airfield operations could increase up to 22 percent above current levels of about 47,500 annual operations. However, annual operations at NASKW were estimated at 85,000 per year, with approximately 400 airfield operations per day estimated on a busy day in the late 1970s. Noise and visual disturbance from aircraft operations associated with increased operations would be temporary and short in duration. Average noise levels would vary among the alternatives from a decrease by -1 dB from current levels under Alternative 1 to an increase of +4 dB under Alternative 3, depending on the type of aircraft used for operations and the distance from the airfield. However, the LKMR population has been increasing at the station in recent years, as opposed to declining in other areas, and there appears to be no impact on the population from existing noise and disturbance levels.</p> <p>The loggerhead sea turtle nests occasionally in the area in one known location, a public beach exposed to noise from aircraft operations under existing conditions. The beach is not frequently used for nesting because it mainly consists of rocky shoreline with few suitable nest sites. Sea turtles appear to habituate to man-made noise without experiencing long-term effects. Moein <i>et al.</i> (1994) noted loggerhead sea turtles, when exposed to air guns with source levels of 175, 177, and 179 micropascals (dB re 1 µPa m [the peak pressure of an underwater sound]), exhibited avoidance behavior during their initial exposure, but appeared to habituate to the stimuli after three exposures. In addition, Moein <i>et al.</i> (1994) examined the effects of repeated acoustic stimuli on the health of loggerhead sea turtles used in the air gun study. The researchers concluded the sea turtles might have been affected by exposure to repeated acoustic stimuli, but the effects were minor. The Navy concluded in its 2009 Environmental Assessment that swimming sea turtles exposed to aircraft overflights may exhibit either no response or a behavioral reaction such as quick diving. Any behavioral avoidance reaction a sea turtle may experience would likely be short-term and would not permanently displace animals or result in physical harm. Under the DEIS alternatives, only a small percentage of annual operations, up to 3.1 percent, would occur at night from 10 p.m. to 7 a.m., the primary time sea turtles come ashore to nest.</p> <p>West Indian manatees are only occasional visitors to the extreme western Lower Keys, primarily in winter when they seek warmer water. Eller and Cavanagh (2000) concluded that it is difficult to construct cases (for any aircraft at any altitude in any propagation environment) for which the underwater sound is sufficiently intense and long lasting to cause harm to any form of marine life. In addition, no in-water work is planned, and aircraft overflights are not expected to result in Level A or Level B harassment of any marine mammal as defined by the MMPA.</p> <p>For the reasons outlined above, the Department concurs with the Navy’s determinations of “may affect, but not likely to adversely affect” for the LKMR, loggerhead sea turtle, and West Indian manatee.</p> <p style="text-align: center;">Page 4</p>	<p>Navy Response</p> <p>M-02-B</p> <p>Sections ES-4.11, 4.11.2.4, 4.11.3.4, and 4.11.4.4 have been revised to note the Department’s support of the Navy’s “may affect, not likely to adversely affect” Endangered Species Act determinations for the Lower Keys marsh rabbit, loggerhead sea turtle, and West Indian manatee.</p>
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M-02

Navy Response

No substantive comments on this page.

Naval Air Station Key West Airfield Operations – ER 12-476

Based on the information provided, no impacts to submerged resources are expected to occur from the proposed project. NASKW will continue to carrying out programs and implementing management strategies to conserve and protect biological resources on its lands in accordance with the installation's 2007 INRMP, BASH program, and agreements negotiated with the Department, the National Marine Fisheries Service, and the Florida Fish and Wildlife Conservation Commission. Based on the above, the Department finds the proposed activity will not significantly impact fish and wildlife resources.

Thank you for your cooperation in the effort to conserve fish and wildlife resources. If you have any questions regarding this letter, please contact Winston Hobgood at (772) 469-4306. I can be reached on (404) 331-4524 or via email at joyce_stanley@ios.doi.gov.

Sincerely,



Joyce Stanley, MPA
Regional Environmental Protection Assistant

- cc: Jerry Ziewitz – FWS – Region 4
Brenda Johnson - USGS
Anita Barnett – NPS
Chester McGhee – BIA
Li-Tai Sikiu Bilbao OSMRE
Tommy Broussard
OEPC – WASH

M-02

Naval Air Station Key West Airfield Operations – ER 12-476

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M-02

Naval Air Station Key West Airfield Operations – ER 12-476

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET
 ATLANTA, GEORGIA 30303-8960

M-03

Navy Response

No substantive comments on this page.

August 20, 2012

Naval Facilities Engineering Command, Southeast
 Attn: NAS Key West Airfield Operations EIS Project Manager
 P.O. Box 30, Building 903
 NAS Jacksonville, FL 32212

Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR AIRFIELD OPERATIONS AT NAVAL AIR STATION KEY WEST, FLORIDA).

EIS Project Manager:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the U. S. Department of The Navy's Draft Environmental Impact Statement (draft EIS) for the Airfield Operations Naval Air Station (NAS) Key West, Florida. Under Section 309 of the CAA, EPA is responsible for reviewing and commenting on major federal actions significantly affecting the quality of the human environment.

Background:

The primary purpose of the proposed action is to sustain fleet training conducted at and associated with NAS Key West airfield for Navy tactical aviation and use by other DoD and federal agencies, while introducing new aircraft. The proposed action is needed in order to maintain the level of readiness mandated in Title 10 United States Code (USC) Part 5062. The Department of the Navy needs to continue use of NAS Key West to accomplish Navy and Marine Corps required aviation training. The Navy and DoD need to maintain the long-term viability of NAS Key West as a fleet training station for tactical aviation squadrons and for airfield operations and associated training in the Key West Range Complex by other DoD and federal agencies.

NAS Key West is comprised of approximately 6,500 acres of land distributed over several properties located in the Florida Keys, Monroe County, Florida. The approximately 4,700 acre Boca Chica Field property is NAS Key West's primary site and includes the airfield that is the subject of this EIS, as well as administrative and industrial facilities and recreational areas. Boca Chica Field is located on Boca Chica Key, approximately 5 miles east of the city of Key West in Monroe County, 156 miles southwest of Miami, and 90 air miles north of Cuba. Key West is the closest point in the United States to Cuba, South America, and the Caribbean Sea, making NAS Key West a significant military and homeland security asset, independent of its role as an aviation training venue.

This DEIS addressed the following alternatives:

- No Action Alternative – Annual airfield operations would continue to occur at a level similar to present (approximately 47,500 annual operations), support of existing capabilities would continue, no new aircraft would be introduced, and no facilities would be altered to support next generation aircraft training operations.

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<p style="text-align: right;">M-03</p> <ul style="list-style-type: none"> Alternative 1 – Annual airfield operations would continue to be maintained at a level similar to present (approximately 47,500 annual operations), plus legacy aircraft would gradually transition to next generation aircraft, and existing facilities would be altered to meet requirements for next generation aircraft. Alternative 2 – Same as Alternative 1, plus provides the flexibility to accommodate additional carrier air wing Field Carrier Landing Practice (FCLP) training at NAS Key West when primary carrier air wing training locations around the U.S. are unavailable. Additional carrier air wing FCLP operations would vary annually based on availability of the primary training locations, but could total up to 4,500 additional annual operations (2,250 patterns). Total annual airfield operations could equal approximately 52,000 operations. Alternative 3 – Same as Alternative 2, plus provides added operational capacity and flexibility to effectively meet Navy training requirements under the Fleet Readiness Training Plan with an approximately 10 percent increase in other annual airfield operations. Total annual airfield operations could equal approximately 57,000 operations. <p>EPA understands that under this DEIS, the 4 alternatives or proposed action presented (including the no action alternative) will have no impacts to geology, topography, soils, air, wetlands or groundwater supplies.</p> <p>EPA’s Concerns:</p> <p>Noise impact is EPA’s primary concern. The Federal Aviation Administration (FAA) determines noise exposure at or above 65 DNL to be incompatible with residential land use. According to the DEIS, significant noise exposure to local residents is predicted for all alternatives. Because the mitigation discussed in the DEIS is primarily limited to aircraft operations, EPA recommends the Final EIS (FEIS) discuss mitigation to address residential noise exposure and the prospective Record of Decision should provide commitment targets for residential mitigation. Recommendations include: 1) residential mitigation (home buyouts and soundproofing) starting with those residences located in the highest (loudest) contours; 2) greater use of other available runways as weather and airfield operations permits. EPA is particularly concerned over noise impacts to children per Executive Order 13045: <i>Protection of Children from Environmental Health Risks and Safety Risks</i>. E.O. 13045 recognizes children may suffer disproportionately from environmental health risks and safety risks. Because their smaller ear canals magnify the sounds entering the ear canals, children’s hearing may be particularly sensitive. For example, a 20-decibel difference can exist between adult and infant ears.¹ All four alternatives analyzed in the DEIS, including the no action alternative, indicate no noise impacts to children. While the DEIS alternatives analysis discussed the number of schools, (including day-care centers) potentially impacted at or greater than 65 DNL. However, it did not discuss the actual number of potential children, e.g., students, residents, etc., exposed to noise impacts or identify mitigation measures to diminish the noise impacts. Consequently, the FEIS should identify the population of children, analyze potential noise impacts upon them, and identify mitigation alternatives if necessary.</p> <p>After all public and agency comments are considered and explored, objectively evaluate all reasonable alternatives. The Navy should identify a preferred alternative or alternatives in the Final EIS. The Final EIS should also briefly discuss the reasons for eliminating the other alternatives.</p> <p>¹ www.childrenshearing.org/custom/hearing_health.html</p>	<p>Navy Response</p> <p>M-03-A</p> <p>The Navy recognizes the importance of being good neighbors with local communities and makes every effort to balance noise abatement with the need to train Navy pilots. The Navy will continue to make every attempt to minimize its noise impacts to nearby communities through the continued use of designated flight paths, procedures, and noise abatement measures for military aircraft operating from NAS Key West. These measures include restricting the manner in which aircraft climb, limiting late night flying to only mission essential activities, minimizing flights over heavily populated areas, and accepting input from the public to ensure these measures remain as effective as practicable.</p> <p>M-03-A</p> <p>Congress has not given the military services the authority to install soundproofing in homes and buildings that are not owned by the federal government. The management actions included in the impact analysis in Chapter 4 and summarized in Section 7.3 consist of existing best management practices and standard operating procedures that will continue to mitigate the proposed action. Section 7.3.1.2 specifically outlines such management measures for noise such as the NAS Key West airfield course rules and noise abatement procedures. As also noted in Section 7.2, local governments could adopt the land use compatibility recommendations to ensure the impact on existing and future land use compatibility is minimized.</p>
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<p style="text-align: right;">M-03</p> <ul style="list-style-type: none"> Alternative 1 – Annual airfield operations would continue to be maintained at a level similar to present (approximately 47,500 annual operations), plus legacy aircraft would gradually transition to next generation aircraft, and existing facilities would be altered to meet requirements for next generation aircraft. Alternative 2 – Same as Alternative 1, plus provides the flexibility to accommodate additional carrier air wing Field Carrier Landing Practice (FCLP) training at NAS Key West when primary carrier air wing training locations around the U.S. are unavailable. Additional carrier air wing FCLP operations would vary annually based on availability of the primary training locations, but could total up to 4,500 additional annual operations (2,250 patterns). Total annual airfield operations could equal approximately 52,000 operations. 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The Final EIS should also briefly discuss the reasons for eliminating the other alternatives.</p> <p>¹ www.childrenshearing.org/custom/hearing_health.html</p> <p style="text-align: right;">M-03-A</p>	<p>Navy Response</p> <p>M-03-A (Continued)</p> <p>The Navy’s real property acquisition authorities are set forth under 42 U.S. Code 4601 et seq. and Secretary of the Navy Instruction (SECNAVINST) 11011.47B; policies and procedures are provided in Naval Facilities Engineering Command Publication P-73. In addition, authority under 10 U.S. Code Section 2684a allows the Navy to partner with state and local governments or private conservation groups to cost share the acquisition of easements and other real property interests to prevent encroachment (impacts to military training capabilities).</p> <p>In accordance with today’s AICUZ guidelines (DOD Instruction 4165.57 and Office of the Chief of Naval Operations Instruction [OPNAVINST] 11010.36C), the acquisition of restrictive use easements or interests in land outside the clear zone, such as APZs and noise zones, should only be pursued when state and local governments are unwilling or unable to enact land use controls to achieve land use compatibility in accordance with AICUZ guidelines and the operational integrity of the air installation is manifestly threatened. As noted in Section 7.3.4.2, the Navy’s coordination with local elected officials, planners, and citizens in protecting the health, safety, and welfare of individuals living near the NAS Key West airfield while preserving the operational capability of the airfield would continue.</p>
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The Final EIS should also briefly discuss the reasons for eliminating the other alternatives.</p> <p>¹ www.childrenshearing.org/custom/hearing_health.html</p>	<p>Navy Response</p> <p>M-03-B</p> <p>The EIS team is unaware of any research which substantiates the claim of infants being up to 20 dB more sensitive to sound pressure levels than adults. The best available science on the comparison of sound pressure levels in the ears of adults and infants is contained in research conducted by Voss and Hermann (2005). Using over the ear headphones to generate sound, it was found that the difference between sound pressures generated in infant and adult ears is less than 3 dB at all frequencies. Likewise, the difference for exposure to a sound field exterior to the ear, such as aircraft noise, is expected to be less than 3 dB. Differences of up to 15 dB were found for frequencies above 2 kilohertz only when using earphones inserted inside the ear canal. Placement of the sound source within the ear canal effectively changes its physical dimensions and resonant frequencies, especially in infants younger than two years of age. As such, the increased sensitivity of infants to intra-aural sound sources is not relatable to the differences associated with extra-aural sound sources.</p> <p>With regard to potential non-auditory noise effects on children’s health and development, much of the data is inconsistent and unsubstantiated, and suffers from confounding effects inherent in the published studies. As a result, the Defense Noise Working Group finds that the current state of scientific knowledge cannot yet support inference of a causal or consistent</p>
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<p style="text-align: right;">M-03</p> <ul style="list-style-type: none"> Alternative 1 – Annual airfield operations would continue to be maintained at a level similar to present (approximately 47,500 annual operations), plus legacy aircraft would gradually transition to next generation aircraft, and existing facilities would be altered to meet requirements for next generation aircraft. Alternative 2 – Same as Alternative 1, plus provides the flexibility to accommodate additional carrier air wing Field Carrier Landing Practice (FCLP) training at NAS Key West when primary carrier air wing training locations around the U.S. are unavailable. Additional carrier air wing FCLP operations would vary annually based on availability of the primary training locations, but could total up to 4,500 additional annual operations (2,250 patterns). Total annual airfield operations could equal approximately 52,000 operations. Alternative 3 – Same as Alternative 2, plus provides added operational capacity and flexibility to effectively meet Navy training requirements under the Fleet Readiness Training Plan with an approximately 10 percent increase in other annual airfield operations. Total annual airfield operations could equal approximately 57,000 operations. <p>EPA understands that under this DEIS, the 4 alternatives or proposed action presented (including the no action alternative) will have no impacts to geology, topography, soils, air, wetlands or groundwater supplies.</p> <p>EPA’s Concerns:</p> <p>Noise impact is EPA’s primary concern. The Federal Aviation Administration (FAA) determines noise exposure at or above 65 DNL to be incompatible with residential land use. According to the DEIS, significant noise exposure to local residents is predicted for all alternatives. Because the mitigation discussed in the DEIS is primarily limited to aircraft operations, EPA recommends the Final EIS (FEIS) discuss mitigation to address residential noise exposure and the prospective Record of Decision should provide commitment targets for residential mitigation. Recommendations include: 1) residential mitigation (home buyouts and soundproofing) starting with those residences located in the highest (loudest) contours; 2) greater use of other available runways as weather and airfield operations permits. EPA is particularly concerned over noise impacts to children per Executive Order 13045: <i>Protection of Children from Environmental Health Risks and Safety Risks</i>. E.O. 13045 recognizes children may suffer disproportionately from environmental health risks and safety risks. Because their smaller ear canals magnify the sounds entering the ear canals, children’s hearing may be particularly sensitive. For example, a 20-decibel difference can exist between adult and infant ears.¹ All four alternatives analyzed in the DEIS, including the no action alternative, indicate no noise impacts to children. While the DEIS alternatives analysis discussed the number of schools, (including day-care centers) potentially impacted at or greater than 65 DNL. However, it did not discuss the actual number of potential children, e.g., students, residents, etc., exposed to noise impacts or identify mitigation measures to diminish the noise impacts. Consequently, the FEIS should identify the population of children, analyze potential noise impacts upon them, and identify mitigation alternatives if necessary.</p> <p>After all public and agency comments are considered and explored, objectively evaluate all reasonable alternatives. The Navy should identify a preferred alternative or alternatives in the Final EIS. The Final EIS should also briefly discuss the reasons for eliminating the other alternatives.</p> <p>¹ www.childrenshearing.org/custom/hearing_health.html</p>	<p>Navy Response</p> <p>M-03-B (Continued)</p> <p>relationship between military aircraft noise exposure and non-auditory health consequences for exposed residents (Defense Noise Working Group <i>in preparation</i>).</p> <p style="text-align: right;">M-03-B</p>
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M-03

In summary, EPA has environmental concerns regarding this project as stated above, and rates this draft EIS as "EC-2" (i.e. environmental concerns with additional information requested in the final EIS). Our primary concerns relate to the data indicating that children will be impacted by noise above 65 DNL; selecting a preferred alternative; and identifying necessary mitigation alternatives. These issues should be further addressed in the FEIS.

Thank you for the opportunity to review and provide comments. If you wish to discuss this matter further, please contact Larry O. Gissentanna (404-562-8248 or Gissentanna.larry@epa.gov) of my staff.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosures: Summary of Rating Definitions

M-03

**U.S. ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA**

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- EO (Environmental Objections): The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
 1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
 2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
 3. Where there is a violation of an EPA policy declaration;
 4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
 5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- EU (Environmentally Unsatisfactory): The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
 1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
 2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
 3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- 1 (Adequate): The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- 2 (Insufficient Information): The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- 3 (Inadequate): The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 28, 2012

Commanding Officer
Naval Facilities Engineering Command Southeast
Attn: Mr. John D. Conway, P.G. (EV21)
P.O. Box 30A, Bldg. 903
NAS Jacksonville, FL 32212-0030

RE: Department of the Navy - Draft Environmental Impact Statement,
Naval Air Station Key West Airfield Operations - Monroe County, Florida.
SAI # FL201207036288C

Dear Mr. Conway:

The Florida State Clearinghouse has coordinated a review of the referenced Draft Environmental Impact Statement (EIS) under the following authorities: Presidential Executive Order 12372; § 403.061(42), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

The Florida Department of Environmental Protection's (DEP) South District staff has reviewed the Draft EIS and notes that the proposed activities in Alternatives 1-3 will not result in expansion or modifications to the airfield runway or water and wastewater utilities and will, therefore, not require permits from the DEP. Only minor infrastructure improvements to the interior of buildings and aircraft hangars are proposed. The Draft EIS also states that, prior to the minor infrastructure upgrades proposed in Alternatives 1, 2 and 3, surveys will be conducted for the presence of asbestos containing materials and lead-based paint. As applicable, these hazardous materials must be removed or managed in accordance with all federal and state regulations. Under Rule 62-257.301(1), *Florida Administrative Code*, a Notice of Asbestos Renovation or Demolition must be submitted to the DEP at least 10 business days prior to initiating a facility demolition, or a facility renovation that will disturb more than 160 sq. ft., 260 linear ft. or 35 cubic ft. of regulated asbestos. For further information, please contact Mr. Gus Rios, Environmental Administrator, at the South District Branch Office in Marathon at (305) 289-7081.

Based on the information contained in the Draft EIS and enclosed agency comments, the state has determined that, at this stage, the proposed federal activities are consistent with

www.dep.state.fl.us

M-04

Navy Response

M-04-A

Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.

M-04-B

Section 4.12.2.3 has been revised to clarify that all asbestos containing material would be removed and disposed of in accordance with Florida Administrative Code (FAC) 62-257.301(1) in addition to 40 CFR 61.40-157 and established NAS Key West procedures.

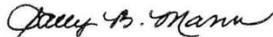
M-04-C

Section 6.1 and Appendix I have been modified to indicate Florida Department of Environmental Protection's determination that the proposed federal activities in the EIS are consistent with the Florida Coastal Management Program and the Navy's commitment to continued adherence to Florida Coastal Management Program federally enforceable policies. Section 4.12.2.3 and Appendix I have been modified to note that the Navy will comply with Florida asbestos program requirements to include FAC 62-257.301(1) as well as 40 CFR 61.40-157, and established NAS Key West procedures.

M-04-A

M-04-B

M-04-C

<p>Mr. John D. Conway, P.G. August 28, 2012 Page 2 of 2</p> <p>the Florida Coastal Management Program (FCMP). To ensure the project's continued consistency with the FCMP, the concerns identified by DEP staff must be addressed prior to project implementation. The state's continued concurrence will be based on the activities' compliance with FCMP authorities, including federal and state monitoring of the activities to ensure their continued conformance, and the adequate resolution of issues identified during this and any subsequent reviews.</p> <p>Thank you for the opportunity to review this proposal. Should you have any questions regarding this letter, please contact Mr. Chris Stahl at (850) 245-2169.</p> <p>Yours sincerely,</p> <p> Sally B. Mann, Director Office of Intergovernmental Programs</p> <p>SBM/cjs Enclosures</p> <p>cc: Gus Rios, DEP South District Branch Office Jennifer Nelson, DEP South District</p>	<p>M-04</p> <p>Navy Response</p> <p>See Response M-04C (on previous page).</p> <p>M-04-C</p>
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M-04

Navy Response

These comments were reiterated in your cover letter and, therefore, are addressed in Responses M-04-A, M-04-B, and M-04-C.



Project Information	
Project:	FL201207036288C
Comments Due:	08/03/2012
Letter Due:	08/28/2012
Description:	DEPARTMENT OF THE NAVY - DRAFT ENVIRONMENTAL IMPACT STATEMENT, NAVAL AIR STATION KEY WEST AIRFIELD OPERATIONS - MONROE COUNTY, FLORIDA.
Keywords:	NAVY - DEIS, NAVAL AIR STATION KEY WEST AIRFIELD OPERATIONS - MONROE CO.
CFDA #:	99.300
Agency Comments:	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
DEP South District staff has reviewed the Draft EIS and notes that the proposed activities in Alternatives 1-3 will not result in expansion or modifications to the airfield runway or water and wastewater utilities and will, therefore, not require permits from the DEP. Only minor infrastructure improvements to the interior of buildings and aircraft hangars are proposed. The Draft EIS also states that, prior to the minor infrastructure upgrades proposed in Alternatives 1, 2 and 3, surveys will be conducted for the presence of asbestos containing materials and lead-based paint. As applicable, these hazardous materials must be removed or managed in accordance with all federal and state regulations. Under Rule 62-257.301(1), Florida Administrative Code, a Notice of Asbestos Renovation or Demolition must be submitted to the DEP at least 10 business days prior to initiating a facility demolition, or a facility renovation that will disturb more than 160 sq. ft., 260 linear ft. or 35 cubic ft. of regulated asbestos. For further information, please contact Mr. Gus Rios, Environmental Administrator, at the South District Branch Office in Marathon at (305) 289-7061.	
STATE - FLORIDA DEPARTMENT OF STATE	
The DOS has no concerns or issues that need to be identified because of aircraft and airfield operations at NAS Key West.	
SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT	
Released Without Comment	
COMMUNITY PLANNING - FLORIDA DEPARTMENT OF ECONOMIC OPPORTUNITY	
No Comments Received	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
NO COMMENT BY MARY ANN POOLE ON 7/12/12.	
TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION	
The FDOT Seaport Office and FDOT District 6 have no comments.	
SOUTH FL RPC - SOUTH FLORIDA REGIONAL PLANNING COUNCIL	
Comments, if any, will be forwarded directly to the Navy.	
MONROE -	
Comments, if any, will be forwarded directly to the Navy.	

For more information or to submit comments, please contact the Clearinghouse Office at:

3900 COMMONWEALTH BOULEVARD, M.S. 47
 TALLAHASSEE, FLORIDA 32399-3000
 TELEPHONE: (850) 245-2161
 FAX: (850) 245-2190

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FLORIDA DEPARTMENT of STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

July 12, 2012

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JUL 17 2012

DEP Office of
Intergov't Programs

Ms. Lauren Milligan
Florida State Clearinghouse
Agency Contact & Coordinator (SCH)
3900 Commonwealth Blvd. MS-47
Tallahassee, FL 32399-3000

Re: SHPO/DHR Project File No.: 2012-3182
SAI#: FL201207036288C
US Department of the Navy
Draft Environmental Impact Statement, Naval Air Station Key West Airfield Operations
County: Monroe

Dear Ms. Milligan:

This office reviewed the referenced draft environmental impact statement to identify issues for possible concerns regarding impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*, that should be addressed in the final statement. Our review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966* as amended, the National Environmental Policy Act (NEPA), their implementing regulations; as well as the Coastal Zone Management Act.

This agency has no concerns or issues that need to be identified because of aircraft and airfield operations at Naval Air Station Key West.] M-04-E

If there are any questions concerning our comments, please contact me by phone at 850.245.6333, or by e-mail at Laura.Kammerer@DOS.MyFlorida.com.

Sincerely,

Laura A. Kammerer
Deputy State Historic Preservation Officer



DIVISION OF HISTORICAL RESOURCES
R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250
Telephone: 850.245.6333 • Facsimile: 850.245.6437 • www.flheritage.com
Commemorating 500 years of Florida history www.fla500.com



M-04

Navy Response

M-04-E

Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.

M-05

Navy Response

No substantive comments on this page.

Rick Scott
GOVERNOR



Hunting F. Deutsch
EXECUTIVE DIRECTOR

September 5, 2012

Ms. Lauren P. Milligan
Florida Department of Environmental Protection
Florida State Clearinghouse
3900 Commonwealth Boulevard, M.S. 47
Tallahassee, Florida 32399-3000

Re: SAI# FL201207036288C

Dear Ms. Milligan:

The Department of Economic Opportunity (Department), pursuant to its role as the state land planning agency, has reviewed the Draft Environmental Impact Statement (DEIS) for Naval Air Station – Key West (NAS-KW) for consistency with its statutory responsibilities under the Florida Coastal Management Program, which includes Chapter 163, Part II, and Chapter 380, Florida Statutes (F.S.). NAS– Key West is located in Monroe County which is designated within the Florida Keys Area of Critical State Concern; therefore, development must also be consistent with Section 380.0552, F.S., Chapter 163, Part II, F.S., Rule 28-20 and 28-36, Florida Administrative Code (F.A.C.) and the local Comprehensive Plans.

The DEIS addresses the potential impacts of future aircraft and airfield operations at the Naval Air Station and contains three action alternatives for new aircraft and future airfield operations and a No Action alternative. NAS-KW has not indicated a preference for the various alternatives. The options include:

No Action Alternative

- Approximately 47,500 annual airfield operations
- No new aircraft introduced
- No facilities alterations

Alternative 1

- Approximately 47,500 annual airfield operations
- Aircraft replaced with next generation aircraft
- Existing facilities altered for next generation aircraft

Florida Department of Economic Opportunity The Caldwell Building 107 E. Madison Street Tallahassee, FL 32399-4120
886.FLA.2345 850.245.7105 850.921.3223 Fax www.FloridaJobs.org www.twitter.com/FLDEO www.facebook.com/FLDEO
An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.

<p style="text-align: right;">M-05 Lauren P. Milligan September 5, 2012 Page 2 of 2</p> <p>Alternative 2</p> <ul style="list-style-type: none"> • Approximately 47,500 to 52,000 operations • Existing facilities altered for next generation aircraft <p>Alternative 3</p> <ul style="list-style-type: none"> • Approximately 57,000 operations • Existing facilities altered for next generation aircraft <p>The Department finds all of the proposed alternatives to be generally consistent with the Monroe County Comprehensive Plan and the Department's statutory responsibilities under the Florida Coastal Management Program. The Department encourages continued collaboration between Monroe County and the Naval Air Station in addressing the Military Installation Area of Influence in the event that an alternative is selected which results in increased operations and personnel. M-05-A M-05-B</p> <p>Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Airfield Operations at the Naval Air Station- Key West. If additional information is needed, please contact Rebecca Jetton at 850-717-8494.</p> <p style="text-align: center;">Sincerely,  Mike McDaniel, Chief Bureau of Community Planning</p> <p>MM/rj</p>	<p>Navy Response</p> <p>M-05-A</p> <p>Section 6.1 and Appendix I have been modified to indicate Florida Department of Environmental Protection's determination that the proposed federal activities in the EIS are consistent with the Florida Coastal Management Program and the Navy's commitment to continued adherence to Florida Coastal Management Program federally enforceable policies. Section 4.12.2.3 and Appendix I have been modified to note that the Navy will comply with Florida asbestos program requirements to include FAC 62-257.301(1) as well as 40 CFR 61.40-157, and established NAS Key West procedures.</p> <p>M-05-B</p> <p>The Navy recognizes the importance of the Military Installation Area of Influence as a land use planning tool and will continue to work closely with Monroe County in issues associated with Military Installation Area of Influence under the Navy's preferred alternative, Alternative 2.</p>
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Naval Air Station Key West Airfield Operations Environmental Impact Statement

PM-01

COMMENT SHEET

Thank you for providing your comments on the Naval Air Station Key West Airfield Operations Draft Environmental Impact Statement (EIS). Please provide us with your comments no later than August 28, 2012. Comments may be submitted at the public meeting, by visiting the project website at www.keywesteis.com, or via U.S. Postal Service to the address below.

I am disappointed in the fact that here we are trying to create an EIS for Para Chutes when this should have been accomplished five years ago. If the Navy had not tried to avoid the truth of start the first EIS process we could have used the ensuing time that have been spent in pursuing solutions that is the past. As I understand the four options published in the newspaper the Navy is still not serious about coming to a compatible solution with the community. The four choices that have been presented would leave the community

PM-01-A

Please Print - Additional space is provided on back

1. Name: ED SWIFT III
2. Address: Key West Florida
3. Please check here if you would NOT like to be on the mailing list
4. Please check here if you would like your name/address kept private (i.e., not published in EIS documents)
5. Would you like to receive a copy of the Final EIS?

During the Draft EIS comment period, the public can provide input in various ways:

- Submit your comments today at the Public Meeting.
- Electronically enter your comments at www.keywesteis.com, and
- Write your comments and mail them to:

Naval Facilities Engineering Command Southeast
 NAS Key West Air Operations EIS Project Manager
 P.O. Box 30, Building 903
 NAS Jacksonville, FL 32212

To ensure your comments are considered, please submit them by August 28, 2012.

Navy Response

PM-01-A

Thank you for your comment during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.



Naval Air Station Key West Airfield Operations Environmental Impact Statement

COMMENT SHEET cont.

PM-01

exactly where we are, which is not tenable, or in excess the noise levels & the number of flights. It seems that the Navy is once again stonewalling.

PM-01-B

Last year when the Navy was repairing the primary runway they used the current alternative runways with some success which in turn reduced the hazards & the noise levels for Key Haven where I live by about 80%. The alternative which is dismissed in the EIS draft document of expanding the Alternate Runway to 5,000 ft would give permanent relief to the community so long as there was a commitment by the Navy to use. To insure use I would suggest that the mitigation required to expand the alternate runway be accomplished by reducing the length and width of runway 07/25. This solution may be expensive but if this training base is as important as I have heard it is, then it would be a small price to pay for compatibility with the neighbors. Again, it is amazing to me that rather than take this doable direction that the government would risk the care of the residents that will most certainly turn into suits against continued current use & increased use. Personally I love the Navy presence in the community but this series of events in the past EIS & now the less than sincere alternatives being proffered leaves me doubtful of the sincerity of the Navy in solving the problem and the structure of the process.

PM-01-C

Navy Response

PM-01-B

The Navy has conducted a thorough and unbiased analysis on all alternatives presented in this EIS and a decision will be made that takes into account all resources analyzed herein. In addition, the Navy and NAS Key West work closely with the local community to ensure that all concerns are taken into account during decision making processes.

PM-01-C

Clarification has been added to Section 7.4 noting that such an operational change is addressed in terms of a mitigation considered and not carried forward rather than in Chapter 2 because such an action would be inconsistent with the proposed action and associated purpose and need being evaluated in this EIS. Shifting operations from the primary runway would provide no gains with respect to the Navy's ability to support and conduct aircraft training operations and capabilities, including support of the Fleet Response Training Plan and introduction of next generation aircraft at NAS Key West. Selection of which runway is to be used at any given time is primarily determined by the local winds due to safety and aircraft performance. Runway 07 is used 58 percent of the time and Runway 25 is used 9 percent of the time, thus the alternate runways (Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time (see Section 2.4.5). Based on the prevailing wind conditions favoring Runway 07/25 (see Section 3.3.1), there is a limitation in the volume of operations that could be shifted to the alternate runways.

 <p style="text-align: right;">PM-02</p> <h2 style="text-align: center;">COMMENT SHEET</h2> <p>Thank you for providing your comments on the Naval Air Station Key West Airfield Operations Draft Environmental Impact Statement (EIS). Please provide us with your comments no later than August 28, 2012. Comments may be submitted at the public meeting, by visiting the project website at www.keywesteis.com, or via U.S. Postal Service to the address below.</p> <p style="text-align: center;">SEE ATTACHED</p> <p>1. Name: [REDACTED]</p> <p>2. Address: [REDACTED] KEY WEST, FL 33040</p> <p>3. Please check here if you would NOT like to be on the mailing list <input type="checkbox"/></p> <p>4. Please check here if you would like your name/address kept private (i.e., not published in EIS documents) <input checked="" type="checkbox"/></p> <p>5. Would you like to receive a copy of the Final EIS? <input checked="" type="checkbox"/> YES</p> <div style="border: 1px solid black; padding: 5px;"> <p>During the Draft EIS comment period, the public can provide input in various ways:</p> <ul style="list-style-type: none"> •Submit your comments today at the Public Meeting, •Electronically enter your comments at www.keywesteis.com, and •Write your comments and mail them to: <p style="text-align: center;">Naval Facilities Engineering Command Southeast NAS Key West Air Operations EIS Project Manager P.O. Box 30, Building 903 NAS Jacksonville, FL 32212</p> <p>To ensure your comments are considered, please submit them by August 28, 2012.</p> </div>	<p>Navy Response</p> <p>No substantive comments on this page.</p>
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<p style="text-align: center;">Comments on Draft EIS for NAS Key West by Resident of Key Haven</p> <p>The existing level of jet noise is unacceptable to most residents affected by it now. According to the Navy, the F-35 is slightly louder on take off and slightly quieter on landing than the F-18 Super Hornet. Although this remains to be seen based on the studies provided, there will apparently be no relief from the noise problem resulting from a change in aircraft type.</p> <ul style="list-style-type: none"> • If no action is taken to change to the F-35 or increase the number of flight operations, we will have the same noise problem that we have today. • Alternative #1 – No increase in flights but a phasing in of the F-35. There will be no discernable difference and we will still have the noise problem that we have now. • Alternative #2 – New planes phased in at a 9% flight operations will result obviously result in even more noise than we have now. • Alternative #3 – New planes with a 20% increase in flight operations will result in unbearable noise levels for the area residents. <p>The Navy has offered no mitigation to Monroe County residents such as changing the frequency of use of the other runways when wind direction would make them optimal for flight operations, and improvements to those runways is certainly possible and probably not very expensive. They could easily meet the standards currently provided at many bases where the F-18 Super Hornet and the F-35 will be in use. Those other runways take off and land over water or over undeveloped or industrial use property instead of residential neighborhoods. That this change would make a substantial difference for the local residents was already proved when the main runway, 7/25 was closed for repairs and flight operations shifted to the other 2 runways. The local residents enjoyed a very noticeable reduction in the amount of jet noise.</p> <p>This is obviously the best way to accommodate the Navy’s training needs as well as the residents’ health safety and quality of life issued.</p>	<p style="text-align: center;">PM-02</p> <p style="text-align: center;">} PM-02-A</p> <p style="text-align: center;">} PM-02-B</p> <p>Navy Response</p> <p>PM-02-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p> <p>PM-02-B</p> <p>The Navy recognizes the importance of being good neighbors with local communities and makes every effort to balance noise abatement with the need to train Navy pilots. The Navy will continue to make every attempt to minimize its noise impacts to nearby communities through the continued use of designated flight paths, procedures, and noise abatement measures for military aircraft operating from NAS Key West. These measures include restricting the manner in which aircraft climb, limiting late night flying to only mission essential activities, minimizing flights over heavily populated areas, and accepting input from the public to ensure these measures remain as effective as practicable. Section 4.1.2.2 provides a comparison of the single event noise exposure data for overflight events for the legacy and next generation aircraft, including the F-35. The Navy variant of the F-35 (the F-35C) is estimated to produce noise levels that are similar to those of the aircraft it is replacing, the FA-18C/D. In addition, as discussed in Section 4.1, any</p>
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<p style="text-align: center;">Comments on Draft EIS for NAS Key West by A. Wayne Lujan- Resident of Key Haven</p> <p>The existing level of jet noise is unacceptable to most residents affected by it now. According to the Navy, the F-35 is slightly louder on take off and slightly quieter on landing than the F-18 Super Hornet. Although this remains to be seen based on the studies provided, there will apparently be no relief from the noise problem resulting from a change in aircraft type.</p> <ul style="list-style-type: none"> • If no action is taken to change to the F-35 or increase the number of flight operations, we will have the same noise problem that we have today. • Alternative #1 – No increase in flights but a phasing in of the F-35. There will be no discernable difference and we will still have the noise problem that we have now. • Alternative #2 – New planes phased in at a 9% flight operations will result obviously result in even more noise than we have now. • Alternative #3 – New planes with a 20% increase in flight operations will result in unbearable noise levels for the area residents. <p>The Navy has offered no mitigation to Monroe County residents such as changing the frequency of use of the other runways when wind direction would make them optimal for flight operations, and improvements to those runways is certainly possible and probably not very expensive. They could easily meet the standards currently provided at many bases where the F-18 Super Hornet and the F-35 will be in use. Those other runways take off and land over water or over undeveloped or industrial use property instead of residential neighborhoods. That this change would make a substantial difference for the local residents was already proved when the main runway, 7/25 was closed for repairs and flight operations shifted to the other 2 runways. The local residents enjoyed a very noticeable reduction in the amount of jet noise.</p> <p>This is obviously the best way to accommodate the Navy’s training needs as well as the residents’ health safety and quality of life issued.</p>	<p>PM-02</p> <p>PM-02-B</p> <p>PM-02-C</p>	<p>Navy Response</p> <p>PM-02-B (Continued)</p> <p>changes in average noise levels, single event noise, speech interference, or sleep disturbance would be imperceptible under Alternative 1 and imperceptible to slight under Alternatives 2 and 3, and no population would be at risk for hearing loss.</p> <p>PM-02-C</p> <p>Clarification has been added to Section 7.4 noting that such an operational change is addressed in terms of a mitigation considered and not carried forward rather than in Chapter 2 because such an action would be inconsistent with the proposed action and associated purpose and need being evaluated in this EIS. Shifting operations from the primary runway would provide no gains with respect to the Navy’s ability to support and conduct aircraft training operations and capabilities, including support of the Fleet Response Training Plan and introduction of next generation aircraft at NAS Key West. Selection of which runway is to be used at any given time is primarily determined by the local winds due to safety and aircraft performance. Runway 07 is used 58 percent of the time and Runway 25 is used 9 percent of the time, thus the alternate runways (Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time (see Section 2.4.5). Based on the prevailing wind conditions favoring Runway 07/25 (see Section 3.3.1), there is a limitation in the volume of operations that could be shifted to the alternate runways.</p>
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 <p style="text-align: right;">PM-03</p> <h2 style="text-align: center;">COMMENT SHEET</h2> <p>Thank you for providing your comments on the Naval Air Station Key West Airfield Operations Draft Environmental Impact Statement (EIS). Please provide us with your comments no later than August 28, 2012. Comments may be submitted at the public meeting, by visiting the project website at www.keywesteis.com, or via U.S. Postal Service to the address below.</p> <p>Please provide Air Activity Reports for years 2000-2009, and 2010-present] PM-03-A</p> <hr/> <p>1. Name: <u>John Abbott</u> <small>***Please Print – Additional space is provided on back***</small></p> <p>2. Address: <u>[REDACTED] Fort Lauderdale FL 33076</u> <u>jabbott@keithandschnars.com</u></p> <p>3. Please check here if you would NOT like to be on the mailing list <input type="checkbox"/>.</p> <p>4. Please check here if you would like your name/address kept private (i.e., not published in EIS documents) <input type="checkbox"/>.</p> <p>5. Would you like to receive a copy of the Final EIS? <u>NO</u></p> <div style="border: 1px solid black; padding: 5px;"> <p>During the Draft EIS comment period, the public can provide input in various ways:</p> <ul style="list-style-type: none"> •Submit your comments today at the Public Meeting, •Electronically enter your comments at www.keywesteis.com, and •Write your comments and mail them to: <p style="text-align: center;">Naval Facilities Engineering Command Southeast NAS Key West Air Operations EIS Project Manager P.O. Box 30, Building 903 NAS Jacksonville, FL 32212</p> <p>To ensure your comments are considered, please submit them by August 28, 2012.</p> </div>	<p>Navy Response</p> <p>PM-03-A</p> <p>Concurrent with the release of the FEIS, the requested documents have been posted at the project website www.keywesteis.com.</p>
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 <p style="text-align: right;">PM-04</p> <h2 style="text-align: center;">COMMENT SHEET</h2> <p>Thank you for providing your comments on the Naval Air Station Key West Airfield Operations Draft Environmental Impact Statement (EIS). Please provide us with your comments no later than August 28, 2012. Comments may be submitted at the public meeting, by visiting the project website at www.keywesteis.com, or via U.S. Postal Service to the address below.</p> <p><i>Enjoyed all the presenters who were knowledgeable & friendly. It clears up the questions I had about the air craft & noise levels of different planes. I see no objections to any of the training in Key West its part of life here & necessary for our country. We keep our men well trained & ready to go at any time. That's needed to keep us safe.</i></p> <p><i>We do have some concerns about the South Atlantic fleet & things they are doing. Don't like the idea</i></p> <p>1. Name: [REDACTED] space is provided on back***</p> <p>2. Address: [REDACTED] West FLA</p> <p>3. Please check here if you would NOT like to be on the mailing list <input checked="" type="checkbox"/></p> <p>4. Please check here if you would like your name/address kept private (i.e., not published in EIS documents) <input checked="" type="checkbox"/></p> <p>5. Would you like to receive a copy of the Final EIS? <input checked="" type="checkbox"/></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>During the Draft EIS comment period, the public can provide input in various ways:</p> <ul style="list-style-type: none"> • Submit your comments today at the Public Meeting, • Electronically enter your comments at www.keywesteis.com, and • Write your comments and mail them to: <p style="text-align: center;">Naval Facilities Engineering Command Southeast NAS Key West Air Operations EIS Project Manager P.O. Box 30, Building 903 NAS Jacksonville, FL 32212</p> <p>To ensure your comments are considered, please submit them by August 28, 2012.</p> </div>	<p>Navy Response</p> <p>PM-04-A</p> <p>The Navy has also prepared a Draft Atlantic Fleet Training and Testing (AFTT) Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS), which is a separate effort from the NAS Key West Airfield Operations EIS. The Draft AFTT EIS/OEIS evaluates the potential environmental effects associated with military readiness training and research, development, test and evaluation activities ("training and testing") conducted within existing range complexes, operating areas and testing ranges. The AFTT study area encompasses the East Coast of the United States, the Gulf of Mexico, and select Navy pier-side locations, port transit channels and the lower Chesapeake Bay. For more information on the AFTT EIS/OEIS please visit the project website: www.AFTTEIS.com.</p>
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Naval Air Station Key West Airfield Operations Environmental Impact Statement

COMMENT SHEET cont.

PM-04

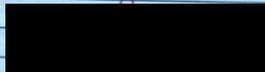
of this so called "Cliff" no one here knew much or where it was deployed. But millions upon millions of aluminum water glass ball are released as radar Detonant or what ever & doing this 30,000 times a year is hard to take. Is these glass balls falling into the sea? Fish or what is eating them? or into the jet stream & carried by air to distant places. I find this disturbing also. The large explosions under water & killing dolphins & whales. I'm sure you could find better ways to do this than killing or dolphins. The low frequency sonar of what ever else you use isn't good for the whales or dolphins either & have killed or disoriented those animals in the past.

PM-04-A

We all share the planet together & have to look out for all who live here. I know your mission is important but please give us all a better place to live.

PM-04-B

Thanks,



Navy Response

PM-04-B

Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.



Naval Air Station Key West Airfield Operations Environmental Impact Statement

PM-05

COMMENT SHEET

Thank you for providing your comments on the Naval Air Station Key West Airfield Operations Draft Environmental Impact Statement (EIS). Please provide us with your comments no later than August 28, 2012. Comments may be submitted at the public meeting, by visiting the project website at www.keywesteis.com, or via U.S. Postal Service to the address below. 8-2-12 ①

I have read the entire impact statement. As a resident of Key West for 55 years I will comment on the military impact on the City and County in the past and present. St. Perry took Key West because of the deep harbor and fresh water for an operating base in 1822. It is still a legal problem because there was no treaty to establish the Key boundaries. Commodore Porter used the first steam boat in the Navy to eliminate the pirates. In 1835 Major Stede of the K.M. Garrison put his 150 men on a ship to start an operation and led his men to Gainesville. They were killed by the Indians. Stede County is named in his honor. After the Indians raided Indian Key St. Augustine, VA set up a base and

PM-05-A

Please Print – Additional space is provided on back

1. Name: _____
2. Address: A.L. BLAZEVIC
[REDACTED] - KEY WEST, FL. 33040
3. Please check here if you would NOT like to be on the mailing list _____
4. Please check here if you would like your name/address kept private (i.e., not published in EIS documents) _____
5. Would you like to receive a copy of the Final EIS?

During the Draft EIS comment period, the public can provide input in various ways:

- Submit your comments today at the Public Meeting,
- Electronically enter your comments at www.keywesteis.com, and
- Write your comments and mail them to:

Naval Facilities Engineering Command Southeast
 NAS Key West Air Operations EIS Project Manager
 P.O. Box 30, Building 903
 NAS Jacksonville, FL 32212

To ensure your comments are considered, please submit them by August 28, 2012.

Navy Response

PM-05-A

Your continued interest, support, and historical accounts of the Navy's activities in the Key West vicinity have provided input into this EIS process. Your comments have become part of the record and contributed to the decision-making process.

PM-05

(2)

hospital. While pursuing the the Indians he was the first white man to cross the Everglades in row boats. Prior to the Civil War Key West had its own senator in Washington. Senator Mallory became the Confederate Secretary of War. The East and West Martello Towers were built ~~was built~~ to protect the back of Fort Taylor in case the Confederates landed with field pieces on the eastern shore. In the Spanish American War electrically detonated mines were assembled on the end of a long pier; placed in the channel and harbor with wires to a watch tower with switches. After the War there was fear that they may explode and damage our ships. They were detonated from the tower with great explosions. In 1904 Laforest built the Navy radio station. He had difficulty with various radio receiver detectors and invented the triode radio tube that was a better detector, but also an amplifier and oscillator. This started the long distance phone calls and the radio industry. The Navy Radio Receiver site later become the Navy Hospital and Clinic. Flagler extended the railroad to Key West because of the Panama Canal. Key West had the only deep harbor for large ships below Charleston. There was a large construction and maintenance facility on Boca Chica where 30 men were killed by a dynamite explosion. The railroad was important for shipping for the Navy and civilians. Freight cars went to Cuba via ferries. Tank cars of molasses, fruit, and lumber

PM-05

(3)

from Oregon and Norway were shipped north. In World War I the Navy enclosed the harbor by enclosing the army pier for a submarine base. There were blimps, single engine, and twin engine sea planes on trumbo which was the railroad switch yard for the railroad. With the military expansion the Navy needed a hospital and bought the school on White and United Streets. This became the Commissary in World War II and was given as the public schools maintenance building. The Weather Bureau building is on a former Navy trailer park. After World I Aeromarine Co. bought the surplus Navy seaplanes and operated from the north end of Siontown St. They established the first international airline to Cuba and the Bahamas. Pan American bought the more reliable three engine FOKKER land planes and operated out of Meacham Field in 1927. Both the Army and Navy wanted observation planes to find out where the shells were landing. The 600 pound projectiles from Fort Taylor were going past the reef and the Army constructed airfields in Key West in 1926. The Biological Research Station was built next to the Navy Radio Receiver Site on the end of Flagler Ave and the Navy did extensive research with sharks in the pool with chemical shark chasers. In the 1930s economic depression, Roosevelt started an airport building program. Boca Chica was built on State Land by the Civil Aeronautics Board.

PM-05-A

PM-05

(4)

In 1939 Roosevelt cut off the oil, scrap iron, and aviation fuel to Japan. He moved the battleships from California to Pearl Harbor, put a destroyer patrol on the east coast, opened up the Naval Station, put seaplanes on Trumbo and a Marine fighter squadron on Boca Chica. In 1939 the Fleet Sonar School was established with a Canadian ship and British Sonar equipment. Ships, aircraft, and blimps were used. A target submarine sank off Key West. At Trumbo the Navy dredged three long runways for the large seaplanes and created Fleming Key and Sigbee Park. The Sigbee causeway was used to haul limestone to Boca Chica to extend the runways. In World War II there were 15,000 sailors and 5000 civil service in Key West. The Navy bore the total ^{cost} of building a water line from Florida City and sold water to the Aqueduct Authority at Southard and Thomas streets for 2 cents for 1000 gallons of treated water. By the end of the war only two places were air conditioned; the Naval Station theatre and the operating room of the 150 bed Navy Hospital. In President Truman's many trips to Key West his quarters were not air conditioned.

McKean Field was taken over for blimp training and National Airlines was allowed joint use. Richmond Naval Air Station in Miami operated blimps on anti-submarine patrol and had one of these blimps shot down by a German submarine.

PM-05

(5)

The blimp hangars of wood were 1000 feet long and 300 feet wide. In the 1945 hurricane they caught fire with a loss of 25 blimps, 200 aircraft and 150 vehicles. This was the Navy's next biggest loss to Pearl Harbor. Boca Chica was a Fleet Air Wing with patrol, torpedo, and fighter planes. After World War II the Navy had NAS Boca Chica appraised and asked the County if they wanted joint use. They only wanted the money and planned to dredge an airport between Fleming Key and Key Haven. The seaplanes at Trumbo were replaced by H-5 helicopters training. The VX-1 squadron had blimps, patrol planes, and aircraft carrier anti-submarine planes. Fleet All Weather Squadron had night attack and night fighter aircraft. They had the first jet fighter F-80 in 1951. In 1958 VF-108 arrived to train night fighter. Each pilot had to launch a Sparrow Radar Missile at a moving radar target. VF-108 flew aircraft until mid night. The RA5C reconnaissance aircraft squadrons trained in Key West for Viet Nam. The F4 and RA5C took off with afterburner and made as much noise as the F-18. After Viet Nam operations were reduced, land around the base and Stock Island was cheap because of noise and danger, so development greatly increased. The County created minimum zoning, but ~~they~~ didn't enforce it any zoning. Individuals and developers threatened to sue and were allowed to build.

PM-01-A

PM-05

(6)

The County still has not improved or enforced zoning because of threatened law suits. Land was extremely cheap on East Rockland Key and there were no water lines or electricity. The Navy offered the County landing rights for commercial aircraft to TAXI to a County terminal on Rockland Key. The County was not interested. The most used runway on Boca Chica was extended away from Key West to eliminate possible aircraft collisions. The west end of the K.W. airport was an auto airfield built in World War II and became a Navy trailer park. It was given to the County for a greater safety over a run which was used twice last year. The railroad went through the center of the Base and the highway also did which was dangerously close to the end of a runway. The Navy had the highway diverted around the Base to increase safety with the increased auto traffic. The large Poinciana Housing area was given to the City and serves as a low income and special housing needs area. Key West had the largest desalination plant but was continually beset with erratic operation. The electric system had frequent failures and insufficient power. The Navy considered building an atomic energy plant on Fleming Key for water and electricity. Fort Taylor had a seawater distilling plant for use before the Civil War. The Navy used ^{the fort} for surplus storage and disposal.

PM-05

(7)

The channel and harbor were dredged which made the area much larger and the Fort and land were given for a State Park with the best beach. Key West was forced to build a sewage treatment plant. The Chamber of Commerce wanted it next to Fort Taylor. The Navy gave land on Fleming Key for the sewage treatment plant with deep injection wells. The Navy housing area at White St. and Atlantic Blvd. was transferred to the Dept. of Interior for a park. The Navy gave Truman Annex land for a park. In ten years the City has not developed it. The Navy allows joint use of the Mole for tour ships which contributes to the City's income. The Truman Annex harbor is used for training special forces that will increase in the future. In the Bay of Pigs episode Castro had spies in the Pentagon and State Dept. Trenches were constructed in the landing area. Castro wanted the men who were help the invasion. It was not possible to be successful. In the missile crisis 90,000 troops came into Florida and were issued ammunition to invade Cuba. General LeMay wanted to atomic bomb Cuba and possibly Russia. B-52's with atomic bombs were airborne all over the world. There were 60 atomic missiles that could go 2000 miles and their priority would be Washington D.C. and New York City. Kennedy negotiated through a KGB agent in the Russian Embassy and Khrushchev used the Western Union to reply.

PM-05-A

PM-05

(8)

A line in the noise area of the Key West airport. The FAA put in 32 windows, 5 large glass doors, installed 3 air conditioning systems, and put the electrical power underground. In speaking to Senator Nelson about possible buy outs of property or home modification he stated there would have to be strict zoning and strict enforcement before Congress would appropriate funds for land purchase or anti noise modifications.

PM-05-A

This information is to inform the local population of the Navy's tremendous contributions to the City plus the Navy expenditures on salaries, \$20 million spent on chemical and biological hazards, The Navy has spent more than \$50 million on improving the environment of the Naval Air Station

R.B. Blazovic

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	<p style="text-align: right;">PM-06 1</p> <p style="text-align: center;">NAVAL AIR STATION KEY WEST AIRFIELD OPERATIONS ENVIRONMENTAL IMPACT STATEMENT PUBLIC MEETING</p> <p style="text-align: center;">Tennessee Williams Theatre 5901 College Road Key West, FL 33040</p> <p style="text-align: center;">Thursday, August 2, 2012 Commencing at 5:00 p.m. Concluding at 8:00 p.m.</p> <p style="text-align: center;">Stenographically Reported By: Cathy H. Webster RPR, FPR 302 Southard Street, Suite 107 Key West, Florida 33040 305.295.6279</p>	<p>Navy Response</p> <p>No substantive comments on this page.</p>
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<p style="text-align: right;">2</p> <p>1 (There were no comments made with the Court 2 Reporter at the August 1, 2012 Public Meeting.) 3 (The following is the one comment made with the 4 Court Reporter at the August 2, 2012 Public 5 Meeting:) 6 MS. MARTINEZ: My name is Judy Martinez. 7 This was a very lovely visit and now I feel 8 more informed. I try to get involved as much as I 9 can in civic matters, and I'm for No. 3. And I want 10 to see them go full speed ahead with this and bring 11 these planes in here. I don't think that we should 12 cut back on military spending and I think that we 13 should plan on protecting our country as much as 14 possible. 15 I come from a Navy family, going back to the 16 first World War. I think the planes are beautiful 17 and I understand that they do not harm the 18 environment. The noise factor will be very, very 19 minimal, not much different than it is right now. 20 And I'm going to be taking one of these sheets 21 to my fiance, he is going to fill it out and he's 22 backing No. 3, also, he told me. And I think they 23 did a wonderful, wonderful study here. I think they 24 did a wonderful presentation. They are all well 25 informed. This obviously took a lot of work. I</p>	<p>PM-06</p>	<p>Navy Response</p> <p>PM-06-A</p> <p>Your support for Alternative 3 is noted and has become part of the record.</p> <p>PM-06-B</p> <p>Section 4.1 assesses the potential noise impacts of Alternatives 1, 2, and 3 in detail.</p> <p>PM-06-C</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
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<p>1 wanted to come last night but I had to work. So, 2 I'm here today, and I want to thank you. 3 (Concluded at 6:33 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>PM-06</p>	<p>Navy Response</p>	<p>No substantive comments on this page.</p>
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<p>Name: Anonymous Comment: I ask that all future jet traffic turn out over the Atlantic Ocean as soon after take off as possible. At present they fly almost straight up US 1 and directly over hundreds of homes all the way up to Sugarloaf Key. The noise on take off by a F-18 makes talking inside our homes impossible! We have people on chemotherapy, people who work nights,etc. The jets wait till they are directly overhead and then turn. We live almost 8 miles away! A little courtesy please City: Key West Date Received: 7/7/2012 12:02:52 AM EDT</p>	<p>W-01 W-01-A</p>	<p>Navy Response W-01-A Aircraft operating out of NAS Key West normally turn to fly over the ocean as soon as safely possible. At times when there is inbound traffic to Key West International Airport, the turn is delayed in order to maintain safe separation from that civilian air traffic. In the vicinity of Sugarloaf Key, airspace is also constrained by Restricted Area R-2916 (see Figure 2.3-1), an area of 4 statute miles in diameter, protected up to 14,000 feet mean sea level that aircraft must avoid as it contains a tethered aerostat balloon flown at various altitudes and times.</p>
<p>Name: arleen knight Comment: We have written letters to the base commander of the Key West NAS and spoken in person to the director of flight operations regarding the flight path of the F-18s after take off. They fly straight up the Keys over hundreds of homes before they finally turn over the ocean. The noise is extremely loud. We live miles(6-8) away and cannot use our phones inside our homes. Their attitude has been very rude and unresponsive. The jets are needed-the people who fly them are not! City: Key West Date Received: 7/7/2012 12:17:49 AM EDT</p>	<p>W-02 W-02-A</p>	<p>W-02-A The Navy recognizes the importance of being good neighbors with local communities and makes every effort to balance noise abatement with the need to train Navy pilots. The Navy will continue to make every attempt to minimize its noise impacts to nearby communities through the continued use of designated flight paths, procedures, and noise abatement measures for military aircraft operating from NAS Key West. These measures include restricting the manner in which aircraft climb, limiting late night flying to only mission essential activities, minimizing flights over heavily populated areas, and accepting input from the public to ensure these measures remain as effective as practicable. Aircraft operating out of NAS Key West normally turn to fly over the ocean as soon as safely possible. At</p>

<p>Name: arleen knight</p> <p>Comment: We have written letters to the base commander of the Key West NAS and spoken in person to the director of flight operations regarding the flight path of the F-18s after take off. They fly straight up the Keys over hundreds of homes before they finally turn over the ocean. The noise is extremely loud. We live miles(6-8) away and cannot use our phones inside our homes. Their attitude has been very rude and unresponsive. The jets are needed-the people who fly them are not!</p> <p>City: Key West</p> <p>Date Received: 7/7/2012 12:17:49 AM EDT</p>	<p style="text-align: center;">W-02</p> <p style="text-align: center;">W-02-A</p> <p>Navy Response</p> <p>W-02-A (Continued)</p> <p>times when there is inbound traffic to Key West International Airport, the turn is delayed in order to maintain safe separation from that civilian air traffic. In the vicinity of Sugarloaf Key, airspace is also constrained by Restricted Area R-2916 (see Figure 2.3-1), an area of 4 statute miles in diameter, protected up to 14,000 feet mean sea level that aircraft must avoid as it contains a tethered aerostat balloon flown at various altitudes and times.</p> <p>NAS Key West takes all noise concerns seriously. Noise complaints are logged and reviewed by NAS Key West Air Operations, and (when appropriate) the responsible flight squadron is notified and any deviations from standard procedures are identified. If necessary, Air Operations personnel may contact the individual who complained and provide follow up information and explanation.</p>
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<p>Name: John Walsh Comment: As long as the Navy isn't doing a lot of night training after midnight, we should be encouraging the Navy to increase their presence in our community. City: Key West Date Received: 7/25/2012 9:29:39 AM EDT</p>	<p>W-03 W-03-A</p>	<p>Navy Response</p> <p>W-03-A</p> <p>As noted in Section 4.1 for all alternatives, any operations that occur after 10:00 p.m. would be in support of critical mission requirements and completed as early as possible. Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
<p>Name: Anonymous Comment: Why do people buy, or build next to the runway; and then complain about the noise? The US Navy has been here longer than the last five generations of Conchs and newcomers. Just be thankful that the flag on the planes is that of the USA. Also consider the impact if the Navy were to completely withdraw from Key West. City: Cudjoe Key Date Received: 8/1/2012 3:01:14 AM EDT</p>	<p>W-04 W-04-A</p>	<p>W-04-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>

<p>Name: Joseph Stone</p> <p>Comment: First I think the jets operating there now are too noisy for the area, but the few of the new ones I've heard are intolerable. This being said, I know my opinion will not change much. But I would like to make a suggestion. The jets operating out of the base now return to the station at full speed and make a large circle over the area, (every time). The noise, pollution and fuel use when approaching the field could probably be cut by at least half if they spaced their landing at a distance, commercial jets do it hundreds of times a day. I'm sure there will be some kind reason that this is necessary (I was in the military). I still think it would be a great improvement. 6TCVX</p> <p>Date Received: 8/2/2012 3:38:49 PM EDT</p>	<p style="text-align: center;">W-05</p> <p style="text-align: center;">W-05-A</p> <p>Navy Response</p> <p>W-05-A</p> <p>The Navy recognizes the importance of being good neighbors with local communities and makes every effort to balance noise abatement with the need to train Navy pilots. The Navy will continue to make every attempt to minimize its noise impacts to nearby communities through the continued use of designated flight paths, procedures, and noise abatement measures for military aircraft operating from NAS Key West. These measures include restricting the manner in which aircraft climb, limiting late night flying to only mission essential activities, minimizing flights over heavily populated areas, and accepting input from the public to ensure these measures remain as effective as practicable.</p> <p>Section 4.1.2.2 provides a comparison of the single event noise exposure data for overflight events for the legacy and next generation aircraft, including the F-35. The Navy variant of the F-35 (the F-35C) is estimated to produce noise levels that are similar to those of the aircraft it is replacing, the FA-18C/D. In addition, as discussed in Section 4.1, any changes in average noise levels, single event noise, speech interference, or sleep disturbance would be imperceptible under Alternative 1 and imperceptible to slight under Alternatives 2 and 3, and no population would be at risk for hearing loss.</p> <p>As noted in Section 2.4.3, approximately 15 percent of arrivals are straight-in arrivals and 85 percent of</p>
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<p>Name: Joseph Stone</p> <p>Comment: First I think the jets operating there now are too noisy for the area, but the few of the new ones I've heard are intolerable. This being said, I know my opinion will not change much. But I would like to make a suggestion. The jets operating out of the base now return to the station at full speed and make a large circle over the area, (every time). The noise, pollution and fuel use when approaching the field could probably be cut by at least half if they spaced their landing at a distance, commercial jets do it hundreds of times a day. I'm sure there will be some kind reason that this is necessary (I was in the military). I still think it would be a great improvement. 6TCVX</p> <p>Date Received: 8/2/2012 3:38:49 PM EDT</p>	<p>W-05</p> <p>W-05-A</p>	<p>Navy Response</p> <p>W-05-A (Continued)</p> <p>overhead arrivals). Straight-in arrivals require spacing by external agencies with radar control. Overhead arrivals were originally used to allow pilots to take their own safe (and minimum) separation. Minimum separation is a key skill in tactical aviation. During a recovery at the ship, pilots are graded (partially) on the separation from the aircraft in front of them to hone skills on recovering aircraft quickly when required. Another factor is that tactical jets conduct missions in multi-aircraft flights. When recovering in a 2-, 3-, or 4-ship formation, sufficient separation between members of the same flight is much more difficult during a straight-in approach.</p> <p>Overhead arrivals are more efficient on fuel and generate less emissions, as sequencing into a straight-in arrival requires slowing to a much less efficient speed earlier and maintaining a configuration with drag (created with landing gear, flaps, etc.) for a longer period of time. In jets, flying at those slower speeds requires greater fuel consumption and generates greater emissions.</p>
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<p>Name: Anonymous Comment: I live on Big Coppitt Key City: Key West Date Received: 8/3/2012 11:26:44 AM EDT</p>	<p>W-06</p>	<p>Navy Response</p> <p>No substantive comment was submitted.</p>
<p>Name: Charlotte Annyce Brauch Comment: We are in the final stage of remodeling our home on Big Coppitt Key. Up to this point all work was contained inside the house. The final stage is for a wood patio attached to the back of our house. It is less than 18 inches above the ground and even after the county has signed off on the permit it is pending and having to go to Tallahassee for approval; which can take 90 days more. This is all because of NAS Environmental Impact Statement. Apparently the state does not understand that a wooden deck less than 18 inches will not interfere with your proposed flight patterns. Does not sense that they are concerned about a deck that is attached to my house which is certainly more than 18 inches high. I think all of this approval on the states part is moving so slow because they don't have any idea what's required of them. If any help could be shared with the state permitting office it would be of great help. I work for the NASKW at Boca Chica and see this as a good opportunity for the base. Just wish the other entities involved would educate themselves. Thanks Charlotte Annyce Brauch City: Key West Date Received: 8/3/2012 12:32:51 PM EDT</p>	<p style="text-align: center;">W-07</p> <div style="display: flex; align-items: center; justify-content: center;"> <div style="border-left: 1px solid black; border-right: 1px solid black; height: 100px; margin-right: 5px;"></div> <div style="margin-right: 5px;">W-07-A</div> </div> <div style="display: flex; align-items: center; justify-content: center; margin-top: 10px;"> <div style="border-left: 1px solid black; border-right: 1px solid black; height: 30px; margin-right: 5px;"></div> <div style="margin-right: 5px;">W-07-B</div> </div>	<p>Navy Response</p> <p>W-07-A</p> <p>This EIS has no bearing on the permitting requirements noted in your comment.</p> <p>W-07-B</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>

<p>Name: Daniel Simpson</p> <p>Comment: This report is full of inaccuracies and bad measurements. The number of flights flown are greatly exaggerated, for instance there were no flights at all after Wilma. And if there were as many touch and goes over my house as listed, I would be insane. The sound measurements and models are a joke. The F35 has been run out of every other community for a reason, it's louder, much louder. And refusing to use the other "too short" runway is ridiculous, these are aircraft that land on carriers, right? This document just proves that you can't trust environmental impact studies that are done "in-house". The study should be scrapped and done by an outside agency.</p> <p>City: Key West</p> <p>Date Received: 8/3/2012 6:44:52 PM EDT</p>	<p style="text-align: center;">W-08</p> <p style="text-align: center;">] W-08-A</p> <p style="text-align: center;">] W-08-B</p> <p>Navy Response</p> <p>W-08-A</p> <p>As detailed in Section 2.4.1, annual airfield operations are based on a 10-year average and events and factors influence operations over this time period have included six hurricane events. The number of airfield operations by aircraft type listed in Table 2.8-1 includes all types of airfield operations, of which touch-and-goes represent one type of pattern airfield operation discussed in Section 2.4.3. The specific number of operations by type of airfield operation for fixed-wing aircraft used in the noise modeling analysis is provided in Table 4-2 in the noise technical study available at the project website, www.keywesteis.com. A 10 year average was utilized to determine the annual number of flight operations and detailed examination of 2009 and 2010 flight operations, validated through 2011, was conducted to determine the specific details and nature of those annual flight operations.</p> <p>W-08-B</p> <p>Section 4.1.2.2 provides a comparison of the single event noise exposure data for overflight events for the legacy and next generation aircraft, including the F-35. The Navy variant of the F-35 (the F-35C) is estimated to produce noise levels that are similar to those of the aircraft it is replacing, the FA-18C/D. In addition, as discussed in Section 4.1, any changes in average noise levels, single event noise, speech interference, or sleep disturbance would be imperceptible under Navy</p>
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<p>Name: Daniel Simpson</p> <p>Comment: This report is full of inaccuracies and bad measurements. The number of flights flown are greatly exaggerated, for instance there were no flights at all after Wilma. And if there were as many touch and goes over my house as listed, I would be insane. The sound measurements and models are a joke. The F35 has been run out of every other community for a reason, it's louder, much louder. And refusing to use the other "too short" runway is ridiculous, these are aircraft that land on carriers, right? This document just proves that you can't trust environmental impact studies that are done "in-house". The study should be scrapped and done by an outside agency.</p> <p>City: Key West</p> <p>Date Received: 8/3/2012 6:44:52 PM EDT</p>	<p style="text-align: center;">W-08</p> <p style="text-align: center;">] W-08-B</p> <p style="text-align: center;">] W-08-C</p> <p>Response</p> <p>W-08-B (Continued)</p> <p>Alternative 1 and imperceptible to slight under Alternatives 2 and 3, and no population would be at risk for hearing loss.</p> <p>W-08-C</p> <p>Clarification has been added to Section 7.4 noting that such an operational change is addressed in terms of a mitigation considered and not carried forward rather than in Chapter 2 because such an action would be inconsistent with the proposed action and associated purpose and need being evaluated in this EIS. Shifting operations from the primary runway would provide no gains with respect to the Navy's ability to support and conduct aircraft training operations and capabilities, including support of the Fleet Response Training Plan and introduction of next generation aircraft at NAS Key West. Selection of which runway is to be used at any given time is primarily determined by the local winds due to safety and aircraft performance. Runway 07 is used 58 percent of the time and Runway 25 is used 9 percent of the time, thus the alternate runways (Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time (see Section 2.4.5). Based on the prevailing wind conditions favoring Runway 07/25 (see Section 3.3.1), there is a limitation in the volume of operations that could be shifted to the alternate runways.</p>
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<p>Name: John Jones Comment: I believe that the current level of noise pollution and environmental impact is already unacceptable. I have been a resident of KW since I was stationed at NAS in the 70's. (RVAH-3) The only time that the Navy was receptive to any input from the City or County, was during the BRAC hearings. If we could have foreseen the meanness and arrogance of the future, by now we would have doubled our land mass plus possess an International Jet-port. No to the 35's ! City: Key West Date Received: 8/4/2012 3:53:42 PM EDT</p>	<p>W-09] W-09-A</p>	<p>Navy Response W-09-A Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
<p>Name: Bert Lee Comment: Sadly, the Navy does not have a good track record as regards the environment, and I do not trust them to police themselves properly. I wish I had more faith in my military and their honesty, but the turn around of ex- Admiral Hyman Rickover was an eye opening event for many of us. We trusted that he was informed properly about the environmental safety of the nuclear navy, and in the end he said, fundamentally, that the lies and cover- ups were constant and unforgivable. Let outside forces prepare this report, and hold the Navy strictly responsible. Thank you. City: Key West Date Received: 8/4/2012 3:56:43 PM EDT</p>	<p>W-10] W-10-A</p>	<p>W-10-A Consistent with 40 CFR 1507.2, all federal agencies, including the Navy, are required to develop their own capacity within a NEPA program in order to develop analyses and documents (or review those prepared by others) to ensure informed decisionmaking. The U.S. Fleet Forces Command in Norfolk, Virginia, is leading the EIS effort in conjunction with NAS Key West.</p>
<p>Name: robert oneal Comment: I am very interested and concerned about this issue. thank you. City: key west Date Received: 8/4/2012 4:01:44 PM EDT</p>	<p>W-11] W-11-A</p>	<p>W-11-A Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>

<p>Name: Anonymous</p> <p>Comment: I am concerned about the noise levels that will be generated with the addition of more jets and the newer jets proposed. the US National Institute on Deafness as stated that prolonged exposure to loud noise will create noise induced hearing loss. The symptoms of NIHL develop gradually over time and are not reversible. Any sound above 85 db can cause hearing loss. You know you are hearing a sound over this level is you have to raise your voice to be heard by someone else.I am a resident of south Stock Island, my home was not in the flight path or ACUIZ when I purchased it. Our community has meet with Navy representatives several times to discuss this issue. If the jets fly a few degrees south of our community they will be over water.(We are in the return path) I have suggested that flights fly over water, use alternate paths and that a new runway with a different angle be considered. I was told that was impossible. Now I see that a new runway is in the plans.Communications with Navy representatives has not done a thing to address any of our concerns. At worst we were treated like ignorant children and at best with polite, nothing we can do about it mam.It's all ready stressful to be in this kind of noise and any increase is an intolerable consideration. The World Health Organization states that persistent noise has been linked with increased stress levels, headaches,aggressive behaviour, lack of sleep, heart dieases and high blood pressure.Because of the risk of significiant impact on the health of residents I do not think it is appropriate to fly over our community at all, and certainly not to increase the number of flights or the newer and louder jets.There is also the question of how the Navy is measuring noise levels and they are not taking into consideration the lower frequencies which are so detrimental to health and well being.thank you</p> <p>City: Key West</p> <p>Date Received: 8/7/2012 3:43:02 PM EDT</p>	<p style="text-align: center;">W-12</p> <p style="text-align: center;">] W-12-A</p> <p style="text-align: center;">] W-12-B</p> <p>Navy Response</p> <p>W-12-A</p> <p>As stated in Section 3.1, under all alternatives, there would continue to be no population at risk for long-term hearing loss as no population occurs within the 80 DNL and greater noise zone. Further information on the potential noise impacts associated with implementation of the alternatives is detailed in Section 4.1. Specific information on noise-induced hearing impairment can be found in Appendix E, Section E.3.4.</p> <p>W-12-B</p> <p>There is no element of the proposed action or alternatives that adds a runway or changes runway orientation. As stated in Section 7.4, the Navy considered, but did not carry forward, several mitigation measures involving runway selection and lengthening. All of the options presented in Section 7.4 are inconsistent with the proposed action and associated purpose and need being evaluated in this EIS. Prevailing wind conditions are the main driver for runway selection at NAS Key West and any change in runway configuration would have a minimal impact on runway utilization. As shown in Figures 2.3-3, 2.3-4, and 2.3-5 in Section 2.4.3, the airfield approach and departure flight tracks are aligned to overfly the ocean to the maximum extent safely possible.</p>
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<p>Name: Anonymous</p> <p>Comment: I am concerned about the noise levels that will be generated with the addition of more jets and the newer jets proposed. the US National Institute on Deafness as stated that prolonged exposure to loud noise will create noise induced hearing loss. The symptoms of NIHL develop gradually over time and are not reversible. Any sound above 85 db can cause hearing loss. You know you are hearing a sound over this level is you have to raise your voice to be heard by someone else.I am a resident of south Stock Island, my home was not in the flight path or ACUIZ when I purchased it. Our community has meet with Navy representatives several times to discuss this issue. If the jets fly a few degrees south of our community they will be over water.(We are in the return path) I have suggested that flights fly over water, use alternate paths and that a new runway with a different angle be considered. I was told that was impossible. Now I see that a new runway is in the plans.Communications with Navy representatives has not done a thing to address any of our concerns. At worst we were treated like ignorant children and at best with polite, nothing we can do about it mam.It's all ready stressful to be in this kind of noise and any increase is an intolerable consideration. The World Health Organization states that persistent noise has been linked with increased stress levels, headaches,aggressive behaviour, lack of sleep, heart dieases and high blood pressure.Because of the risk of significiant impact on the health of residents I do not think it is appropriate to fly over our community at all, and certainly not to increase the number of flights or the newer and louder jets.There is also the question of how the Navy is measuring noise levels and they are not taking into consideration the lower frequencies which are so detrimental to health and well being.thank you</p> <p>City: Key West</p> <p>Date Received: 8/7/2012 3:43:02 PM EDT</p>	<p>W-12</p> <p>W-12-C</p> <p>W-12-D</p>	<p>Navy Response</p> <p>W-12-C</p> <p>Noise effects on health are described in Appendix E, including discussion of World Health Organization findings in Section E.3.5. The noise analysis was conducted using DOD-approved best methods.</p> <p>W-12-D</p> <p>In June 2001, the Federal Interagency Committee on Aviation Noise (FICAN) met with two members of a low-frequency noise expert panel to discuss results of studies completed to determine the potential impacts of low-frequency aircraft noise. FICAN published a report in April 2002 in which they concurred with the expert panel that low-aircraft noise (aside from low altitude, high-speed military aircraft which is not analyzed in the EIS) will not pose a public health risk, risk of structural damage, or an increase in indoor speech interference (FICAN 2002). See Appendix E, Section E3.3.3 for additional information.</p> <p>Analyses of aircraft noise exposure and compatible land uses around DOD airfield facilities are accomplished using a group of computer-based programs, collectively called NOISEMAP. This analytical methodology and the results presented in the EIS are consistent with current Navy policy regarding the modeling of aircraft noise.</p>
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<p>Name: Anonymous</p> <p>Comment: “The assessment by the Navy analyzed impacts to the human environment, including noise and flight paths of all aircrafts, including the F/A-18 EF Super Hornet” and I would like to see as the county has requested a complete and thorough analysis of the F/18-18 E/F on human environment including noise and flight paths of all aircrafts that will be flying off of NAS Key West base. “The Navy needs to fully evaluate the F/A-18E/F Super Hornet to get a proper baseline of comparison with the incoming F-35C”. Also would like the Navy to compare the NAS Key West draft environmental impact statement to the much larger Atlantic Fleet Training and Testing environmental impact statements. As stated by Commissioner Wigington “these two environmental impacts statements clearly go hand in hand”.</p> <p>City: Key Largo</p> <p>Date Received: 8/9/2012 7:18:13 AM EDT</p>	<p>W-13</p> <p>W-13-A</p>	<p>Navy Response</p> <p>W-13-A</p> <p>The No Action Alternative, as detailed in Section 2.4.1, provides a benchmark that enables decision makers to evaluate the environmental consequences of the proposed alternatives consistent with CEQ guidance entitled “Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations”(CEQ 1981).</p> <p>In addition, the environmental analysis required under NEPA is “forward looking,” in that it focuses on the potential impacts of the proposed action that an agency is considering (CEQ 2005). Section 1.1 was modified to provide clarification that this EIS is a “forward looking” examination of potential future conditions associated with NAS Key West airfield operations and that the environmental effects of existing aircraft operations are analyzed in detail as part of the No Action Alternative, which serves as baseline for comparison for the future conditions or alternatives under consideration. FA-18E/Fs are part of the current inventory of aircraft operating at NAS Key West and comprise approximately 25 percent of the existing annual airfield operations (see Table 2.8-1). Therefore, no revision was made to the baseline or noise analysis in response to this comment.</p>
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<p>Name: Anonymous</p> <p>Comment: “The assessment by the Navy analyzed impacts to the human environment, including noise and flight paths of all aircrafts, including the F/A-18 EF Super Hornet” and I would like to see as the county has requested a complete and thorough analysis of the F/18-18 E/F on human environment including noise and flight paths of all aircrafts that will be flying off of NAS Key West base. “The Navy needs to fully evaluate the F/A-18E/F Super Hornet to get a proper baseline of comparison with the incoming F-35C”. Also would like the Navy to compare the NAS Key West draft environmental impact statement to the much larger Atlantic Fleet Training and Testing environmental impact statements. As stated by Commissioner Wigington “these two environmental impacts statements clearly go hand in hand”.</p> <p>City: Key Largo</p> <p>Date Received: 8/9/2012 7:18:13 AM EDT</p>	<p>W-13</p> <p>W-13-B</p>	<p>Navy Response</p> <p>W-13-B</p> <p>The AFTT EIS/OEIS focuses on events that occur and may potentially occur within existing at-sea ranges, to include the Key West Range Complex. The AFTT EIS/OEIS does not include any activities occurring at Boca Chica Field, which was analyzed in this EIS. Since the Navy’s preferred alternative for this EIS is Alternative 2, any increase in training events in the Key West Range Complex that involve aircraft taking off or landing at Boca Chica Field, are captured in the discussion of aircraft operations in Chapter 2. Please note that the action alternatives described in the AFTT EIS/OEIS expand training and testing capabilities, but there is no direct correlation to NAS Key West aircraft operations. All training described in the AFTT EIS/OEIS and this EIS will continue to be performed in accordance with the Fleet Response Training Plan. The AFTT EIS/OEIS has analyzed alternatives that would address the largest potential use of the range. This will ensure all applicable permit coverage for whatever alternative is implemented from this EIS. AFTT EIS/OEIS analysis efforts do not pre-select an alternative for this EIS, and a decision on this EIS is expected to be reached by the Navy prior to a decision on the AFTT EIS/OEIS.</p>
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<p>Name: Gwenn Smith</p> <p>Comment: The noise from the aircraft is not that often . Twenty minutes for take-off and about the same for landings. This is not every day. People live with trains and traffic in cities . The complainers just want to complain. Gwenn Smith</p> <p>City: Key West</p> <p>Date Received: 8/16/2012 9:41:05 AM EDT</p>	<p style="text-align: right;">W-14</p> <p style="text-align: right;">W-14-A</p> <p>Navy Response</p> <p>W-14-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
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<p>Name: Anonymous</p> <p>Comment: NOISE IS THE MAIN ISSUE FOR RESIDENTS IN THE LOWER KEYS WE LIVE ABOUT EIGHT MILES EAST OF THE MAIN RUNWAY AND WHEN TWO JETS TAKE OFF THEY MANY TIMES TURN SLIGHTLY TO THEIR LEFT, AND PASS OVER OUR HOME IN BAY POINT.THE NOISE IS DEAFINING. THEY CONTINUE OVER SUGARLOAF AND CUDJO KEYS, GAINING ALTITUDE AAS THEY GO.WE HAVE HELD MEETINGS WITH THE BASE COMMANDERS STAFF TO SUGGEST THAT EACH TAKEOFF, WHEN USING THAT RUNWAY, TURN OUT INTO THE OCEAN AND GAIN THEIR ALTITUDE WHERE THE NOISE IS NOT OVER HOMES.SUCH A SIMPLE MANUVER WOULD REDUCE THE NOISE LEVEL OVER ALL THE HOMES FROM mm#15 TO mm#40.MAKE IT MANDATORY THAT THE PILOTS AVOID FLYING OVER LAND MASSES BOTH ON LANDINGS AND TAKEOFFS.WHEN LANDING, THEY COULD DECEND OVER THE BACKCOUNTRY. THEN LAND ON THE MAIN RUNWAY.THEN THERE IS THE SHORT RUNWAY THAT SENDS THE PLANES OUT OVER THE OCEAN. THIS ONE SHOULD BE USED MOST OF THE TIME. DURING A PERIOD OF RUNWAY CONSTRUCTIONTHE SHORT RUNWAY WAS USED FOR ABOUT A MONTH AND WE DID NOT EVEN KNOW THE JETS WERE AROUND.i THINK IT IS TIME THE NAVY RETHINK ITS MISSION AND DO THINGS THAT WOULD MAKE THE LOCALS HAPPIER.ALSO, IT WOULD BE DESIREABLE TO TAKE DECIBEL READINGS IN THE VARIOUS SUBDIVISIONS TO PROVE THAT THE NOISE IS NOT DAMAGING THE RESIDENTS HEARING, AS MOST OF US THINK IT IS.HEZEP</p> <p>City: Key West</p> <p>Date Received: 8/16/2012 4:10:38 PM EDT</p>	<p>W-15</p> <p>W-15-A</p> <p>W-15-B</p>	<p>Navy Response</p> <p>W-15-A</p> <p>Aircraft operating out of NAS Key West normally turn to fly over the ocean as soon as safely possible. At times when there is inbound traffic to Key West International Airport, the turn is delayed in order to maintain safe separation from that civilian air traffic. In the vicinity of Sugarloaf Key, airspace is also constrained by Restricted Area R-2916 (see Figure 2.3-1), an area of 4 statute miles in diameter, protected up to 14,000 feet mean sea level that aircraft must avoid as it contains a tethered aerostat balloon flown at various altitudes and times.</p> <p>W-15-B</p> <p>Clarification has been added to Section 7.4 noting that such an operational change is addressed in terms of a mitigation considered and not carried forward rather than in Chapter 2 because such an action would be inconsistent with the proposed action and associated purpose and need being evaluated in this EIS. Shifting operations from the primary runway would provide no gains with respect to the Navy’s ability to support and conduct aircraft training operations and capabilities, including support of the Fleet Response Training Plan and introduction of next generation aircraft at NAS Key West. Selection of which runway is to be used at any given time is primarily determined by the local winds due to safety and aircraft performance. Runway 07 is used 58 percent of the time and Runway 25 is used 9 percent of the time, thus the alternate runways</p>
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<p>Name: Anonymous Comment: NOISE IS THE MAIN ISSUE FOR RESIDENTS IN THE LOWER KEYS WE LIVE ABOUT EIGHT MILES EAST OF THE MAIN RUNWAY AND WHEN TWO JETS TAKE OFF THEY MANY TIMES TURN SLIGHTLY TO THEIR LEFT, AND PASS OVER OUR HOME IN BAY POINT.THE NOISE IS DEAFINING. THEY CONTINUE OVER SUGARLOAF AND CUDJO KEYS, GAINING ALTITUDE AAS THEY GO.WE HAVE HELD MEETINGS WITH THE BASE COMMANDERS STAFF TO SUGGEST THAT EACH TAKEOFF, WHEN USING THAT RUNWAY, TURN OUT INTO THE OCEAN AND GAIN THEIR ALTITUDE WHERE THE NOISE IS NOT OVER HOMES.SUCH A SIMPLE MANUEVER WOULD REDUCE THE NOISE LEVEL OVER ALL THE HOMES FROM mm#15 TO mm#40.MAKE IT MANDATORY THAT THE PILOTS AVOID FLYING OVER LAND MASSES BOTH ON LANDINGS AND TAKEOFFS.WHEN LANDING, THEY COULD DECEND OVER THE BACKCOUNTRY. THEN LAND ON THE MAIN RUNWAY.THEN THERE IS THE SHORT RUNWAY THAT SENDS THE PLANES OUT OVER THE OCEAN. THIS ONE SHOULD BE USED MOST OF THE TIME. DURING A PERIOD OF RUNWAY CONSTRUCTIONTHE SHORT RUNWAY WAS USED FOR ABOUT A MONTH AND WE DID NOT EVEN KNOW THE JETS WERE AROUND.i THINK IT IS TIME THE NAVY RETHINK ITS MISSION AND DO THINGS THAT WOULD MAKE THE LOCALS HAPPIER.ALSO, IT WOULD BE DESIREABLE TO TAKE DECIBEL READINGS IN THE VARIOUS SUBDIVISIONS TO PROVE THAT THE NOISE IS NOT DAMAGING THE RESIDENTS HEARING, AS MOST OF US THINK IT IS.HEZEP City: Key West Date Received: 8/16/2012 4:10:38 PM EDT</p>	<p>W-15</p> <p>W-15-B</p> <p>W-15-C</p>	<p>Navy Response</p> <p>W-15-B (Continued)</p> <p>(Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time (see Section 2.4.5). Based on the prevailing wind conditions favoring Runway 07/25 (see Section 3.3.1), there is a limitation in the volume of operations that could be shifted to the alternate runways.</p> <p>W-15-C</p> <p>As noted in Section 3.1.2.5, NOISEMAP utilizes a library of actual aircraft noise measurements, adjusted to local meteorological conditions, to produce noise contours based on an average annual day of operations. NOISEMAP represents the best noise modeling science available today for military airfields. Science supports noise modeling as the best way to predict noise exposure levels around airfields. In addition to producing contours that are used to map ranges of noise exposure levels, the modeling can also be used to predict sound levels at representative receptors, including residential areas, as presented in Sections 4.1.2.1, 4.1.3.1, and 4.1.4.1 . DOD policy requires that hearing loss risk be estimated for the at-risk population, defined as the population exposed to 80 DNL or greater. As detailed in Sections 4.1.2.6, 4.1.3.6, and 4.1.4.6 no population would be at risk for hearing loss (i.e., within the 80 DNL and greater noise zone) under any alternative.</p>
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<p>Name: Anonymous Comment: To eliminate any doubts about jet produced noise levels in areas surrounding NAS Key West, permanent noise level monitors should be installed in such areas as Stock Island, Key Haven, Rockland Key, Big Coppitt, Geiger Key, and any other location deemed necessary. These monitors would report actual noise levels 24/7 to the Navy and Monroe County. These monitors would provide the real time data that will eliminate concern by citizens that health and structural hazards are not being created by jet noise from aircraft flying now and in the future. City: Key West Date Received: 8/17/2012 11:19:33 PM EDT</p>	<p style="text-align: center;">W-16</p> <p style="text-align: center;">] W-16-A</p>	<p>Navy Response</p> <p>W-16-A</p> <p>As noted in Section 3.1.2.5, NOISEMAP utilizes a library of actual aircraft noise measurements, adjusted to local meteorological conditions, to produce noise contours based on an average annual day of operations. NOISEMAP represents the best noise modeling science available today for military airfields. Science supports noise modeling as the best way to predict noise exposure levels around airfields. In addition to producing contours that are used to map ranges of noise exposure levels, the modeling can also be used to predict sound levels at representative receptors, including residential areas, as presented in Sections 4.1.2.1, 4.1.3.1, and 4.1.4.1 . DOD policy requires that hearing loss risk be estimated for the at-risk population, defined as the population exposed to 80 DNL or greater. As detailed in Sections 4.1.2.6, 4.1.3.6, and 4.1.4.6 no population would be at risk for hearing loss (i.e., within the 80 DNL and greater noise zone) under any alternative.</p>
<p>Name: Bill Bean Comment: My wife and I tried fishing around Boca Chica in our kayaks and the jet noise was scary. I believe the folks on that island suffer enough, do not add to the level of flight operations. City: Key West Date Received: 8/27/2012 8:10:49 AM EDT</p>	<p style="text-align: center;">W-17</p> <p style="text-align: center;">] W-17-A</p>	<p>W-17-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>

<p>Name: Tony Marra Comment: Don't worry about a little more of the sound of Freedom !!6PTV4 Date Received: 8/27/2012 11:32:00 AM EDT</p>	<p style="text-align: right;">W-18</p> <p style="text-align: right;">} W-18-A</p> <p>Navy Response</p> <p>W-18-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
<p>Name: rosario scavelli Comment: I own a home on Geiger Key The increase in noise prohibits me from enjoying the property I have owned for years. I have suggested many times that if the secondary runway was used it would decrease the noise impact on our community. I am not against keeping our pilots safe but I also think there is a compromise .This has been met with deaf ears.I am fully prepared to go to court regarding this issue.There are quite a few of us in that area who feel the same .It just seems that if the Navy or Govt can spend all this money on land improvements they can certainly equip the alternate runway to accommodate Field Carrier Landing Practice .Regarding new equipment or increase in operations I am opposed to any of that unless noise abatement procedures are put in place as well as a change in flight path so as to fly over industrial important as our military is I do believe that as a citizens we should be able to enjoy the fruits of our labor.I purchased that piece of property to retire on and what NAS proposes will deny me what I paid for. City: key west Date Received: 8/27/2012 11:53:01 AM EDT</p>	<p style="text-align: right;">W-19</p> <p style="text-align: right;">} W-19-A</p> <p style="text-align: right;">} W-19-B</p> <p>Navy Response</p> <p>W-19-A</p> <p>See Section 7.4 and Response M-01-Z.</p> <p>W-19-B</p> <p>As noted in Sections 2.4.4 and 7.3.1.2, under existing noise abatement procedures alternate Runways 03 and 13 are designated as the primary FCLP runways, with Runway 03 is utilized to the maximum extent possible for FCLPs. Runway 07 is used for only 10 percent of FCLP operations.</p>

<p>Name: rosario scavelli</p> <p>Comment: I own a home on Geiger Key The increase in noise prohibits me from enjoying the property I have owned for years. I have suggested many times that if the secondary runway was used it would decrease the noise impact on our community. I am not against keeping our pilots safe but I also think there is a compromise .This has been met with deaf ears.I am fully prepared to go to court regarding this issue.There are quite a few of us in that area who feel the same .It just seems that if the Navy or Govt can spend all this money on land improvements they can certainly equip the alternate runway to accommodate Field Carrier Landing Practice .Regarding new equipment or increase in operations I am opposed to any of that unless noise abatement procedured are put in place as well as a change in flight path so as to fly over industrial important as our military is I do believe that as a citizens we should be able to enjoy the fruits of our labor.I purchased that piece of property to retire on and what NAS proposes will deny me what I paid for.</p> <p>City: key west</p> <p>Date Received: 8/27/2012 11:53:01 AM EDT</p>	<p style="text-align: center;">W-19</p> <p>Navy Response</p> <p>W-19-C</p> <p>Section 7.3.1.2 outlines the existing course rules and noise abatement procedures that would continue to be adhered to under all alternatives. Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
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W-19-C

<p>Name: Rose Jones</p> <p>Comment: Hello. My name is Rose and I grew up as a Navy dependent and grew accustomed to living near air base noise but the noise over my house is like nothing I ever experienced in other military locations. My house is only twelve years old so it has decent insulation and windows, but even with all the doors and windows closed, on some days the jet noise is so pervasive that we have to pause a phone conversation and can't hear the TV at normal volume. I can't work in my yard or outside of my house during some days of heavy flyover activity. Honestly, it didn't seem this bad when I moved in twelve years ago and I wish I could enjoy open windows and the use of my porches and yards. However, I can live with the present situation but increasing the activity level and/or the noise would make life in my neighborhood feel like living in a war zone.</p> <p>City: Big Coppitt Key</p> <p>Date Received: 8/27/2012 12:07:51 PM EDT</p>	<p style="text-align: center;">W-20</p> <p style="text-align: center;">W-20-A</p> <p>Navy Response</p> <p>W-20-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
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<p>Name: Anonymous</p> <p>Comment: The noise at present is only bad when pilots deviate from the established(published) flight paths. Of course this seems to be almost daily.Since first reviewing the flight patterns at the Double Tree briefing, takeoffs and landings routinely go right over our homes. This not only is out if all flight paths for approach and departure from the base but also puts our families in additional danger should there be a failure with the equipment!The Navy reviews all flight data and this should be readily apparent if it was to be checked or if anyone actually cared.Also on the pilots return and subsequent circle maneuver on landing they again routinely fly over Maloney Ave. TOTALLY UNNESSESARY!Well, thank you for letting us have this forum to air our concerns.I have contacted the Navy on several occasions always asking for a follow up call, but unfortunately I have yet to hear back on any of the calls.</p> <p>City: Key West</p> <p>Date Received: 8/27/2012 1:13:29 PM EDT</p>	<p style="text-align: center;">W-21</p> <p style="text-align: center;">} W-21-A</p> <p style="text-align: center;">} W-21-B</p> <p>Navy Response</p> <p>W-21-A</p> <p>Section 3.1.2.5 was modified to include a statement similar to that provided in Section 2.4.3, indicating that a flight track is representative of the route an aircraft follows over the ground while conducting operations at the airfield. Flight tracks are graphically represented as single lines, although flights vary due to aircraft performance, pilot technique, weather conditions, and air traffic control variables, such that the actual flight track is most accurately represented as a band, often half a mile to several miles wide.</p> <p>W-21-B</p> <p>The Navy recognizes the importance of being good neighbors with local communities and makes every effort to balance noise abatement with the need to train Navy pilots. The Navy will continue to make every attempt to minimize its noise impacts to nearby communities through the continued use of designated flight paths, procedures, and noise abatement measures for military aircraft operating from NAS Key West. Section 2.4.3 addresses the different types of airfield operations that occur at NAS Key West. While Figures 2.3-3 and 2.3-4 depict straight-in approach and departure tracks, Figure 2.3-5 depicts overhead/carrier break arrival patterns and Figures 2.3-6, 2.3-7, and 2.3-8 depict pattern tracks that are performed as part of the airfield operations that support the fleet training conducted at NAS Key West.</p>
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<p>Name: Anonymous</p> <p>Comment: The noise at present is only bad when pilots deviate from the established(published) flight paths. Of course this seems to be almost daily.Since first reviewing the flight patterns at the Double Tree briefing, takeoffs and landings routinely go right over our homes. This not only is out if all flight paths for approach and departure from the base but also puts our families in additional danger should there be a failure with the equipment!The Navy reviews all flight data and this should be readily apparent if it was to be checked or if anyone actually cared.Also on the pilots return and subsequent circle maneuver on landing they again routinely fly over Maloney Ave. TOTALLY UNNESSESARY!Well, thank you for letting us have this forum to air our concerns.I have contacted the Navy on several occasions always asking for a follow up call, but unfortunately I have yet to hear back on any of the calls.</p> <p>City: Key West</p> <p>Date Received: 8/27/2012 1:13:29 PM EDT</p>	<p>W-21</p> <p>W-21-C</p>	<p>Navy Response</p> <p>W-21-C</p> <p>NAS Key West takes all noise concerns seriously. Noise complaints are logged and reviewed by NAS Key West Air Operations, and (when appropriate) the responsible flight squadron is notified and any deviations from standard procedures are identified. If necessary, Air Operations personnel may contact the individual who complained and provide follow up information and explanation.</p>
<p>Name: BRIGITTE HANSEN</p> <p>Comment: My husband and I live close to the Navy Base on Boca Chica and respectfully object to additional flights and more jets. Our house is made of concrete blocks and, as it is, sometimes shakes on its foundation because some jets fly so low. In addition, when the planes take off over our house, it's impossible to hold a conversation with someone sitting next to you, much less over the phone. Brigitte and Ralph Hansen</p> <p>Date Received: 8/27/2012 3:30:51 PM EDT</p>	<p>W-22</p> <p>W-22-A</p>	<p>Navy Response</p> <p>W-22-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>

<p>Name: Anonymous Comment: My family and I have lived in close proximity to the NAS Boca Chica for nearly 40 years. We have experienced times of high activity on the base and quiet times. Over the years my biggest concern was the open disposal site (just across the road from our home when we supplied our water through reverse osmosis of ground water). The Navy addressed our concerns with remediation of the site. Another concern was exposure to extreme noise and noxious fumes from close proximity of the static test site where the jets were tested before take off. There were times we have had to vacate our house due to noise and vibration that knocked things off my shelves and the need to get away from the jet fumes. I have communicated often with the Navy about this issue and the use of this site has been greatly reduced. As far as the expansion of the use of the base is concerned, I do have concerns about the impact of increased exposure to noise. The F-18 jets are much louder than earlier models and if the F-35's are as loud or louder, it will definitely impact my family. My husband has had to get hearing aids a few years ago (in his mid 50's) and, though I know the jets are not the only factor, they have most assuredly contributed to his hearing loss. So, I do worry about the effects of more and louder jets. I spoke with the pilots at the public meeting and understand the difficulty they have in adhering to a prescribed flight path while avoiding the populated areas, but the difference between an overhead pass and one a quarter of a mile away is tremendous. Touch and goes right over our house usually lead to the need to evacuate to quieter places. We respect the Navy's needs and have tried our best to work together to find the best solution to allow the Navy to carry out its business but not be forced out of our house. If the Navy does expand its fleet to include the F-35's we would greatly appreciate all efforts to reduce the impact upon our family, the environment, and the community at large. Sincerely, Anonymous City: Key West Date Received: 8/27/2012 4:48:18 PM EDT</p>	<p>W-23</p> <p>W-23-A</p> <p>W-23-B</p> <p>W-23-C</p>	<p>Navy Response</p> <p>W-23-A</p> <p>As noted in Sections 2.4.4 and 7.3.1.2, under existing noise abatement procedures, the engine maintenance run-up location more interior to the Station (near the southern end of Runway 03) is used for the majority (approximately 80 percent) of engine maintenance run-ups.</p> <p>W-23-B</p> <p>Section 4.1.2.2 provides a comparison of the single event noise exposure data for overflight events for the legacy and next generation aircraft, including the F-35. The Navy variant of the F-35 (the F-35C) is estimated to produce noise levels that are similar to those of the aircraft it is replacing, the FA-18C/D.</p> <p>W-23-C</p> <p>The potential noise impacts associated with implementation of the alternatives is detailed in Section 4.1. Changes in average noise levels, single event noise, speech interference, and sleep disturbance at representative receptors were estimated for all alternatives. Under Alternative 1, the level of change would not likely to be perceptible; under Alternative 2, the level of change would be imperceptible to slight; and under Alternative 3, the level of change would be slight. Under all alternatives, there would continue to be no population at risk for</p>
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<p>Name: Anonymous Comment: My family and I have lived in close proximity to the NAS Boca Chica for nearly 40 years. We have experienced times of high activity on the base and quiet times. Over the years my biggest concern was the open disposal site (just across the road from our home when we supplied our water through reverse osmosis of ground water). The Navy addressed our concerns with remediation of the site. Another concern was exposure to extreme noise and noxious fumes from close proximity of the static test site where the jets were tested before take off. There were times we have had to vacate our house due to noise and vibration that knocked things off my shelves and the need to get away from the jet fumes. I have communicated often with the Navy about this issue and the use of this site has been greatly reduced. As far as the expansion of the use of the base is concerned, I do have concerns about the impact of increased exposure to noise. The F-18 jets are much louder than earlier models and if the F-35's are as loud or louder, it will definitely impact my family. My husband has had to get hearing aids a few years ago (in his mid 50's) and, though I know the jets are not the only factor, they have most assuredly contributed to his hearing loss. So, I do worry about the effects of more and louder jets. I spoke with the pilots at the public meeting and understand the difficulty they have in adhering to a prescribed flight path while avoiding the populated areas, but the difference between an overhead pass and one a quarter of a mile away is tremendous. Touch and goes right over our house usually lead to the need to evacuate to quieter places. We respect the Navy's needs and have tried our best to work together to find the best solution to allow the Navy to carry out its business but not be forced out of our house. If the Navy does expand its fleet to include the F-35's we would greatly appreciate all efforts to reduce the impact upon our family, the environment, and the community at large. Sincerely, Anonymous City: Key West Date Received: 8/27/2012 4:48:18 PM EDT</p>	<p>W-23</p> <p>W-23-C</p> <p>W-23-D</p> <p>W-23-E</p>	<p>Navy Response</p> <p>W-23-C (Continued)</p> <p>long-term hearing loss as no population occurs within the 80 DNL and greater noise zone.</p> <p>W-23-D</p> <p>Section 3.1.2.5 was modified to include a statement similar to that provided in Section 2.4.3, indicating that a flight track is representative of the route an aircraft follows over the ground while conducting operations at the airfield. Flight tracks are graphically represented as single lines, although flights vary due to aircraft performance, pilot technique, weather conditions, and air traffic control variables, such that the actual flight track is most accurately represented as a band, often half a mile to several miles wide. This is standard DOD-approved methodology for noise analysis.</p> <p>W-23-E</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p>
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<p>Name: Anonymous</p> <p>Comment: I believe no action should be taken on this proposal. I live on Stock island and the noise is horrendous and affects me greatly; I can only imagine the negative impacts and stresses this has on animal life in the area, as well as my own environment. I don't believe an increase in planes and exercises in the Keys should be necessary. I noticed a lot of trainees from foreign countries visit us. Why do we have to train airmen from other countries in the Keys? Don't we have enough noise and pollution with our own training missions? Why not send the foreign airmen to a less sensitive and more remote spot for training, and use the spaces opened up for the training you think is necessary here, without increasing the total number of missions? It also is a huge expenditure in terms of fuel costs and pollution, both air and water. We're on the top of the world already, I don't think it's the necessary thing to do to spend our tax dollars on louder planes and more pollution.</p> <p>City: Key West</p> <p>Date Received: 8/27/2012 4:56:19 PM EDT</p>		<p>Navy Response</p> <p>W-24</p> <p>W-24-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p> <p>W-24-B</p> <p>The United States, through various agreements, supports periodic mutual training with some of our allies at installations and ranges throughout the United States. This training is in the mutual defense interest of the United States and the allied countries. Foreign training comprises a very small percentage of the total annual airfield operations at NAS Key West. Foreign aircrews must follow all of the same procedures as all U.S. aircrews.</p>
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<p>Name: Bill Hunter</p> <p>Comment: I respectfully request that actual noise measurements be used, rather than modeling, to create a base line for the FA 18 Super Hornet. I would like to see actual noise measurements used for the F 35 as well.</p> <p>Date Received: 8/28/2012 11:29:18 AM EDT</p>	<p style="text-align: center;">W-25</p> <p style="text-align: center;">} W-25-A</p> <p style="text-align: center;">} W-25-B</p> <p>Navy Response</p> <p>W-25-A</p> <p>As noted in Section 3.1.2.5, NOISEMAP utilizes a library of actual aircraft noise measurements, adjusted to local meteorological conditions, to produce noise contours based on an average annual day of operations. Sections 3.1.2.5 was modified to note that NOISEMAP has been validated through extensive study (and Section 8.0 was modified to include the added citations).</p> <p>W-25-B</p> <p>The SEL for F-35A measured at Edwards Air Force Base on October 22, 2008 remains the best available data on SEL for all variants of the F-35.</p>
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<p>Name: Anonymous</p> <p>Comment: Dear Sir or Madam, We have been residents of Key West since 1979. No jet noise was evident when we lived here owning houses in the meadows, Old Town, and midtown; until recent years. We have resided at our house at <<address omitted>> since purchasing it in 1993. In the last 10 years, the escalation of Navy jet noise has gotten worse and worse. Some days, it goes on from dawn to dusk, especially during the winter when the weather is such that we don't need air conditioning, and we have the house open. I really resent the fact that this noise invades our house and our lives, and ruins our peace and quiet that we used to have. I chose this house very carefully, being mindful of the fact that Old Town is noisy (having lived there for 15 years), being mindful of the fact that our municipal airport is noisy so we didn't want to be within that noise zone; and wanting to live in Key West so we could ride our bikes to wherever we wished. After much research, I found the perfect spot on the water in midtown. We are far enough from the Municipal airport for the noise not to be bothersome, and are close to everything in Key West we have come to love over 35 years. We are well accepted and involved members of our community, and this unwelcome Navy jet activity is ruining our lives. Well documented studies have been made that show that noise, especially excessive noise (such as that made by these jets) is detrimental to our health. Therefore, you must consider that you are adversely affecting our health with this training for us to go to war, which we can ill afford and do not need. Please do these noisy maneuvers elsewhere, if at all. It's our money you're spending, after all, and it shouldn't be at the expense of our health, quality of life, and property values.</p> <p>City: Key West</p> <p>Date Received: 8/28/2012 10:54:27 PM EDT</p>	<p style="text-align: center;">W-26</p> <p style="text-align: center;">W-26-A</p> <p style="text-align: center;">W-26-B</p> <p>Navy Response</p> <p>W-26-A</p> <p>Thank you for your comment provided during the public review period for the NAS Key West Airfield Operations DEIS. Public and agency involvement is an important part of the NEPA process. You can be assured that your comments have become part of the record and contributed to the decision-making process.</p> <p>W-26-B</p> <p>Noise effects on health are described in Appendix E, including discussion of World Health Organization findings in Section E.3.5. The noise analysis was conducted using DOD-approved best methods.</p>
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