

DEPARTMENT OF DEFENSE

Department of the Navy

Record of Decision for the Final Environmental Impact Statement (EIS) for Naval Air Station (NAS) Key West Airfield Operations, Florida

AGENCY: Department of the Navy, DOD.

ACTION: Record of Decision.

SUMMARY: The Department of the Navy (DoN), after carefully weighing the strategic, operational, and environmental consequences of the proposed action, announces its decision to support and conduct airfield operations at NAS Key West by accomplishing the proposed action as set out in Alternative 2. Alternative 2 will provide for the transition from legacy aircraft to next generation aircraft, alteration of existing facilities as necessary to meet requirements for next generation aircraft, and will potentially accommodate carrier air wing detachment training events in the event that primary carrier air wing training locations on the U.S. East Coast are unavailable. Total annual airfield operations could equal up to approximately 52,000 operations.

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A. SUPPLEMENTARY INFORMATION: Pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969, sections 4321 et seq. of Title 42, U.S.C, Council on Environmental Quality regulations (parts 1500-1508 of Title 40 CFR), and DoN regulations (part 775 of Title 32 CFR), the DoN announces its decision to support and conduct aircraft training operations at NAS Key West. The proposed action will be accomplished as set out in Alternative 2, described in the Final EIS as the Preferred Alternative.

The implementation of this alternative will result in the gradual transition from legacy aircraft to next generation aircraft and alteration of existing facilities to meet requirements for next generation aircraft. In addition, Alternative 2 provides the DoN with flexibility to accommodate carrier air wing detachment training events when primary carrier air wing training locations on the U.S. East Coast are unavailable. Additional carrier air wing Field Carrier Landing Practice (FCLP) operations would vary annually based on availability of the primary training locations, but could total up to 4,500 additional annual operations (aircraft conducting up to 2,250 FCLP patterns; each pattern consists of two flight operations [a take-off and a landing]). As there would be no increase in other flight operations, total annual airfield operations could equal up to approximately 52,000 operations.

This decision will enable the DoN to sustain fleet training conducted at and associated with the NAS Key West airfield by DoN tactical aviation and its use by other DOD and federal agencies.

B. BACKGROUND AND ISSUES: NAS Key West's weather/climate supports year-round fleet training, and its location provides quick and efficient access to the nearby Key West Range Complex, a key training venue for jet aircraft with fighter or attack missions.

Purpose and Need

The purpose of the proposed action is to sustain fleet training conducted at, and associated with, the NAS Key West airfield by DoN tactical aviation and its use by other DOD and federal agencies, while introducing next generation aircraft. The proposed action is needed in order to maintain the level of readiness mandated in Title 10 U.S.C., part 5062. Specifically, the use of NAS Key West enables DoN to achieve and sustain required aviation training, thereby supporting the timely deployment of naval units; achieve and sustain readiness of squadrons to quickly surge significant combat power in the event of a

national crisis or contingency operation consistent with the Fleet Response Training Plan. The Fleet Response Training Plan implements the DoN's Fleet Response Plan at the U.S. Fleet Forces Command level and is essential to the readiness of U.S. Naval forces. The NAS Key West airfield is also needed to support required flight operations by DoD and other federal agencies.

Public Involvement

The Notice of Intent to prepare this EIS was published in the Federal Register on May 12, 2010 (75 FR 26739). Notification of public scoping was also made through local media outlets and letters sent to government agencies, local organizations, Native American tribes, and interested private citizens. Two public scoping meetings were held on May 26 and 27, 2010 in Key West, Florida.

The Notice of Availability (NOA) for the Draft EIS was published in the Federal Register on June 29, 2012 (77 FR 38801) and a Notice of Public Meetings was published in the Federal Register on July 3, 2012 (77 FR 39489). Public meetings were conducted in Key West, Florida August 1 and 2, 2012. The public comment period ended on August 28, 2012. This 60-day public comment period included a 15-day extension granted by the DoN in response to a request from the Monroe County Board of County Commissioners. The extension was announced in the Federal Register on July 24, 2012 (77 FR 43275). A total of 37 individuals and organizations provided 101 separate comments on the Draft EIS.

The NOA for the Final EIS was published in the Federal Register on August 2, 2013 (78 FR 46940). Notices published in newspapers in Key West, Florida also announced the release and summarized the results of the Final EIS. The Final EIS addressed all oral and written comments received during the Draft EIS public comment period. The Final EIS was mailed to all individuals, agencies, and organizations that requested a copy of the final document;

the Final EIS is publicly available on the project website at www.keywesteis.com.

Alternatives Considered

The DoN identified and evaluated the environmental conditions associated with current airfield operations and compared these with the potential environmental conditions under a reasonable range of alternatives that would satisfy its purpose and need. Alternatives considered in the Final EIS were identified as the No Action Alternative and Alternatives 1 through 3.

The No Action Alternative would continue annual airfield operations at a level similar to present (approximately 47,500 annual operations), and continue to support existing capabilities. Because of year-to-year fluctuations, a 10-year average was used to represent existing airfield operations from 2000 through 2009. When the EIS analysis began in 2010, operational data from Fiscal Years (FY) 2010 and 2011 were not available. However, when these data became available, annual airfield averages were found to be within the 10-year average used in this EIS. Under the No Action Alternative, next generation aircraft would not be introduced and no facilities would be altered to support next generation aircraft training operations. While the No Action Alternative does not meet the purpose for and need of the proposed action, it does serve as a baseline for describing and quantifying the impacts associated with the various alternatives analyzed in the Final EIS.

Alternatives 1 through 3 are described as follows:

- Alternative 1 - annual airfield operations would continue at a level similar to present (approximately 47,500 annual operations). Legacy aircraft would gradually transition to next generation aircraft. In addition, existing facilities would be altered to meet requirements for next generation aircraft.

- Alternative 2 - builds on Alternative 1, by providing the flexibility to accommodate additional carrier air wing FCLP training at NAS Key West when primary carrier air wing training locations on the U.S. East Coast 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 (aircraft conducting up to 2,250 FCLP patterns). Under Alternative 2 total annual airfield operations could equal approximately 52,000 operations.
- Alternative 3 - the same as Alternative 2, and additionally provides operational capacity and flexibility to effectively meet DoN training requirements under the Fleet Response Training Plan with up to an approximately 10 percent increase in other annual airfield operations. Under Alternative 3 total annual airfield operations could equal approximately 57,000 operations.

Alternative 2 is identified in the Final EIS as the Preferred Alternative since it best meets mission and foreseeable training. Factors that influenced selection of Alternative 2 as the Preferred Alternative included the results of the impact analysis in the EIS, and the strategic and additional training capability provided by establishing NAS Key West as a contingent location for carrier air wing FCLP training when primary carrier air wing training locations on the U.S. East Coast are unavailable in accordance with requirements identified by Commander, Naval Air Forces Atlantic. Carrier air wing training is essential to maintaining the higher levels of readiness required by the Fleet Response Plan and Fleet Response Training Plan, in particular, maintaining the air wings associated with the six aircraft carriers that are required to be available for deployment within 30 days.

Regulations implementing NEPA require the identification of the environmentally preferred alternative. The environmentally preferred alternative for this EIS is

Alternative 1. When compared to the other action alternatives, there are potentially less flight operations associated with Alternative 1 as this alternative does not include the accommodation of carrier air wing detachment training events in the event that primary carrier air wing training locations on the U.S. East Coast are unavailable. Consequently, over the long-term, Alternative 1 would result in less estimated noise and land use impacts as compared to the other action alternatives. Additionally, as with the other action alternatives, reductions in heavy metal use and some air emissions would be expected with the transition from legacy aircraft to next generation aircraft.

Environmental Impacts

The EIS analyzed environmental impacts and the potential magnitude of those impacts relative to the following environmental resource categories: noise; air quality; safety; land use; transportation; infrastructure; socioeconomics, environmental justice and protection of children; cultural resources; geology, topography, and soils; water resources; biological resources; and hazardous materials, hazardous waste, toxic substances, and contaminated sites. The EIS provided an examination of potential future conditions associated with NAS Key West airfield operations. The geographic scope of this analysis was defined by the extent of the effects of the subject airfield operations and includes NAS Key West and the surrounding community.

The environmental effects of existing aircraft operations were analyzed in detail as part of the No Action Alternative, which served as baseline for comparison for the future conditions identified in the other alternatives under consideration. Many impacts were common among the action alternatives. A detailed discussion of the environmental consequences for each resource is provided in Chapter 4 of the Final EIS. The discussion below identifies resource categories for which the potential for significant impacts were identified or for which

substantial public comments were made. The focus of this discussion is on the impacts associated with the Preferred Alternative (Alternative 2), to transition to next generation aircraft while providing additional FCLP capability when other training locations are unavailable.

Noise: The noise environment at the NAS Key West airfield was modeled using the NOISEMAP software suite. 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 is approved for use by DOD to model noise exposure at and around military air stations. NOISEMAP has been validated through extensive study.¹

Although a newer aircraft noise model called the Advanced Acoustic Model (AAM) is under development for aircraft noise modeling, AAM has not yet been approved for use by the DOD. Per OPNAVINST 11010.36C, NOISEMAP is to be used for developing noise contours and is the best noise modeling science available today for fixed-wing aircraft.

The analysis in the Final EIS addresses noise associated with aircraft flight operations, aircraft engine run-up activities, and on-ground testing. Based on the results of NOISEMAP, the estimated off-station population exposed to

¹Lundberg, W.R. (June 1991). Analysis of Measured Environmental Noise Levels: An Assessment of the Effects of Airbase Operational Model Variables on Predicted Noise Exposure Levels. Final Report for Field Measurement July 79-March 80 and Analysis June 89-December 90. AL-TR-1991-007.

Speakman, Jerry D. (July 1989). Lateral Attenuation of Military Aircraft Flight Noise. Final. Report for Field Test and Analysis: April 1984-September 1988. AAMRL-TR-89-034.

Lee, R.A. (March 1982). Field Studies of the AF Procedures (NOISECHECK) for measuring Community Noise Exposure from Aircraft Operations. AFAMRL-TR-82-12.

Seidman, Harry and Ricarda L. Bennett. (June 1981). Comparison of NOISEMAP Computer Program with and without the SAE Lateral Attenuation Model.

Rentz, Peter E. and Harry Seidman. (May 1980). Development of Noisecheck Technology for Measuring Aircraft Noise Exposure.

Bishop, Dwight E., Thomas C. Dunderdale, Richard D. Horonjeff, and John F. Mills. (April 1977). Further Sensitivity Studies of Community-Aircraft Noise Exposure (NOISEMAP) Prediction Procedures. AMRL-TR-76-116.

Dunderdale, Tom C., Richard D. Horonjeff, and John F. Mills. (March 1976). Sensitivity Studies of Community-Aircraft Noise Exposure (NOISEMAP) Prediction Procedure.

noise levels greater than or equal to 65 decibels (dB) using the standard noise exposure metric of Day-Night Average Sound Level (DNL) will potentially increase by 366 people (15%) to 2,782 people. The estimated housing units within the 65 DNL or greater noise zone will potentially increase by 184 units (14%) to 1,457 units on off-station lands (excluding water). The estimated on-station land acreage within the 65 DNL or greater noise zone will remain at 3,920 acres and the off-station land acreage within the 65 DNL or greater noise zone will increase by 92 acres to 1,886 acres. Estimated changes in noise exposure at representative receptors (analyzed in terms of average noise levels, single event noise, speech interference, and sleep disturbance) will be imperceptible to slight. No population affected by NAS Key West airfield operations would be at risk for long-term hearing loss as no population resides within the 80 DNL or greater noise zone. Occupational noise exposure at NAS Key West will continue to be managed with hearing protection and monitoring in accordance with all applicable regulations.

Air Quality: There will be no air emissions associated with the minor infrastructure upgrades. The transition from legacy aircraft is estimated to result in a reduction in volatile organic compounds (VOCs), carbon monoxide (CO), and particulate matter emissions, and a modest increase in oxides of nitrogen (NO_x) and sulfur dioxide (SO₂) emissions that will not approach the Mobile Source Comparative Threshold. Infrastructure upgrades and aircraft operations emissions are estimated to result in negligible impacts to area air quality.

Safety: There will be no changes to existing runways or Accident Potential Zones (APZs), and no new construction to add new risks with implementation of the Preferred Alternative. All regulations, plans, and safety protocols that pertain to runways, APZs, mishaps, Bird/Wildlife Aircraft Strike Hazard (BASH), and other flight safety considerations will continue to be followed. The slight increased risk of BASH potential associated with the increase in annual airfield operations at lower altitudes

where there is more bird activity will be minimized through adherence to the air station's BASH program, flight operations standard operating procedures, and best management practices that use all available resources to minimize exposure during higher risk times of day, and migration seasons.

As there is some uncertainty about mishap rates for next generation aircraft, the DOD and DoN will continue to place a high priority on safety programs for introducing next generation aircraft, including increased modeling, simulator training, ground tests and ensuring that each new aircraft meets required standards prior to certification. Even though the likelihood of an aircraft mishap will remain remote, the increased annual airfield operation levels will result in the potential for slight increased risk of mishap. However, due to safety mishap program advances it is expected that overall mishap rates will remain below historical mishap rates for NAS Key West.

Land Use: The land use analysis is focused on off-station lands and the land area within the 65 DNL or greater noise zones and airfield safety zones. The total off-station acreage within 65 DNL and greater associated with implementation of Alternative 2 would be 1,886 acres, an increase of 92 acres compared to No Action Alternative, an approximate five percent increase. Within these zones, residential land use is not recommended by the DoN. However, local land use is not controlled by the DoN; the local government of Monroe County has jurisdiction for land use controls. Historically, Monroe County has allowed residential development within the DoN's 65 DNL or greater noise zones. The areas where existing incompatible residential land use will increase with implementation of the preferred alternative are primarily in the Big Coppitt Key, Geiger Key, and Key Haven areas. Existing county zoning prohibits or restricts new incompatible land uses for all of these areas except for Key Haven and a small portion of Stock Island. The DoN will continue to work with Monroe County elected officials, planners, and citizens to encourage compatible use adjacent to the Air

Station consistent with the Air Installations Compatible Use Zones Program.

Off-station noise exposure within the 65 DNL or greater noise zone will continue. Based on the Monroe County Year 2010 Comprehensive Plan Future Land Use Map, areas within the 65 DNL or greater noise zone designated as residential will increase by 59 acres (includes 46 acres Residential and 13 acres Residential Conservation) to 596 acres, an 11 percent increase from the No Action Alternative. On-Station incompatible land uses within the noise and safety zones are addressed in the NAS Key West Master Plan. There will be no change to safety zones (accident potential zones) and therefore no change to associated land use impacts. The DoN will continue to work with Monroe County to address compatible use of privately owned land within APZ I in the northwest portion of Boca Chica Key and APZ I and II on Geiger Key.

Transportation: Transportation impacts related to the proposed action are associated with the temporary increases in personnel at NAS Key West as a result of units that travel from their respective homebase to NAS Key West for training (i.e., detachment training). The peak number of personnel that would travel to NAS Key West at any one time for such training is estimated at 920 and this would occur during carrier air wing training events for up to 10 days twice per year. This change represents an increase of up to 139 persons as compared with existing conditions. Although minor increases in personnel during peak times will result in more in-bound and out-bound vehicular traffic to NAS Key West properties, the potential impacts could be reduced with carpooling and other traffic management measures, as needed. No disruption to current transportation patterns or changes to existing levels of traffic safety are anticipated. Construction traffic will be negligible given the scale of infrastructure improvements to be implemented. Collaboration with local and regional transportation planning will continue consistent with Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance.

Socioeconomics, Environmental Justice, and Protection of Children: The implementation of the minor facility upgrades will not result in noticeable regional socioeconomic impacts. Direct and indirect beneficial local economic impacts associated with the additional up to 18,400 man days by transient personnel will not result in changes to long-term population, employment, income, or housing trends. Implementation of the Preferred Alternative will not result in disproportionately high and adverse human health or environmental effects on minority and low-income populations and there will be no environmental health or safety risks that would disproportionately affect children.

Biological Resources: The implementation of facility upgrades are proposed to occur along the flight line within developed areas of NAS Key West, which will not result in loss of marine and terrestrial communities or wildlife habitat.

While it is possible that migrating birds could react to construction noise, any reaction would likely be slight, temporary, and not significant as research suggests migratory birds acclimate to noise and visual disturbance. Because flight operations are military readiness activities, impacts to bird populations protected by the Migratory Bird Treaty Act have been analyzed under 50 C.F.R. Section 21.15 (Authorization of take incidental to military readiness activities) and found that impacts will not cause significant adverse effect to populations of migratory birds. Therefore, further consultation with the U.S. Fish and Wildlife Service (USFWS) was not required.

Increases in aircraft noise exposure levels will not significantly impact terrestrial wildlife as in-air noise would be temporary, short in duration, and dissipate quickly once an airfield operation is completed. Resident species within terrestrial habitats near the airfield likely have acclimated to the existing noise and visual disturbance generated by overflying aircraft and maintenance run-up activities. NAS Key West will continue

to manage wildlife and carry out conservation and protection of biological resources (including migratory birds) in accordance with the installation's Integrated Natural Resource Management Plan (INRMP) (and associated BASH program) and per agreements with the USFWS, National Marine Fisheries Service (NMFS), and Florida Fish and Wildlife Commission (FWC).

Marine wildlife at the surface or submerged could experience exposure to aircraft noise. However, aircraft sound is refracted upon transmission into water because sound waves move faster through water than through air. In addition, in-air noise from aircraft operations will be temporary, short in duration, and dissipate quickly once the airfield operation is completed. Furthermore, the sound exposure levels will be relatively low to marine wildlife that spend the majority of their time underwater, constantly move, and are presently exposed to aircraft noise under existing conditions. Therefore, it is unlikely that exposure to aircraft noise from increased annual airfield operations will injure or disturb natural behavioral patterns of any marine mammals in the area to the point where such behaviors are abandoned or significantly altered that would rise to harassment under the Marine Mammal Protection Act.

The Lower Keys marsh rabbit, nesting loggerhead sea turtle, and Florida manatee are already subject to aircraft noise under existing conditions. Based on available research regarding reactions to aircraft overflights, the DoN determined and USFWS concurred, that implementation of the Preferred Alternative may affect, but is not likely to adversely affect the Lower Keys marsh rabbit, nesting loggerhead sea turtles, or Florida manatees. Designated critical habitat for federally listed species does not occur within the area of potential biological resource effect; therefore, the implementation of the Preferred Alternative will have no effect on critical habitat. NAS Key West will continue to manage threatened and endangered species in accordance with the installation's INRMP and

subsequent annual updates, and per agreements negotiated with USFWS, NMFS, and FWC.

Mitigation Measures

The management actions included in the Final EIS consist of existing best management practices (BMPs) and standard operating procedures (SOPs) that will continue to mitigate potential environmental effects associated with implementation of the Preferred Alternative. The DoN has determined that the practices and procedures, detailed in Chapter 7 of the Final EIS, provide all practicable means within the DoN's ability to avoid or minimize significant environmental impacts from implementation of the Preferred Alternative. In summary, these practices and procedures, which are all related to noise abatement, specify:

- High performance/unrestricted climbs are prohibited.
- Northeast departing aircraft are directed to fly over the Boca Chica Road Bridge before turning.
- Pilots avoid overflying Key Haven, Stock Island, East Rockland Key, Big Coppitt, and Geiger Key.
- In the pattern for Runway 13, aircraft remain within 2 miles on the downwind leg.
- Aircraft do not overfly Key West or any key below 3,000 ft unless instructed by ATC or for safety of flight.
- The arrival to Runway 07 is south of Key West and Stock Island and is adjusted to remain over water (the Boca Chica Channel) near the final approach to the runway.
- Runways 03 and 13 are designated as the primary FCLP runways. Runway 03 is utilized to the maximum extent practicable for noise abatement.

- NAS Key West typically operates from 7 am to 10 pm daily.
- The majority of engine maintenance run-ups occur on the interior of NAS Key West.
- All arriving squadrons are briefed on the course rules and pilots are made aware of noise concerns associated with airfield operations.
- NAS Key West Air Operations receives noise complaints by a hotline.

While the DoN cannot commit to mitigation measures outside its jurisdiction, the DoN is required to identify all relevant and reasonable mitigation measures that could minimize potential adverse impacts identified in the EIS. Accordingly, the Final EIS identified that neighboring communities could adopt the land use compatibility recommendations outlined in the OPNAVINST 11010.36C, Air Installations Compatible Use Zones Program, to ensure the impact on existing and future land use compatibility is minimized.

Agency Consultation and Coordination

The results of agency consultation and coordination is summarized as follows:

- The DoN determined the Proposed Action is consistent to the maximum extent practicable, with the enforceable policies of the Florida State Coastal Management Program and submitted a Coastal Consistency Determination to the Florida Department of Environmental Protection (FLDEP). In a letter dated August 28, 2012, the FLDEP concurred with the DoN's federal consistency determination.
- In accordance with Section 7 of the Endangered Species Act, the DoN consulted with the USFWS regarding potential impacts to threatened and endangered

species. In a letter dated August 8, 2012, USFWS concurred with the DoN's determination that implementation of the Preferred Alternative may affect, but is not likely to adversely affect the Lower Keys Marsh Rabbit, nesting loggerhead sea turtles, or Florida manatees and will have no effect on critical habitat.

- Because the Navy determined these flight training activities are military readiness activities under 50 C.F.R. Section 21.15 (Authorization of take incidental to military readiness activities) and found that impacts will not cause significant adverse effect to populations of migratory birds, further conference with USFWS was not required.
- In addition, National Historic Preservation Act consultation was not required for this EIS.

Responses to Comments Received on the Final EIS

The DoN reviewed and considered all comments that were received during the 30-day wait period following publication of the NOA for the Final EIS. During the wait period, two comment letters were received. One comment letter was submitted by a local citizen supporting the DoN's proposed action, and the other from the Monroe County government, in which four primary concerns were raised. Monroe County representatives and Congressman Garcia also met with the Navy to discuss their concerns. Monroe County's concerns were similar to comments received on the Draft EIS that were previously considered and addressed in the Final EIS. The DoN has again carefully reviewed the Monroe County comments and provides the responses summarized below.

Concern #1: Consideration of the establishment of absolute maximum limits on all types of flight operations, including carrier air wing FCLPs and night flights. The current Final EIS does not clearly establish limits for DoN operations.

Response #1: This EIS evaluated the potential 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. Approximately 52,000 total annual airfield operations could occur with implementation of the Preferred Alternative, including additional carrier air wing FCLP operations that would vary annually based on availability of the primary training locations, but could total up to 4,500 additional annual operations (aircraft conducting up to 2,250 FCLP patterns). A NEPA analysis does not result in an absolute limit on the number of operations that can be conducted as part of the action, however, to the extent that DoN makes a substantial change in the proposed action relevant to the environmental concerns or there are significant new circumstances or information relevant to environmental concerns bearing on the impacts evaluated in this EIS, the DoN would evaluate whether supplemental analysis was warranted in the future.

Concern #2: Proper evaluation of the baseline for existing operations. Specifically, impacts associated with the F/A-18E/F Super Hornet were included in the FEIS baseline, notwithstanding the fact that the impacts to the surrounding community by this aircraft were not properly evaluated in previous NEPA documents. Including the Super Hornet has the effect of reducing the magnitude of impacts between the baseline operations and the preferred alternative operations.

Response #2: The 2003 Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements at NAS Key West analyzed potential impacts to the human environment, including noise and flight paths resulting from all transient aircraft operations, including F/A-18E/F operations. As a result of that analysis the DoN reached a Finding of No Significant Impact on April 14, 2003, which completed and satisfied the NEPA requirements associated

with the introduction of F/A-18E/F aircraft at NAS Key West.

This EIS is an examination of potential future conditions associated with NAS Key West airfield operations. The environmental effects of existing aircraft operations, (including the F/A-18E/Fs), 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. F/A-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.

Concern #3: Previous recommendation that the DoN contract with an independent consultant to conduct a noise study with actual noise sampling based on industry accepted protocols.

Response #3: As part of the EIS, the DoN conducted a detailed examination of the existing and potential noise conditions associated with NAS Key West airfield operations. NAS Key West airfield operations were modeled using the DOD-approved NOISEMAP program. The NOISEMAP program 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 and 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.

Concern #4: Request appropriate mitigation by the DoN for the impacts associated with the proposed increases in flight operations included in the Preferred Alternative, and as a result of the F/A-18E/F Super Hornet, to ensure the impacts on the existing surrounding community are minimized. This includes but is not limited to: 1)

providing mitigation to surrounding communities impacted by the proposed increases in flight operations, including, but not limited to soundproofing. That the DoN request statutory authority, if necessary, to undertake such mitigation; 2) Using alternative runways (i.e., 13/31 and 03/21) to alleviate impacts to surrounding community; 3) Modification of operational procedures and full enforcement of course rules (e.g., flight paths, altitudes) to minimize impacts to the surrounding community.

Response #4: As described above, with the implementation of the Preferred Alternative there will continue to be no population at risk for long-term hearing loss as no population resides within the 80 DNL or greater noise zone. In addition, the estimated changes in noise exposure at representative receptors (measured in terms of average noise levels, single event noise, speech interference, and sleep disturbance) will be imperceptible to slight. The DoN recognizes the importance of and makes every effort to balance noise abatement with the need to train DoN pilots. The DoN 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.

In response to the specific recommendations listed above, 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 alternate runways (Runway 03/21 and/or Runway 13/31) are already used 33 percent of the time. Selection of which runway is to be used at any given time is primarily determined by the local winds. Aircraft performance, particularly during takeoffs and landings, is safer and more efficient when aligned into the wind. Since the prevailing wind conditions favor Runway 07/25, there is a limitation in the volume of operations that could be shifted to the alternate runways. And as detailed in the EIS, all practicable procedures are already in place to minimize aircraft noise to the local community.

C. Conclusion

In determining how best to support and conduct existing and future aircraft training operations at NAS Key West, I considered the following factors: operational and readiness requirements; potential aircraft mix and types of airfield operations; manpower requirements and costs; the analysis of environmental and socioeconomic effects within the Final EIS; relevant federal and state statutes and regulations; and the comments received during the EIS process. After carefully weighing all of these factors, and analyzing the data presented in the Final EIS, I have determined that the Preferred Alternative (Alternative 2) best meets the needs of the DoN while minimizing potential environmental impacts to the greatest extent possible. The Preferred Alternative allows for the gradual transition from legacy aircraft to next generation aircraft and alteration of existing facilities to meet requirements for next generation aircraft, while also providing the DoN with flexibility to accommodate carrier air wing detachment training events when primary carrier air wing training locations on the U.S. East Coast are unavailable.

OCT 31 2013

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