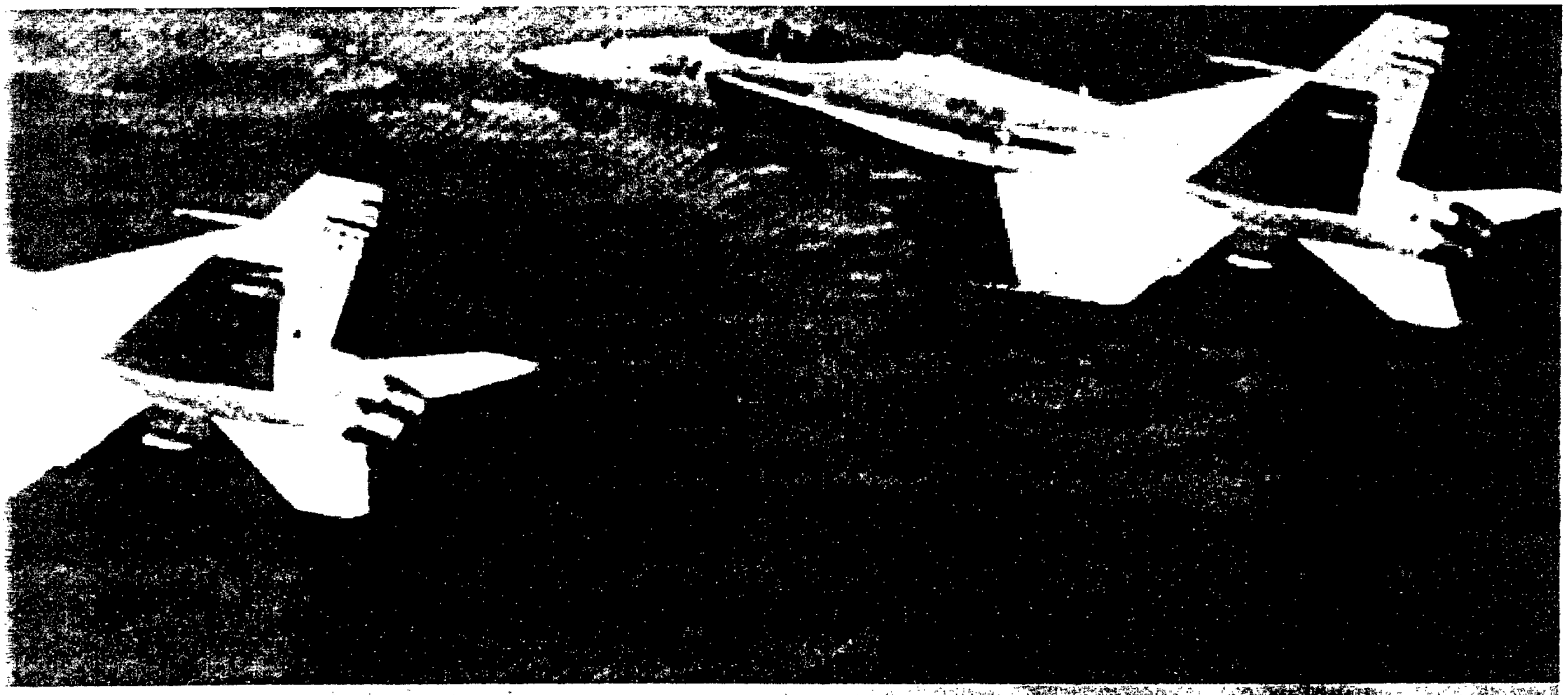
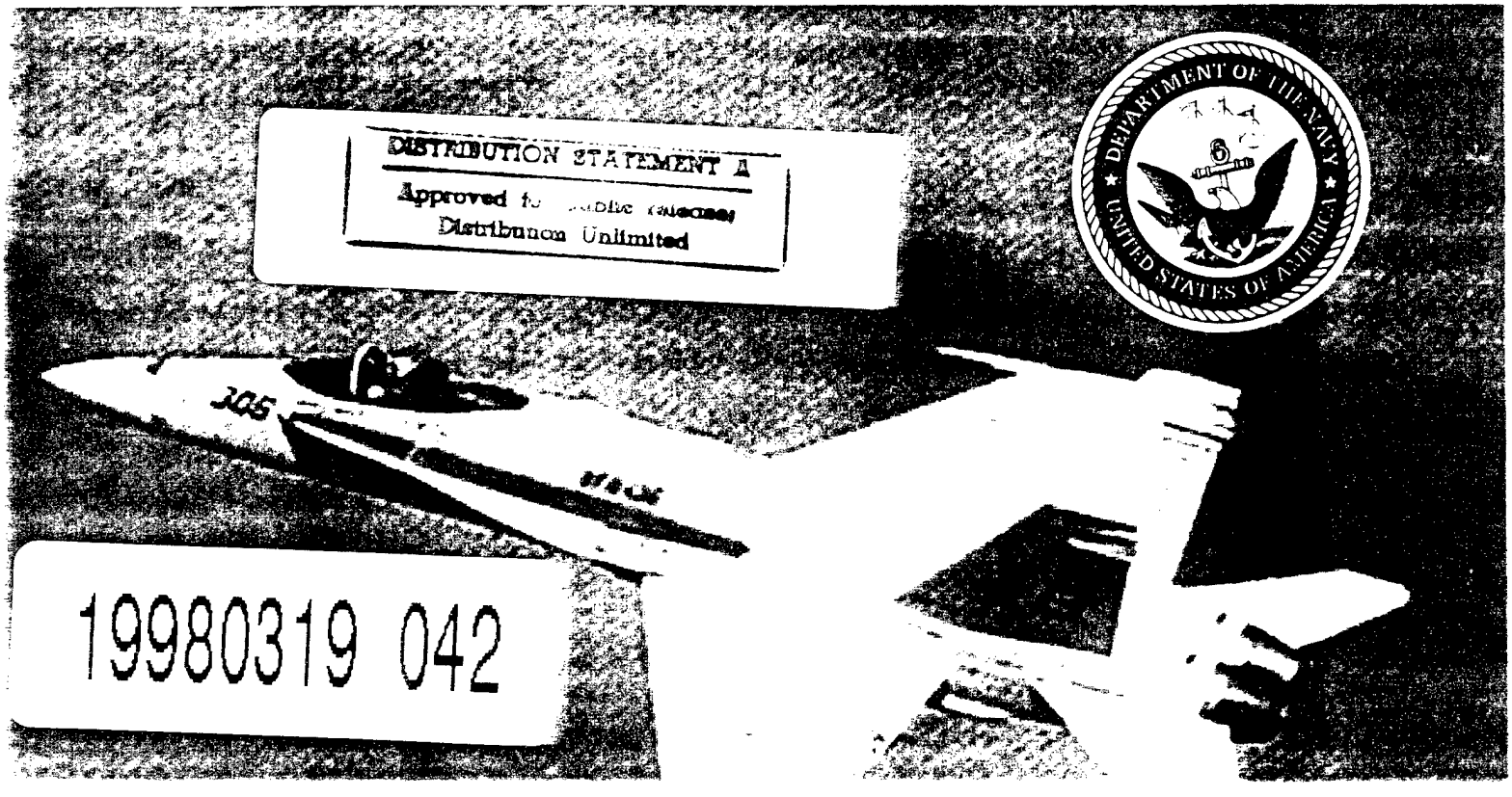


FINAL ENVIRONMENTAL IMPACT STATEMENT

Appendix I Comments and Responses

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I Comments and Responses

I.1 Introduction

Appendix I contains all of the public comments received on the Draft EIS. Comments received during the public hearings are contained in Part A, and comments received via correspondence are contained in Part B.

The public hearings were recorded by a court reporter, and the verbal comments received are reproduced below in the verbatim transcript of each speaker. Opening remarks and presentation of the Draft EIS by Navy representatives have been omitted from the verbatim transcript. Each comment within a speaker's transcript has been marked and sequentially numbered. Responses are marked with corresponding numbers, using the speaker's initials as a prefix. Responses appear on the right-hand side of the page. If a comment warrants a change to the EIS, the reader is referred to the appropriate section of the report.

The comments received on comment cards follow the transcripts. The Navy provided standard comment cards at the public hearing for those individuals who preferred to submit written comments. Comment cards were typed as written; minor corrections were made, if needed, to clarify the comment. Each comment is numbered sequentially and identified by the commentors' initials. Responses follow each comment.

Transcripts and comment cards are organized by location of the public hearings, as follows:

- October 20, 1997 (Technical College of the Low Country), Beaufort, South Carolina;
- October 21, 1997 (Havelock Middle School), Havelock, North Carolina;
- October 22, 1997 (Pamlico County Courthouse), Bayboro, North Carolina;

- October 23, 1997 (North Carolina Aquarium on Roanoke Island), Manteo, North Carolina;
- November 17, 1997 (North Carolina Aquarium on Roanoke Island), Manteo, North Carolina;
- October 27, 1997 (Virginia Beach Pavilion and Convention Center Auditorium), Virginia Beach, Virginia; and
- October 28, 1997 (Butts Road Intermediate School), Chesapeake, Virginia.

Part B contains all of the correspondence on the Draft EIS received during the public comment period from September 19 to December 2, 1997. The comments are indicated and coded in the same manner as the public hearing transcripts. Responses also correspond to the comments in the same manner. The correspondence has been organized into the following categories:

- Federal agencies;
- Congressional representatives;
- State agencies
- State representatives;
- Local agencies;
- Local representatives;
- Organizations/associations; and
- Concerned citizens.

A.1 Public Hearing, Beaufort, SC

A.1 Public Hearing Transcript/Comment Cards, Beaufort, SC

Speaker: Mr. Claude E. McLeod, Jr.
P.O. Box 22
Seabrook, SC 29940

My name is Claude E. McLeod, Jr. I live at Seabrook. I represent my family which is a family partnership which owns a thousand acres at the northwest end of the air station short runway.

And first I would like to apologize for Beaufort County to you and your staff for calling another very important meeting tonight which concerns a lot of people that live in this same area, and they are at another meeting, and I just got here. So I think that's why you have such a short crowd.

As I said, my family owns a thousand acres in Seabrook, which is on your northwest short runway. My family has been a farming family since 1884, and we have grown vegetables up to 1984. Farming in Beaufort County went bad as it did all over this country and is no longer feasible.

My family along with many others in Beaufort County had to cease our farming operations and are stuck with large acreages of property, and basically there's nothing to do with this property other than grow trees. A lot of this property is prime development property, as this thousand acres is.

In 1990, my family looking toward the future hired a very well-known and renowed land planner on Hilton Head to outline a development plan for us and had a feasibility study done, and this thousand acres is laid out with a preliminary plan for a golf course community.

The family not being able to go through it, we've had it on the market for sale trying to find a buyer. We've had two interests. Right now the AICUZ zone stops just short of coming into the thousand acres. It comes into a marsh just a little bit on your air station side of the property.

The noise we hear from the airplanes flying over Seabrook is not excessive. I think the short runway of the air station currently handles 60% of traffic. I think the long runway handles 85 to 90%. We've learned to think of this noise as the sound of freedom. That's what the sign says at the air station. It doesn't bother anybody.

McLeod (Cont.)

Now the air station, the military, wants to move in up to five squadrons to the air station. The proposed new AICUZ zone extends out and takes in just about this whole thousand acres. In my mind, I mean, that is condemning the thousand acres. I don't think a developer in his right mind would give 5,000 acres when he can look at the county and see where this is an AICUZ zone, and you're going to have planes crashing all around you and flying low all over your head, and it's just going to destroy the value of that property. 1

So, therefore, on behalf of my family, I would like to go on record as opposing any expansion of the AICUZ zone. We think you have enough, and I think if the general populations from the Grays Hill area could be here to speak, I think they would tell you they've had enough.

I really wonder that in an area like Beaufort that has been discovered by the retirement population and the tourists, if expansion of the air station is compatible with the retirement and the tourist industry as we have it today. I think that should be looked at seriously. 2

The property that we have is the jewel in our basket. If someone comes along and puts this cloud on top of our head, I think we are stuck with a piece of property maybe to grow some pine trees. Other than that, we have a very nice beautiful piece of property that could be used for many uses.

Now, this meeting I just left is from the—Beaufort County is in the process of trying to pass a new comprehensive plan. I'll leave this with you, but I think they may be getting ahead of you. I don't know, but they've got this gray area, which is a military development area or whatever they call it, and right off the bat, they are going to take the property and say this is a military area.

On the other side of the short runway where I noticed in your environmental impact study book, it looked like you pulled the AICUZ zone into the air station away from the city of Beaufort. They've got the whole city of Beaufort in the military zone as coming out toward Broad River and going across the Coosaw River.

I just feel and would like to go on record one more time, as I said, that we feel like that the military has enough. We are used to the noise. We can put up with it, and we would like to leave the AICUZ zone where it is, no more restriction. We have enough.

Beaufort County is putting them on us every day, and we just don't need any more, and we would like to listen to the sound of freedom, not the sound of condemnation and taking. And I thank you.

CEM-1 Within each noise zone and APZ, various land uses are compatible with aircraft operations. Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

CEM-2 Table 1 in Appendix D of the EIS presents the compatibility of various land uses with noise zones. As shown in the table, most recreational activities are compatible with noise zone 2 (65-75 dB Ldn). Figures 5.1-1 and 7.1-1 show noise zone increases and underlying land use at MCAS Beaufort under ARS 2 and ARS 4, respectively.

[Mr. McLeod submitted a map entitled "Port Royal Island Future Land Use". It has been included in the Administrative Record.]

Speaker: Mr. William D. Walsh, Jr.
29 Walsh Lane

My name is William D. Walsh, Jr. I'm here to say something against the air station. My dad and I have been farmers right at the north end of the runway for, oh, years. Thirty years ago they condemned 100 acres. They took it. That was it. We had to go and find other places to farm.

Then about four or five years ago, they condemned 57 acres from me so they could fly out over the water. I own the whole entire river show down there, 300 acres. They've condemned all this land. They've put me in problems all over the whole entire country, money problems and everything else.

1 So what I would suggest to the Navy, if they can condemn that part of the land and that much, why don't they clean me out completely and condemn the rest of it, my home, everything I have, then I can pick up—I'm 72 years old. I can pick up and leave and go someplace else and live in peace.

Right now I can't live in peace. They fly over my house. They fly that whole river show area down there. They make the worst noise I've ever heard in my life. In fact, they are just as noisy as that Harriett business they got.

And I'm just asking you, the Navy department, to buy me out, get me out of there and let me go, and they can have it and do whatever they want with it. And I thank you for listening to me.

WDW-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Speaker: Ms. Hope McLeod Cappelmann
P.O. Box 80
Seabrook, SC 29940

1 My name is Hope McLeod Cappelmann. Claude McLeod is my cousin, and we own the property together. Our fathers and grandfathers farmed that property for years, as he told you, and I, too, would like to go on the record as agreeing with everything that he said.

And I taught school at Laurel Bay for 24 years and am now retired. So I did work for the Department of Defense, and I was for them. I appreciate what you all do, but I don't like what you're doing to my property. Thank you.

HMC-1 Please see responses to comments CEM-1 and CEM-2.

Ms. Donna Smith Alley
908 Scott St.
Beaufort, SC 29902

Comment:

I am concerned about noise levels regarding excessive vibration etc., and the effect upon our historic area. **[DSA-1]** The new/extended flight area will be even closer than the existing flight area. We are already experiencing unacceptable noise and vibration. Our houses/structures are fragile and we demand their protection.

Response:

DSA-1 Noise levels in the vicinity of MCAS Beaufort would increase under ARS 2 and ARS 4. However, no effects to historic structures are anticipated. Sections 5.1.13 and 7.1.13 of the EIS have been amended to address potential impacts on historic properties due to the increased noise levels. The Navy's determination of "no effect" has been forwarded to the South Carolina Department of Archives and History.

Ms. Nancy Seaver
4338 Pinewood Cir.
Burton, SC 29902

Comment:

I know that "the noise I fear is the sound of freedom," but the aircraft fly too low, and too late at night. **[NS-1]** At times I can read the squadron numbers on the aircraft, which is too low I know and not legal. My entire house shakes, when they fly over. I can't imagine what the noise level is doing to the mobile homes in the area. **[NS-2]** I'm surprised there hasn't been a law suit put against MCAS before now. My home lies right in the fly path of the runway.

Response:

NS-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

NS-2 Thank you for your comment; no response required.

Mr. Roger Wood
1008 9th St.
Port Royal, SC 29935

Comment:

Please do not add additional wings to MCAS Beaufort. We love the military here but we do not need the additional noise created by the extra air activity.

Thank you.

Response:

Thank you for your comment; no response required.

Mr. and Mrs. Louis Pinckney
50 Cotesworth Ln.
Beaufort, SC 29906

Comment:

We oppose the realignment of aircraft. See attached.

November 11, 1997

To: The Commander of the Atlantic Division
From: Debora and Louis Pinckney

We adamantly oppose additional aircraft to relocate to the Beaufort Air Station. With the current status of F/A 18 aircraft, there is extreme jet noise present. The Air Station has not been considerate of the residents in the area. We are surrounded by large bodies of water and yet these planes end up at slow speed on top of our roofs. If complaints are lodged it is interesting to note the increase and targeting of the noise directly above the complainant's home. **[LDP-1]**

Our home is insulated with hurricane resistant, diagonal weather board, Armax, ship lap siding, and then covered by an additional layer of LP lap siding. The windows are Thermopane, insulated glass. Even with these extra measures, the noise level is unbearable.

To have any type of enjoyable social gathering out of doors is left to chance, secondary to the unscientific guesswork as to when planes are flying. We have been longstanding residents, both born and raised with generations of our families before us. Property was seized from my father and his father before him so that the air station could prosper.

We are NO longer willing to be good neighbors - as the Air Station attempts to manipulate our residents with intent to lower our property values and make it virtually impossible for growth of the area. **[LDP-2]** We are sure that there are areas that would welcome the additional squadrons, but we are not one of them.

Response:

LDP-1 Commanders review operating practices on a continuing basis with the goal of minimizing aircraft noise annoyance to the public. Aircraft noise complaints are fully investigated to reduce recurring complaints. Complaints received during normal working hours are referred to the Joint Public Affairs Officer (JPAO). After normal working hours, the complaints are referred to the MCAS Officer of the Day (OOD). The Airfield Operations Officer ensures that the JPAO and duty personnel are thoroughly briefed on all special airfield operations in a timely manner in order to respond to public questions. The JPAO determines whether action is required.

LDP-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

Ms. Peggy Butler
63 Blacksmith Cir.
Beaufort, SC 29906

Comment:
As one who grew up in Beaufort and had both parents retire from MCAS Beaufort I have grown to appreciate the good friends and economic prosperity brought to our small town by MCAS. However, there has been a lot of negative impact as far as noise pollution, especially after 8:00 at night, that has become almost unbearable at times. It has become impossible on these evenings to take phone calls, hear television and even carry on a conversation. These flying patterns continue until after I usually go to bed at 11:00 pm. I suggest that bringing in additional squadrons would be most unpleasant and detrimental to peaceful evenings at home.

Response:

Thank you for your comments; no response required.

Ms. Colleen E. Brant
Davis & Floyd, Inc.
P.O. Box 55
Port Royal, SC 29935

Comment:
Beaufort has supported the military in this area for a very long time. However, the military is not the reason why Beaufort is such a wonderful place to live. I feel additional squadrons would be a detriment to the community, affecting the environment, encroaching into areas designated for residential uses, and creating more noise in the already noisy areas.

Response:

Thank you for your comments; no response required.

A.2 Public Hearing, Havelock, NC

A.2 Public Hearing Transcript/Comment Cards, Havelock, NC

Speaker: Ms. Deborah Marn
Representing Congressman Walter B. Jones, Jr.
P.O. Box 867
New Bern, NC

GOOD EVENING, MY NAME IS DEBORAH MARN. IT'S MY PLEASURE TO SHARE COMMENTS WITH YOU FROM CONGRESSMAN WALTER JONES:

DEAR CONCERNED CITIZENS OF EASTERN NORTH CAROLINA:

I WISH THAT I COULD PERSONALLY BE IN HAVELOCK TO PARTICIPATE IN THIS, THE FIRST OF THREE SCOPING HEARINGS TO BE HELD IN NORTH CAROLINA REGARDING THE RELOCATION OF F/A-18 AIRCRAFT SQUADRONS FROM CECIL FIELD NAVAL AIR STATION.

AS THE REPRESENTATIVE OF THE THIRD CONGRESSIONAL DISTRICT AND A MEMBER OF THE HOUSE COMMITTEE ON NATIONAL SECURITY, I HAVE AN IMMEDIATE INTEREST IN THE FUTURE HOME OF THE CECIL FIELD HORNET SQUADRONS. UNFORTUNATELY, I AM REQUIRED TO BE IN WASHINGTON WHERE THE CONGRESS REMAINS IN SESSION LATE INTO THE EVENING.

I'M AWARE THAT THE DEPARTMENT OF THE NAVY IS PRESENT, AND WILL COMMENT ON THE RECENTLY COMPLETED DRAFT ENVIRONMENTAL IMPACT STATEMENT. I APPRECIATE THE NAVY BEING IN HAVELOCK TO DISCUSS THE RESULTS OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND ITS EFFECT UPON THE FUTURE RELOCATION OF F/A-18s FROM CECIL FIELD.

FOR MANY REASONS, THIS IS CLEARLY A DECISION OF WHICH THE PEOPLE OF NORTH CAROLINA DESERVE TO BE A PART. THE RELOCATION OF THE F/A-18 SQUADRONS GOES BEYOND MERE POLITICS OR EVEN ECONOMICS. INDEED THIS CRITICAL ISSUE GOES BEYOND THE CONSIDERATION OF HOW AIRSPACE WILL BE USED, OR TO WHAT EXTENT NOISE MAY INCREASE HERE IN HAVELOCK, OR IN ANY OF THE OTHER SITES UNDER CONSIDERATION, DUE TO THE PRESENCE OF ADDITIONAL NAVAL AIRCRAFT.

Marn (Cont.)

1 I BELIEVE THE IMPERATIVE FOR THIS HEARING TODAY IS TO DECIDE WHAT IS IN THE BEST INTERESTS OF OUR NATIONAL SECURITY. I AM CONCERNED THAT THE NAVY HAS PUT THE CART IN FRONT OF THE HORSE IN ITS DECISION MAKING BY PLACING LESS IMPORTANT CRITERIA AT THE TOP OF THE LIST IN DETERMINING WHERE TO LOCATE THE CECIL FIELD SQUADRONS. IN THIS REGARD, I FIRMLY BELIEVE NORTH CAROLINA HAS BEEN UNIQUELY DISADVANTAGED IN THE PROCESS FROM BEING CHOSEN AS THE HOME FOR THESE HORNET SQUADRONS.

AS A MEMBER OF THE HOUSE NATIONAL SECURITY COMMITTEE, I AM VERY FAMILIAR WITH THE OUTSTANDING FACILITIES AT CHERRY POINT MARINE CORPS AIR STATION, AND AM FULLY CONFIDENT IN THE ABILITY OF CHERRY POINT TO EASILY ACCOMMODATE AT LEAST FIVE OF THE F/A-18 SQUADRONS WITHOUT NEGATIVELY IMPACTING THE SURROUNDING COMMUNITIES.

WBJ-1 Criteria used to screen and develop ARSs were derived from the BRAC process and input from the Naval aviation community. As described in Section 2 of the EIS, the Navy placed particular importance on criteria that are considered crucial to the ability of the F/A-18 pilots to train and operate effectively.

2 I BELIEVE THIS APPROACH IS SQUARELY WITHIN THE INTERESTS OF OUR NATIONAL SECURITY. IN ADDITION, THE NAVY WOULD SAVE CONSIDERABLE MONEY IN UTILIZING EXCESS CAPACITY IN CHERRY POINT. UNFORTUNATELY, THE NAVY HAS CONTINUED TO CITE THE RELOCATION OF ALL THOSE SQUADRONS TO OCEANA AS THEIR PREFERRED ALTERNATIVE.

WBJ-2 Under ARS 3, three F/A-18 squadrons would be relocated to MCAS Cherry Point, utilizing all existing excess hangar capacity. Please see Section 2.1 for a description of the criteria used to determine excess capacity and Section 2.2.6.3 for a discussion of excess capacity at MCAS Cherry Point. Because NAS Oceana has the most excess capacity and because the operational preference is to single-site the F/A-18 squadrons, relocation of all F/A-18 squadrons to NAS Oceana is the preferred alternative.

THIS ALTERNATIVE, HOWEVER, IS NOT FREE FROM PROBLEMS. ONE CAN ONLY WONDER IF THE PEOPLE AND COMMUNITY OF VIRGINIA BEACH REALIZE HOW SIGNIFICANTLY THESE JETS WILL IMPACT THEIR LAND, AIR QUALITY, AND TRAFFIC USE. THE INCREASE IN NOISE ALONE IS A SEEMINGLY INSURMOUNTABLE PROBLEM. AS THE NAVY HAS INDICATED IN THEIR REPORT, 22 SCHOOLS WILL FIND THEMSELVES IN THE HIGH NOISE LEVEL ZONE, WHICH WOULD REQUIRE SOUND INSULATION OR RELOCATION.

3 OPERATIONALLY, I AM CONCERNED THAT THESE NOISE AND AIRSPACE ISSUES WILL HAVE A LONGER TERM EFFECT UPON THE ABILITY OF OUR NAVY PILOTS TO TRAIN EFFECTIVELY.

WBJ-3 Thank you for your comment; no response required.

OUR MILITARY MUST MAKE DECISIONS THAT MAKE REAL WORLD SENSE. I THINK THE PEOPLE OF EASTERN NORTH CAROLINA AND THE REST OF THE COUNTRY DESERVE NOTHING LESS FOR THEIR HARD-EARNED TAX DOLLARS.

Marn (Cont.)

MY WRITTEN COMMENTS WILL BE FORWARDED TO THE NAVY WHICH ADDRESS MY SPECIFIC CONCERNS FOR THE REASONING AND METHODOLOGY USED IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT. I ENCOURAGE THE PEOPLE OF THIS COMMUNITY TO TAKE TIME TO FORWARD COMMENTS TO THE NAVY, AS THEY WILL CERTAINLY HELP TO DETERMINE THE FUTURE OF OUR AIR STATION HERE AT CHERRY POINT.

AGAIN, THANK YOU FOR THE OPPORTUNITY TO MAKE A STATEMENT ON THIS CRITICAL ISSUE. I CAN ASSURE YOU THAT I WILL CONTINUE TO WORK HARD ON BEHALF OF THE MARINE CORPS AND THE COMMUNITY OF HAVELOCK.

SINCERELY,
WALTER B. JONES
MEMBER OF CONGRESS.

THANK YOU

[Ms. Marn submitted the prepared statement of Representative Jones, which is represented by the verbatim transcript.]

Speaker: Ms. Susan Kelly
Representing Congresswoman Eva Clayton
P.O. Box 867
New Bern, NC

IT'S A PLEASURE TO BE WITH YOU THIS EVENING. AND MS. CLAYTON IS ALSO IN WASHINGTON BECAUSE CONGRESS IS IN SESSION. BUT I WORK IN THE WASHINGTON OFFICE, AND SHE WANTED ME TO BE HERE THIS EVENING TO EXPRESS THE
1 IMPORTANCE OF THIS ISSUE. SHE SHARES MANY OF THE CONCERNS STATED BY THE PREVIOUS SPEAKER, SUCH AS THE CRITERIA THAT HAS BEEN USED, THE FACT THAT THE NAVY HAS ALREADY STATED A PREFERENCE, AND HER COMMENTS ON THAT WILL BE FORTHCOMING IN WRITING.

THANK YOU.

EC-1 Please see responses to comments WBJ-1, WBJ-2, and WBJ-3

Speaker: Col. (Ret.) Dave Jones
North Carolina Governor's Military Liaison
P.O. Box 867
New Bern, NC

I'M DAVE JONES, GOVERNOR HUNT'S MILITARY LIAISON.

AT THE SCOPING HEARING, AND IN WRITTEN COMMENTS, THE GOVERNOR ASKED FOR, ABOVE ALL ELSE, AN APPLES-TO-APPLES COMPARISON BETWEEN OCEANA AND CHERRY POINT. WE WERE CONFIDENT THEN, AND CONFIDENT NOW, THAT SUCH A COMPARISON WILL LEAD TO THE CONCLUSION THAT SOME OF THE SQUADRONS SHOULD COME TO CHERRY POINT.

DURING BRAC '95 THE NAVY CLAIMED THE ONLY COST OF MOVING ALL THE SQUADRONS TO NAS OCEANA WAS $28.3 MILLION FOR MILITARY CONSTRUCTION. THIS WAS FOR A SIMULATOR, MAINTENANCE BUILDINGS, AND A TRAINING FACILITY. AT THAT TIME THE STATE CONTENDED THAT DIFFERENT STANDARDS WERE APPLIED AT OCEANA AND AT CHERRY POINT; STANDARDS WHICH KEPT THE COSTS DOWN AT OCEANA, WHILE THE COSTS AT CHERRY POINT WERE PROJECTED ARTIFICIALLY HIGH.

1 IT WAS PARTICULARLY GRATIFYING TO SEE THAT WHEN P-80 STANDARDS WERE APPLIED TO OCEANA DURING THE DEIS THAT WE WERE CORRECT IN OUR ANALYSIS. THERE IS, IN FACT, A REQUIREMENT FOR BEQ SPACE, HANGAR MODULES, AND PARKING APRON EXPANSION, AS WELL AS NUMEROUS OTHER PROJECTS TOTALING $93.5, NOT $28.3 MILLION. BUT EVEN AT $93 MILLION, WE BELIEVE THE REQUIREMENT IS UNDERSTATED. FOR EXAMPLE, WHEN THE PLANNING WAS DONE FOR CHERRY POINT USING P-80 STANDARDS, THREE MODULES WERE REQUIRED TO HOUSE THE 48-AIRCRAFT FLEET REPLACEMENT SQUADRON. THE DEIS ONLY REFLECTS TWO MODULES FOR OCEANA. WHY IS THAT? THE DEIS STATES THAT EVEN AFTER THE $20.9 MILLION BEQ TO HOUSE 460 SAILORS IS BUILT, THERE WILL BE A SHORTFALL OF 1,100 BEQ SPACES FOR E-1 TO E-4 PERSONNEL. NAVY POLICY IS TO HOUSE E-1 TO E-4s ABOARD THE AIR STATION. SATISFYING THIS REQUIREMENT WOULD COST APPROXIMATELY $50 MILLION. WHY ISN'T THIS SHORTFALL INCLUDED IN THE MILCON REQUIREMENT?

2

DJ-1 The applicable Naval Facilities Engineering Command (NAVFAC) P-80 standard has been updated. NAVFAC replaced previous factors with a single factor based upon scheduled and unscheduled maintenance applied to the total number of aircraft in nonstandard squadrons. Applying the new factor, two hangar modules are required to support the Fleet Replacement Squadron (FRS). As discussed in Section 2.6 of the EIS, the "BRAC 93 scenario" of single-siting all F/A-18s at MCAS Cherry Point was re-evaluated and updated based on current criteria. When the updated P-80 criteria are applied, two modules are required for the FRS instead of three.

DJ-2 Current Navy policy is to house all E1 through E4 personnel on base. Navy policy permits E5 through E9 personnel to receive a housing allowance rather than reside in government housing. When determining the need for construction of new bachelor housing, E5 through E9 personnel are not taken into consideration.

Because of a shortage of BEQ spaces for E1 through E4 personnel at NAS Oceana under ARS 1 and ARS 2, the EIS has been amended to include an additional BEQ project at NAS Oceana. Similarly, the life-cycle costs for all ARSs have been updated to reflect changes in the housing allowance for bachelors living off base. Please see Section 2 of the EIS for amended bachelor housing costs.

CONVERSELY, WE BELIEVE THE COST TO BRING THE SQUADRONS TO CHERRY POINT IS OVERSTATED, EVEN IF YOU ACCEPT THE
3 AIMD FACILITY COST OF $13.2 MILLION, WHICH SEEMS QUESTIONAB LE GIVEN THE FACT THAT FIVE YEARS AGO TWO SEPARATE AIMDs OPERATED OUT OF THE EXISTING FACILITIES AT CHERRY POINT. BUT WHAT REALLY SEEMS OUTRAGEOUS IS THE
4 $199 MILLION FOR AIRCRAFT MAINTENANCE OVER A 30-YEAR PERIOD. IN THE FIRST PLACE, WHY ARE WE EVEN TALKING ABOUT 30 YEARS? THE F/A-18s ARE SCHEDULED FOR REPLACEMENT LONG BEFORE 30 YEARS.
SECONDLY, HOW WERE THE AIMD PEOPLE AND EQUIPMENT DIVIDED? SUPPORT REQUIREMENTS ARE BASED ON THE NUMBER OF SQUADRONS AND AIRCRAFT BEING SUPPORTED. IN ARS 5, ONE-
5 THIRD OF THE F/A-18s ARE STATIONED AT CHERRY POINT WITH PROPORTIONAL NUMBERS OF AIMD PERSONNEL AND EQUIPMENT ASSIGNED TO CHERRY POINT ALONG WITH THE AIRCRAFT. ADDITIONALLY, WAS THE PROXIMITY AND AVAILABILITY OF NADEP CHERRY POINT CONSIDERED AS A SOURCE FOR AIMD SUPPORT?
THERE'S SEVERAL OTHER POINTS THAT I WOULD LIKE TO DISCUSS AND I WILL INCLUDE THEM IN MY WRITTEN COMMENTS, BUT DUE TO THE TIME CONSTRAINTS I WANT TO LEAVE YOU WITH ONE LAST THOUGHT. AFTER CECIL CLOSES THE NAVAL SERVICE WILL HAVE TWO MASTER JET BASES ON THE EAST COAST, ONE AT OCEANA AND ONE AT CHERRY POINT. WITH ALL THE F/A-18s AT OCEANA THERE BASE LOADING WILL BE IN EXCESS OF 350 HIGH PERFORMANCE AIRCRAFT ALL OPERATING IN A BUILT-UP URBAN AREA. AT THE SAME TIME THE OTHER MASTER JET BASE, CHERRY POINT, WILL HAVE 130 AIRCRAFT OPERATING IN WHAT IS ESSENTIALLY A RURAL AREA. BOTH AIR STATIONS WILL BE SHARING THE SAME RANGES AND TRAINING AIRSPACE. FROM THE STANDPOINT OF MINIMIZING EXCESS CAPACITY, REDUCING OPERATIONAL CONGESTION, COUPLED WITH JUST PLAIN COMMON SENSE, THERE SHOULD BE MORE BALANCE BETWEEN THE TWO MASTER JET BASES. ARS 5 WOULD GO A LONG WAY TO HELP PROVIDE THAT BALANCE.
THANK YOU VERY MUCH.

DJ-3 All previously utilized and existing AIMD facilities were analyzed by a joint Marine Corps/Navy team, and it was found that no excess capacity was available for AIMD facilities with the exception of the parachute shop. Because of the expeditionary nature of the Marine Corps air support mission, much of the aviation maintenance support equipment, which deploys with the air group, is configured as mobile facilities. For this reason, all Marine Corps maintenance facilities must be a combination of permanent construction and mobile facilities, while Navy aircraft maintenance facilities are all of permanent construction. The Commander, Naval Air Force, U.S. Atlantic Fleet, developed the equipment and facilities requirements for a full stand-alone AIMD to include airframes, aviation armament, avionics, engines, aviation supply, and shops and storage for ground support equipment.

DJ-4 There are two different types of assets, aircraft and facilities, and two different corresponding expected service lives. The expected service life is 12 years for military aircraft and 50 years for military facilities (U.S. Dept of Commerce data from 1925-1985). The Navy's primary investment in this BRAC relocation is facilities; the aircraft have already been procured. The Navy has and will perform a life-cycle cost analysis, both for procurement and maintenance of new aircraft systems under those procurement actions.

The Navy's facilities will certainly outlast the life of the F/A-18 given the respective service lives. Historically, the Navy used a period of 25 years for the economic life of facilities, which was based on NAVFACINST P-442, "Economic Analysis Handbook," dated June 1986. However, based on guidance contained in the U.S. Office of Management and Budget (OMB) Circular No. A-94, dated October 29, 1992, the Navy used a period of 30 years for this life-cycle analysis.

DJ-5 Manning requirements for ARS 1 were validated by a fleet Manpower Analysis Team Efficiency Review. For all other ARSs, Commander, Naval Air Force, U.S. Atlantic Fleet (COMNAVAIRLANT) developed staffing standards using Navy Manpower Analysis Center (NAVMAC) models, which are based on Aircraft Maintenance Organization models (ACMO II and ACMO VII) for staffing standards. In addition, an analysis was performed for each ARS to show estimated costs of required support equipment. These estimated equipment shortages and costs were derived using modeling processes from Support Equipment Requests Management Information System (SERMIS) and the Federal Logistics (FEDLOG) data bases. Many of the "F/A-18 specific" equipment shortage items are no longer manufactured. In addition, there is an acquisition delay on some of the more common automated test equipment.

Speaker: Representative John Nichols
North Carolina House of Representatives
New Bern, NC

THANK YOU VERY MUCH. MY NAME IS JOHN NICHOLS. I REPRESENT THE THIRD HOUSE DISTRICT OF NORTH CAROLINA, AND THIS INCLUDES HAVELOCK AND CHERRY POINT. I'M DELIGHTED TO BE HERE TONIGHT. I'LL CUT RIGHT TO THE CHASE AND FORGET SOME OF THE OTHER THINGS SOME OTHER PEOPLE HAVE ALREADY SAID.

1 THERE ARE SEVERAL THINGS IN THE ENVIRONMENTAL IMPACT STATEMENT THAT WERE NOT ADDRESSED PROPERLY, I DO NOT BELIEVE. NUMBER ONE, I DIDN'T SEE ANYWHERE IN THERE THE FACT THAT HAVELOCK AND CHERRY POINT HAVE NO PROBLEMS MEETING AIR QUALITY AND OZONE STANDARDS, AS OCEANA DOES. THAT'S A KNOWN FACT, BEING OUT OF STANDARDS FOR A LONG TIME. YOU HAVE OVER A MILLION PEOPLE IN A SMALL CROWDED AREA OF VIRGINIA BEACH, WITH A LOT OF THEM CONCERNED ABOUT THE NOISE PROBLEM. COMPARE THAT TO PAMLICO COUNTY, NORTH CAROLINA, WHICH HAS AN AVERAGE OF 36 PEOPLE PER SQUARE MILE. I THINK YOU'LL SEE VERY READILY THAT THAT PROBLEM GOES AWAY DOWN HERE.

JN-1 Section 3.3.9.2 of the EIS notes that the Southern Coastal Plain air quality control region (which contains the area around MCAS Cherry Point) is designated as attainment for all criteria pollutants.

2 WATER SHORTAGES. YOU'VE GOT ALL THOSE PEOPLE IN VIRGINIA BEACH WHO HAVE SEVERE WATER SHORTAGES. YOU HAVE HAD FOR SEVERAL YEARS -- AS A MATTER OF FACT, YOU ARE STILL IN A BATTLE WITH NORTH CAROLINA TODAY FIGHTING OVER THE PIPELINE TO GIVE WATER TO THE PEOPLE IN VIRGINIA BEACH, AND YOU WANT TO SEND 4200 PEOPLE MORE IN THERE. IF YOU LOSE THAT BATTLE, WHAT ARE YOU GOING TO DO? I DON'T KNOW WHAT YOU'RE GOING TO DO WITH THOSE PEOPLE AT THAT POINT.

JN-2 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies").

YOU HAVE ONE THING HERE THAT YOU DON'T HAVE UP THERE. YOU DO NOT HAVE PEOPLE HERE WHO CONSIDER THE SOUND OF FREEDOM TO BE EXCESSIVE NOISE. AND THAT'S ONE THING THAT WE BELIEVE HERE. WE DON'T HAVE THAT MANY PEOPLE HERE, AND IT WON'T IMPACT US. AS WAS SAID EARLIER, THE NOISE WILL IMPACT 22 SCHOOLS IN VIRGINIA AND 3 IN NORTH CAROLINA IF THEY CAME TO CHERRY POINT.

IF THIS THING WAS NON-POLITICAL, IT WOULD HAVE STAYED LIKE 1993 WHEN BRAC MADE ITS DECISION AND NONE OF THEM WOULD GO TO OCEANA BECAUSE OF THE PROBLEMS THEY HAVE THERE. AND POLITICS GOT INVOLVED, OBVIOUSLY. WE SHOULD GET AT LEAST FIVE SQUADRONS. I THINK WE SHOULD GET MORE, BUT WE SHOULD GET AT LEAST FIVE. WE'RE GOING TO GET THE NOISE FROM THE F-18s USING OUR BOMBING RANGES, COMING IN HERE TO REFUEL AND TO GO BACK OUT. IF WE'RE GOING TO HAVE THE NOISE, WE DESERVE SOME OF THE PLANES.

THANK YOU VERY MUCH.

Speaker: Mr. Tom Bayliss
Mayor of New Bern, NC
City Hall
New Bern, NC

I KNOW IN YOUR INSTRUCTIONS YOU SAID FOR US TO SPEAK SLOWLY AND CLEARLY, BEING FROM NORTH CAROLINA I DON'T HAVE ANY CHOICE ABOUT THE SLOW PART, AND I'LL TRY TO BE AS CLEAR AS I POSSIBLY CAN.

I'D JUST LIKE TO SAY THAT ONE OF THE THINGS THAT I HAVE GOTTEN OUT OF THIS THING IN READING YOUR STUDIES IS YOU ALL HAVE DONE A VERY GOOD JOB IN LOOKING AT HOW TO SPEND THE TAXPAYER'S MONEY WISELY. I DIDN'T APPRECIATE THAT MANY YEARS AGO WHEN I DIDN'T PAY THAT MUCH TAXES, BUT I APPRECIATE IT A WHOLE LOT MORE NOW WHEN I PAY THE KIND OF TAXES I'VE HAD TO PAY.

I'M ONE OF THE PRODUCTS OF WHAT HAPPENS IN EASTERN NORTH CAROLINA WHEN YOU HAVE A GOOD MILITARY BASE AROUND. I WENT THROUGH THE CHERRY POINT APPRENTICE SCHOOL, GOT MARRIED AT 17 YEARS OLD - STILL MARRIED TO THE SAME ONE, BY THE WAY - AND BECAUSE OF THAT APPRENTICE SCHOOL I WAS ABLE TO LATER GO TO COLLEGE AND MAJOR IN PHYSICS, WHICH IS QUITE WONDERFUL FOR A NORTH CAROLINIAN, AND I'VE DONE PRETTY WELL; I'VE BEEN A LUCKY PERSON. THE POINT THAT I'M GETTING AT IS A LOT OF TIMES YOU CAN LOOK AT THINGS LIKE WHERE PLANES SHOULD BE AND SHOULDN'T BE -- IT'S KIND OF LIKE THE EAST CAROLINA MEDICAL SCHOOL WHEN THERE WAS A GREAT DEBATE AND ARGUMENT IN NORTH CAROLINA ABOUT WHETHER THERE OUGHT TO BE A MEDICAL SCHOOL IN GREENVILLE, NORTH CAROLINA, BECAUSE THEY THOUGHT MAYBE THEY COULD PRODUCE DOCTORS A LITTLE CHEAPER IN CHAPEL HILL, AND THAT TYPE OF THING, WHEN I POINTED OUT TO THEM THAT MY FATHER DIED IN 1958 WITH A BRAIN HEMORRHAGE AT 35 YEARS OLD AND I REMEMBER THE DOCTOR TELLING ME WHEN I WAS 13 THAT IF HE COULD SURVIVE THE TRIP TO CHAPEL HILL, HE MIGHT LIVE, BUT OTHERWISE HE WAS GONE. SO AT 35 HE WAS GONE. THE POINT BEING, I APPRECIATE MY TAX MONEY BEING SPENT WISELY. THEY BEAT IT THROUGH MY SKULL IN SCHOOL ABOUT THE MULTIPLIER EFFECT OF MONEY, AND THAT TYPE OF THING, AND I CAN ASSURE YOU THAT IN EASTERN NORTH CAROLINA, WHERE WE HAVE BEEN VERY PROUD WITH OUR RELATIONSHIP WITH THE MARINE CORPS HERE, AND VERY PROUD OF

Thank you for your comments; no response required.

Bayliss (Cont.)

THE IMPACT THOSE TAX DOLLARS HAVE HAD. AND WHEN YOU TALK ABOUT THE SOUND OF FREEDOM, WE KNOW WHEN SOMEBODY AROUND THE WORLD HUFFS AND PUFFS AND THREATENS TO BLOW OUR HOUSE DOWN THAT WE CAN DO SOMETHING ABOUT IT. BUT IT'S EVEN MORE GRATIFYING WHEN I SEND MY TAX MONEY OFF TO KNOW THAT IN EASTERN NORTH CAROLINA, WHERE WE DON'T HAVE A WHOLE LOT OF OPPORTUNITY, THAT THE MILITARY AND THEIR GOOD COMPANIONSHIP MEANS A TREMENDOUS AMOUNT TO US.

SO THOSE PLANES REPRESENT TO US IN EASTERN NORTH CAROLINA A RAY OF HOPE, AND THAT RAY OF HOPE GOES DOWN FROM TOP TO BOTTOM. AND I CAN TELL YOU RIGHT NOW THAT WE DON'T HAVE ALL THAT MUCH HOPE IN EASTERN NORTH CAROLINA SOMETIMES. SO THE MULTIPLIER EFFECT, THE IMPACT OF THOSE PLANES COMING HERE IS SO GREAT, I'LL MAKE AN OFFER TO YOU HERE TONIGHT AS THE MAYOR OF NEW BERN, IF YOU DON'T WANT TO PUT THEM IN CHERRY POINT, WE DON'T HAVE A RUNWAY MUCH LONGER THAN THAT STAGE UP THERE, BUT WE'LL FIND A PLACE TO PUT THEM IN NEW BERN, IF YOU WANT TO. YOU CAN DEFINITELY SEND -- THE NAVY GUYS CAN MOVE DOWN HERE IN NEW BERN AND WE'LL BE MORE THAN HAPPY TO HAVE THEM.

SO, IN MY SUMMATION ALL I'D LIKE TO SAY IS THAT EVERYBODY SEEMS TO HAVE DONE THEIR HOMEWORK ON THIS KIND OF THING. THERE'S GOING TO BE A BIG NOISE PROBLEM IN OCEANA. BUT REALLY WHEN YOU LOOK AT THE TAX DOLLARS AND HOW WE SPEND THEM, ONE THING IS TO DEFEND OUR COUNTRY AND THE OTHER THING IS TO COME BACK TO SOME OF US AND HELP US OUT, AND THAT'S A GREAT WAY TO DO IT. SO I HOPE YOU CONSIDER THAT WHEN YOU DECIDE WHERE TO PUT THESE THINGS.

Speaker: Mr. Don Phillips
Craven County Board of Commissioners
P.O. Box 867
New Bern, NC

GOOD EVENING, CAPTAIN, AND LADIES AND GENTLEMEN. I'M HERE TONIGHT AS A REPRESENTATIVE OF THE CRAVEN COUNTY BOARD OF THE COUNTY COMMISSIONERS

I WON'T ADDRESS WHERE THESE F-18s SHOULD NOT BE LOCATED. I BELIEVE AFTER LISTENING TO THE PEOPLE SPEAK AND TAKING A LOOK AT THOSE NUMBERS IT'S VERY OBVIOUS. I'D PREFER TO EXPRESS MY JUDGEMENT ON WHERE THEY SHOULD BE LOCATED.

I'M A NUMBERS PERSON. BASICALLY I LOOK AT NUMBERS, AND THERE'S A LOT OF NUMBERS TO LOOK AT. YOU HAVE ALL LOOKED AT THOSE NUMBERS. THE NUMBERS HAVE BEEN JOCKEYED BACK AND FORTH. WHEN I LOOK AT THESE NUMBERS IT POINTS TO ME THAT IT'S VERY CLEAR THAT THESE PLANES SHOULD BE LOCATED AT THE MARINE CORPS AIR STATION, CHERRY POINT. WHEN YOU LOOK AT THE MILITARY SUPPORT OPERATIONS AND THEIR PERFORMANCE, AGAIN IN THE CHERRY POINT FACILITY, AGAIN THERE'S NO QUESTIONS WHERE THESE SHOULD BE LOCATED. WHEN YOU LOOK AT THE CITIZEN SUPPORT AND THEIR DETERMINATION, AGAIN THERE IS NO QUESTION WHERE THESE SHOULD BE LOCATED.

GENTLEMEN, WHEN THERE IS A NEED FOR THE SUPPORT OF THE FIGHTING MEN, YOU'LL NEVER FIND PEOPLE MORE DEDICATED TO THOSE THAN IN CRAVEN AND CARTERET COUNTY. WHEN YOU CONSIDER ALL OF THESE FACTORS, ALL OF THE NUMBERS, EVERYTHING THAT WE'VE TALKED ABOUT, RELOCATING AT LEAST FIVE F/A-18 FLEET SQUADRONS TO THE MARINE CORPS AIR STATION IN CHERRY POINT WILL BEST SERVE THE UNITED STATES MILITARY, THE U.S. NAVY, AND IT'S CITIZENS.

CAPTAIN, I WAS NAVY, I AM NAVY, AND ALWAYS WILL BE NAVY. AND YOU CAN RELAY THAT TO THE SECRETARY OF THE NAVY.

THANK YOU.

Thank you for your comments; no response required.

Speaker: Mr. Albert Toon
Craven County Board of Commissioners
P.O. Box 867
New Bern, NC

GOOD EVENING, MY NAME IS ALBERT H. TOON. I AM ONE OF CRAVEN COUNTY'S COMMISSIONERS. I AM THE COMMISSIONER FOR DISTRICT 5. CHERRY POINT LIES WITHIN DISTRICT 5. IT IS IN MY DISTRICT. AND I RISE TONIGHT TO SAY A FEW THINGS.

I THINK THERE'S A GREAT NEED THAT THESE PLANES NEED TO COME TO CHERRY POINT. HOWEVER, IN 1941 I MOVED OFF THE BASE AT CHERRY POINT. CHERRY POINT WAS ORIGINALLY MY HOME. I MOVED BECAUSE THEY BUILT A MARINE CORPS AIR STATION THERE AND WE HAD TO MOVE OUT. NOW, CHERRY POINT HAS BEEN OUTSTANDING, GOOD IN THIS COMMUNITY IN HAVELOCK AND THE SURROUNDING COUNTIES, AND THERE IS AN OPPORTUNITY THAT IT PROBABLY COULD BE BETTER. SO I RISE TONIGHT TO SUPPORT.

I REPRESENT ALL THE WAY FROM HAVELOCK HERE TO ADAMS CREEK. I HAVE ABOUT FOUR COMMUNITIES THAT I REPRESENT IN DISTRICT 5, AND I RISE TONIGHT. I KNOW THERE IS GOING TO BE SOME NOISE. WE ALL REALIZE AND UNDERSTAND THAT. BUT WE'VE BEEN LIVING WITH NOISE ALL OF OUR LIFE, AND I DON'T THINK A FEW MORE YEARS THAT I GOT HERE IS GOING TO HURT. I RISE TO SUPPORT. BRING THEM ON DOWN, AS MANY AS WE CAN GET, TO CHERRY POINT.

THANK YOU VERY MUCH.

Thank you for your comments; no response required.

Speaker: Mr. Lee K. Allen
Craven County Board of Commissioners
P.O. Box 867
New Bern, NC

MY NAME IS LEE K. ALLEN. I'M A RETIRED COMMAND MASTER CHIEF, SO I SPEAK REGULAR NAVY. I HOPE YOU UNDERSTAND THAT.

I'M A CRAVEN COUNTRY COMMISSIONER, AND I REPRESENT ALL OF CRAVEN COUNTY. I SPENT THREE TOURS OF DUTY AT CHERRY POINT. WITH 22 YEARS IN THE NAVY, HALF OF MY CAREER WAS SPENT WITH THE MARINE CORPS, AND I LEARNED TO RESPECT THE MARINE CORPS. WHEN I WAS IN A FOXHOLE IN VIETNAM AND I HAD MARINES ALL AROUND ME I FELT SAFE. I THINK THE CAMARADERIE BETWEEN THE NAVY AND THE MARINE CORPS IS SOMETHING THAT CAN BE ADMIRED, AND I HAVE ALWAYS BEEN A GREAT ADMIRER OF THAT.

WHEN YOU TALK ABOUT THE NAVY AND THE MARINE CORPS RESIDING TOGETHER, WE ALL KNOW THAT THERE ARE OTHER BRANCHES OF THE SERVICE THAT RESIDE TOGETHER. THE AIR FORCE AND THE ARMY, LIKE FORT DIX AND MCGUIRE AIR FORCE BASE, AND MANY OF THE OTHER BASES. WE HAVE A LOT OF SAILORS HERE ON THIS BASE. AND I'VE ENJOYED MY TIME WITH THE MARINE CORPS.

CHERRY POINT IS PROBABLY ONE OF THE BEST KEPT SECRETS IN THE SERVICE. MY WIFE AND I DECIDED THAT WE WERE GOING TO RETIRE HERE AND SPEND THE REST OF OUR LIFE HERE IN 1958. AND THIS IS OUR HOME. THERE ARE NICE CHURCHES HERE, GOOD SCHOOLS, RECREATION, BEACHES, FISHING, HUNTING, HISTORIC SITES. THIS IS A GREAT PLACE TO BE. AND I THINK THAT IF YOU BRING THOSE SAILORS DOWN HERE, WE'LL WELCOME THEM WITH OPEN ARMS, BECAUSE I THINK THEY WILL LEARN TO LOVE HAVELOCK AND CHERRY POINT AND THIS AREA AS MUCH AS MY WIFE AND I DO.

Thank you for your comments; no response required.

A CAPTAIN ONCE TOLD ME, HE SAYS, "YOU KNOW, THERE'S ONLY TWO THINGS I NEED TO KNOW: WHAT ARE MY CAPABILITIES AND WHAT ARE MY LIMITATIONS. AND I NEVER PUT ALL OF MY EGGS IN ONE BASKET." ABOARD SHIP THE CO IS UP ON THE FOCSLE, THE XO IS ON THE FANTAIL. I THINK THAT'S WHAT WE OUGHT TO DO WITH THESE F/A-18 AIRCRAFT. DON'T PUT THEM ALL IN ONE BASKET, SPREAD THEM OUT. PUT SOME OF THEM UP IN OCEANA, BUT PUT THEM HERE AT CHERRY POINT, TOO, BECAUSE I THINK THAT WE CAN SURVIVE TOGETHER. I THINK THAT WE'LL ALL BE BETTER OFF, AND I CERTAINLY WILL BE ONE TO WELCOME THEM HERE WITH EVERYONE ELSE.

THANK YOU, SIR.

Speaker: Mr. Johnnie Sampson, Jr.
Craven County Board of Commissioners
P.O. Box 867
New Bern, NC

I'M JOHNNIE SAMPSON, JR. I'M GLAD TO BE HERE AT THIS HEARING TONIGHT. I'M CONCERNED ABOUT ALL OF CRAVEN COUNTY, AND I WORKED AT THE BASE FOR 25 YEARS, AND I'M VERY HAPPY TO HAVE YOU HERE TONIGHT BECAUSE WE NEED ALL THE HELP WE CAN GET TO GET THOSE PLANES HERE. WE'RE WILLING TO SHARE. WE'RE WILLING TO HAVE A FEW GO TO VIRGINIA, AND WE WANT THE REST OF THEM TO COME HERE.

WE KNOW OUR CITIZENS ARE IN GREAT NEED OF EMPLOYMENT IN THIS AREA. ON THE EAST COAST WE HAVE VERY LITTLE EMPLOYMENT. CHERRY POINT REALLY HAS BEEN A GREAT CONTRIBUTION TO THIS AREA, AND WE WANT TO CONTINUE TO HAVE CHERRY POINT HERE, AND I WELCOME THEM HERE, BECAUSE WITH THEM HERE WE FEEL EVEN SAFER WITH CHERRY POINT, AND WE ALSO HAVE THE MARINES BECOMING MEMBERS OF THE COMMUNITY, WORKING IN THE COMMUNITY, TO MAKE THIS A BETTER COMMUNITY FOR ALL OF US. SO, WORKING TOGETHER WE REALIZE THAT WE CAN DO GREAT THINGS, AND WE HAVE DONE GREAT THINGS IN EASTERN NORTH CAROLINA

SO WE ARE ASKING THAT THESE PLANES WOULD COME HERE, AND THAT WE WILL WORK TOGETHER TO MAKE THIS A BETTER COUNTRY FOR ALL OF US TO LIVE.

THANK YOU.

Thank you for your comments; no response required.

Speaker: Mr. Bill Rivenbark
Superintendent, Craven County Schools
Craven County Board of Education
New Bern, NC

GOOD EVENING, CAPTAIN.

I BRING YOU GREETINGS ON BEHALF OF THE CRAVEN COUNTY BOARD OF EDUCATION, THE STAFF AND STUDENTS OF CRAVEN COUNTY SCHOOLS. MY NAME IS BILL RIVENBARK, AND I'M SUPERINTENDENT OF THE CRAVEN COUNTY SCHOOLS.

CRAVEN COUNTY SCHOOLS IS A HIGH-PERFORMING SCHOOL SYSTEM. WE HAVE JUST ROLLED OUT AN AGGRESSIVE STRATEGIC PLAN WITH FIVE DIRECTIONS: OPTIMUM STUDENT ACHIEVEMENT, A SAFE AND INVITING AND LEARNING WORKING ENVIRONMENT, QUALITY PARTNERSHIPS, HIGH-PERFORMING WORK FORCE, AND AN INTEGRATED MANAGEMENT SYSTEM. THIS STRATEGIC PLAN HAS ATTACHED TO IT 20 SPECIFIC GOALS AND 70 RIGOROUS RESULTS MEASURES. AS I SAID, WE'RE A HIGH-PERFORMING SCHOOL DISTRICT, BUT OUR GOAL IS TO BECOME THE HIGHEST PERFORMING SCHOOL DISTRICT IN NORTH CAROLINA. WE ARE CURRENTLY PERFORMING IN THE TOP QUARTILE IN STATE PERFORMANCE. WE HAVE FOCUSED THE DISTRICT ON CONTINUOUS IMPROVEMENT AT THE DISTRICT LEVEL, THE SCHOOL LEVEL, AND THE CLASSROOM LEVEL, AND WE'RE ALSO FOCUSED ON LEADERSHIP FROM THE BOARD ROOM TO THE CLASSROOM.

WE'VE BEEN ACTIVELY PREPARING FOR THE HOPEFUL REDIRECTION OF F/A-18 HORNET SQUADRONS TO CHERRY POINT. WE HAVE BEEN INVOLVED IN AN AGGRESSIVE BUILDING PROGRAM. WE CURRENTLY HAVE JUST COMPLETED TUCKER CREEK MIDDLE SCHOOL HERE IN HAVELOCK. WE'RE ADDING A NEW ADDITION TO HAVELOCK HIGH SCHOOL THAT WILL BE READY FOR NEXT YEAR. THE POINT HERE IS THAT WE HAVE ROOM FOR THE CHILDREN THAT WILL BE INVOLVED WITH THESE SQUADRONS. ADDITIONALLY, WE'LL BE SPENDING $23 MILLION OVER THE NEXT FOUR YEARS TO RENOVATE AND UPGRADE OUR EXISTING FACILITIES, AND WE'RE IN THE PLANNING STAGES OF A NEW ELEMENTARY SCHOOL FOR HAVELOCK TO REPLACE THE OLD HAVELOCK ELEMENTARY SCHOOL.

Thank you for your comments; no response required.

Rivenbark (Cont.)

IN THE STATE ACCOUNTABILITY PROGRAM, WHICH MEASURED THIS PAST YEAR ELEMENTARY AND MIDDLE SCHOOLS, THE STATE HAD AN AVERAGE OF 34 PERCENT SCORING AT THE EXEMPLARY LEVEL. IN PERFORMANCE, CRAVEN COUNTY HAD 56 PERCENT AT THE EXEMPLARY LEVEL. IF YOU COMBINE THOSE SCHOOLS THAT MET THEIR GOALS AND ALSO PERFORMED AT THE EXEMPLARY LEVEL, THE STATE HAD 56 PERCENT, CRAVEN COUNTY HAD 73 PERCENT. SO YOU CAN SEE WE ARE A HIGH-PERFORMING SCHOOL DISTRICT.

ALL SCHOOLS ARE FOCUSED ON PROVIDING EDUCATIONAL EXCELLENCE THROUGH CONTINUAL IMPROVEMENT, AND CRAVEN COUNTY SCHOOLS IS A LEADER IN EDUCATION. WE ARE RAPIDLY BECOMING THE PREMIER SCHOOL DISTRICT IN NORTH CAROLINA. THE SCHOOL SYSTEM LIVES ITS VALUES OF COMMITMENT, TEAMWORK, AND EXCELLENCE. WE'RE ALWAYS CONTINUALLY IMPROVING TO PROVIDE THE VERY BEST IN STUDENT PERFORMANCE AND EDUCATIONAL SERVICES.

CRAVEN COUNTY SCHOOLS SHOULD BE THE EDUCATIONAL HOME OF CHOICE FOR THE CHILDREN OF THE F/A-18 HORNET SQUADRONS.

THANK YOU.

Speaker: Mr. Albert J. McCarthy
Neuse River Council of Governments
P.O. Box 1717
New Bern, NC 28563

GOOD EVENING. I'M ALBERT MCCARTHY. I REPRESENT THE NEUSE RIVER COUNCIL OF GOVERNMENTS, WHICH IS NINE-COUNTY ECONOMIC DEVELOPMENT ENTITY, OF WHICH CRAVEN COUNTY IS A PART. AND I SPEAK ON BEHALF OF THAT ORGANIZATION THIS EVENING AND ITS EXECUTIVE DIRECTOR, BRIGADIER GENERAL JAMES MEAD, WHO HAPPENS TO BE A RETIRED MARINE AVIATOR.

THE FEELING OF THE COUNCIL OF GOVERNMENTS IS UNIFORM AND VERY STRONG AND CALLS FOR AT LEAST A PORTION OF THE NAVY SQUADRONS TO COME TO CHERRY POINT. THE COMMENTS THAT HAVE ALREADY BEEN MADE RELATIVE TO THE ECONOMIC IMPACT ARE VERY SIGNIFICANT TO OUR COUNCIL OF GOVERNMENTS. WE CONTINUALLY LOOK FOR WAYS TO STABILIZE AND GROW IN A VERY MEASURED WAY THE ECONOMY OF OUR REGION HERE, AND THERE IS NOTHING THAT CAN DO THAT BETTER THAN THE MILITARY PRESENCE THAT WOULD BE BROUGHT BY THOSE SQUADRONS HERE AT CHERRY POINT.

AND THAT REALLY IS ALL I HAVE TO SAY

THANK YOU.

Thank you for your comments; no response required.

Speaker: Mr. Dave Inscoe
Carolina Power and Light Company
P.O. Box 12365
New Bern, NC 28561

MY NAME IS DAVID INSCOE. I AM REPRESENTING CAROLINA POWER & LIGHT COMPANY, A $3 BILLION ELECTRIC UTILITY SERVING ONE MILLION CUSTOMERS THROUGH THE CAROLINAS. AND WE'RE ALSO PROUD TO BE A PARTNER WITH MARINE CORPS AIR STATION CHERRY POINT SINCE THIS BASE BEGAN.

WE HAVE SUPPORTED THE COMMUNITY'S EFFORTS TO BRING ECONOMIC DEVELOPMENT TO CHERRY POINT AND THIS AREA THROUGH THE UTILIZATION OF CHERRY POINT'S FACILITIES FOR THE PAST FOUR YEARS. WE HAVE A STRONG REPUTATION IN THIS COMMUNITY TO SUPPORT ECONOMIC DEVELOPMENT. WE ARE A PARTNER WITH THIS COMMUNITY. WE HAVE BROUGHT 64 UNITS OF AFFORDABLE HOUSING, INVESTING OVER $3 MILLION TO THIS COMMUNITY.

A STRONG MILITARY COMMUNITY LEADS TO A STRONG COMMUNITY OUTSIDE, AND IS GOOD FOR BUSINESS, AND IT'S GOOD FOR THE ECONOMY, AND IT'S GOOD FOR OUR COUNTRY. WE STRONGLY SUPPORT BRINGING THE FIVE SQUADRONS TO MARINE CORPS AIR STATION CHERRY POINT.

THANK YOU.

Thank you for your comments; no response required.

Speaker: Mr. Robert Schultz
Colonel USMC (Ret)
105 Lakeside Drive
Havelock, NC

CAPTAIN, I FIND IT NECESSARY TO TELL SOME OF MY HISTORY IN MAKING MY COMMENTS. PLEASE BEAR WITH ME. IN THE EARLY '70s I HAPPENED TO BE THE COMMANDING OFFICER OF THE FLEET REPLACEMENT SQUADRON HERE AT CHERRY POINT, 36 F-4 AIRCRAFT. WE DID NOT FIND IT NECESSARY TO BE CO-LOCATED WITH OUR TACTICAL SQUADRONS, WHICH WERE LOCATED AT BEAUFORT. WE TRANSFERRED OUR AIR CREWMEN AS THEY COMPLETED THEIR TRAINING TO BEAUFORT, WHICH IS WHERE OUR TACTICAL SQUADRONS WERE. I FAIL TO SEE WHY THE NAVY FEELS
1 THAT THEIR FRS SQUADRON, 48 AIRPLANES, MUST BE CO-LOCATED WITH THE REST OF THEIR SQUADRONS.

RS-1 Experience has shown that collocating the FRS and fleet squadrons provides benefits in training, logistics, maintenance, cost, and operational readiness and efficiency. Section 2.6.5 of the EIS provides a discussion of these issues and describes why any ARS that does not collocate the FRS with the majority of fleet squadrons is unacceptable.

MY SECOND POINT HERE IS THAT FOLLOWING THAT I WAS THE COMMANDING OFFICER OF A MARINE AIR GROUP AT BEAUFORT WHEN WE HAD TWO AIR GROUPS THERE. TODAY WE HAVE ONE.
2 YOU MUST LOOK AT THE NUMBER OF AIRCRAFT THAT WE HAVE IN OUR SQUADRONS TODAY VERSUS WHAT WE HAD 20 YEARS AGO. THE BASE LOADING AT BEAUFORT CAN HANDLE ADDITIONAL AIRCRAFT, THERE'S NO DOUBT IN MY MIND.

RS-2 Under ARS 2, two F/A-18 squadrons would be relocated to MCAS Beaufort, utilizing all existing excess hangar capacity. Please see Section 2.1 for a description of the criteria used to determine excess capacity. Please see Section 2.2.6.2 for a description of excess capacity at MCAS Beaufort.

MY NEXT ASSIGNMENT WHICH CAUSES ME TO ALSO COMMENT ON THAT WAS THAT AS THE CHIEF OF STAFF AND ASSISTANT WING COMMANDER OF THE SECOND MARINE AIRCRAFT WING HERE AT CHERRY POINT FROM '77 TO '80. AT THAT TIME WE HAD TWO TACTICAL AIR GROUPS HERE, AND I WOULD SAY THAT IN THAT PERIOD OF TIME WE DID THREE TIMES THE DAILY OPERATIONS
3 OUT OF THIS FIELD THAT ARE CONDUCTED TODAY. IN THE MID-'80s AND THE EARLY-'90s WE PROBABLY DID ONLY TWICE AS MANY OPERATIONS AS ARE CONDUCTED TODAY, WHICH MEANS TODAY THERE ARE NO WHERE NEAR THE NUMBER OF OPERATIONS BEING CONDUCTED OUT OF HERE THAT THIS BASE CAN ACTUALLY HANDLE. IT'S A GREAT OPERATING FIELD. EVERY PILOT SHOULD FEEL VERY COMFORTABLE OPERATING OUT OF HERE. FOUR HUNDRED FOOT WIDE RUNWAYS, IF WE WERE TO PAVE THEM COMPLETELY, WHICH FOR MONEY, DOLLARS AND CENTS FIGURES, WE DIDN'T DO THAT LAST TIME.

RS-3 Thank you for your comment; no response required.

Schultz (Cont.)

4 MY COMMENTS PERTAIN TO THE FACT, PRIMARILY, THAT WE HAVE ONE TACTICAL AIR GROUP HERE AT CHERRY POINT AND ONE TACTICAL AIR GROUP AT BEAUFORT. WE COULD PROBABLY USE ALL OF THOSE AIRPLANES AT BEAUFORT UP HERE VERY NICELY AND LET THE NAVY HAVE BEAUFORT IF THEY WANTED IT. WHATEVER FOLLOWS OUT FROM THIS, THOUGH, WE CAN STILL USE, AS FAR AS I SEE, A LARGER NUMBER OF AIRCRAFT HERE AT CHERRY POINT AND NOT BOTHER ANYBODY AND HAVE NO ONE COMPLAINING ABOUT NOISE, NO ONE COMPLAINING ABOUT TRAFFIC, NO ONE COMPLAINING ABOUT ANYTHING, BECAUSE WE'VE GOT MORE SCHOOLS, MORE HOUSING, MORE ANYTHING THAN WE HAD 20 YEARS AGO.

THANK YOU.

RS-4 The EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, moving aircraft from MCAS Beaufort to MCAS Cherry Point is outside of the scope of this analysis.

Speaker: Mr. Joe Huffman
City Manager
Havelock, NC

MY NAME IS JOE HUFFMAN, CITY MANAGER OF HAVELOCK, AND I'M SPEAKING ON BEHALF OF THE BOARD OF COMMISSIONERS AND THE CITY OF HAVELOCK.

GOOD EVENING, AND THANK YOU FOR THE OPPORTUNITY TO MAKE PUBLIC COMMENT TONIGHT. MY REMARKS WILL SUPPORT THOSE I OFFERED AT LAST YEAR'S SCOPING MEETING AND WILL CENTER ON QUALITY OF LIFE, PREPARATIONS BY THE CITY OF HAVELOCK, AND LOCAL GOVERNMENT COMMITMENTS MADE BY THE CITY OF HAVELOCK.

1 LET ME BEGIN BY SAYING HAVELOCK IS PREPARED FOR GROWTH AND THE F/A-18s. THE CITY HAS UNDERTAKEN SEVERAL CAPITAL PROJECTS AND PROGRAMS TO MEET QUALITY OF LIFE CONCERNS AND ASSIST IN SUPPORTING MARINE CORPS AIR STATION CHERRY POINT. IN ANTICIPATION OF GROWTH, THE CITY HAS RECENTLY UNDERTAKEN SEVERAL GENERAL FUND PROJECTS IN THE AREAS OF PUBLIC SAFETY, PUBLIC WORKS, AND PARKS AND RECREATION AT A COST OF HUNDREDS OF THOUSANDS OF DOLLARS. FUTURE PROJECTS INCLUDE A ROOM OCCUPANCY TAX TO FUND A TOURIST CENTER COSTING APPROXIMATELY $1 MILLION OR OVER, AND A STATE-FUNDED $5 MILLION INSTITUTE OF AERONAUTICAL TECHNOLOGY TO SUPPORT NADEP AND BASE OPERATIONS.

JH-1 Thank you for your comments; no response required.

2 REGARDING WASTEWATER TREATMENT PLANT IMPROVEMENTS, THE CITY IS INVESTING $5.8 MILLION IN CONSTRUCTION UPGRADES. COMPLETION DATE OF THE PROJECT IS DECEMBER 1997, NEXT MONTH. PERMITTED CAPACITY AFTER THE EXPANSION WILL BE 1.9 MILLION GALLONS PER DAY, MAXIMUM CAPACITY WILL BE 2.25 MILLION GALLONS PER DAY, AND OUR CURRENT DAILY AVERAGE FLOWS ARE 1.27 MILLION GALLONS PER DAY.

JH-2 Thank you for your comments; no response required.

3 OUR NITROGEN LIMITS, STARTING JANUARY 1ST, WILL BE 4 MILLIGRAMS PER LITER IN THE SUMMER AND 8 MILLIGRAMS PER LITER IN THE WINTER. PHOSPHOROUS LIMITS, THE SAME DATE, .7 MILLIGRAMS PER LITER IN THE SUMMER, 1 MILLIGRAM PER LITER IN THE WINTER - PLEASE, I URGE YOU, COMPARE THESE LIMITS TO THOSE AT OCEANA.

JH-3 As noted in Section 4.6.2 of the EIS, excess wastewater treatment capacity in the Hampton Roads Sanitation District is more than sufficient to meet anticipated increases under ARS 1. The additional 0.69 million gallons per day (MGD) that would be generated under ARS 1 represents less than 5% of the total treatment capacity; therefore, nutrient loading to surface waters is not expected to increase significantly as a result of the realignment.

Huffman (Cont.)

4 REGARDING WATER PLANT IMPROVEMENTS. FIRST OF ALL, OUR WATER CAPACITY. WE HAVE RECENTLY INSTALLED ONE NEW WELL WITH A CAPACITY OF 1.4 MILLION GALLONS PER DAY. THIS WILL MEET THE CITY'S RAW WATER NEEDS THROUGH THE YEAR 2015. A SECOND WELL COULD BE INSTALLED TO MEET MAXIMUM DEVELOPMENT PROJECTIONS. REGARDING WATER TREATMENT FACILITIES, WE CURRENTLY HAVE AVAILABLE 2.8 MILLION GALLONS PER DAY CAPACITY, AND BASED ON POPULATION PROJECTIONS, THAT TREATMENT CAPACITY IS SUFFICIENT THROUGH THE YEAR 2005. UPGRADES ARE EASILY ACCOMPLISHED ON THE CURRENT SITE.

JH-4 Thank you for your comments; no response required.

5 IN RECREATION, WE HAVE A 50-ACRE SPORTS COMPLEX. THIS IS THE LARGEST MUNICIPAL COMPLEX IN EASTERN NORTH CAROLINA, SEVEN PARKS AND PLAYGROUNDS, A RECREATION CENTER, AND OTHER RECREATION OPPORTUNITIES TO TAKE CARE OF MILITARY DEPENDENTS AND OTHERS MOVING INTO THE AREA ASSOCIATED WITH THE TRANSFER.

JH-5 Thank you for your comments; no response required.

6 IN PUBLIC SAFETY, WE HAVE A LOW CRIME RATE. WE ARE IMPLEMENTING SEVERAL INNOVATIVE PUBLIC SAFETY MEASURES, INCLUDING COMMUNITY POLICING, WE HAVE INCREASED SUBSTATIONS IN THE CITY, AND WE HAVE SCHOOL RESOURCE OFFICERS AND JUVENILE OFFICERS IN OUR SCHOOLS.

JH-6 Thank you for your comments; no response required.

7 IN CLOSING, HAVELOCK HAS DONE WHAT IT TAKES TO PREPARE. WE ARE WILLING AND ABLE TO RECEIVE ADDITIONAL SQUADRONS REALIZED BY ALTERNATIVE REALIGNMENT SCENARIO 5. FURTHER, WE ALSO BELIEVE WE CAN BETTER SUPPORT THE NUMBER OF AIRCRAFT AND PERSONNEL WE HAD HERE IN 1992. PLEASE EXAMINE THOSE RECORDS AND COMPARE THOSE TO THE TRANSFERS YOU ARE CONSIDERING NOW.

JH-7 Thank you for your comments; no response required.

THANK YOU VERY MUCH.

Subject: Mr. Jim Davis
Craven County Economic Development Commission
P.O. Box 867
New Bern, NC

THANK YOU, CAPTAIN, AND GOOD EVENING. MY NAME IS JIM DAVIS. I'M THE EXECUTIVE DIRECTOR OF THE CRAVEN COUNTY ECONOMIC DEVELOPMENT COMMISSION, A NONPROFIT CORPORATION RESPONSIBLE FOR JOB CREATION AND TAX BASE EXPANSION IN CRAVEN COUNTY

IN MY REMARKS THIS EVENING I WANT TO ADDRESS TWO ISSUES. FIRST, I WILL DISCUSS THE ECONOMIC IMPORTANCE OF THE AIR STATION. SECOND, I WILL DISCUSS THE PUBLIC COMMENTS, FINANCIAL AND OTHERWISE, MADE TO IMPLEMENT THE RECOMMENDATIONS OF THE 1993 REALIGNMENT AND CLOSURE COMMISSION.

UNLIKE THE URBAN HAMPTON ROADS/NORFOLK AREA, THE CHERRY POINT REGION IS DEFINED BY ITS SMALL CITIES AND PASTORAL CHARACTER. NOTWITHSTANDING THE REDUCTIONS IN FORCE OF APPROXIMATELY 2600 MARINE PERSONNEL AT CHERRY POINT SINCE 1992, THE TOTAL ECONOMIC IMPACT OF CHERRY POINT ON THE STATE OF NORTH CAROLINA IN THE MOST RECENT FISCAL YEAR WAS OVER $689 MILLION. OF THAT, 91 PERCENT, OR OVER $631 MILLION, WAS SPENT IN THE QUAD-COUNTY AREAS OF CARTERET, CRAVEN, JONES, AND PAMLICO COUNTIES. THE ECONOMIC IMPACT OF CHERRY POINT DWARFS THE OTHER EMPLOYERS IN THE REGION.

THE TOTAL CHERRY POINT-RELATED POPULATION IN THE FOUR COUNTIES IS OVER 51,000 PEOPLE, UNDERSCORING THE IMPORTANCE OF THE AIR STATION TO THIS REGION. THERE IS BROAD-BASED COMMUNITY SUPPORT FOR CHERRY POINT. THAT SUPPORT IS SHARED BY ALL OF US HERE THIS EVENING, AND WE GREATLY APPRECIATE THE MARINE CORPS AND NAVY PERSONNEL STATIONED HERE.

UNLIKE THE RELATIONSHIP OF OCEANA TO THE HAMPTON ROADS AREA, CHERRY POINT IS THE ECONOMIC HUB OF THIS REGION. BECAUSE OF THE AMOUNT OF PLANNING REQUIRED TO IMPLEMENT THE 1993 BRAC DECISION, LOCAL GOVERNMENTS AND CITIZENS BEGAN MAKING SIGNIFICANT PREPARATIONS FOR THE ARRIVAL OF THE NAVY AIRCRAFT AND RELATED PERSONNEL. IN CARTERET COUNTY, FOR AN EXAMPLE, VOTERS PASSED A $29 MILLION BOND REFERENDUM. THE BULK OF THE PROCEEDS WERE USED TO CONSTRUCT A NEW HIGH SCHOOL AND A NEW ELEMENTARY SCHOOL. REGIONAL MEDICAL FACILITIES AND UTILITY SYSTEMS WERE AND ARE BEING EXPANDED.

Thank you for your comments; no response required.

Davis (Cont.)

PRIOR TO THE BRAC ORDERED RELOCATION, CRAVEN COUNTY CONDUCTED A COUNTY-WIDE STRATEGIC PLANNING PROCESS, AND OUT OF THAT MANY RECOMMENDATIONS RELATIVE TO THE ISSUE BEFORE US THIS EVENING, SPECIFICALLY THE RECOMMENDATION OF A MAJOR BRIDGE CONNECTING HIGHWAY 17 AND 70, WAS INCLUDED. TODAY THAT STRUCTURE IS IN THE PROCESS OF BEING CONSTRUCTED AND TO BE COMPLETED BY OCTOBER OF 1999 AT A COST OF $120 MILLION. FOR CRAVEN COUNTY ALONE FOR THE YEARS 1998 TO THE YEAR 2000, THERE WILL BE OVER $70 MILLION SPENT BY THE DEPARTMENT OF TRANSPORTATION FOR RELATED PROJECT. BY THE WAY, THAT'S $810 PER CAPITA. FOR THE SAME YEARS 1998 TO 2000, THERE WILL BE OVER $112 MILLION SPENT ON DOT PROJECTS IN THE QUAD-COUNTY AREA. THIS ALONE SHOULD TELL YOU THAT OUR GOVERNOR JIM HUNT AND OUR DOT BOARD AND LOCAL OFFICIALS ARE SERIOUS ABOUT GETTING READY FOR OUR JETS AND OUR NEW CITIZENS. ALSO, A NEW REGIONAL AIR FACILITY IS BEING BUILT HERE IN NEW BERN AT A COST OF $16 MILLION, TO BE COMPLETED IN APRIL 1999. TWENTY-FIVE PERCENT OF THE EXISTING PASSENGER TRAFFIC IS CHERRY POINT-RELATED.

PRIVATE CITIZENS HAVE INVESTED MILLIONS OF DOLLARS IN LAND IMPROVEMENTS FOR HOUSING. OFF-BASE HOUSING CERTAINLY SHOULD BE OF NO CONCERN. AS THIS DATE THERE ARE 1600 APARTMENTS, TOWNHOUSES, OR HOUSES LISTED IN THE REGION.

THE CHERRY POINT REGION DID EVERYTHING REQUESTED BY THE DEPARTMENT OF DEFENSE TO IMPLEMENT THE 1993 BRAC DECISION. THE COMMUNITY ENTHUSIASTICALLY EMBRACED THE EXPANSION ORDERED BY THE DEPARTMENT OF DEFENSE AND SUPPORTED THEIR ENTHUSIASM WITH ACTION, UNFORTUNATELY, AFTER YEARS . . . .

WE ARE PLEASED THAT THE NAVY HAS REOPENED THE DIALOGUE, AND CHERRY POINT AND THE SURROUNDING REGION HAVE AN EXCELLENT STORY TO TELL. OUR STATE AND LOCAL GOVERNMENTS AND CITIZENS HAVE BACKED UP THEIR RHETORIC WITH COMMENT AND ACTION. WE HOPE THE NAVY WILL DO SIMILARLY. ONCE AGAIN, THE CHERRY POINT REGION STANDS READY TO DO WHATEVER IS NECESSARY TO ACCOMMODATE THE CECIL FIELD ASSETS.

THANK YOU, SIR.

[Mr. Davis submitted his prepared statement, including a table of the numbers cited in his text. Mr. Davis's prepared statement is represented by the verbatim transcript.]

Speaker: Mr. Gordan Corcoran
North Carolina Department of Commerce
P.O. Box 867
New Bern, NC

I'M GORDAN CORCORAN, SENIOR ECONOMIC DEVELOPMENT REPRESENTATIVE OF THE NORTH CAROLINA DEPARTMENT OF COMMERCE, AND IT'S MY PLEASURE TO BE HERE THIS EVENING TO REPRESENT THE SECRETARY OF COMMERCE, NORRIS TOLSON, WHO IS UNABLE TO BE HERE THIS EVENING. I'M ALSO SPEAKING AS A RETIRED FULL COLONEL WITH 27 YEARS OF ACTIVE DUTY.

I HAVE BEEN MONITORING THE ACTIVITIES AT OUR VARIOUS MILITARY INSTALLATIONS IN NORTH CAROLINA FOR THE PAST TEN YEARS. FIRST OF ALL I WANT TO STATE CLEARLY AND EMPHATICALLY THAT THE NORTH CAROLINA DEPARTMENT OF COMMERCE SUPPORTS FULLY THE EFFORTS OF OUR CONGRESSIONAL DELEGATION, GOVERNOR HUNT AND HIS CABINET, AND MEMBERS OF THE NORTH CAROLINA GENERAL ASSEMBLY, THE LOCAL GOVERNMENTAL LEADERSHIP AND GROUPS THAT ARE FIGHTING VALIANTLY TO SUPPORT THE REASSIGNMENT OF CECIL FIELD AIRCRAFT AND PERSONNEL TO MARINE CORPS AIR STATION CHERRY POINT.

THERE'S SOMETHING DRASTICALLY WRONG WHEN A 1993 BRAC DECISION APPEARS TO HAVE BEEN OVERTURNED. SUPPOSEDLY THE PURPOSE OF CREATING THE BRACs WAS TO TAKE THE POLITICS OUT OF THE RECOMMENDATIONS AND BASE THEM ON COST SAVINGS, WHILE STILL MAINTAINING THE OPERATIONAL EFFECTIVENESS OF OUR MILITARY SERVICES. MARINE CORPS AIR STATION CHERRY POINT PASSED THE TEST ON THE TWO PREVIOUS ROUNDS, AND NOW APPEARS TO BE PENALIZED WHILE STILL MAINTAINING THE PRODUCTIVITY AND READINESS THAT HAS BEEN A HALLMARK OF ITS OPERATIONAL HISTORY.

THE CREATION OF JOBS IN EASTERN NORTH CAROLINA AND OTHER RURAL AREAS HAS BEEN A HIGH PRIORITY IN THE TEN YEARS THAT I HAVE BEEN WITH COMMERCE. EVIDENCE OF THIS COMMITMENT HAS BEEN THE ESTABLISHMENT OF THE GLOBAL TRANSPARK JUST UP THE ROAD, IN WHICH THE STATE OF NORTH CAROLINA HAS JOINED IN A PUBLIC/PRIVATE PARTNERSHIP IN ORDER TO ATTEMPT TO DIVERSIFY THE ECONOMY OF THIS REGION. ONE OF THE FACTORS IN THE SELECTION OF ITS LOCATION WAS ITS PROXIMITY TO SEVERAL MILITARY INSTALLATIONS, AND THE SKILLS THAT WERE AVAILABLE FROM BOTH THE MILITARY AND CIVILIAN WORKFORCE.

Thank you for your comments; no response required.

Corcoran (Cont.)

REVERSAL OF THE '93 DECISION WITHOUT REASSIGNMENT OF SOME UNITS TO MARINE CORPS AIR STATION CHERRY POINT IS NOT IN THE BEST INTERESTS OF THE STATE, THE REGION, OR THE MILITARY. FAIR IS FAIR. THE STATE OF NORTH CAROLINA HAS SUPPORTED ITS VARIOUS MILITARY INSTALLATIONS THROUGHOUT THEIR HISTORY. THE UNITS HAVE SUPPORTED THE VARIOUS WARS AND NUMEROUS DEPLOYMENTS AT GREAT PERSONAL SACRIFICE AND HARDSHIP. COMMUNITIES HAVE FELT TREMENDOUS NEGATIVE IMPACTS AT TIMES TO THEIR ECONOMIES, BUT HAVE WEATHERED THOSE STORMS. IT'S TIME TO REWARD THESE COMMUNITIES IN THE STATE OF NORTH CAROLINA BY ONCE AGAIN DEMONSTRATING DEPARTMENT OF DEFENSE APPRECIATION FOR THE LONG-TERM COMMITMENT THAT THE STATE OF NORTH CAROLINA HAS GIVEN IN SUPPORTING THE MILITARY BY DOING WHAT IS BEST FOR OUR COUNTY, BY RECOMMENDING THAT AT LEAST A PORTION OF THE AIRCRAFT AND PERSONNEL BE REASSIGNED TO MARINE CORPS AIR STATION CHERRY POINT.

THANK YOU.

[Mr. Corcoran submitted his prepared statement, which is represented by the verbatim transcript.]

Speaker: Mr. Clark Wright, Esq.
Ward and Smith, Attorneys
P.O. Box 867
New Bern, NC

MY NAME IS CLARK WRIGHT. I'M WITH THE LAW FIRM OF WARD AND SMITH, BASED OUT OF NEW BERN, NORTH CAROLINA. OUR FIRM HAS REPRESENTED A NUMBER OF CLIENTS WHO HAVE HAD SOME INTEREST IN THIS MATTER OVER THE PAST SEVERAL YEARS, AND WHO WOULD LIKE TO SEE THAT CHERRY POINT IS TREATED FAIRLY IN THIS PROCESS, AND BELIEVE THAT IF TREATED FAIRLY, SOME OR ALL OF THE APPOINTED SQUADRONS SHOULD BE LOCATED AT MARINE CORPS AIR STATION CHERRY POINT.

PRIOR TO COMING TO WARD AND SMITH I WAS AN ASSISTANT ATTORNEY GENERAL IN THE NORTH CAROLINA DEPARTMENT OF JUSTICE WHERE TWO OF MY AREAS OF EXPERTISE WERE NATIONAL ENVIRONMENTAL POLICY ACT MATTERS AND MILITARY AIRSPACE. I'D LIKE TO SORT OF CHANGE THE FOCUS HERE AND SORT OF GIVE YOU A COUPLE OF COMMENTS QUOTE "IF I WERE YOUR LAWYER."

1 WHEN I LOOK AT THIS DRAFT ENVIRONMENTAL IMPACT STATEMENT, THE FIRST THING THAT OCCURS TO ME IS, ARE THE ALTERNATIVES ANALYSIS LEGALLY SUPPORTABLE? WHY, GIVEN THE FACT THAT THE SCREENING CRITERIA LEAVE ALL THREE BASES, BEAUFORT, CHERRY POINT, AND OCEANA, AS ACCEPTABLE RECEIVING SITES, AREN'T THEIR ALTERNATIVES IN THIS DOCUMENT THAT HAVE ALL OF THE PLANES GOING TO EACH OF THOSE THREE SITES? THE NAVY'S ANSWER SEEMS TO BE DOLLARS ALONE. WELL, DOLLARS ALONE DOESN'T CUT THE MUSTARD IN AN ENVIRONMENTAL IMPACT STATEMENT.
THE FINAL DECISION MAKER HAS GOT TO HAVE BEFORE HIM OR HER THE DOLLARS WEIGHED AGAINST ALL THE OTHER IMPACTS, POSITIVE AND NEGATIVE. AND THOSE IMPACTS INCLUDE ISSUES YOU'VE HEARD BEFORE: AIR QUALITY, WATER POLLUTION, TRAFFIC CONGESTION, PUBLIC SAFETY, NOISE CONTOURS. ON ALL OF THOSE ISSUES, CHERRY POINT SCORES PRETTY HIGHLY. WHERE IN THIS DOCUMENT DOES THE DECISION MAKER HAVE BEFORE HIM ADEQUATE INFORMATION, AS THE DRAFT NOW STANDS, TO WEIGH THE DOLLARS VERSUS THOSE IMPORTANT OTHER ISSUES WITH REGARD TO ALL OF THESE SQUADRONS GOING TO BEAUFORT OR CHERRY POINT? I THINK THAT YOU SHOULD CONSIDER WHETHER THE DOCUMENT IS LEGALLY SOUND IN ITS DEFINITION OF THE ALTERNATIVES ANALYSIS.

WS(CW)-1 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible:
1) relocation of all aircraft to MCAS Cherry Point and
2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of the ARSs.

Wright (Cont.)

2 NUMBER TWO, AN IMPORTANT POINT, CUMULATIVE IMPACT. YOU HAVEN'T HEARD MUCH SAID ABOUT IT, AND THERE'S A REASON FOR THAT. THE NOISE ISSUE IS A TWO-EDGED SWORD. THERE WILL BE ADVERSE IMPACTS IN NORTH CAROLINA, BOTH IN TERMS OF NOISE AND IN TERMS OF MILITARY AIRSPACE - TRAINING IMPACTS ON COMMERCIAL AND CIVIL AVIATION. THE POINT IS, AND WHAT DOES NOT APPEAR CLEARLY ENOUGH IN THE DOCUMENT, IS THAT WE'RE GOING TO SUFFER THOSE IMPACTS REGARDLESS OF WHERE THE ASSETS ARE LOCATED. THAT IS A CRITICAL POINT TO WEIGH FOR THE DECISION MAKER. BECAUSE GIVEN THAT, HOW DO YOU THEN FACTOR IN THE POTENTIAL POSITIVE ECONOMIC BENEFITS THAT WOULD BE ASSOCIATED WITH LOCATING THEM HERE VERSUS IN VIRGINIA, WHERE WE DON'T GET ANY OF THE POSITIVE IMPACTS, BUT WE GET ALL OF THE NEGATIVE IMPACTS.

WS(CW)-2 The EIS discusses ranges in North Carolina. There will be an increase in training over eastern North Carolina. However, as discussed in Sections 4.2 and 4.3, and Appendix C, no significant impact on noise levels to and from the ranges, or on civilian traffic at the Dare County Airport will result from the proposed realignment.

3 AND YOU'VE HEARD SOME ELOQUENT DISCUSSIONS FROM THE LAST FOUR OR FIVE SPEAKERS ON WHAT THE STATE HAS DONE IN RELIANCE ON '93 BRAC MONEY. SPENT MILLIONS OF DOLLARS, HUNDREDS OF MILLIONS OF DOLLARS, INFRASTRUCTURE COMMITMENTS - WHERE ARE THOSE DETAILED IN THE DRAFT EIS?

WS(CW)-3 Improvements to the local community are reflected in the description of the existing environment around MCAS Cherry Point. Please see Section 3.3 of the EIS.

4 AND WHERE IS THE POSITIVE ECONOMIC IMPACT THAT WOULD OCCUR TO THIS AREA DISCUSSED IN A PROPER RELATIVE SENSE? WHEN YOU LOOK AT THE IMPACT OF THIS BASE ON THIS FOUR-COUNTY AREA, VERSUS THE IMPACT OF THESE ASSETS AT OCEANA, THERE IS A HUGE DIFFERENCE.

WS(CW)-4 The economic impact of each ARS on the local communities is discussed in the EIS. The economic impact of ARS 3 and ARS 5 on the four counties around MCAS Cherry Point is discussed in Sections 6.1.5 and 8.1.5 of the EIS, respectively.

5 AND, LASTLY, I THINK THAT FALLS INTO THE NEPA CATEGORY OF MITIGATION AS WELL. THOSE POSITIVE IMPACTS CAN BE PART OF WHAT IS DEFINED AS THE MITIGATING FACTORS IN THE DOCUMENT THAT WOULD SUPPORT LOCATING THESE ASSETS AT CHERRY POINT AS OPPOSED TO THE OTHER POTENTIAL ALTERNATIVES.

WS(CW)-5 Thank you for your comment; please see responses to WS(CW)-3 and WS(CW)-4.

Wright (Cont.)

SO I THINK IN SUMMARY, THE ALTERNATIVES ANALYSIS, CUMULATIVE IMPACTS, AND MITIGATION ISSUES, I THINK THE DOCUMENT IS DEFICIENT. IT'S DEFICIENT IN WAYS THAT MIGHT AT FIRST GLANCE BE CONSIDERED SUBTLY, BUT I THINK THEY'RE CRITICAL HERE. BECAUSE OBVIOUSLY WE'VE GOT THE DOLLAR ISSUES. THERE'S NO DOUBT THE A-6s ARE LEAVING UP THERE AND THERE'S EXCESS CAPACITY UP THERE. THERE ARE LEGITIMATE DOLLAR ISSUES TO SUPPORT THE SCREENING PROCESS THE NAVY IS ENGAGED IN. BUT WHERE IS THE OTHER SIDE OF THE COIN THAT NEPA DEMANDS AND REQUIRES, AND THAT IS THE BALANCING OF THE JUST DOLLARS AGAINST THE LEGITIMATE SOCIOECONOMIC AND ADVERSE ENVIRONMENTAL IMPACTS? AND I WOULD SUBMIT TO YOU THAT IN TERMS OF THE ALTERNATIVES ANALYSIS AND THE IMPACT DISCUSSION, THE DOCUMENT AS IT PRESENTLY STANDS IS DEFICIENT.

6

THANK YOU.

WS(CW)-6 All of the relevant socioeconomic and environmental impacts are discussed in the EIS at a level of detail sufficient for decision makers to accurately assess the impacts from each ARS. The alternatives screening process was intended to identify those alternatives that were both feasible and reasonable when examined in the context of the BRAC 95 Commission recommendation and the operational requirements of the Navy. NEPA requires only that all feasible alternatives be considered. Those alternatives eliminated as not being feasible or reasonable are addressed briefly in Section 2.6 of the EIS in accordance with the CEQ regulations.

Speaker: Mr. Steve Root
Strategic Resources Solutions
Carolina Power and Light Company
P.O. Box 867
New Bern, NC

GOOD EVENING, CAPTAIN, MY NAME IS STEVE ROOT, AND I'M GENERAL MANAGER OF THE FEDERAL DIVISION WITH STRATEGIC RESOURCES SOLUTIONS, WHICH IS A CAROLINA POWER AND LIGHT COMPANY.

I, TOO, HAVE A SENSE OF HUMOR, AND THAT'S WHY I'M HERE TONIGHT. I'D LIKE TO READ THROUGH A COUPLE THINGS THAT WERE PREPARED BACK WHEN THE BASE CLOSING COMMISSION TOOK PLACE IN 1993. WHEN CECIL FIELD, FLORIDA, WAS CONSIDERED FOR CLOSURE, ALL FACTS WERE CONSIDERED ON AN EVEN SCALE BETWEEN NAVAL AIR STATION OCEANA AND MARINE CORPS AIR STATION CHERRY POINT, AND CHERRY POINT AND MARINE CORPS AIR STATION BEAUFORT WERE SELECTED AS THE PREFERRED SITES FOR THE 204 PLUS F/A-18s.

IN 1995, AFTER VIRGINIA'S INTENSIVE LOBBYING OF THE DEPARTMENT OF THE NAVY, AND ITS DISTINGUISHED COLLEAGUE, SENATOR WARNER OF VIRGINIA, WHO CERTAINLY WAS THE FORMER SECRETARY OF THE NAVY, THE NAVY RECOMMENDED THAT OCEANA, INSTEAD OF CHERRY POINT, RECEIVE 144 OF THESE JETS, WITH THE REMAINDER GOING TO BEAUFORT, SOUTH CAROLINA, AND ATLANTA, GEORGIA.

THIS IS SOME OF THE WORK THAT WAS DONE IN PREPARATION FOR THE 1995 BRAC. IN HERE IS APPROXIMATELY TWO INCHES OF ENVIRONMENTAL PROBLEMS AND SITUATIONS THAT WERE NOTED THROUGH PUBLIC SOURCES, SUCH AS THE NEWSPAPERS, NAVY TIMES, MARINE CORPS TIMES, ET CETERA, REGARDING NAVAL AIR STATION OCEANA, AND THESE WERE SUBMITTED TO THE COMMISSION IN 1995. AND I SUBMIT TODAY, CAPTAIN, THAT WE COULD COME BACK WITH A FEW MORE BOXES OF THESE AND IT STILL WOULDN'T HAVE MUCH OF AN IMPACT HERE.

Root (Cont.)

I DO HAVE A COUPLE OF PICTURES, AND I WILL HOLD THEM UP FIRST FOR YOU, SIR, AND THEN FOR THE REST OF THE FOLKS. THIS IS A PICTURE OF THE NAVAL AIR STATION OCEANA, FOR THE CROWD. YOU CAN SEE BUILDINGS THAT ARE HIDING BEHIND THE TREES. IT'S A PRETTY SOLID AREA THERE. CERTAINLY, MR. CECCHINI, A LOT OF CHURCHES, SCHOOLS, MALLS, AND INHABITABLE AREAS. THEN WE HAVE SOME PICTURES OF MARINE CORPS AIR STATION CHERRY POINT, AND YOU CAN SEE ALL THE TREES HIDING BEHIND THE BUILDINGS -- NO, I DON'T THINK SO. HERE'S ANOTHER ONE. A LOT OF GREEN LAND HERE, AS A NUMBER OF PEOPLE POINTED OUT THIS EVENING.

I DO BELIEVE THAT THE ENVIRONMENTAL ISSUES ARE THE MOST IMPORTANT ISSUES. I BELIEVE NORTH CAROLINA HAS PROVED ITS CASE BEYOND A REASONABLE DOUBT, CERTAINLY AS WE'RE TALKING LEGAL TERMS HERE. HOW MANY SCHOOLS, MALLS, HOSPITALS, AND PEOPLE ARE LOCATED IN THE 75 DECIBEL RANGE AT OCEANA TODAY? CERTAINLY, WE DID NOT SEE THAT PICTURE THIS EVENING. AND IF I CAN UNDERSTAND THIS CORRECTLY, MORE SCHOOLS, HOSPITALS, MALLS, PEOPLE ARE ALREADY IN THE APZ AT OCEANA, YET THIS DOESN'T SEEM TO IMPACT THE FACT THAT OCEANA IS ON ALL FIVE OF THE ALTERNATE RELOCATION SCENARIOS. MORE SCHOOLS, MALLS, HOSPITALS, AND PEOPLE ARE ALREADY IN THE 75 DECIBEL NOISE RANGE AT OCEANA, AND THIS CERTAINLY WASN'T SHOWN TONIGHT, BUT IT ALSO DOESN'T ALTER THE FACT THAT OCEANA IS LISTED IN ALL FIVE ARSs.

1

SR-1 Figures 3.1-14 and 3.1-23 of the EIS show the locations of schools, hospitals, and churches within the existing noise zones and APZs at NAS Oceana. The estimated population living within the noise zones at NAS Oceana is presented in Table 3.1-35.

I WOULD LIKE TO SUBMIT ALTERNATE RELOCATION SCENARIO NUMBER 6 THIS EVENING FOR CONSIDERATION. AND THAT WOULD BE TO RELOCATE SIX SQUADRONS TO MARINE CORPS AIR STATION CHERRY POINT, AND THE REMAINING AIRCRAFT TO MARINE CORPS AIR STATION, BEAUFORT. AND IF I COULD READ: "PER THE SECRETARY OF DEFENSE RECOMMENDATION OF 1993, CLOSE NAVAL AIR STATION CECIL FIELD. RELOCATE ITS AIRCRAFT, ALONG WITH DEDICATED PERSONNEL, EQUIPMENT AND SUPPORT TO MARINE CORPS AIR STATION CHERRY POINT, NORTH CAROLINA, NAVAL AIR STATION OCEANA, VIRGINIA, AND MARINE CORPS AIR STATION BEAUFORT, SOUTH CAROLINA. DISPOSITION OF MAJOR TENANTS IS AS FOLLOWS: MARINE CORPS SECURITY FORCE COMPANY RELOCATES TO MARINE CORPS AIR STATION CHERRY POINT; AVIATION INTERMEDIATE MAINTENANCE DEPARTMENT RELOCATES TO MARINE CORPS AIR STATION CHERRY POINT; AIR MAINTENANCE TRAINING GROUP DETACHMENT, FLEET AVIATION SUPPORT OFFICE, TRAINING GROUP ATLANTIC, AND SEA OPERATIONS DETACHMENT RELOCATE TO MARINE CORPS AIR STATION CHERRY POINT.

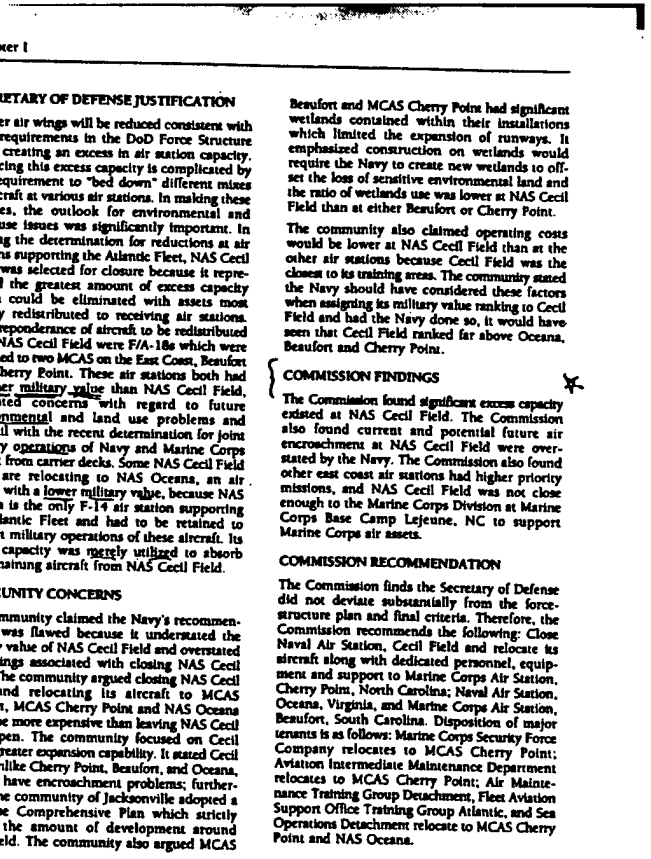
2

SR-2 The 1995 BRAC Commission directed that the aircraft be aligned to maximize use of existing excess capacity at receiving installations. Any ARS not including NAS Oceana does not follow this directive because the majority of excess capacity exists at NAS Oceana. The directives of the 1993 BRAC Commission are outside the scope of this analysis.

Root (Cont.)

I WOULD LIKE TO SUBMIT, AND I CAN DO THAT THIS EVENING, THE 1993 FINDINGS THAT WE DO BELIEVE WERE EQUITABLY JUDGED BASED ON NO POLITICAL ORIENTATION.

THANK YOU.



Chapter 1

SECRETARY OF DEFENSE JUSTIFICATION

Carrier air wings will be reduced consistent with fleet requirements in the DoD Force Structure Plan, creating an excess in air station capacity. Reducing this excess capacity is complicated by the requirement to "bed down" different mixes of aircraft at various air stations. In making these choices, the outlook for environmental and land use issues was significantly important. In making the determination for reductions at air stations supporting the Atlantic Fleet, NAS Cecil Field was selected for closure because it represented the greatest amount of excess capacity which could be eliminated with assets most readily redistributed to receiving air stations. The preponderance of aircraft to be redistributed from NAS Cecil Field were F/A-18s which were relocated to two MCAS on the East Coast, Beaufort and Cherry Point. These air stations both had a higher military value than NAS Cecil Field, alleviated concerns with regard to future environmental and land use problems and dovetail with the recent determination for joint military operations of Navy and Marine Corps aircraft from carrier decks. Some NAS Cecil Field assets are relocating to NAS Oceana, an air station with a lower military value, because NAS Oceana is the only F-14 air station supporting the Atlantic Fleet and had to be retained to support military operations of these aircraft. Its excess capacity was merely utilized to absorb the remaining aircraft from NAS Cecil Field.

COMMUNITY CONCERNS

The community claimed the Navy's recommendation was flawed because it understated the military value of NAS Cecil Field and overstated the savings associated with closing NAS Cecil Field. The community argued closing NAS Cecil Field and relocating its aircraft to MCAS Beaufort, MCAS Cherry Point and NAS Oceana would be more expensive than leaving NAS Cecil Field open. The community focused on Cecil Field's greater expansion capability. It stated Cecil Field, unlike Cherry Point, Beaufort, and Oceana, did not have encroachment problems; furthermore, the community of Jacksonville adopted a Land-Use Comprehensive Plan which strictly limited the amount of development around Cecil Field. The community also argued MCAS Beaufort and MCAS Cherry Point had significant wetlands contained within their installations which limited the expansion of runways. It emphasized construction on wetlands would require the Navy to create new wetlands to offset the loss of sensitive environmental land and the ratio of wetlands use was lower at NAS Cecil Field than at either Beaufort or Cherry Point.

The community also claimed operating costs would be lower at NAS Cecil Field than at the other air stations because Cecil Field was the closest to its training areas. The community stated the Navy should have considered these factors when assigning its military value ranking to Cecil Field and had the Navy done so, it would have seen that Cecil Field ranked far above Oceana, Beaufort and Cherry Point.

COMMISSION FINDINGS

The Commission found significant excess capacity existed at NAS Cecil Field. The Commission also found current and potential future air encroachment at NAS Cecil Field were overstated by the Navy. The Commission also found other east coast air stations had higher priority missions, and NAS Cecil Field was not close enough to the Marine Corps Division at Marine Corps Base Camp Lejeune, NC to support Marine Corps air assets.

COMMISSION RECOMMENDATION

The Commission finds the Secretary of Defense did not deviate substantially from the force-structure plan and final criteria. Therefore, the Commission recommends the following: Close Naval Air Station, Cecil Field and relocate its aircraft along with dedicated personnel, equipment and support to Marine Corps Air Station, Cherry Point, North Carolina; Naval Air Station, Oceana, Virginia, and Marine Corps Air Station, Beaufort, South Carolina. Disposition of major tenants is as follows: Marine Corps Security Force Company relocates to MCAS Cherry Point; Aviation Intermediate Maintenance Department relocates to MCAS Cherry Point; Air Maintenance Training Group Detachment, Fleet Aviation Support Office Training Group Atlantic, and Sea Operations Detachment relocate to MCAS Cherry Point and NAS Oceana.

1-20

[Mr. Root submitted a copy of the Defense Base Closure and Realignment Commission's "1993 Report to the President" with a tab indicated on page 1-20. The entire copy of the report is included in the Administrative Record, and only the one highlighted page is included here.]

Speaker: Mr. Dan Walsh
213 Highway 70 West
Havelock, NC

MY NAME IS DANNY WALSH. I'M A FORMER MARINE, AND A SMALL BUSINESS OWNER IN HAVELOCK, NORTH CAROLINA. I'VE BEEN HERE FOR 32 YEARS.

FIRST OF ALL, I'D LIKE TO THANK ALL OF THE PEOPLE WHO HAVE DONE SO MUCH WORK TO GET US PREPARED FOR THE AIRPLANES TO COME HERE, WHETHER THEY BE NAVY OR MARINES.

I AM THE CRAVEN COUNTY REPRESENTATIVE TO THE ENVIRONMENTAL REVIEW BOARD AT CHERRY POINT, AND I REALIZE WHAT WENT INTO THIS EIS; AS TOUGH AS IT IS. I'VE SET IN ON A LOT OF MEETINGS WITH THEM. BUT AS A SMALL BUSINESSMAN, I LOOK AT THIS BUDGET AND I SEE YOU SPENDING MONEY TO MOVE THESE AIRPLANES HERE, THERE , AND YONDER. IT SEEMS LIKE IT WOULD MAKE AN AWFUL LOT MORE SENSE, LIKE COLONEL SCHULTZ SAID, TO BRING ALL OF THE MARINE CORPS AVIATION TO CHERRY POINT AND SPLIT THE NAVY BETWEEN BEAUFORT AND OCEANA, IN WHATEVER FORM THAT NEEDED TO BE. 1

AS A BUSINESSMAN, IT WOULD MAKE MORE SENSE TO BRING ALL THE MARINE CORPS AVIATION AS A WHOLE HERE TO CHERRY POINT AS AN ALL-VOLUNTEER SERVICE. ONE OF THE BEST-KEPT SECRETS IN THE WORLD IS CHERRY POINT. AND IF THEY KNEW THEY WERE GOING TO COME TO CHERRY POINT AND SPEND THEIR 20 YEARS HERE WITH THEIR FAMILIES AND DEPLOY TEMPORARILY AROUND THE WORLD AND COME BACK HERE, THE LONG-TERM SAVINGS TO THE FAMILIES AND FOR THE NAVY DEPARTMENT FOR MOVING THOSE FAMILIES SEEMS LIKE IT WOULD BE TREMENDOUS SAVINGS, RATHER THAN JUST WHAT WE'RE GOING TO SPEND ON BUILDING SOME NEW HANGARS.

THERE'S A LOT OF OTHER THINGS THAT WOULD GO INTO THE IMPACT STATEMENT IF YOU LOOKED AT THE OVERALL FAMILY PICTURE OF THE MILITARY AND HOW THEY WOULD WORKOUT. AND IT JUST SEEMS LIKE IT WOULD MAKE MORE SENSE TO ME THAT ALL THE MARINES WOULD MOVE UP HERE FROM BEAUFORT AND GIVE BEAUFORT TO THE NAVY, OR TRANSFER IT TO THE NAVY, WHICHEVER WAY.

THAT'S ALL I HAVE. THANK YOU.

DW-1 The EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, relocating aircraft from MCAS Beaufort to MCAS Cherry Point is outside of the scope of this analysis.

Speaker: Mr. John R. Anderson
146 Beach Road
Beaufort, NC

MY NAME IS JOHN ANDERSON. I'M A PRIVATE CITIZEN OF BOTH CRAVEN AND CARTERET COUNTY. I WAS BORN AND RAISED IN CRAVEN COUNTY. I NOW LIVE IN CARTERET COUNTY. AND I MIGHT NOT BE THE OLDEST MAN IN HERE, BUT I'M PRETTY DARN CLOSE TO IT, SO I KNOW WHEN CHERRY POINT WAS BUILT. I WAS A YOUNG BOY AT THE TIME LIVING IN NEW BERN. AND HERE WHERE CHERRY POINT IS NOW. . . .

WHEN I WAS A YOUNG BOY WHEN CHERRY POINT WAS FIRST STARTED, THIS AREA HERE WAS VARIED PATCHES OF FARMLAND AND TIMBERLAND. I REMEMBER IT WELL. SINCE CHERRY POINT STARTED, THE ECONOMY HAS IMPROVED YEAR AFTER YEAR IN THIS AREA. THERE HAS BEEN MANY, MANY IMPROVEMENTS TO THE HIGHWAYS, AND EVERYTHING HAS IMPROVED GREATLY. THE ECONOMY HERE HAS GROWN VERY, VERY MUCH IN THE FEW YEARS THEY HAVE BEEN HERE, WHICH STARTED BACK ABOUT '41 OR '42, WHEN THEY FIRST STARTED BUILDING THE BASE.

I SAY BRING THE PLANES HERE, ANY OR ALL OF THEM. THE ECONOMY HERE CAN USE IT, THE AREA NEEDS TO GROW MORE, AND WE'RE WILLING TO GROW WITH THE BASE. I AM NOW LIVING IN SPORTSMEN'S VILLAGE, WHICH IS ABOUT A MILE FROM A LITTLE PLACE CALLED SOUTH RIVER, WHICH IS ON YOUR MAP. THE FLIGHT PATTERN FROM CHERRY POINT GOES RIGHT OVER MY TRAILER. THE TARGET RANGE IS ABOUT TWO-AND-A-HALF MILES FROM WHERE WE LIVE. WHEN THEY ARE USING THE TARGET RANGE OUR TRAILER SHAKES. WE CAN HEAR THE MACHINEGUNS FIRING FROM THE PLANES. BUT WE ACCEPT IT. WE KNOW IT. WE KNOW THE PILOTS NEED THE TRAINING; WE WANT THEM TO HAVE THE TRAINING. I KNOW BACK IN WORLD WAR II MANY, MANY PEOPLE WENT IN SERVICE, AND AFTER ONLY A FEW WEEKS SERVICE HAD TO GO OVERSEAS ILL TRAINED. I WAS FORTUNATE, I WAS A LITTLE BIT LATER GOING. IT WAS AT THE END OF WORLD WAR II BEFORE I WENT IN.

BUT LIKE I SAY, WE NEED THE ECONOMY TO GROW MORE HERE AND WE ARE WILLING TO ACCEPT ANY INCONVENIENCE IN ORDER TO HAVE THE ECONOMY IMPROVED IN OUR AREA.

Anderson (Cont.)

AND ANOTHER THING, AND I JUST TOOK A PLAIN OLD ROADMAP AND STARTED LOOKING, AND FROM CHERRY POINT TO OUR HOUSE -- THE RANGE, RATHER, IS APPROXIMATELY 20 MILES, THAT'S B-11 I THINK IT IS. FROM OCEANA, IT'S A HUNDRED MILES. THINK OF THE FUEL THAT THEY ARE USING TO FLY FROM OCEANA DOWN HERE TO PRACTICE, AND THE AMOUNT THAT YOU TAKE FROM CHERRY POINT THERE TO PRACTICE, AND THE SAVINGS THAT WOULD BE IF THE PLANES WERE HERE. 1

THE NOISE LEVEL WHICH YOU WERE TALKING ABOUT, OSHA HAS A STATEMENT OUT OF WHAT THEY CONSIDER AS A HARMFUL LEVEL. AND THE LEVEL USED TO BE 86 WHEN I WAS WORKING IN A FACTORY. I THINK IT'S ABOUT 85 NOW. THE LEVEL YOU WERE TALKING ABOUT WAS 77 OR 78, WHICH IS FAR BELOW WHAT OSHA RECOMMENDS PEOPLE HAVE TO WEAR EAR PLUGS. THEREFORE, I THINK WE SHOULD BRING THE PLANES HERE. THANK YOU. 2

JRA-1 Proximity to training ranges was a screening parameter in selecting receiving installations for the aircraft. The distance from NAS Oceana to either BT-9 or BT-11 is acceptable for the current fuel configuration, training requirements, and funding levels of the Atlantic Fleet F/A-18s.

JRA-2 As discussed in Section 3.1.8, an Ldn of 75 dB has been identified as the minimum level at which hearing loss may occur. Ldn is not a measure of the instantaneous sound level experienced by the listener, but rather an average of all sound levels experienced throughout a 24-hour period (with a 10-dB adjustment for nighttime noise). Thus, exposure time is already included in the Ldn calculation. Continuous exposure for eight hours to a sound level in excess of 90 dB would exceed OSHA's standard for workplace noise exposure.

Speaker: Mr. Harvey Hurst
OSN/Ret Captain
Route 4
213 E. Palmer Drive
New Bern, NC 28560

GOOD EVENING, CAPTAIN. I'M CAPTAIN HARVEY HURST, RETIRED U.S. NAVY. I CAME HERE IN 1977. MY SON SAID IT WAS LIKE BEING LET OUT OF JAIL MOVING ABOARD THE MARINE CORPS BASE AFTER THE NAVY BASE WE LIVED ON THE LAST THREE YEARS, AND HE STILL LIVES IN THE AREA.

I SERVED AS A PROGRAM MANAGER IN THE MID-'60s IN NAVAIR, AND I'VE BEEN IN COST STUDIES SINCE THEN. UP UNTIL LAST YEAR I WAS WORKING CONTRACTOR SUPPORT INVOLVING LIFE-CYCLE
1 COSTS. I WAS NEVER TO TAKE THE LIFE-CYCLE COST BEYOND THE WEAPON SYSTEM. IT ALWAYS TERMINATED WHEN WE TERMINATED THE WEAPON SYSTEM. WE HAVE A NEW GENERATION OF AIRCRAFT COMING INTO THE SERVICE. PART OF THIS HAS BEEN STARTED SINCE THE BRAC STUDY STARTED. THE MARINE CORPS JUST LAST NOVEMBER SIGNED UP IN TERMS OF THE JOINT STRIKE FIGHTER, WHICH IS TO REPLACE BOTH THE AV-8B HARRIER AND THE F-18s.

WE KNOW AT CHERRY POINT HOW TO DRIVE A NEW AIRCRAFT ABOARD. WE'VE BROUGHT THE AV-8B ABOARD WITH ALMOST A 90 PERCENT OPERATIONAL AVAILABILITY, UNHEARD OF IN TERMS OF NEW AIRCRAFT AVAILABILITY ENTERING THE FLEET, COMPARED TO THE Ts --- I'VE SEEN ON THE F-4Ts AND THE S-3s WHEN THEY CAME IN SERVICE.

HH-1 There are two different types of assets, aircraft and facilities, and two different corresponding expected service lives. The expected service life is 12 years for military aircraft and 50 years for military facilities (U.S. Dept of Commerce data from 1925-1985). The Navy's primary investment in this BRAC relocation is facilities; the aircraft have already been procured. The Navy has and will perform a life-cycle cost analysis, both for procurement and maintenance of new aircraft systems under those procurement actions.

The Navy's facilities will certainly outlast the life of the F/A-18 given the respective service lives. Historically, the Navy used a period of 25 years for the economic life of facilities, which was based on NAVFACINST P-442, "Economic Analysis Handbook," dated June 1986. However, based on guidance contained in the U.S. Office of Management and Budget (OMB) Circular No. A-94, dated October 29, 1992, the Navy used a period of 30 years for this life-cycle analysis.

Hurst (Cont.)

2 THE NAVY HAS MADE THEIR DECISIONS ON TERMS OF REPLACEMENT AIRCRAFT. THEY HAVE DECIDED, AND THEY ARE IN FULL PRODUCTION, ON THE NEW F-18s. THAT'S A NEW AIRCRAFT, ONE-THIRD LARGER, 65,000 POUND GROSS WEIGHT, VERY LITTLE COMMONALITY WITH THE EXISTING AIRCRAFT. AND THEY HAVE ALSO SELECTED THEIR VERSION OF THE JOINT STRIKE FIGHTER. THIS AIRCRAFT, THE FLEET IS DUE TO STAND UP IN IT IN SEPTEMBER OF 2000. WE NEED TO BE SPENDING OUR RESOURCES TO BUILD THE SUPPORT FOR THESE NEW WEAPONS SYSTEMS. THE BUILDINGS WE BUILD TODAY NEED TO SUPPORT THOSE, AND THE AVAILABILITY. AND WE BEST DO THAT BY MOVING THE MARINE CORPS AIRCRAFT AT BEAUFORT UP HERE, AS WAS STATED PREVIOUSLY, AND LET CECIL FIELD MOVE INTO BEAUFORT. IF WE DO THAT WE HAVE ONE CENTRAL LOCATION FOR THE NEW JOINT STRIKE FIGHTER AIRCRAFT FOR THE MARINE CORPS, WE HAVE ONE JOINT LOCATION FOR THE NAVY IN TERMS OF THEIR F-18s, SINCE

3 THEIR F-14s AT OCEANA ARE GOING TO BE REPLACED BY THE JOINT STRIKE FIGHTER. IF WE DO THAT WE CAN, IN MY COST PROJECTIONS, SEE SAVINGS OF $300 MILLION TO A BILLION DOLLARS COMPARED WITH THE OTHER SCENARIOS WE'VE TALKED ABOUT THIS EVENING.

THANK YOU.

HH-2 The EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, relocating aircraft from MCAS Beaufort to MCAS Cherry Point is outside of the scope of this analysis. It is also outside the scope of this analysis to analyze the impact of the F/A-18 E/F or the Navy version of the joint strike fighter aircraft. Please see Section 9 of the EIS for a discussion of the F/A-18 E/F.

HH-3 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

Speaker: Mr. David Rowe
102 Foxhall Street
Havelock, NC 28532

I'M DAVID ROWE. I LIVE AT 107 FOXHALL STREET IN HAVELOCK. I'M RETIRED FROM THE MARINE CORPS.

1 AND I'VE STARTED READING THIS EIS BASICALLY COVER-TO-COVER, AND I THINK THE SECRETARY OF THE NAVY IS OWED MORE FACTS AND LESS PRESUMPTIONS. THE TOTAL NUMBER OF SQUARE FOOT OF HANGER SPACE AT EACH OF THE THREE INSTALLATIONS SHOULD HAVE BEEN ADDRESSED AND WASN'T, THE TOTAL UTILIZATION AND THE TOTAL CAPABILITIES TO LOAD OUT THOSE BASES. FOR EXAMPLE, 1968, CHERRY POINT, NORTH CAROLINA, HAD 200 AIRCRAFT, PLUS OR MINUS 10. THE SQUADRON COMMANDER WAS DIRECTED TO FLY A MINIMUM OF 1000 FLIGHT HOURS OR HE WAS RELIEVED OF HIS COMMAND AND WE WANTED THE NEW GUY TO DO IT. TODAY A SQUADRON COMMANDER HAS BASICALLY GOT TO FLY ABOUT 300 HOURS, AND IF HE FLIES 301 THEY'RE LOOKING FOR NEW EMPLOYMENT, BECAUSE CONGRESS

DR-1 Total square footage of hangar space at each of the three installations was analyzed and used to determine the excess capacity of each installation in accordance with NAVFAC P-80 criteria.

2 DOESN'T FUND US QUITE AS GOOD AS THEY USED TO FOR PROFICIENCY. WITH THAT IN MIND, AND THE TOTAL FLIGHT HOURS THAT YOU GOT TO GO TO THE RANGES, WHY WOULDN'T YOU WANT TO BE AS CLOSE TO YOUR BOMBING RANGES AS POSSIBLE? THE SECOND THING IS, THE TOTAL NUMBER OF BOMBS

DR-2 Proximity to training ranges was a screening parameter in selecting receiving installations for the aircraft. The distance from NAS Oceana to either BT-9 or BT-11 is acceptable for the current fuel configuration, training requirements, and funding levels of the Atlantic Fleet F/A-18s.

3 DROPPED ON THOSE RANGES DOES HAVE A CUMULATIVE EFFECT WITH THE NEW CHEMICALS USED IN MARK 76s.

THE RUNWAYS AT CHERRY POINT DEFINITELY HAVE THE CAPABILITIES. THEY DON'T HAVE TO BE EXPANDED, OTHER THAN RESURFACE WHAT ALREADY EXISTS UNDERNEATH THE GROUND. THE HANGER SPACES AT CHERRY POINT HAVE WENT UP ALMOST 40 PERCENT SINCE 1968 WHEN I CAME HERE AS A YOUNG CORPORAL. JUST DRIVING ON THE BASE YOU CAN FIGURE THAT OUT REAL QUICK BY SEEING ALL THE NEW FANCY BRICKS IN BETWEEN WHAT USED TO BE A BUNCH OF WHITE BUILDINGS.

DR-3 As discussed in Section 3.1.3.1 of the EIS, the MK-76 practice bombs contain only inert materials. All chemicals present in signal cartridges used with the MK-76s are discussed in Sections 3.1.3.1 and 4.3.1. These chemicals include red phosphorus and titanium tetrachloride. As discussed in the EIS, neither of these chemicals is expected to adversely affect water quality or soil chemistry at the ranges.

4 AND THE CONSTRUCTION COSTS, DOLLAR FOR DOLLAR, WHEN SOMEBODY GIVES AN ARBITRARY NUMBER IT COSTS $1 MILLION TO BUILD A 10,000 SQUARE FOOT BUILDING AT CHERRY POINT, THE SAME COST DOESN'T' APPLY TO BEAUFORT, SOUTH CAROLINA OR NORFOLK, VIRGINIA. THE ECONOMY DICTATES WHAT'S GOING TO SELL FOR THAT PRICE AND THE DEMAND FOR THOSE MATERIALS. THAT SHOULD BE ADDRESSED IN THE THAT DOCUMENT.

DR-4 Each installation's area cost factor was used to compute construction costs for that installation in accordance with the appropriate Department of Defense factor published in the *Military Handbook.*

5 AND SPACE UTILIZATION SHOULD BE ADDRESSED IN THAT DOCUMENT. THERE COULD BE A LOT OF SPOTS WHERE YOU COULD PUT A F-18 SIMULATOR AT CHERRY POINT WITHOUT ANY CONSTRUCTION. THERE ARE CERTAINLY PLACES TO PUT YOUR WEAPONS DEPARTMENT WITH NO CONSTRUCTION.

SO I THINK THE SECRETARY OF THE NAVY, AND I THINK THE TAXPAYERS, BEFORE HE MAKES THAT DECISION, HAVE IT IN THEIR BEST INTERESTS THAT YOU GIVE HIM ALL THE FACTS YOU CAN. I DON'T KNOW THE SCIENTIFIC DATA. I DON'T CARE ABOUT NOISE. I DON'T CARE ABOUT POLLUTION FROM THE NOISE AND FIGURING OUT ALL THOSE FORMULAS. BUT FACTS - THAT'S SQUARE FOOTAGE, DOLLARS, RUNWAYS EXISTENCE AND UTILIZATION, CLOSEST TO THE TARGETS, AND TAXPAYERS' SAVINGS. IF YOU USE A WEAPON SYSTEM FOR TEN YEARS AND YOU CAN BE AT THE TARGET IN 12 MINUTES AND YOU CAN WORK IT OVER FOR 30 MINUTES, THAT'S HOW THE PILOT GETS PROFICIENT IN BOMBING THAT TARGET AS HE NEEDS TO BE.

THANK YOU.

DR-5 Additional weapons department space is not required under either ARS 3 or ARS 5. ARS 3 does not require a flight simulator facility. ARS 5 does require a flight simulator facility; however, no excess space is available to support the F/A-18 flight simulator facility at MCAS Cherry Point. New construction is required.

Speaker: Mr. Louis J. Balogh
249 Highway 70 West
P.O. Box 858
Havelock, NC 28532

WELL, FIRST OF ALL I'D LIKE TO WELCOME YOU VERY, VERY MUCH TO CHERRY POINT. IT'S TERRIFIC TO SEE A BLUE SUIT OTHER THAN IN THE HOSPITAL SITUATION. WE LOOK FORWARD TO SEEING A LOT MORE BLUE SUITS.

SO FAR THIS EVENING WE'VE BEEN TALKING A LOT ABOUT AIRPLANES. BUT EVERYONE OF THOSE AIRPLANES IS SUPPORTED BY EITHER A PILOT AND/OR A LOT OF GROUND CREW. AND EACH ONE OF THOSE GROUND CREW IS ALSO SUPPORTED BY A LOT OF DEPENDENTS. AND THAT'S ONE THING THAT WE'VE HAD AN AWFUL LOT OF SUCCESS WITH IN OUR AREA HERE AT CHERRY POINT, AS FAR AS I'M CONCERNED. AND THAT'S DEALING WITH BOTH THE MILITARY PERSON AND THEIR DEPENDENTS.

THE QUALITY OF LIFE IN HAVELOCK IS EVIDENT TO ME. I'M HERE BY CHOICE. I'M NOT A RETIRED ANYTHING. I'M STILL ON MY FIRST CAREER, VERY HAPPILY ON THAT FIRST CAREER. BUT I WILL SAY THIS, WE HAVE MORE RETIRED PEOPLE NOW IN HAVELOCK - REALLY THE FOUR-COUNTY AREA. WE HAVE TO INCLUDE CARTERET COUNTY AND CRAVEN COUNTY, AND NEW BERN AS BEING ONE OF THOSE AREAS - AS A BEAUTIFUL PLACE TO RETIRE. WE HAVE PEOPLE COMING UP FROM FLORIDA TO LIVE HERE. WE'VE GOT PEOPLE COMING DOWN FROM NEW YORK TO LIVE HERE, BY CHOICE, NOT ORDERED BY THE FEDERAL GOVERNMENT. SO WHAT I'M TRYING TO SAY IS WE HAVE AN AREA HERE WHERE WE ARE WITHIN A COUPLE OF HOURS OF EAST CAROLINA UNIVERSITY. IT'S ALREADY BEEN MENTIONED, THEY'RE A MEDICAL SCHOOL, AND THEY ALSO HAVE A PRETTY GOOD FOOTBALL TEAM SOMETIMES. WE ALSO HAVE WILMINGTON VERY CLOSE.

Thank you for your comments; no response required.

WHEN YOU GET CAUGHT IN THE BELTLINE TRAFFIC IN WASHINGTON, D.C., OR IN NORFOLK IF YOU'VE EVER TRIED TO GO THROUGH THERE ON THE CHESAPEAKE BAY BRIDGE TUNNEL, YOU CAN SPEND MORE TIME IN A FIVE-MILE AREA THAN YOU CAN GOING TO RALEIGH AND BACK. SO WHAT I'M TRYING TO SAY IS THE QUALITY OF LIFE IN HAVELOCK IS FANTASTIC. YOU'VE GOT EXCELLENT SCHOOLS; YOU'VE ALREADY SEEN THAT. AND I'LL PUT OUR SCHOOLS UP AGAINST ANYBODY'S SCHOOLS IN THE UNITED STATES. ONE OF THE MEASURES IS HOW MANY KIDS DO YOU HAVE PASSING THE SATs OR GETTING GOOD SCORES. WELL, IF YOU ONLY HAVE THE CREAM OF THE CREAM TAKE THE SAT YOU'RE GOING TO HAVE A HIGH PASS RATE. BUT IF YOU INSIST THAT EVERYBODY HAVE AN OPPORTUNITY TO TAKE THAT TEST, WHETHER THEY'VE BEEN COACHED OR NOT, THEN YOU'RE GOING TO HAVE PERHAPS A LOWER RATE OF PASSAGE, OR A LOWER NET SCORE, BUT YOU ARE GOING TO HAVE THE BEST KIDS GOING TO COLLEGE AND GETTING AN EDUCATION THAT YOU WILL HAVE ANYWHERE. SO I'LL PUT UP NORTH CAROLINA AGAINST SOUTH CAROLINA OR VIRGINIA WHEN IT COMES TO A QUALITY LIFE.

AND WHAT IS AN ENVIRONMENT? AN ENVIRONMENT IS A QUALITY PLACE TO LIVE.

Speaker: Mr. Darryl Garner
Mayor, City of Newport
Newport, NC

THANK YOU, CAPTAIN. I APOLOGIZE FOR BEING LATE, BUT I WILL EXPLAIN TO YOU THAT WE'RE SO OBJECTIVE ABOUT SEVERAL OF THE SQUADRONS BEING LOCATED HERE THAT WE HAVE BEEN DISCUSSING THE POSSIBILITY OF A BOND REFERENDUM WHICH WE'RE HAVING THE 4TH OF NOVEMBER TO UPGRADE THE WATER SYSTEM IN NEWPORT TO ACCOMMODATE SOME OF THE GROWTH THAT'S GOING TO BE ASSOCIATED WITH THAT.

I AM PRESIDENT OF THE CIVILIAN/MILITARY COMMUNITY COUNSEL, WHICH IS COMPRISED OF CARTERET, CRAVEN, PAMLICO, AND JONES COUNTIES, AND THE MARINE CORPS AIR STATION. MANY OF THE PEOPLE BEHIND ME ARE FRIENDS OF OURS WHO, HAD IT NOT BEEN FOR CHERRY POINT, WOULD NOT BE FRIENDS OF OURS BECAUSE THEY WOULD HAVE NOT LOCATED HERE. BUT, OF COURSE, THEY DID.

THE LOGISTICS AND THE INFRASTRUCTURE HAVE BEEN ADDRESSED THIS EVENING, AND SO I WILL NOT ADDRESS THOSE. BUT I WILL TELL YOU THAT THE QUALITY OF LIFE IN CARTERET, CRAVEN COUNTIES, AND PAMLICO COUNTY, SHOULD THE DECISION BE MADE TO LOCATED THESE SQUADRONS - SEVERAL OR ALL OF THE AIRCRAFT - AT MARINE CORPS AIR STATION CHERRY POINT, THEY WILL BE WELL RECEIVED.

THE SEVERAL COUNTIES HAVE ALREADY BEGUN - AND THEY DID THIS A COUPLE OF YEARS AGO - MAKING THE NECESSARY ARRANGEMENTS WITH ADDING INFRASTRUCTURE, HAVING SCHOOL BOND REFERENDUMS TO BUILD NEW SCHOOLS. WE'VE DONE THOSE THINGS WHICH WERE APPROPRIATE TO EQUIP US SHOULD THESE SQUADRONS BE LOCATED AT CHERRY POINT. AND IF THAT DECISION IS MADE FOR ANY OR ALL, THEY WILL BE WELL-RECEIVED, THEY WILL BE WELL-HOUSED, AND THEY WILL BE CITIZENS OF THE COMMUNITY HERE AND BE MADE TO HAVE THAT VERY FEELING.

AND SO ON BEHALF OF ALL OF THESE, IT IS MY RECOMMENDATION, AS HAS BEEN STATED HERE SO ABLY BY SO MANY OTHERS, TO SEND ANY AND ALL OF THEM TO CHERRY POINT. WE CAN TAKE CARE OF THEM.

THANK YOU, SIR.

Thank you for your comments; no response required.

Speaker: Mr. Hurst
(Continuation)

4 JUST ONE ITEM. ON ARS 6 THAT WAS ADDRESSED IN TERMS OF MOVING BEAUFORT UP HERE, I REALIZE THAT IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT THE STATEMENT WAS MADE THAT IT WAS NOT ALLOWED TO LOOK AT THIS BY THE BRAC, THAT THIS WAS BEYOND THE SCOPE OF WHAT WAS CHARGED WITH THE BRAC. I DO HAVE A LETTER SIGNED OUT OF THE PENTAGON, OPNAV, BY ADMIRAL MCGINN (PHONETIC) IN MARCH TO SENATOR THORNTON (PHONETIC) SAYING THAT IT WOULD BE ADDRESSED, HE WAS CONFIDENT THAT IT WOULD BE FULLY COVERED. THAT'S THE ONLY ITEM THAT I HAVE. AND A COPY OF THE LETTER HAS BEEN PROVIDED IN THE COMMENT SHEET.

[Mr. Hurst was given the opportunity to resume his comments after all speakers had completed their presentations.]

HH-4 Please see response to HH-2.

[Mr. Hurst provided a copy of the letter referenced and other supplemental material, which is included in the Administrative Record.]

Mr. Alvin L. Jackson
103 Angela Dr.
Havelock, NC

Comment:

Common sense both tax dollars and defense dollars should be move at least 5 squadrons to MCAS Cherry Point, N.C. Navy should get more for the buck, training is one of the most important element. Cherry Point would be best for that.

Response:

Thank you for your comments; no response required.

Mr. Stephen M. Zucks
Cherry Point Employees Association
P.O. Box 186
Havelock, NC 28532

Comment:

In view of how this is being presented it appears a political decision has been made in favor of Oceana. This relocation to CP is for realtors and bankers. The station and NADEP will not benefit but for unwanted noise and congestion. I hope the commission looks at alternatives to Cherry Point! **[SMZ-1]**

Response:

SMZ-1 Section 2 of the EIS describes the process of alternatives screening in accordance with the requirements of the 1995 BRAC Commission, federal regulations, and Navy guidelines. Three of the five alternatives (ARS 1, ARS 2, and ARS 4) consider relocation of aircraft to installations other than MCAS Cherry Point.

A.3 Public Hearing, Bayboro, NC

A.3 Public Hearing Transcript, Bayboro, NC

Speaker: Mr. Albert R. Bell, Esq.
Ward and Smith Attorneys
1001 College Court
New Bern, NC 28562

MY NAME IS ALBERT BELL. I AM A MEMBER OF THE LAW FIRM OF WARD AND SMITH, AND WE'RE HERE ON BEHALF OF VARIOUS INTERESTS THAT WE REPRESENT WHO HAVE CONCERNS ABOUT THE DECISION THAT'S GOING TO FOLLOW THIS PROCESS.

I WAS HERE LAST NIGHT -- NOT HERE, BUT I WAS AT CHERRY POINT, AND I HAVE TO TELL YOU IN ADVANCE THAT I THINK I MUST BE THE ONLY PERSON IN THE EASTERN PART OF THE STATE THAT'S IN THE ARMY, OR THAT WAS IN THE ARMY, NOT THE NAVY OR THE MARINE CORPS. EVERYBODY LAST NIGHT HAD A CONNECTION THAT THEY WERE VERY PROUD OF. THE ARMY HAS ITS DAYS AS WELL.

I HAD THE BENEFIT OF PARTICIPATING IN THE 1995 BRAC PROCESS - NOT THE '93 I DID NOT - BUT IN '95, TO INCLUDE THE HEARINGS IN BALTIMORE AND THE HEARINGS IN ALABAMA. SEVERAL DIFFERENT ASPECTS OF THAT, AND THEN IN PREPARATION FOR A POSITION FROM A NORTH CAROLINA INTEREST STANDPOINT. SO I DO HAVE A GOOD SENSE OF THE PROCESS. I UNDERSTAND WHERE YOU ARE AND I UNDERSTAND, I BELIEVE, WHAT YOUR CONCERN IS. AND I WILL COME BACK TO A POINT THAT WAS MADE BY ANOTHER PARTNER OF MINE LAST NIGHT, CLARK WRIGHT. HE WAS SPEAKING FROM THE PERSPECTIVE OF "AS YOUR LAWYER" LOOKING AT A DOCUMENT AND ULTIMATELY THE DECISION THAT YOU WILL HAVE TO BE ABLE TO DEFEND. IN OTHER WORDS, THE EIS, IT WILL EITHER HAVE DEFICIENCIES WHICH PROVE FATAL TO IT OR, IT WILL NOT. AND IF YOU CAN DEFEND IT, OF COURSE, IT WON'T.

Bell (Cont.)

BUT A COUPLE OF CONCERNS THAT I HAVE FROM LOOKING AT IT FROM A LONG-TERM PERSPECTIVE, INCLUDING AT LEAST ALL OF THE '95 PROCESS AND WHERE WE ARE NOW, FOCUSING MY ATTENTION, AT LEAST, ON A COUPLE OF DEFICIENCIES. ALL THE ARSs, ALL OF THEM, INCLUDE OCEANA. NOW I HEARD MR. CECCHINI EXPLAIN THAT STARTS AS A FUNCTION OF EXCESSIVE CAPACITY, AND THE NEED, ALSO, TO TRY TO SINGLE-SITE, BY NAVY PREFERENCE, THE AIRPLANES, AND THEN FINALLY TO KEEP THE FLEET REPLACEMENT SQUADRON IN PROXIMITY AS WELL AS YOU CAN. THERE IS, HOWEVER, NO ARS THAT INVOLVES A DIRECT COMPARISON BETWEEN CHERRY POINT AND OCEANA FOR ALL THE AIRPLANES. THREE AND FIVE CERTAINLY INCLUDE REFERENCES TO ALLOCATIONS TO CHERRY POINT. ONE, OBVIOUSLY, SENDS ALL OF THE AIRPLANES TO OCEANA; THERE IS NO DIRECT COMPARISON. A DEFICIENCY. YOU WOULD ASK THE QUESTION, WHY?

1

WS(AB)-1

The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5.1 presents a comparative summary of all ARSs.

ANOTHER DEFICIENCY IS THE STATE AND LOCAL INFRASTRUCTURE EXPENSES INCURRED. THEY'RE NOT DIRECTLY ADDRESSED. THE MILITARY EXPENSE THAT'S BEEN INCURRED SINCE THE '93 BRAC DECISION -- OR BETWEEN '93 AND '95, THAT'S ADDRESSED TO SOME EXTENT, BUT NOT WHAT OCCURRED IN A PERIPHERAL SENSE TO THAT. AND THAT IS THE THINGS YOU HEARD SOME REFERENCES TO LAST NIGHT, AND MAY AGAIN TONIGHT, I DON'T KNOW, BUT THE THINGS THAT THE STATE GOVERNMENT, THE LOCAL GOVERNMENT, THE LOCAL PEOPLE DID. MONEY THEY SPENT IN RELIANCE ON THE '93 DECISION, WHICH WAS SEND THEM ALL HERE. THOSE WERE REAL DOLLARS EARNED BY REAL PEOPLE; THOSE WERE REAL TAX DOLLARS PAID BY REAL PEOPLE. AGAIN, A QUESTION, IT'S NOT THERE, WHY?

2

WS(AB)-2

Improvements to the local community are reflected in the description of the existing environment around MCAS Cherry Point. Please see Section 3.3 of the EIS.

Bell (Cont.)

3 NO RELATIVE POSITIVE ECONOMIC COMPARISON. YOU'RE LOOKING AT A RURAL AREA WITH SOME BEAUTIFUL NATURAL RESOURCES, A GREAT WORK ETHIC, OBVIOUSLY SOMETHING POISED TO REALLY BENEFIT FROM SOMETHING THAT WOULD HAVE A SIGNIFICANT IMPACT - SUCH AS THE ADDITION OF ADDITIONAL PERSONNEL, THE JOB OPPORTUNITIES THAT WOULD GO WITH THESE AIRPLANES - VERSUS A METROPOLITAN AREA THAT, CERTAINLY IN SOME SENSE COULD BENEFIT, BUT, ESSENTIALLY IT WOULD BE SUCKED IN AND YOU WOULDN'T BE ABLE TO TELL THE DIFFERENCE THE NEXT DAY. AGAIN, THAT QUESTION REALLY IS NOT ADDRESSED; AND THE QUESTION HAS TO BE, IF I'M YOUR LAWYER, I HAVE TO ASK YOU, ARE YOU IN A POSITION TO DEAL WITH THAT WHEN THIS PROCESS POST-DECISION IS CHALLENGED, AS REALISTICALLY IT WILL.

THE BRAC '93 DECISION WAS MADE BY A COMMISSION, AN INDEPENDENT COMMISSION. THE BRAC '95 DECISION, OF COURSE, CHANGED THAT. AND YOU HAVE TO ASK, WHY? OBJECTIVELY IT WOULD BE BASED ON MATERIAL INFORMATION THAT CAME TO LIGHT DURING THE COURSE OF THE TWO YEARS. PERHAPS YOU COULD ALSO CONCLUDE THAT IT WAS A NAVY INTEREST VERSUS THE INTEREST OF AN INDEPENDENT COMMISSION THAT SPOKE IN '93.

THE OTHER ASPECT OF DEFENDING THE EIS THAT I THINK HAS TO COME TO MIND FOR YOU, AND AS YOUR COUNSEL I WOULD SUGGEST THAT, IS THE INTEGRITY OF THE PROCESS. BUT ULTIMATELY, CERTAINLY, YOU HAVE TO BE ABLE TO CROSS THE "Ts" AND DOT THE "Is" AND SUPPORT SPECIFICS. BUT EVENTUALLY THE COMMUNITY AT LARGE - AND THAT'S NORTH CAROLINA, MAYBE SOUTH CAROLINA, VIRGINIA - IS GOING TO STAND BACK AND LOOK AT THE INTEGRITY OF THE PROCESS, AND IT'S EITHER GOING TO BE THERE OR IT'S NOT. AS I SAID, THE '93 DECISION, AN INDEPENDENT COMMISSION. THE '95 DECISION OBVIOUSLY WAS A COMPLETE CHANGE IN TERMS OF THESE AIRPLANES. AND THE ISSUE CERTAIN IS RAISED AS TO THE ROLE THE ACTIVE UNIFORMED NAVY PLAYED IN THAT, BECAUSE IT'S CLEAR. I MEAN, MR. CECCHINI STARTS OUT WITH -- THE DEIS STARTS OUT, THE PREFERENCE OF THE NAVY IS OCEANA.

THE '95 REVERSAL OCCURRED WITH SOME UNUSUAL NUMBERS AS PART OF THAT PROCESS. YOU MAY RECALL THE P-80 STANDARD WAS APPLIED TO CHERRY POINT. IT JUST WAS NOT APPLIED IN THE NAVY'S NUMBERS BEFORE THE '95 DECISION. IT HAS BEEN ADDRESSED SUBSEQUENTLY; I UNDERSTAND THAT.

WS(AB)-3 The economic impact of each ARS on the local communities is discussed in the EIS. The economic impact of ARS 3 and ARS 5 on the four counties around MCAS Cherry Point is discussed in Sections 6.1.5 and 8.1.5 of the EIS, respectively.

Bell (Cont.)

THE INFORMATION THAT WAS PRESENTED DURING THE COURSE OF TIME LEADING UP TO THE '95 DECISION OBVIOUSLY INVOLVED AN EFFORT ON OUR PART, THE VARIOUS PEOPLE CONCERNED WITH THE PROPOSED CHANGE OF THE BRAC '93 DECISION. THERE'S CLEAR INSTANCES WHERE THERE WERE CONTRACTUAL COSTS FOR CONSTRUCTION ALLOCATED TO CHERRY POINT THAT WERE SIMPLY OUT OF LINE. THEY DID NOT MAKE ANY SENSE. THERE WERE STATEMENTS REGARDING THE NECESSARY ACTIVITIES THAT HAD TO OCCUR AT CHERRY POINT, THINGS THAT HAD TO BE BUILT - SOME DID, OF COURSE, AND THERE'S REFERENCE TO IT NOW - BUT NOT WITH RESPECT TO OCEANA. EFFECTIVELY, OCEANA WAS A TURNKEY READY TO DROP THE AIRPLANES IN AND GO FROM THERE. WELL, SUBSEQUENTLY, I THINK CLEARLY THE DEIS DOES ADDRESS SOME CONCERNS THAT OCEANA DOES HAVE. IT CAN'T HOUSE THE PEOPLE IF THEY'RE ON BASE. IT DOESN'T HAVE THAT, IT'S GOING TO HAVE TO BUILD IT. CHERRY POINT HAS IT. I THINK THAT ISSUE HAS BEEN PUT TO REST.

5 YOU BRING IN PEOPLE TO THIS COMMUNITY, YOU HAVE SOME SPECIFICS THAT DON'T APPEAR IN THE DEIS AND DID APPEAR IN THE EARLY MATERIAL RELATIVE TO THE ENVIRONMENT INTO WHICH THEY WILL COME. VERY LOW CRIME. AN EXTREMELY GOOD CIVILIAN HOUSING SITUATION. THINGS THAT EXIST HERE TO A MUCH GREATER DEGREE THAN YOU HAVE AT OCEANA, THEY'RE SIMPLY NOT ADDRESSED.

WS(AB)-5 The availability of housing in the communities around MCAS Cherry Point and NAS Oceana is addressed in Sections 3.3.5.1 and 3.1.5.1 of the EIS, respectively. The evaluation of alternatives considers operational, economic, and environmental factors.

6 THE NOISE ISSUE. ADDRESSED IN THE DOCUMENT, BUT ADDRESSED FROM THE STANDPOINT OF AVERAGES; BASICALLY 24-HOUR AVERAGES. A 75 DECIBEL 24-HOUR AVERAGE KIND OF PALES BESIDE A 110 DECIBEL NOISE LEVEL THAT YOU WOULD RECEIVE IN THE TAKEOFF OF ONE OF THESE AIRPLANES, OR MORE. YOU'RE MUCH MORE OF AN EXPERT AT THAT THAN I AM. A 24-HOUR AVERAGE IS VERY MISLEADING. I THINK THAT'S WHAT YOU HAVE HERE.

WS(AB)-6 The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

I THINK THE AICUZ CONTOURS, AGAIN, LOOKING AT IT FROM THE PERSPECTIVE OF ONE ESSENTIALLY IN THE MIDDLE OF A CITY - NOT A SMALL CITY - VERSUS A RURAL ENVIRONMENT, AND THE THINGS THAT APPLY THERE, IT'S MORE THAN SQUIGGLY LINES, SHADED OR OTHERWISE. IT'S WHAT'S INCLUDED IN THOSE LINES ONCE YOU LEAVE THAT BASE. AND I THINK WHAT YOU'VE GOT IS A METROPOLITAN AREA VERSUS ESSENTIALLY A PASTORAL LANDSCAPE.

Bell (Cont.)

TO SUMMARIZE, EVENTUALLY EVERYBODY AFFECTED BY THIS PROCESS IS GOING TO HAVE TO STEP BACK AND DECIDE THAT THE PROCESS WAS FAIR, THAT THE INTEGRITY OF THE PROCESS, AS INTENDED TO BE FAIR, WAS IN FACT FOLLOWED THROUGH, AND THAT WHILE THEY MAY OR MAY NOT AGREE WITH THE OUTCOME, THEY WILL AT LEAST BELIEVE THEY HAD THEIR OPPORTUNITY TO SPEAK IN SOME MEANINGFUL WAY. YOU'RE HERE TONIGHT - YOU'VE BEEN OTHER PLACES EARLIER IN THE WEEK AND I'M SURE YOU HAVE OTHER PLACES TO GO - SO AT LEAST IN TERMS OF THE PROCESS PROVIDING AN OPPORTUNITY TO SPEAK, IT'S HERE. THEN THE BIGGER PROCESS WILL DECIDE THE RELATIVE MERITS OF WHAT YOU HEAR AND WHAT YOU DO WITH THE INFORMATION YOU GET.

BUT WHAT I HOPE DOES NOT HAPPEN IS THIS. WHEN YOU FINISH IT -- WELL, THE DRAFT EIS IS A VERY IMPRESSIVE DOCUMENT. IF I HAD ONE, IT LOOKS GOOD, IT IS BIG, IT'S IMPRESSIVE, IT'S SIGNIFICANT, IT'S GOT A LOT OF INFORMATION IN IT. AND THE FINAL EIS IS GOING TO BE MARVELOUS. IT'S GOING TO BE BOUND, IT'S GOING TO BE BIGGER, IT'S GOING TO LOOK EVEN BETTER. IT'S GOING TO BE AN IMPRESSIVE DOCUMENT THAT ANYBODY CAN FLIP TO A PAGE AND FIND SOMETHING. MY CONCERN IS, IF ALL OF THAT CONCLUDES WITH JUST THIS, THEN THERE WILL BE A PROBLEM THAT WILL HAVE TO BE ADDRESSED IN THE POST-DECISION WRANGLING - WHATEVER THAT IS AND WHENEVER THAT COMES - IF INSTEAD OF LOOKING AT THE WHOLE DOCUMENT AND TRYING TO DISCERN WHAT'S IN THERE AND WHAT IT MEANS, IF IN REALITY ALL YOU HAVE TO DO IS FLIP TO THE BACK PAGE WHERE IN BIG BLOCK LETTERS WHAT IT SHOULD SAY IS, "IT'S BECAUSE THE NAVY WANTS IT THIS WAY." AND IF THAT'S WHAT THE EIS ULTIMATELY BECOMES, THEN I THINK YOU WILL HAVE A DOCUMENT DEFICIENT IN THE INTEGRITY OF THE PROCESS AND THE MATERIAL WITHIN IT, AND ONE THAT WILL PROVIDE A PROBLEM.

7

THANK YOU FOR EXTENDING ME THE COURTESY OF ADDITIONAL TIME.

WS(AB)-7 Thank you for your comments; no response required.

Speaker: Ms. Grace B. Evans
P.O. Box 355
Oriental, NC 28571

MY NAME IS GRACE EVANS. I AM A RESIDENT OF ORIENTAL, PAMLICO COUNTY, AND AS SUCH I HAVE SOME OBJECTIONS, MAINLY TO NOISE AND POLLUTION, AS SHOWN IN THE PROPOSED REALIGNMENT OF THE F/A-18 AIRCRAFT AND OPERATIONAL FUNCTIONS TO MCAS CHERRY POINT.

I CAN FIND NOTHING POSITIVE IN THE EIS FOR PAMLICO COUNTY. IN FIGURE 3.3-4 IT NOTES THAT THERE ARE NO ACTIVE MILITARY PERSONNEL LIVING IN PAMLICO COUNTY, THAT 2.7 PERCENT OF THE CIVILIAN POPULATION OF THE COUNTY WORK AT THE BASE, COMPRISING 1.2 OF THE TOTAL MILITARY AND CIVILIAN WORKFORCE. FURTHER IT IS NOTED THAT IF THE REALIGNMENT OCCURS, EITHER ARS 3 WITH 36 AIRCRAFT, OR ARS 5 WITH 60 AIRCRAFT, IF THEY TAKE PLACE, PAMLICO'S POPULATION MIGHT INCREASE BY 20, WITH TEN MILITARY HOUSEHOLDS RELOCATING,
1 BUT THAT THERE WOULD BE NO CHANGES IN LOCAL TAX COLLECTION. AND THIS IS WITH A PROJECTED IMPACT FIGURED FOR THE FOUR-COUNTY AREA OF 149 MILLION. NOW, I CAN FIND THAT IN THE EIS, BUT I COULDN'T FIND THAT PARTICULAR FIGURE OUT ON THE BOARD. THAT'S THE FIRST THING.

SECOND, THERE ARE OMISSIONS IN THE EIS. IN FIGURE 3.1-7, THE BAYBORO AND NORTH SIDE OF NC 304 IS BLANK AS FAR AS POPULATION, LAND USE, BUILDINGS, ET CETERA, WITH THE CAVEAT THAT THE DATA IS NOT AVAILABLE. THE MERRITT AND FLORENCE AREA, WHICH ARE TWO PRETTY MUCH CROSSROADS, SHOW A GREAT DEAL MORE DEVELOPED AREA THAN ORIENTAL, ARAPAHOE, OR MINNESOTT, THREE OF OUR MORE DEVELOPED AREAS. AND
2 MINNESOTT SHOWS ON THE MAP AS MARSH AND FOREST. THE MINNESOTT FERRY CROSSING, WHICH IS THE SECOND MOST USED IN THE STATE OF NORTH CAROLINA, CAMPS SEAGULL AND DON-LEE, WHICH ARE YEAR-ROUND CAMPS THAT DO SERVE THOUSANDS OF PEOPLE WHO ARE OUTDOORS - THEY'RE NOT INDOORS AS THE SCHOOLS MIGHT BE WHERE YOU'RE GOING TO HAVE THE AIR CONDITIONING INCREASED - THEY ARE NOT SHOWN IN ANY OR SPOKEN TO IN ANY OF THE MATERIAL IN THE EIS. THEY ARE DIRECTLY IN THE LANDING PATH NOW - MINNESOTT, DON-LEE, SEAGULL - AND THEY ARE IMPACTED GREATLY, AND ARE GOING TO BE IMPACTED MORE.

GBE-1 Thank you for your comments; no response required.

GBE-2 Land use/cover was provided by the North Carolina Center for Geographic Information and Analysis. The information is obtained from LandSat 5 satellite images. Contributors to these data include Earth Observation Satellite Corporation and North Carolina State University. The data were reviewed in November 1996 and represent the most up-to-date data available. Areas identified as not available could be the result of cloud cover or morning fog that occurred when the area was photographed. The locations of Camps Sea Gull, Seafarer, and Don Lee, and the Cherry Branch to Minnesott Ferry Crossing have been added to Figure 3.1-7. In addition, descriptions of the camps have been included in Section 3.1.3. Under ARS 3, the camps would be outside of the 65-75 dB Ldn noise zone. Under ARS 5, the 65-75 dB Ldn noise zone would increase and would include Camps Sea Gull and Don Lee.

Evans (Cont.)

3 NO OUTLYING FIELD FOR CHERRY POINT IS IDENTIFIED, AND THE USE OF BRANT ISLAND AS A JETTISONING AREA IS NOT MENTIONED. BRANT ISLAND IS NOTED, NOT ONLY FOR THE EMISSIONS AND ORDNANCE THERE, BUT ALSO WITH THE F/A-18 SQUADRONS 24 PERCENT MORE USAGE, THERE WILL BE AN INCREASE IN NOISE LEVEL. BUT THE EIS STATES QUOTE, "THIS RANGE IS REMOVED FROM ANY DEVELOPMENT, THEREFORE, THERE WOULD BE NO SIGNIFICANT NOISE IMPACT" UNQUOTE. I THINK THERE IS QUITE A BIT OF CORRESPONDENCE WITH THE BASE OVER A PERIOD OF SOME 25 TO 30 YEARS SHOWING THAT THE PEOPLE IN GOOSE CREEK ISLAND, BAY RIVER, BROAD CREEK, ORIENTAL, HAVE COMPLAINED ABOUT THE NOISE AS FAR BACK AS THAT TIME.

GBE-3 MCAS Cherry Point has an ALF: Marine Corps Auxiliary Landing Field (MCALF) Bogue. The runway at MCALF Bogue is only 4,010 feet (1,215 meters) and was specifically designed to simulate a Marine Corps expeditionary airfield. MCALF Bogue is thus unsuitable for the level and type of operations, specifically FCLPs, associated with Navy F/A-18 squadrons.

Please see Section 3.1.3 for a discussion of the types and use of ordnance found at the Brant Island Shoal (BT-9) target range.

Section 4.3 of the EIS has been amended to state that no significant land use impacts will occur in the vicinity of the target ranges under ARS 1 because noise levels will not increase more than 2 dB for any of the target ranges, military training routes, and restricted areas. A 2 dB increase in noise would generally not be perceptible to individuals under any airspace.

4 THREE, IT IS PROJECTED THAT WITH ARS 3, THE 65-75 dBN, WHICH I UNDERSTAND IS THE AVERAGE OF ALL FLIGHTS WITHIN A 24-HOUR PERIOD, WILL REACH TO WITHIN ONE-HALF MILE OF THE TOWN OF MINNESOTT AND CAMPS SEAGULL AND DON- LEE, AND ARS 5 WILL EXTEND INLAND OVER AND BEYOND THIS AREA. NOW, AS I STATE, THESE ARE WELL-USED CAMPS, WITH PEOPLE COMING FROM ACROSS THE COUNTRY AS WELL AS FROM THE STATE AND VIRGINIA, THE CLOSER STATES

GBE-4 Please see response to GBE-2

5 THE PROJECTED FLIGHTS FOR 1999 ARE 130,310 DAYTIME - AND DAYTIME FROM 0700 TO 2200 - AND 6,929 NIGHTTIME, 2200 TO 0700. AN INCREASE WITH THE ARS -- F/A-18s OF 23,064 TAKEOFFS, LANDINGS, AND TOUCH-N-GOES. UNDER ARS 5 THERE WOULD BE AN ADDITIONAL 11,624 ADDED TO THAT FIGURE. "AN ADDITION OF MORE THAN THREE SQUADRONS" - AGAIN A QUOTE - "WILL INCREASE TRAFFIC BY 45 PERCENT IN PEAK HOURS."

GBE-5 Thank you for your comments; no response required.

6 LATE IN THE EIS IT IS MENTIONED THAT THE F/A-18C/D AND F-14 ARE TO BE REPLACED BY AN E/F SERIES WHICH MAY BE QUIETER BUT EMIT ABOUT 55 PERCENT MORE NITROGEN OXIDE, WHICH BRINGS UP A MOST TROUBLING PROBLEM. I'M WELL AWARE OF CHERRY POINT'S ACTIONS IN CLEANING UP THE AIR STATION'S LAND AND GROUND WATER - I HELP WITH A GRANT OVER THERE - HOWEVER, THE AMOUNT OF AIR EMISSIONS AT BT-9, BT-11, AND BY AIRCRAFT AIRBORNE AND STATIONERY WITHIN MCAS IS VERY TROUBLING.

GBE-6 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

Evans (Cont.)

7 CONTRARY TO THE EIS, THE WHOLE OF THE NEUSE RIVER ESTUARIAN SYSTEM IS NOT CLASSIFIED AS SB, WHICH IS MEDIUM BETWEEN SA AND SC AS FAR AS ITS USAGE. IT IS SA FROM MINNESOTT OUT TO PAMLICO SOUND. WE WHO LIVE ON THE NEUSE ARE CONCERNED ABOUT THE AMMONIA EMISSIONS FROM WASTE LAGOONS AND THE NO_X EMISSIONS FROM CARS AND FAR-AWAY FACTORIES THAT SETTLE ON THE RIVER. BUT I PERSONALLY HAD NO IDEA OF

8 THE TONNAGE FROM CHERRY POINT'S OPERATIONS, STATED AT PRESENT AS ANNUAL FIGURES OF, FOR AIRCRAFT, 256 TONS OF VOC, THAT'S HYDROGEN CHLORIDE; 280 TONS OF NITROUS OXIDE; 966 TONS OF CARBON MONOXIDE; 37 TONS OF SULFUR DIOXIDE; 128 TONS OF PARTICULATE MATTER; AND THE STATIONARY OPERATION THERE, THE VOC IS 30 TONS; NO_X, 198 TONS; CO, 64 TONS; SO_2, 450 TONS; AND PM_{10}, 19 TONS.

AT BT-9 AND 11, THE VOC, NO_X, SO_2, AND PM_{10} ARE ESTIMATED AT LESS THAN ONE TON EACH ANNUALLY, BUT CARBON MONOXIDE EXCEEDS ONE TON. IT APPEARS FROM THE CHARTS, AS BEST I COULD EXTRAPOLATE, THAT F/A-18s PRODUCE MORE OF THESE POLLUTANTS THAN OTHER AIRCRAFT USING THE RANGES.

9 SOME OF US IN PAMLICO COUNTY HAVE COMPLAINED FOR YEARS OF THE OILY SUBSTANCE ON OUR HOUSES, ROOFS, AND BOATS WHICH WE BELIEVED TO BE FROM AIRCRAFT EMISSIONS. BUT MORE IMPORTANT NOW IS THE HEALTH OF THE NEUSE RIVER AND HOW GREATLY IT, WITH A PREVAILING SOUTHWEST WIND, IS IMPACTED BY THESE EMISSION FROM THE BASE. I SINCERELY BELIEVE WE DO NOT NEED AN INCREASE FROM THE DIRTY F/A-18s AND THE NEXT GENERATION OF F/A-18s - E/Fs. WE NEED TO CONTAIN AND REDUCE THE EMISSIONS NOW PRODUCED.

GBE-7 The classification of the Neuse River has been amended in Section 3.3.11.1 of the EIS. Other comments noted.

GBE-8 Emissions of air pollutants from MCAS Cherry Point's stationary sources, which include jet engine test facilities, are regulated through permits issued by NCDEHNR or, at a minimum, reviewed by NCDEHNR for significance on an individual basis. These reviews evaluate the impact of these emissions on the surrounding area. Aircraft engine emissions due to flight operations are not a source requiring permitting from NCDEHNR. Significant changes in aircraft emissions due to squadron changes are evaluated through the NEPA process and reviewed by NCDEHNR for impacts to the surrounding area.

The calculation of aircraft emissions at BT-9 and BT-11 factors in the number of operations below 3,000 feet and the emission characteristics of each aircraft. As shown in Table 4.3-3 (ARS 1), helicopters would produce 1.0337 tons of CO per year compared to F/A-18s, which would produce 0.0272 tons of CO per year. Table 4.3-5 (ARS 1) shows that AV-8 aircraft and helicopters emit more than 90% of the CO, while F/A-18s account for only 3% of the total.

GBE-9 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

Evans (Cont.)

10 IN CLOSING I NOTE THAT INCREASES IN MILITARY AIRSPACES ARE PROPOSED. THE CORE AND CHERRY MOAs, WHICH WERE FELT TO BE BY SOME EXCESSIVE IN 1985 WHEN THE MOA WAS BEING CONSIDERED, AND A NEW PHELPS MOA - WHICH I CAN'T FIND IN THE EIS JUST WHERE IT'S LOCATED - TO TIE IN STUMPY POINT AND DARE RANGE, AND A NEW SPECIAL USE AIRPORT (SIC), THE GREATER SANDY RUN AREA NEAR CAMP LEJEUNE. I TRUST THAT THESE WILL ALL BE ADDRESSED SEPARATELY, AND NOT BE INCORPORATED AS PART OF THE REALIGNMENT PLAN. I DON'T BELIEVE IT WOULD BE POSSIBLE TO DO THAT, BUT IT MADE ME A LITTLE NERVOUS.

JUST AS CHERRY POINT HAS GROWN, SO HAS THE SURROUNDING LAND. IT IS RETIREMENT, FISHING, TIMBERING, VERY LITTLE INDUSTRIAL USE AT ALL IN PAMLICO COUNTY. AND WE WERE TOLD WHEN THE MOA WAS COMING UP THAT IT WAS NECESSARY TO USE OUR AREA BECAUSE WE WERE SO SPARSELY POPULATED; IT WOULDN'T AFFECT SO MANY PEOPLE. WE ARE NOT AS SPARSELY POPULATED ANYMORE. AND I DON'T THINK ARE WILLING TO GIVE AWAY THE QUALITY OF LIFE, THE ENVIRONMENT, AND THE FISHING LIVELIHOOD. IT WILL BE IMPACTED NEGATIVELY.

I THANK YOU VERY MUCH.

GBE-10 The Phelps MOA and Greater Sandy Run restricted airspace are discussed in Section 9.1.1 of the EIS. Establishment of the Phelps MOA and Greater Sandy Run restricted airspace is independent of the BRAC-mandated F/A-18 realignment.

Speaker: Mr. Frank H. Sheffield, Jr., Esq.
Ward and Smith Attorneys
1001 College Court
New Bern, NC 28562

MY NAME IS FRANK SHEFFIELD, AND I'M WITH THE WARD AND SMITH LAW FIRM IN NEW BERN, AS IS MR. BELL. QUITE FRANKLY I'M SURPRISED THAT MR. BELL DID NOT WORK INTO HIS REMARKS THE FACT THAT HE IS A GRADUATE OF WAKE FOREST UNIVERSITY, ALTHOUGH THAT MIGHT SHED SOME LIGHT ON WHY HE IS AN ARMY MAN. SPEAKING, HOWEVER, AS A UNIVERSITY OF TEXAS GRADUATE, I DO WANT TO HAVE ON THE RECORD THAT I APPLIED TO NAVY OCS AND WAS TURNED DOWN ONLY BECAUSE OF ALLERGIES. AS A RESULT, I WENT INTO THE PEACE CORPS RATHER THAN INTO THE MILITARY SERVICE. BUT THE NAVY'S JUDGMENT PROVED TO BE VERY WISE IN THAT CASE, BECAUSE I STILL HAVE PROBLEMS WITH ALLERGIES, AND BASED UPON A DEEP SEA FISHING TRIP I TOOK LAST YEAR DURING WHICH I WAS SEASICK THE WHOLE TIME, I THINK I WAS ILL-SUITED FOR THE NAVY ON MANY GROUNDS.

WHAT I WOULD LIKE TO DO IS TO CONTINUE ON THE THEME OF IDENTIFYING WHAT I SEE IS SOME POSSIBLE DEFICIENCIES WITH THE DRAFT EIS. AND, AS WAS SAID EARLIER, IT IS CERTAINLY AN IMPRESSIVE DOCUMENT. I KNOW FROM MY OWN EXPERIENCE IN DEALING WITH THESE DOCUMENTS AND PREPARING THEM IN THE PAST, THAT A GREAT DEAL OF WORK GOES INTO THEM, AND I COMMEND YOU AND ALL OF THOSE WHO HAVE BEEN INVOLVED WITH THIS PROCESS, BECAUSE I KNOW A LOT OF HARD WORK GOES INTO IT.

BUT I FEEL LIKE IT'S MY OBLIGATION TO IDENTIFY SOME ISSUES THAT YOU MAY WISH TO THINK ABOUT. ONE OF THEM IS SORT OF A GLOBAL COMMENT, IF YOU WILL. MR. CECCHINI HAD SAID EARLIER THAT THE BRAC COMMISSION DIRECTED THE NAVY TO LOOK AT FACILITIES THAT HAD EXCESS CAPACITY, AND ONE OF THE GOALS OF THE BRAC COMMISSION IS TO BEST UTILIZE THE EXCESS CAPACITY THAT IS AVAILABLE. AND CAPACITY IS TRADITIONALLY THOUGHT OF, AND IT MAY VERY WELL BE DEFINED IN THE BRAC PROCESS, AS PHYSICAL CAPACITY - MILITARY CAPACITY IN TERMS OF HANGARS AND WHATNOT. BUT I THINK IT'S WORTH CONSIDERING THAT CAPACITY - ALTHOUGH IT'S A VERY IMPORTANT CONCEPT IN A MILITARY CONTEXT - IT'S ALSO A VERY FUNDAMENTAL CONCEPT IN THE ENVIRONMENTAL CONTEXT.

1

Sheffield (Cont.)

WE OFTEN SAY THAT AN ECOLOGICAL SYSTEM HAS A CERTAIN AMOUNT OF CAPACITY TO ASSIMILATE MAN-MADE POLLUTION OR HUMAN ACTIVITIES. AND THE AMBIENT AIR THAT WE HAVE HERE, THE WATER BODIES THAT WE HAVE IN THIS AREA, ALL HAVE A CERTAIN ASSIMILATIVE CAPACITY. AND ONCE THAT CAPACITY IS REACHED OR EXCEEDED, WE SEE PROBLEMS FROM THE ENVIRONMENTAL PERSPECTIVE. AND I THINK THE COMMENTS OF MS. EVANS ARE ILLUSTRATIVE OF THAT. THERE'S BEEN A LOT OF CONCERN IN THE REGION OVER THE NEUSE RIVER. THERE IS SOME THINKING THAT POSSIBLY THE CAPACITY OF THE NEUSE RIVER, FROM A NUTRIENT POINT OF VIEW, HAS BEEN EXCEEDED. SO, THE POINT IS, IT'S AN EQUALLY IMPORTANT CONCEPT IN THE ENVIRONMENTAL CONTEXT AS WELL AS THE MILITARY CONTEXT.

AND I THINK IF YOU LOOK AT CAPACITY IN A MORE GLOBAL SENSE, I THINK IT'S AN INACCURATE STATEMENT TO SAY THAT OCEANA HAS THE MOST EXCESS CAPACITY. BECAUSE IF YOU LOOK AT ENVIRONMENTAL CAPACITY AND PHYSICAL CAPACITY TOGETHER, I THINK IT WOULD BE ACCURATE TO SAY THAT OCEANA MAY HAVE EXCESS PHYSICAL CAPACITY, BUT IT PROBABLY HAS A DEFICIT OF ENVIRONMENTAL CAPACITY BECAUSE OF THE LARGE METROPOLITAN AREA IN WHICH IT SITS. IN THIS AREA, THIS AN ATTAINMENT AREA FOR ALL CRITERIA POLLUTANTS. FOR EXAMPLE, THE AREA AROUND CHERRY POINT GENERALLY I THINK YOU COULD SAY HAS AN EXCESS OF ENVIRONMENTAL CAPACITY, NOT TO SAY THAT WE WISH TO SEE IT DEGRADED OR THAT WE POSE ANY HEALTH PROBLEMS TO CITIZENS IN THIS AREA, BUT I THINK IT'S ACCURATE TO SAY THAT WE HAVE AMPLE ENVIRONMENTAL CAPACITY TO ABSORB THE RATHER SMALL ENVIRONMENTAL IMPACTS THAT WOULD BE ASSOCIATED WITH LOCATING THREE OR FIVE SQUADRONS IN THIS AREA.

2 LET ME GO ON, THOUGH, TO MAKE SOME SPECIFIC COMMENTS. AND I WAS INTENDING TO PUT ALL OF THIS UP ON AN OVERHEAD PROJECTOR, BUT I UNDERSTAND ONE'S NOT AVAILABLE TONIGHT, SO I'LL DELIVER THESE VERBALLY. AND THAT IS, FIRST OF ALL WITH RESPECT TO THE AIR CONFORMITY ANALYSIS IN THE EIS, THE FIRST POINT IS THAT IT USES A 1993 BASELINE. AND MY QUESTION IS WHETHER A '93 BASELINE IS REALLY REPRESENTATIVE OF CURRENT CONDITIONS. I UNDERSTAND THE REASONS THE '93 BASELINE WAS USED, BUT IT SEEMS LIKE A '96 BASELINE OR A '97 BASELINE WOULD BE MORE APPROPRIATE.

WS(FHS)-1 Each ARS is evaluated both in terms of meeting operational criteria and in terms of the environmental impacts associated with that ARS. A summary of operational criteria and environmental impacts for each ARS is included in Table 2.5.1.

WS(FHS)-2 The 1993 baseline is the correct baseline year to use for the conformity analysis. As stated in the EIS and conformity report (Appendix E), VDEQ chose 1993 as the baseline year for use in its ozone maintenance plan emission budget. It is a logically and technically sound air quality analysis procedure for the conformity analysis to also use 1993 NAS Oceana emissions. This allows direct comparison of the change from 1993 to 1999 due to each ARS, the same procedure VDEQ uses to evaluate the ability of its maintenance plan to maintain the ozone standard. The General Conformity Rule requires a demonstration of compliance with, in this case, Virginia's State Implementation Plan (SIP). The ozone maintenance plan and mobile source emission budget for Hampton Roads recently added to Virginia's SIP defines NAS Oceana's emission growth allotment. The Navy demonstrates compliance with the emission growth allotment in the approved SIP and therefore demonstrates conformity.

Sheffield (Cont.)

3 ANOTHER QUESTION I HAVE IS WHETHER USING A '93 BASELINE IS CONSISTENT WITH OTHER COMPONENTS OF THE DEIS WHERE OTHER BASELINE YEARS HAVE BEEN USED. MORE IMPORTANTLY, HOWEVER, I WOULD LIKE TO POINT OUT THE FACT THAT NONE OF THE MOBILE SOURCE EMISSIONS ASSOCIATED WITH THE TRANSFER OF PERSONNEL FROM CECIL FIELD HAVE BEEN INCLUDED IN THE AIR ANALYSIS. SPECIFICALLY, ACCORDING TO MY ESTIMATE, YOU HAVE ROUGHLY 584 TONS PER YEAR OF NO_X EMISSIONS THAT ARE NOT INCLUDED, AND THOSE ARE EMISSIONS ASSOCIATED WITH THE AUTOMOBILES OF THE MILITARY PERSONNEL AND THE DEPENDENTS OF PEOPLE WHO WILL BE TRANSFERRED FROM CECIL FIELD, AND THOSE ARE SIMPLY EXCLUDED FROM THE DEIS ALL TOGETHER. THOSE APPARENTLY ARE ACCOUNTED FOR ELSEWHERE, BUT ONE OF THE QUESTIONS I HAVE IS, IS THE NAVY CONVINCED THAT THOSE EMISSIONS HAVE BEEN FULLY ACCOUNTED FOR IN THE VIRGINIA MAINTENANCE PLAN, AND DOES THE NAVY HAVE A VERIFICATION OF THOSE NUMBERS? THERE IS NO DOCUMENTATION PROVIDED IN THE EIS TO DEMONSTRATE WHETHER THAT HAS BEEN ACCOUNTED FOR AND WHETHER THEY ARE INCLUDED OR NOT.

4

ANOTHER POINT IS THAT THE NO_X BUDGET FOR THE OCEANA AREA IS EXTREMELY TIGHT. IF YOU REVIEW CAREFULLY VIRGINIA'S MAINTENANCE PLAN, IT SHOWED THAT THEY CAME VERY, VERY CLOSE TO EXCEEDING THEIR NO_X BUDGET WHEN YOU GO OUT TO THE YEAR 2008. THERE WAS AN 800 TON ALLOWANCE INCLUDED IN THE MAINTENANCE PLAN FOR OCEANA, BUT, AGAIN, THAT INCLUDES ONLY STATIONARY SOURCES AND AIRCRAFT EMISSIONS AND OTHER MOBILE SOURCES ON THE BASE. IT DOES NOT INCLUDE THESE 584 TONS OF NO_X EMISSIONS, AND A COMPARABLE AMOUNT OF VOC EMISSIONS, ASSOCIATED WITH THE VEHICLES OF PERSONNEL AND DEPENDENTS THAT ARE USED IN THE VIRGINIA BEACH/CHESAPEAKE METROPOLITAN AREA

IS THE NAVY CONFIDENT THAT VIRGINIA CAN IN FACT MEET ITS MAINTENANCE BUDGET IF ALL OCEANA-RELATED EMISSIONS ARE INCLUDED? AND THAT MAY BE TRUE, WE JUST HAVEN'T BEEN ABLE TO DETERMINE THAT YET. AND MY QUESTION TO YOU IS, HAS THE NAVY DETERMINED THAT; ARE YOU CONFIDENT THAT ALL THOSE EMISSIONS ARE FULLY ACCOUNTED FOR?

WS(FHS)-3 Please see response to WS(FHS)-2.

WS(FHS)-4 Mobile emissions caused by the personnel and dependents relocated from NAS Cecil Field to the Hampton Roads area are accommodated in Virginia's mobile emissions budget for Hampton Roads by the loss of military personnel and dependents leaving the Hampton Roads area due to downsizing and force restructuring. The reference for this conclusion has been added to the EIS and conformity analysis (Appendix E).

Neither the EIS nor the conformity analysis is required to analyze impacts in the year 2008; the only requirement is to analyze impacts in the maximum emission year, which is 1999. However, the Navy anticipates at this time that emissions will remain relatively constant through 2008. The net change in NO_x emissions for each ARS is discussed in Sections 4 through 8 of the EIS. As discussed in the first paragraph of this response, the NO_x and VOC emissions associated with the use of automobiles by military personnel and their dependents is already included in the maintenance budget.

5 MY FINAL POINT WITH REGARD TO THE AIR ANALYSIS IS THAT THIS ANALYSIS DOES NOT IN ANY WAY CONSIDER THE IMPLICATIONS OF THE NEW OZONE OR FINE PARTICLE STANDARD. AS I'M SURE YOU'VE SEEN ON THE NEWS LATELY, THE EPA JUST PROMULGATED THIS STANDARD A MATTER OF WEEKS AGO, THEIR NEW MORE STRINGENT STANDARDS, AND THE VIRGINIA BEACH AREA WILL, IN FACT, VIOLATE THOSE STANDARDS. THEY HAVE ALREADY BEEN IDENTIFIED BY EPA AS AN AREA WHICH DOES NOT MEET, OR WILL EXCEED, THE NEW STANDARD. SO, A LONG-TERM PROCESS HAS NOW BEGUN TO IMPLEMENT MEASURES TO REDUCE EMISSIONS SUFFICIENT TO MEET THE NEW STANDARDS. IN PARTICULAR NO_X, WHICH ARE FROM THE AIRCRAFT, ARE PRECURSORS OF BOTH OZONE AND FINE PARTICLES. AND MY QUESTION IS WHETHER THESE INCREASED NO_X EMISSIONS, AND OTHER EMISSIONS, HAVE BEEN CONSIDERED, AND WILL THEY CONTRIBUTE TO A VIOLATION OR MAKE IT MORE DIFFICULT TO ATTAIN THESE NEW AND MORE STRINGENT AIR STANDARDS?

WS(FHS)-5 The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementation Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. SIP revisions, if any, addressing the new standards are not expected until after 1999. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard. There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with ARS 1 are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

WITH REGARD TO THE NOISE ANALYSIS, I JUST HAVE THREE OR FOUR BRIEF POINTS OR QUESTIONS. I WOULD SAY THAT WE WOULD LIKE TO HAVE MORE TIME TO REVIEW THE NOISE STUDY THAT WAS DONE, THE WYLE LABS' REPORT. WE RECEIVED THAT ON MONDAY OF THIS WEEK, AND WE'VE ONLY HAD TIME TO TAKE A VERY CURSORY LOOK AT IT AT THIS POINT, BUT IT REALLY WARRANTS A DETAILED EVALUATION. I WOULD LIKE TO GO ON THE RECORD AS REQUESTING AN EXTENSION IN THE PUBLIC COMMENT PERIOD FOR THIRTY DAYS TO ALLOW US AND OTHER INTERESTED PARTIES TO HAVE A CHANCE TO REVIEW THAT REPORT AND THE REMAINDER OF THE DEIS. 6

WS(FHS)-6 The close of the public comment period on the Draft EIS was extended from November 18, 1997, to December 2, 1997, due to public request.

GOING ON TO SOME SPECIFICS, ONE QUESTION WE HAVE IS, WHY DOES THE NOISE ANALYSIS ASSUME 50 PERCENT USE OF THE OCEANA RUNWAY O5R WHEN WE UNDERSTAND THAT HISTORICALLY SOMETHING ON THE ORDER OF ABOUT 80 PERCENT OF THE OPERATIONS AT OCEANA HAVE TAKEN PLACE ON THAT RUNWAY? THE NOISE CONTOUR THAT WAS PUT ON THE SCREEN EARLIER MIGHT LOOK A BIT DIFFERENT IF, IN FACT, THE OPERATIONS ARE ALLOCATED BASED ON HISTORICAL PATTERNS. 7

WS(FHS)-7 The noise analysis included historical runway utilization averages when modeling aircraft noise contours. Runway 5/23 left/right is a dual runway. The separate designations indicate the different directions in which aircraft arrive and depart. Runway 05 is used approximately 50% of the time; Runway 23 is used approximately 34% of the time.

Sheffield (Cont.)

8 ANOTHER POINT IS THAT THE EIS SAYS THAT AN ADDITIONAL 38,983 PEOPLE WOULD FALL WITHIN THIS SIGNIFICANT NOISE CONTOUR AREA - WOULD BE SIGNIFICANTLY IMPACTED BY NOISE FROM THESE OPERATIONS. IF YOU LOOK AT THE WYLE REPORT, HOWEVER, IT STATES THAT ALMOST 100,000 ADDITIONAL PEOPLE WILL BE SUBJECT TO THESE HIGH NOISE LEVELS. IT WAS INTERESTING TO ME THAT THE WYLE REPORT REFERS TO IT ONE WAY, BUT THE EIS REFERS TO IT IN A WAY THAT IS MORE FAVORABLE TO OCEANA. THE EIS COMPARED 1999 INFORMATION TO 1978 AICUZ DATA, WHEREAS THE WYLE REPORT LOOKS AT 1999 AND COMPARES THAT TO 1997 DATA. WELL, AGAIN, THEY BOTH MIGHT BE ACCURATE, BUT I THINK IT'S MISLEADING TO SAY THAT ONLY 38,000 ADDITIONAL PEOPLE WILL BE IN THIS HIGH NOISE ZONE WHEN, IN FACT, COMPARED TO CURRENT LEVELS - 1997 LEVELS - IT'S ON THE ORDER OF 100,000 PEOPLE.

WS(FHS)-8 The Draft EIS quantitatively compares the number of people impacted by noise zones for 1978, 1997, and 1999 aircraft operations in Tables 4.8-1, 5.2-16, 6.2-16, 7.2-16, and 8.2-16. The tables are also included in the Final EIS, but they have been modified and corresponding figures have been added to clarify the comparison between 1978, 1997, and 1999 aircraft operations.

9 ANOTHER QUESTION WE HAVE IS, WILL THE FINAL EIS INCLUDE A COST ESTIMATE FOR THE NOISE MITIGATION MEASURES THAT WILL BE NECESSARY AT SCHOOLS, CHURCHES, AND OTHER FACILITIES IN THE OCEANA/CHESAPEAKE AREA? THE EIS SIMPLY SAYS THAT THE NAVY, IF ASKED, WILL DO AN ENGINEERING EVALUATION OF WHAT IT WOULD TAKE TO REDUCE NOISE LEVELS AT SCHOOLS AND CHURCHES IN THE IMMEDIATE AREA, BUT THERE IS NO QUANTIFICATION OF WHAT THAT MIGHT COST. I THINK IF THAT COST WERE ADDED IN IT COULD BE QUITE SUBSTANTIAL. BECAUSE, AS WE KNOW, TO INSULATE BUILDINGS SUFFICIENT TO WITHSTAND JETS GOING OVERHEAD WITH A 100 TO 108 DECIBEL LEVEL - AND THOSE OPERATIONS COULD TAKE PLACE IN THE ORDER OF EVERY FIVE MINUTES BASED UPON THE DATA IN THE EIS - IT'S GOING TO TAKE SOME SUBSTANTIAL INVESTMENTS. MY QUESTION IS, WILL THE FINAL EIS DOCUMENT WHAT THE COSTS WILL BE FOR ANY NOISE MITIGATION MEASURES THAT MIGHT BE NECESSARY?

WS(FHS)-9 The City of Virginia Beach has requested that the Navy work with local officials in their efforts to conduct detailed engineering evaluations at those schools of particular concern. This assistance would include providing technical background information on such issues as specific Ldn values for schools and sound attenuation recommendations. However, because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, cost estimates for noise mitigation at schools and churches were not developed.

10 IN A MORE GLOBAL SENSE, THE QUESTION IS THIS: WHAT IS THE HUMAN COST OF HAVING 130,000 PEOPLE IN THE HAMPTON ROADS METROPOLITAN AREA EXPOSED TO SEVERE NOISE LEVELS - 130,000 PEOPLE? AND IS THAT WHAT THE NAVY WANTS TO DO TO PEOPLE, FOR THE MOST PART, WHO ARE VERY SUPPORTIVE OF THE NAVY, MANY OF WHOM ARE RETIRED NAVY OR DEPENDENT UPON NAVY JOBS? BUT IS THAT FAIR TO PEOPLE TO EXPOSE 130,000 PEOPLE TO THOSE SORTS OF NOISE LEVELS?

WS(FHS)-10 Approximately 50,440 people would be included within the projected greater than 75 dB Ldn noise zone if ARS 1 were to be implemented. The greater than 75 dB Ldn noise zone is an area of "severe" noise impact. Approximately 75,123 people would fall within the 65-75 dB Ldn noise zones which are considered areas of "moderate" noise impact.

Sheffield (Cont.)

FINALLY, I WOULD LIKE TO MAKE A POINT THAT AT THE VERY LEAST THE EIS DOES CONFIRM THAT THERE WOULD BE SEVERE NOISE IMPACTS NEAR OCEANA UNDER ARS 1, AND AT THE SAME TIME THERE WOULD BE MINIMAL NOISE IMPACTS NEAR CHERRY POINT UNDER EITHER ARS 3 OR ARS 5. AND I WOULD LIKE TO JUST SORT OF HOLD UP FOR VIEWING THE NOISE CONTOUR MAPS THAT APPEARED IN THE EIS. I HAD HOPED TO PUT THESE UP ON THE SCREEN WITH THE OVERHEAD. BUT, IF YOU LOOK AT THIS, THIS IS THE NOISE MAP FOR OCEANA UNDER ARS 1. AND, AS YOU CAN SEE, ALL OF THAT RED AND ORANGE AREA ARE AREAS THAT WILL BE IMPACTED BY NOISE LEVELS THAT EXCEED 75 OR 80 DECIBELS, WHICH IS DEFINED AS BEING SEVERE. SO JUST TAKE NOTE OF HOW LARGE THAT IS, AND ALL OF THE RED AND ORANGE THAT YOU SEE THERE.

11

THIS IS UNDER ARS 5 FOR CHERRY POINT. JUST LOOK AT THE DIFFERENCE IN THE NOISE CONTOUR HERE. I THINK IT JUST DRAMATIZES THE HUGE IMPACT THAT SENDING 180 F-18s TO OCEANA WILL HAVE. AND I THINK THAT THE WAY WE SEE ARS 3 - AND EVEN ARS 5 - IS THAT BY SENDING 60 AIRCRAFT, OR SO, TO CHERRY POINT, IT WILL HELP TO MITIGATE THE RATHER SEVERE AND EXTREME NOISE AND TRAFFIC IMPACTS THAT SENDING ALL THE JETS TO THE OCEANA AREA WOULD HAVE.

CERTAINLY WE WELCOME THE ECONOMIC AND OTHER BENEFITS OF HAVING SOME OF THE AIRPLANES SENT TO CHERRY POINT, AND WE WOULD BE PLEASED IF THAT WOULD IN FACT MEET THE NAVY'S OPERATIONAL NEEDS WHILE AT THE SAME TIME MITIGATING SOME OF THE ENVIRONMENTAL AND COMMUNITY IMPACTS IN THE OCEANA AREA.

THANK YOU VERY MUCH.

WS(FHS)-11 Thank you for your comment; no response required.

A.4 Public Hearing, Manteo, NC

A.4 Public Hearing Transcripts/Comment Cards, Manteo, NC
October 23, 1997 Public Hearing

Speaker: Mr. William T. Gaylord
Manager, Dare County
Regional Airport
P.O. Box 429
Manteo, NC 27954

I thank you for this opportunity. I go by the name of Tim instead of William Timothy. I'm the manager of Dare County Regional Airport and I tried to have my authority members here instead of myself, however they are working on the project for the Wright Brothers tonight, so that took them away.

1 In a way I may sound like a complaining individual. In a way I am, but overall, I don't mean to sound so gruff, but my main concern is on page C-53, which is 2.4.2, which is the scheduling on an exclusive use basis, 53.14. The reason for that is on IFR days, numerous times I have called the range and there were no aircraft using the range. Because of this I have had at least three to four aircraft stacked trying to come into Dare County on the runway 17 approach which I will address that difference in--state later. And because of the low ceiling, they were unable to make it. The times that we were able to get the range declared cold, it normally took 35 to 45 minutes, but very safety concern on my part for the aircraft flying around in circles because of it.

The times that we were able to get it cleared, we were able to have people use the runway 5 approach, and within 15 minutes land two aircraft. The others had to depart the area due to fuel restrictions. So, this is one thing that I am looking for is the scheduling situation of the Navy range. The Air Force has already implemented it, that they call the range hot and cold as far as their concern in the southern portion. However, if either service uses a range, the entire range is considered hot. So, this is my major concern that better scheduling, especially what we call real time use of the range be utilized.

DCRA-1 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

2 One part here you have already addressed. The other goes into around page 123 of your study. I think that is the second book. The main thing I need to emphasize here and you all addressed it right off the start, is the potential benefits of enhanced radar coverage in the area. First of all, we have had plenty of meetings on this with the Navy, both at the FAA Headquarters in Washington, DC and plenty of phone calls in between. And the Navy has really come through and identified, from what I understand in writing also, to put radar in Elizabeth City at the Coast Guard Air Base. However, we have run into a roadblock now with the FAA who says they want an ASR-11 when an ASR-8 was going to be provided by the Navy. Our statement is, basically it's nice to have a Cadillac, but we'll settle for a Chevy. And we are looking at the safety aspects. An ASR-8 will do exactly what we needed to cover both the range and radar controlled approach to Dare County.

DCRA-2 Please see response to DCRA-1.

Gaylord (Cont.)

Dare County is actively pursuing, trying to obtain scheduled air service. We anticipate this within the next couple of years. As a matter of fact, Monday I will be in Washington talking to several airlines about this. Once this starts, we are anticipating, once fully operational the projection is 109,600 planes per year, which will bring Dare County to the number six slot as the busiest airport in the state of North Carolina for scheduled air service, if it comes about as projected. So there's going to be a major impact both on the range and trying to get into runway 5.

Vector Airway 189 is our primary concern. We are also fighting a tall tower that the public television is talking about raising. That will effect us. I'm sure it will affect your aircraft that come in from the north, since I was over there the other day and got buzzed by two F-15's as I was coming down the road. They were only about a thousand foot and with this enhanced tower, it sticks up there and they could have easily clipped the top of it. That is my safety concern on the tower. I'll skip over. I've got notes along here.

3 The close proximity to the airport and the range as noted in the study is 6.5 nautical miles. Everybody understands that there should be a three mile nautical separation between the active range and civilian aircraft. If you figure that out, that does not leave much limitation for an aircraft to approach on runway 5 at Dare County, which is basically 3.5 nautical miles. I'm not sure of the Navy or Air Force designation of a King Air or a Citation, but we have quite a few of those used in Dare County lately and they are increasing daily, the number of flights. As a matter of fact, our higher IFR day is Sunday. That is all we had was IFR traffic running into runway 5. They did use 16 to do the let down portion. The ceiling was high enough they were able to do the right-hand approach and land on runway 5. However, if you ever tried making a right-hand turn in a King Air or a Citation in cloudy weather at about 600 feet, those of you that have flown in military aircraft know it's kind of hard. Try it in a civilian aircraft without any instrumentation the Navy or the Air Force do have in their aircraft. As a reference point, three nautical miles is the center span of the Croatan Sound.

DCRA-3 Thank you for your comments; no response required.

4 One of the things that needed to be changed is your description of Dare County Airport. I don't know who researched this, but I have to say they did a very poor job. They described runway 422 as being 3,300 feet. That changed in 1983. It was that way from 1942 to 1983. In 1983 it went to 3,849 and as of July 17th, the runway designations were changed and also the length was enhanced 4,300 feet with 300 foot displacements on both ends. The runway designations for Dare County now are 523 is the primary runway. The secondary runway is 1735. As one guy said, as the world turns. So this is one thing that would help in your study, that would bring it more in line.

DCRA-4 Appendix C of the EIS has been amended to incorporate this information.

Gaylord (Cont.)

We are actively trying to get the VOR at Dare County flight certified. It is scheduled for ground inspection on the 29th of this month, and hopefully the flight check will come soon thereafter. If the VOR stays up and running for a period of time with no problems, I have already had contact with the FAA in Oklahoma. They are looking at trying to give us a VOR approach to runway 23. It would be a great enhancement. It would not interfere with the range at all. So, we are trying to improve the area too and trying to work it so the range can stay active more often. Also the FAA is looking at a stand alone GPS to runway 5, which will--I call it a dog leg and backwards "s" to try to get into that runway without interfering with the range. The radar is a primary concern. If in your study you can push the radar while this move is going on, I'll be glad to buy you all a steak dinner or shrimp to get it done. It's absolutely essential to us as far as aircraft safety.

Another change and that is on C-127. Dare County is monitored by Washington Center. At this time to take control and will do so until such time as radar is installed. Whoever has that radar will be our controlling agency, our aircraft and flight plotter. At the present time Washington Center can consistently see aircraft over Dare County at 2,000 feet. And with luck, they have been able to get at 970. But don't count on that unless we have a low ceiling and have got a lot of radar bands.

5 Basically all of my notes were on the range potential delays, et cetera. My thing is the Tutson [Patuxent] River has been operating at real time use for a long time. I get nothing but good comments on the employers in that area, and how it's turned back and forth for both military and civilian use. My thing is, why do we have to reinvent the wheel at Dare County. It would be so easy to pick up their procedures and apply them to Dare County range. It would save a lot of time and a lot of writing for manuals and regulations, et cetera.

DCRA-5 Because the NAWC-AD Patuxent River airspace is used almost exclusively for aircraft testing and evaluation, it has complete Navy radar coverage and its real time use is fully coordinated with FAA's real time Washington Air Route Traffic Control Center. The Dare County Range does not have Navy low level radar coverage.

6 Since there are no A-6's at the time, I can not see why the range is declared hot with no aircraft, since as I understand it, the F/A-18 is not ready to be certified to fly in IFR weather at this time. We are talking 2,000 feet and below. Normally the IFR conditions we experience here are at about a thousand feet. Hard IFR here is about 518 feet. That is a measured ceiling.

DCRA-6 The F/A-18 is a fully certified IFR aircraft.

7 And my other thing that I notice in your comments were SPLNS. None been reported in five years. I ask that you give me the numbers so I can give you the days and times it happened. Many days, especially on VFR days we see aircraft over the sound and on this side of the channel. It doesn't happen too often, but it does happen. I haven't reported it because I enjoy watching the planes fly. We just advise military aircraft in the vicinity. That's all we do. Several times we had some military aircraft and I know those guys were just practicing, they were about 1,500 feet shooting approach to Dare County.

DCRA-7 Thank you for your comments; no response required.

Gaylord (Cont.)

What scared me one day was a C5 on final approach at about 2,000 feet. So it does happen. It's not very much but it brings our interest, being an old retired military, not so old because of the blond hair. But we enjoy watching the aircraft. As a matter of fact, we encourage as much as we can military fly-bys so people can see them. If they would just contact us on our unicom, we would be glad to tell them to do a max burn and shoot straight up. We enjoy it. We are not against the military, but if you need the reports, we can provide that to you just to keep their records straight.

Basically overall, I really enjoyed the part on page C-129 where you said the enhanced services of the civilian airfields--civil airfields and improve traffic flow into Dare County. I can't tell you how much it means. We are a growing airport as far as numbers of aircraft and capacity. More and more come every year. In 1995 our count was approximately 45,000 operations a year. That is a landing and take off. Not one aircraft dropping six times to get six operations.

This present year we have already conducted three counts and we are going to do our fourth one sometime during the month of November. But the numbers already indicate 47,000 operations. And it may go even higher. So we don't know. We see this increase.

To give you an idea, just in fuel sales alone we've seen in the last three months 62% increase. So we know we are getting more aircraft. Again, the mix of civilian and military aircraft, again, we know in the past we had a lot of problems with that, and I think the radar is the primary thing that will help us. With bringing this many aircraft into Oceana and I have retired Navy pilots state this, so it must be done. They will pull out of Oceana with an IDN, cut it off, fly the VFR route until they get over the range and cut it back on. That doesn't help the air traffic controllers. I think it's guys trying to hot dog it and doing what they can.

Overall we enjoy it. I go over and visit and Harry Mann is a gentleman that gives me an earful without the ear muffs one day. I'm not against it at all. All I'm saying is just try to help us in the actual control of the aircraft flying in Vector 189 and push the enhanced radar. I think it would be extremely helpful for the Navy and the Air Force to have the capabilities on the range for control. As most of you know, Oceana fortunately got rid of the tower that blocked the new radar you have. Since that time we have had a lot better radar control. But it's still not long enough for northeastern North Carolina. The economic impact will be greater enhanced just in Dare County once we get the scheduled service in. And the radar will play a big piece in that.

Thank you.

November 17, 1997 Public Hearing

Speaker: Mr. Bob Gabriel
Lifeguard Beach Service
Dare County Ocean Rescue
P.O. Box 1875
301 E. Clark St.
Kill Devil Hills, NC 27948

Thank you, Captain

My name is Bob Gabriel. I'm here tonight to speak on the ten most commonly asked questions about air installation compatible use zones. These are the ten questions that you all have here. Actually, I'm here to speak on public safety. I'm very honored that we have a right to be here as a group to speak. And part of that building and that right is from the United States Navy. I'm glad that you all are doing what you're doing. I'm very thankful that you can have the F/A-18s to train with, and I'm not speaking for anyone else, but I like the sound of them, I like the looks of them, and I like to watch them go overhead. But there comes questions to my mind as two of the final questions that you have here. You call them APZ zones (Accident Potential Zones).

The only truism that I've every found to be correct when you deal with accidents is if you multiply that factor my zero. And, as we all know, there is no possibility of multiplying aircraft accidents by zero. They are going to happen. I think in an average year you might have four to five in this area. We also have civilian aircraft accidents here. I'm not by any stretch of the imagination saying that they are caused by the Navy, but they do occur. One of the problems that we have is that we have, when we do have downed aircraft, it's usually in the water or over the marshes. As the search and rescue service which has been in Dare County for forty years, myself I guess for 15, being the oldest one at it, it concerns me that, yes, we are an ocean rescue service and, yes, we are basically responsible for taking care of swimmers. But unfortunately the Coast Guard and the Navy, who I have worked with on many occasions very well, are usually a lot farther away than we are. And heavens forbid if one of those aircraft, yours or civilian, goes down in the ocean on one of our beach fronts, my people are going to go in the water regardless of whether I want them to or not. Over the last five years I've had two former Navy rescue swimmers trained by the Navy and cited by the Navy for doing an outstanding job. They have helped teach me through their former textbooks, and I've attended, at my cost, three courses on high impact/low impact air crashes. And I am an instructor at that level.

Also I sent my supervisory personnel and three county personnel, the fire chief, and EMS personnel and police personnel to Camp Pendleton in California three years ago for training for similar type problems.

Gabriel (Cont.)

1 We don't have in Dare County extensive training or preparedness in this area. I would like very, very much, if at all possible, the Navy could work with the emergency agencies, i.e. Ocean Rescue; and since there is no formal program in the civilian market for training, we would like very much to have the right and the cooperation of the Navy before a program like this is announced to start doing some serious year-round training in working with us to supply the county equipment that might be needed in a situation like this. I know your rescue personnel are some of the best in the world, but they take a long time to get here. Even though they come right out of Norfolk and even though it's a helicopter, it still takes time. And in life and death situations time is everything, whether they bail or whether they've crashed. Whether its a recovery or it's a rescue, we still have to respond. And I would hope that the Navy -- I really like these last two questions, Captain, with the potential zones and the numbers and the figures, they really are interesting, but I can assure you that over the years that we do have accidents; and we will have more. I just want to be the best prepared as I possibly can to do my job in assisting you-all. Thank you very much.

DCOR-1 NAS Oceana's Community Planning Liaison Officer contacted Mr. Gabriel to coordinate the requested assistance.

Speaker: Mr. Robert Trick
National Park Service
P.O. Box 675
Manteo, NC 27954

1 Thank you. My name is Bob Trick. I'm with the U.S. Park Service. As a federal government employee I work quite a bit with the Fish and Wildlife. I fly a Cessna 206. Some of the missions we do out over the refuges are fire patrols, actual fires that we do work on, wolf patrols, bug flights. You name it; we do it out there. And the biggest problem we seem to run into is airspace coordination. A lot of times when we start in the morning, early morning, we try to get there before the Navy opens up the range to get our work done. It seems to me that if there was one central location that we could go to get range schedules, and I know range quite a bit. Also, during the day if there was someone we could talk to. Now they do have Navy Dare on 122.9, but if they are working aircraft in one particular location a lot of times they won't talk to us, so we can't ask them to work a different location. It would be nice if there was a full time controller that would talk to us all the time whether they are controlling aircraft or not.

NPS-1 The Navy and Air Force compile separate schedules for their respective portions of the range. A combined schedule is provided to Washington Air Route Traffic Control Center (ARTCC), the Controlling Agency, by the 4th Tactical Fighter Wing, Seymour Johnson AFB, the Using Agency. Each schedule office works closely with state and local agencies to accommodate needed access to range airspace. Organizations requiring access to Navy Dare County Range should contact the Fleet Area Control and Surveillance Facility, Virginia Capes (FACSFAC VACAPES) at (757) 433-1221/1222, from 7:30 AM - 3:30 PM on weekdays, or (757) 433-1320 during other hours. The Air Force schedule office can be contacted at (919) 736-6565/6561.

2 Another big problem we run into is sometimes the ranges are closed down. And the airspace, according to Center, is still being shown as hot or active. And we call on our phone, and we call on our radio; and we get no answer. But because it is still showing hot or active, we cannot go into that airspace to do the immediate things we need to do. I don't know if you're aware or not, but we have the -- the Fish and Wildlife has the red wolf out there, an endangered species; and we track them by aircraft. They are wearing collars. During the fire season we're out there two or three times a day.

NPS-2 The Dare County Range is activated with Washington ARTCC approximately 30 minutes prior to the published schedule time. Activation is accomplished via a commercial phone call directly to the ARTCC sector responsible for the airspace (Area "F"). In order to release the airspace back to Washington ARTCC, both the Navy and the Air Force portions of the Dare County Range must be inactive. The airspace is released back to the Controlling Agency when operations are completed.

3 The airspace is also broken down into different altitudes. A lot of times when we're flying out on the western edge and the bottom of the restricted area is a thousand feet, we're down at 600 feet looking at a fire or lightning strike we get the military aircraft flying under us using us as targets, things like this. If we could do a better job of coordination with them, maybe we could alleviate some of these problems.

NPS-3 Both the Navy and the Air Force Dare County Range facilities monitor the radio frequency of 122.9 MHz during operating hours. When the range is cold during published operating hours, the Air Force monitors 122.9 MHz in the range office. Navy and Air Force range personnel respond to calls for their respective areas. The Navy transmitter antenna is located on the range control building and is most likely unable to receive transmissions from the outer range areas at low altitudes (600 feet).

Trick (Cont.)

> I've probably been flying out there three years, and this past summer/spring flew over a hundred hours on these fire patrols alone. And 99 percent of the time there's no problems. You know, I see the aircraft come in; they see me. They stay out of my way, I stay out of their way. But we still get the occasional time when the aircraft will spin around, come in on us, fly by us at the same altitude or below us, turn right back around and come in on us again. It's hard to get a hold of someone to talk to. I've been given several numbers and get passed around. They say, well, what time was it; did you get a number, this and that; and we never really seem to get anything resolved on this issue. So can we just do a better job of coordinating the airspace out there. We need to be talking to each other just so we don't run into each other because of safety out there. When the visibility is down due to weather conditions or smoke or whatever out there, we especially need to be talking to them, and they need to know I'm out there. So, again, if we could just do a little bit better job of coordinating the airspace, it would help us out tremendously. Thank you.

Speaker: **Mr. W. Jay Wheless**
Dare County Airport Authority
P.O. Box 500
Manteo, NC 27954

Good evening, my name is Jay Wheless, W-H-E-L-E-S-S. I'm a nearly lifelong resident of Manteo, a pilot and Chairman of Dare County Airport Authority. My comments are directed toward the airfield and airspace operational study. It is beyond question that the Dare County Regional Airport is experiencing growth in flight operations and commercial development both in the air and on the ground. The number of flight movements, the amount of fuel sold, the number of aircraft on the tarmac, the size, speed and complexity of the aircraft using our airport, all the measurement sticks, inherent with continuing rapid growth. We have attempted to stay ahead of the growth, and, by and large, have succeeded. We lengthened our main runway. It will be widened within the next six months. We have the remote communications outlet, Washington Center, and we have installed a satellite-linked automatic weather reporting system.

Increasingly and certainly most importantly, our growth has come without compromising safety; that is until now. It is not my concern as to whom is crowding whom; nevertheless it is self-evident that the Navy's increase in training sorties will send through the gauntlet high speed, low altitude aircraft. We too at Dare County Regional Airport are becoming busier and faster.

1 The Dare County Airport Authority believes that it is possible to live together harmoniously and in relative safety by introducing, among other things, two elements into this equation. Number 1, better real-time status communications between you at the Dare County Range and Washington Center and Washington Center in turn communicating that status with our flying guests and, number 2, one simple word, radar.

2 Our users must be able to use our instrument approaches when they are needed. It is frustrating enough not to be able to use our safest runway, 523, just because the Navy is training and cannot give up a small slice of its precious airspace. Frustration builds to utter distraction when we cannot use that approach because no one knows and contact cannot find out whether the range is active or not. Communication makes for good neighbors. In this instance good neighbors are safer neighbors.

DCAA(WJW)-1 Both the Navy and the Air Force Dare County Range facilities monitor the radio frequency of 122.9 MHz during operating hours. When the range is cold during published operating hours, the Air Force monitors 122.9 MHz in the range office. Navy and Air Force range personnel respond to calls for their respective areas. The Navy transmitter antenna is located on the range control building, and is most likely unable to receive transmissions from the outer range areas at low altitudes (600 feet).

DCAA(WJW)-2 Procedures are in place at the Navy/Air Force Dare County Range that limit range operations to permit IFR approaches to Dare County Airport during Instrument Meteorological Conditions. Should an approach be requested when the range is not in use, commencement of military operations is delayed until the approach is completed. Aircraft requesting approaches while the range is in use are required to hold until the range operation is completed, and are then permitted to use the range airspace for the approach. These procedures are not applicable to requests for practice approaches.

Wheless (Cont.)

An appropriately maintained and staffed radar is not wanted; it is warranted. We know the value of radar. If radar coverage were not a keystone to today's safety and airspace it would not be at naval air stations or at our larger public airports. We must have it, and we must have it soon. As all pilots know, you must stay ahead of the airplane. Likewise, we must stay ahead of this increasingly busy airspace. To do otherwise would be shortsighted, further compromise safety and may ultimately cost lives. We must open air/ground communications, push for our radar and not settle for less than both.

Thank you for the opportunity to address these special issues.

Speaker: **Mr. Michael R. Bryant, Refuge Manager**
U.S. Department of the Interior
Fish and Wildlife Service
Alligator River National Wildlife Refuge
Rte. 1, Box 1969
Manteo, NC 27954

My name is Michael Bryant. I'm the refuge manager for Alligator River National Wildlife Refuge. We are part of the Department of Interior, and what I have surmised from this particular draft EIS is there will be 2,000 more sorties, we will have more restricted airspace, both spatially across the landscape and over time in the course of any one day more restricted space and more likely more activity from ground base support.

1 Some of the impacts that we would expect from this would be fish and wildlife service mission capability impacts to both our wildlife habitat and people missions. We have endangered species management that is ongoing at the refuge that involves air ops where we have to monitor our red wolf population from the air. We also do red pileated woodpecker monitoring and surveying and census work. It's another endangered species that we are mandated to manage for. And you find them both on the Dare Range and on the refuge. We also do waterfowl survey work from the air, and our fire management capability depends on air operations as well, in both the detection of wildfires, during wildfire suppression activities and when we do prescribed burning for habitat management.

2 So our interest is in both safety of our air ops and the opportunity to continue to manage the refuge using these air capabilities. In our land management we are also concerned about how our ability to manage the land we have through developmental impoundments where we might be concentrating waterfowl for the purposes that the refuge was established, but as has been demonstrated to us in the past, this can be in direct conflict with some of the safety concerns that both the Air Force and the Navy have expressed to the refuge system in the past around the Alligator River and the Dare Range. And, also, just simple activity on the ground, ingress and egress through the refuge because access to the ground ops for the Navy goes across the refuge lands to get to the Air Force owned Navy Base range.

Those are the things that I want to bring up to the Navy this evening and hope that I can explore with the Navy any mitigation opportunities that might exist to deal with these particular mission capability impacts.

Thank you.

ARNWR1-1 Based on an analysis of impacts in the EIS and Appendix C, the Navy has determined that no mitigation is required. The largest projected increase at the Dare County Range would be for ARS 1, in which all F/A-18 aircraft would be transferred to NAS Oceana. ARS 1 would only result in an increase of approximately five sorties per day (on the average) over existing 1997 operations. In addition, even though the number of operations will increase from 16% to 28% for the Navy portion of the Dare County Range (depending on the alternative), the actual time that the range is considered "active" or "hot" would increase very little over existing conditions. The percent utilization of the Navy Dare County Range would increase from 57% in 1997 to 67% in 1999. Consistent with current procedures, citizens and state and federal officials will be allowed access to airspace over and adjacent to the Dare County Range whenever the range is declared "cold." Upon request, the range may be declared "cold" when not being scheduled by the military. Appendix C of the EIS includes the Dare County utilization table and a detailed discussion of potential impacts to the Dare County Region.

ARNWR1-2 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

Please see response to ARNWR1-1.

Speaker: **Mr. Tim Gaylord**
Dare County Regional Airport
P.O. Box 429
Manteo, NC 27954

My name is Tim Gaylord. I'm the manager of the Dare County Regional Airport, and my primary purpose I'm speaking on is straight out of your study, Section 4. At the last hearing, which I guess I was the only speaker, I stressed the typographical errors in the study such as the runway length which stated it was thirty-three hundred feet which changed in approximately 1984. So whoever did the study did not study our airport very well.

1 The concerns that I really have are going to Section 4.1 which states that civilian traffic must maintain a three nautical separation from restricted airspace boundaries. That leaves us approximately three and a half nautical miles from the end of our most active runway, runway 5. Most aircraft that are the size of a twin aircraft, mainly turbines, cannot make a proper approach to runway 5 under VFR conditions at three and a half miles. So this is the next area I mean to stress is in 4.2, which is the very last paragraph. It says, the activation of the restricted airspace is based upon the first and last scheduled mission of the day. That's between seven to eight o'clock in the morning and after 2400 at night. Many times I've had to call Mr. Larry Pickett who is the overall manager of the range to try and get the range declared cold or inactive. When I called around to the different bases, all the bases were not flying but yet the range was cold or declared hot.

Communications is the primary key to safety. I stress the joint use of the range. It is very favorable at Patuxent River, which is north of us. There is no reason to reinvent the wheel on how to use joint use airspace, so why not use what they have. So communications is the primary thing.

2 Let me skip over to one other area, which is 4.3. It talks about the Navy A6 aircraft. Since the Navy A6 aircraft have been decommissioned and no longer used by the Navy, and I think this is as of about a year ago, I understand the F/A-18s are not ready for IFR weather training at this time. So why have the range declared active or hot during IFR conditions. I realize that the range has a different type of weather than what we have in Dare County. if you use the air traffic tower at the Air Force side of the range, it is only 18 miles away. Sometimes they have good weather, and sometimes we have bad, but proper communications in declaring the range cold when it is actually cold and hot when it's cold, not just when it's scheduled is of prime importance.

The last thing I need to reiterate, which the Navy has recognized is in Section 4.5 which states the benefits of enhanced radar's coverage. I know in studies that the Navy has identified radar that was coming from the Philippines. It was supposed to be overhauled and put in at Elizabeth City. However, there was some problems between the Coast Guard at that time, the FAA and the Navy; and it was not installed.

DCRA1-1 Procedures exist that facilitate coordination between the Dare County Regional Airport and the Navy Dare County Range when aircraft request an IFR approach during Instrument Meteorological Conditions. A phone call from Manteo to the Navy Dare County Range tower is the only coordination required to clear aircraft through the Navy Dare County Range restricted area. Changing weather conditions in and around the restricted area make it impossible to relinquish the airspace every time current observed weather is below minimums for range use, because the weather often clears 30 minutes later, allowing a completed mission. The restricted area is often released when regional weather prohibits adequate training.

DCRA1-2 Please see response to DCRA1-1. The F/A-18 is a fully certified IFR aircraft.

Gaylord (Cont.)

3 A site survey study has been completed for several years. I understand all they've got to do is go back and look at it and reapprove it. Nothing has changed except one tree has grown a couple of feet taller and maybe wider. That tree, from what I understand, needs to be cut down. By use of this radar, even with what you say, it will enhance lifesaving, enhance services at civilian airfields and improve the traffic flow and services to Dare County and Manteo airport. This is straight out of what has been studied. But I know the radar initially started about eight plus years ago. It is still not done; it is still not in use. ASR8s should be available with the closing of several Navy fields, one of the fields on the BRAC Commission. They are in service; they are certified. It would be less costly to take these radars and just move them and put them in place. It should not take that long to get them up and certified. This will increase the aircraft safety of northeastern North Carolina, not just Dare County. That radar should provide coverage to Edenton, Currituck, Dare County, Washington and several other areas in northeastern North Carolina. If nothing else it will be a great public relations benefit to the Navy to show that they are interested in flight safety.

Thank you.

DCRA1-3 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

Speaker: Mr. John Shick
912 Duke of Suffolk Dr.
Virginia Beach, VA

Thank you, Your Honor. I appreciate being able to speak here. For those of you in the audience, I am from Virginia Beach, so I will be -- my comments will be more related to the Virginia Beach issues as it then relates to other locations.

While not categorically opposed to F/A-18s being relocated from NAS Cecil Field to NAS Oceana, I am concerned all the options have not been fully explored and presented to the public. No one will dispute that the arrival of these aircraft in Virginia Beach may be beneficial to certain segments of the community and certainly would be a positive value to the U.S. Navy. Conversely, it is equally difficult to dispute the fact that the aircraft will be accompanied by some negative aspects: increased accident potential, expanded noise zones and elevated noise levels, traffic congestion and public service burdens, classroom crowding and learning impairment potential, and the possibility of real estate devaluation, increased ozone levels, future noise replacement aircraft, et cetera.

Each of these issues in order is a legitimate concern, not only of those most exposed but also every area resident wants and expects decisions of this magnitude to be made for the right reasons. They also expect that every substantive concern receive thorough and credible consideration and that they are ultimately addressed in the adopted solutions that are appropriate. Regrettably residents who have expressed their concerns and reservation in public forums have all too frequently been maligned by individuals who questioned their patriotism and charged them with callous disregard for the living conditions of young sailors.

At this point the preferred option of those who would make a decision would bring all 180 aircraft to densely populated Virginia Beach and rapidly growing Chesapeake. The draft environmental impact statement does not address any option which would place the majority of the aircraft at Cherry Point or Beaufort. It should be amended to do so. Nor does it address the potential of maximizing the use of existing excess capacity at all three sites simultaneously to potentially reduce construction costs. The DEIS should be amended to do so. 1

Nor does it develop a methodology that ascribes a value to all the legitimate issues and integrates them into a non-parochial, regional, vice local solution. A working group of representatives from Virginia and the Carolinas similar to the Navy sponsored community participating restoration advisory boards should in a collaborative manner attempt to consider all reasonable options and craft a better solution which seeks to maximize overall benefits while minimizing adverse impacts.

JS2-1 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible:
1) relocation of all aircraft to MCAS Cherry Point and
2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of the ARSs.

Shick (Cont.)

True, this group may be unsuccessful. In any event, the legion of concerned citizens who have been told in recent editorials to accept the preferred option as fate complete and to just get over it might reluctantly accept whatever resolution was eventually adopted if convinced that it was the best that honest men and women could fashion, all things considered.

I do not believe that the long-term economic vitality of Virginia Beach is contingent upon the explosive growth that will accompany these 180 aircraft. Nor that the readiness of our Navy is contingent upon a single siting of all at NAS Oceana. I do believe however that the sound of freedom would ring equally as sweet if it were to originate from other than Virginia Beach if that were the final outcome.

It is time to set aside individual, institutional and political parochialism that surrounds this issue and fashion an agenda for each solution, one which disenfranchises fewer concerned citizens.

Thank you.

Mr. Michael R. Bryant, Refuge Manager
DOI, USFWS, Alligator River NWR
Route 1, Box 1969
Manteo, NC 27954

Comment:

The preferred alternative in the DEIS describes proposed actions which are likely to impact our aircraft dependent management activities. **[ARNWR-1]** Currently, we fly single engine aircraft and helicopters for monitoring and census work for waterfowl, for red-cockaded woodpeckers (endangered species), and for red wolves (endangered species). We also use these aircraft for detecting wildfires and to conduct prescribed burning operations. In addition, DOD has expressed concerns about our proposed management of impoundments which concentrate waterfowl. How would you propose to mitigate for these impacts? Who can we discuss suggested mitigation with? **[ARNWR-2]**

Response:

ARNWR-1 Based on an analysis of impacts in the EIS and Appendix C, the Navy has determined that no mitigation is required. The largest projected increase at the Dare County Range would be for ARS 1, in which all F/A-18 aircraft would be transferred to NAS Oceana. ARS 1 would only result in an increase of approximately five sorties per day (on the average) over existing 1997 operations. In addition, even though the number of operations will increase from 16% to 28% for the Navy portion of the Dare County Range (depending on the alternative), the actual time that the range is considered "active" or "hot" would increase very little over existing conditions. The percent utilization of the Navy Dare County Range would increase from 57% in 1997 to 67% in 1999. Consistent with current procedures, citizens and state and federal officials will be allowed access to airspace over and adjacent to the Dare County Range whenever the range is declared "cold." Upon request, the range may be declared "cold" when not being scheduled by the military. Appendix C of the EIS includes the Dare County utilization table and a detailed discussion of potential impacts to the Dare County Region.

The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

ARNWR-2 Please contact Mr. Fred Pierson, the community planning liaison officer (CPLO) for NAS Oceana, NALF Fentress, and Navy Dare County Range, at (757) 433-3158

Ms. Jody Raynard McGee
Commercial 135 Pilot/A&P Mechanic/ASEL-IA Flight Instructor
'91 B.S. Aeronautical Science, Embry Riddle Aeronautical Univ.
113 Pirates Way
Manteo, NC 27954

Comment:

Please consider what I have to share with you requisite for the continued safety at Dare County Airport. DCA users need cooperation with ATC/NAVY alignment! **[JRM1-1]** As a commercial 135 pilot based in Dare County and Raleigh-Durham over the past three years I have experienced a burgeoning necessity for joint action in this APZ. Runway 5 at Dare County Airport (DCA-MQI) is the required runway for larger aircraft. This runway provides the preferred instrument approach procedure due to weather and landing minimums. This procedure is rarely allowed by ATC due to ATC's ability to coordinate aircraft; (range status are conflicting resulting in ATC never allowing this approach). Your efforts and bonafide dedication is appreciated. Note: A few years ago I flew wildlife flights in R5314 and was communicating with Navy Dare/Airforce Dare via phone and 122.9 VHF. I feel I received fair consideration being perceptive and respecting the complex and lethal operations that take place in R5314. Communication was primitive and again I believe then, a few years ago, radar would benefit operation there. **[JRM1-2]** Since this time Dare County Airport has increased operations considerably. The Navy's proposed action will increase operations considerably with these ARS proposals. I support these realignment proposals and ask for help.

Response:

JRM1-1 Existing procedures provide civilian, state, and military pilots the capability to communicate with range and ATC facilities. Pilots can contact FAA flight service stations to determine if military training routes are scheduled. In addition, direct phone lines have been established between Dare County Range Control, Norfolk Approach Central, Washington Air Traffic Central Center, and the Fleet Area Control and Surveillance Facility (FACSFAC) to improve communications.

JRM1-2 Based on an analysis of impacts in the EIS and Appendix C, the Navy has determined that no mitigation is required. The largest projected increase at the Dare County Range would be for ARS 1, in which all F/A-18 aircraft would be transferred to NAS Oceana. ARS 1 would only result in an increase of approximately five sorties per day (on the average) over existing 1997 operations. In addition, even though the number of operations will increase from 16% to 28% for the Navy portion of the Dare County Range (depending on the alternative), the actual time that the range is considered "active" or "hot" would increase very little over existing conditions. The percent utilization of the Navy Dare County Range would increase from 57% in 1997 to 67% in 1999. Consistent with current procedures, citizens and state and federal officials will be allowed access to airspace over and adjacent to the Dare County Range whenever the range is declared "cold." Upon request, the range may be declared "cold" when not being scheduled by the military. Appendix C of the EIS includes the Dare County utilization table and a detailed discussion of potential impacts to the Dare County Region.

The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

Mr. Gary L. Clark
211 Sea Oats Ln
Kitty Hawk, NC 27949

Comment:

At the present time it is almost impossible for a civilian aircraft to get approval for an instrument approach to Runway 5 at Dare County Airport and extremely difficult to obtain an IFR clearance along V-189 between Dare County Airport and Tar River VOR due to range activity in R-5314. I sincerely hope that additional military activity in that range will require increased coordination between the range and ATC facilities and/or additional aircraft control facilities which will allow civilian aircraft more availability to the airspace in the vicinity of Dare County Airport. As a pilot that uses that airspace on an almost daily basis, I would greatly appreciate more access to those federal airspaces. **[GLC-1]**

Response:

GLC-1 Existing procedures provide civilian, state, and military pilots the capability to communicate with range and ATC facilities. Pilots can contact FAA flight service stations to determine if military training routes are scheduled. In addition, direct phone lines have been established between Dare County Range Control, Norfolk Approach Central, Washington Air Traffic Central Center, and the Fleet Area Control and Surveillance Facility (FACSFAC) to improve communications.

A.5 Public Hearing, Virginia Beach, VA

A.5 Public Hearing Transcripts/Comment Cards, Virginia Beach, VA

Speaker: Ms. Meyera Oberndorf, Mayor
City of Virginia Beach

Good evening, Judge Utecht and Mr. Cecchini. Thank you very much for your explanations.

I am Meyera Oberndorf, Mayor of the City of Virginia Beach, and with me tonight are members of the Virginia Beach City Council whom I will ask to stand so that they may be recognized.

Gentlemen. Mr. Branch, Mr. Jones, and Mr. Harrison. Thank you for being here.

Let me begin by saying that nothing is sweeter than the sound of freedom. Virginia Beach has been very proud and fortunate to be the home to Oceana for the last 50 years, and we look forward to being its home for the next 50 years.

The City of Virginia Beach fully supports the ARS 1 recommendation in the Draft Environmental Impact Statement. We believe it is the best scenario. This scenario is the best for the environment, disturbing less than one acre of wetland-s. It is less expensive for all taxpayers in the nation, and perhaps most importantly, it is the best for our servicemen and women and their families.

I'd like to point out a few of the intangible benefits Virginia Beach offers that are not covered in the DEIS. The most important is the quality of life, and with the nation looking to an all-volunteer armed service, we need to be able to house our people in the fine city of Virginia Beach.

Besides our beautiful beaches and cultural and recreational facilities, our region offers excellent employment opportunities for military spouses and part-time employment for those who desire it. Educational opportunities abound from preschool through doctoral degrees at the many universities in the area. Quality affordable housing, excellent medical care, and a host of other amenities are available. These advantages make Virginia Beach and the expansion of NAS Oceana the best fit.

There are three specifics mentioned in the DEIS as possible shortfalls. First let me talk about transportation. Virginia Beach has the most aggressive road building program of any city or county in the Commonwealth. In the next four years alone, $65 million is planned for improvements around Oceana Naval Air Station. These include the widening to four lanes of Birdneck Road, First Colonial Road, Oceana Boulevard, London Bridge Road and Great Neck Road.

Thank you for your comments; no response required.

Oberndorf (Cont.)

Since 1988, we have completed $103 million in road projects in proximity to Oceana. These include four and six lanes for Dam Neck Road, which has replaced London Bridge as the artery on the south side of Oceana, and the first phase of London Bridge Road and London Bridge Road Extended, Princess Anne Road, and Virginia Beach Boulevard.

More than 500 million in roadway improvements are planned for the Oceana area in the future. These include the Southeastern Parkway and Greenbelt, which will provide interstate access between Route 44 on the eastern edge of Oceana and Route I-64 in Chesapeake.

Another concern was our schools. Because of the expansion of the Accident Potential Zone and high noise zone, we now have a number of schools in Noise Zone 3. We have already analyzed Birdneck Elementary. Our preliminary analysis indicates that the school has enough attenuation to reduce the noise level inside the building to 45 decibels or below as suggested by the Navy. We will eagerly accept the Navy's offer to assist us in analyzing all of the impacted schools so we can provide the necessary attenuation.

The City is in the process of relocating Linkhorn Park Elementary School at a cost of 12.2 million even though it is now outside the Accident Potential Zone. We are moving forward with plans to move Seatack Elementary School whose playground is in the APZ, even though the school building is not. We will accept the Navy's offer to analyze patterns and operating procedures to reduce impacts on the neighborhoods and to try to remove Brookwood and Plaza Elementary Schools from the APZ, as long as the changes would not impact the Navy's mission.

We have also employed an expert who can work with the Navy in siting all the F/A-18s here, and Lake Gaston will be on line. There will be sufficient water in the region, and last, but not least, I would like to say that we understand that the State of North Carolina has asked for an extension of the public comment period and we object and we ask that their request be denied. The DEIS has already been scheduled for a public comment period in excess of the requirements of the law. Any extension is unwarranted and would cause greater discomfort.

And I must say again the sound of freedom is very, very sweet to the ears of us in Virginia Beach. Bring the Hornets on.

[Mayor Oberndorf submitted her remarks, which are partially represented by the verbatim transcript. The portion of the remarks not read at the public hearing due to time constraints is provided below.]

In addition, we have hired an outside firm to assist the City and the Navy in a non-adversarial role in analyzing the DEIS. This firm has vast experience working with the Navy and the Marine Corps, and tremendous technical expertise in analyzing noise and accident potential zone impacts. Their mission is to help us get all the 180 F/A-18 aircraft here, and to provide us with a base of information for the collaborative process the Navy offered in the DEIS.

Thank you for your comments; no response required.

Finally, and most importantly, the Lake Gaston Water Supply Project will be dedicated next week. This will bring 60 million gallons of water per day to the Hampton Roads area. We have eliminated the threat of Hampton Roads being short on water. We have also worked with the City of Norfolk on a $100 million project to increase the capacity of their water treatment facility to treat the Lake Gaston water. That project will be completed prior to the arrival of the F/A-18s.

I would also like to point out that when comparisons are made concerning changes in the high noise area, the appropriate comparison is between the 1978 area and the 1999 area. In this comparison, 9,000 additional persons are in the high noise zone, not over 30,000 as reported by the media.

In addition, I want to state that a comment by a resident about crime increasing because of additional naval personnel being stationed in the region is utterly false and very unfair to the men and women who serve our nation. The professionals who will be stationed at Oceana are just like their counterparts who serve at Norfolk Naval Base, Dam Neck, Little Neck and Fort Story. They are responsible citizens with good jobs, discipline and a bright future. They provide valuable contributions to this area.

We understand that the State of North Carolina has asked for an extension of the public comment period. We object, and we ask that their request be denied. The DEIS has already been scheduled for a public comment period in excess of the requirements of the law. Any extension is unwarranted, and would cause greater discomfort to the personnel who will be relocated as it would compress the relocation schedule even more.

Virginia Beach wants to be home to all the East Coast F/A-18s. We welcome all the military personnel needed to support these aircraft. We want all of these personnel to be happy and proud citizens of Virginia Beach and Hampton Roads. We are addressing any perceived shortcomings identified in the DEIS to accommodate these aircraft and their personnel. Hampton Roads and Virginia Beach have always been a wonderful place to live, and our community will become even better with the addition of these new citizens.

Thank you very much. Let me say again, "The sound of freedom is very, very sweet in Virginia Beach. Bring on the Hornets!"

-end-

Speaker: Mr. Owen Pickett, Congressman
U.S. House of Representatives
2710 Virginia Beach Blvd.
Virginia Beach, VA 23452

Good evening. My name is Owen Pickett. I represent the Second Congressional District of Virginia in the U.S. House of Representatives. The Draft Environmental Impact Statement prepared by the Navy with respect to the proposed move of F/A-18 aircraft from Cecil Field Florida to Naval Air Station Oceana fully and amply supports the preferred alternative, which is to relocate all aircraft to Oceana. This is the right decision for the Navy, for Navy people, and for our community.

Discussions and debate about the DEIS have focused on the noise zones and Accident Potential Zones. It must be remembered that the Navy elected to adopt new criteria for use in establishing these zones for the DEIS. As a result, there have been some enlargements of these zones and some relocation of them. Changing these zones based upon new criteria, however, does not change the operating characteristics of aircraft. Perhaps bigger zones are better, but the aircraft noise and safety issues are the same. The real concern should be whether or not there will be additional noise and additional accident potential.

The answer, if we are willing to be objective, can best be illustrated by making a comparison between the number, type and operating intensity of aircraft to be assigned at Oceana in 1999 under the preferred alternative with similar data for prior periods in the operating history of Oceana. You will find in making this comparison between the year 1999 and the year 1991 there is little difference in the number, type and operating intensity, which is to say there will be little or no additional noise and little or no additional accident potential beyond what has already been experienced and accommodated at Oceana in the recent past.

Under any of the alternatives considered in the DEIS, additional aircraft will come to Oceana. The impacts on our community will be negligibly different whether we get the minimum of 120 new aircraft or the maximum of 180. With the impacts for this community being essentially the same for each of the alternatives, the correct decision is for all F/A-18s to come to Oceana.

The community impacts, other than noise and Accident Potential Zones, are not substantial. In many instances, the City of Virginia Beach, as the mayor has explained, has already anticipated and made adequate provisions for new requirements. The air quality issue has been resolved. Hampton Roads is no longer a nonattainment area. It is an air quality attainment area, and this fact should be correctly stated in the Final Environment Impact Statement.

1

OP-1 The EIS has been updated with the latest air quality designation for the Hampton Roads region.

Pickett (Cont.)

Virginia Beach and the Hampton Roads community have proudly supported NAS Oceana for more than half a century, and we strongly want to continue in that role. This large and cosmopolitan community offers an extensive array of amenities and activities of tremendous interest and benefit to Navy members and their families. Quality people are absolutely essential for the successful execution of Navy programs. Quality people want to live and work in quality surroundings.

The relocation of F/A-18s from Cecil Field, Florida, is not just an exercise about where to park airplanes. It is first and foremost a people matter. These hard-working and dedicated military members want a decent home for their family in a friendly community where they can prosper and be full, contributing participants. They want opportunity and a decent quality of life for themselves and their families. The only alternative discussed in the DEIS that provides all of this is NAS Oceana.

Hampton Roads is where the aircraft carriers are home-ported and NAS Oceana is where the aircraft that go on these aircraft carriers should also be located. Any other alternative will degrade Navy readiness, be unnecessarily and excessively expensive to our nation's taxpayers and be extremely prejudicial to the quality of life and well-being of our Navy people and their families.

I thank you very much, and I join the mayor in saying that I do not think an extension of the comment period for the Draft Environmental Impact Statement is warranted. We already have extended the period, as you know, beyond that which is required by law. I think that any additional extension beyond that which has already been granted is uncalled for. It's only going to raise the cost of this process to the taxpayers and make more inconvenience for our Navy people. Thank you.

[Congressman Pickett submitted his remarks. Because only a portion of his statement was read during the public hearing, the complete text of the remarks is provided below.

REMARKS BY CONGRESSMAN OWEN PICKETT
ON THE NAVY'S
DRAFT ENVIRONMENTAL IMPACT STATEMENT
ON THE PROPOSED MOVE OF F/A-18 AIRCRAFT FROM
CECIL FIELD TO THE NAVAL AIR STATION OCEANA

MONDAY, OCTOBER 27, 1997

The Draft Environmental Impact Statement (DEIS) prepared by the Navy with respect to the proposed move of F/A-18 aircraft from Cecil Field, Florida to Naval Air Station (NAS) Oceana fully and amply supports the preferred alternative, which is to relocate all aircraft to Oceana. This is the right decision for the Navy, for Navy people, and for our community.

Discussions and debate about the DEIS have focused on the Noise Zones and the Accident Potential Zones (APZ's). It must be remembered that the Navy elected to adopt new criteria for use in establishing these zones for the DEIS. As a result, there have been some enlargements of these zones and some relocation of them. Changing these zones based upon new criteria, however, does not change the operating characteristics of

the aircraft. Perhaps bigger zones are better but the aircraft noise and safety issues are the same. The real concern should be about whether or not there will be **additional** noise and **additional** accident potential.

The answer, if we are willing to be objective, can best be illustrated by making a comparison between the number, type, and operating intensity of aircraft to be assigned at Oceana in 1999, under the ***"preferred alternative"***, with similar data for prior periods in the operating history of Oceana. You will find that in making the comparison between the year 1999 and the year 1991, for example, there is little difference in the number, type, and operating intensity of aircraft; which is to say there will be little or no **additional** noise and little or no **additional** accident potential beyond what has already been experienced and accommodated at Oceana in the recent past.

Additionally, there is a distinct possibility that the number of

total aircraft proposed for Oceana in 1999, under the ***"preferred alternative"*** in the DEIS, will never materialize. Already there are strong rumors based on credible policy considerations that because of high operating cost for the aging model F14-A's (some 40-50 aircraft) all of them are being proposed for imminent retirement. Another factor leading to fewer aircraft at Oceana is the fact that as new F/A-18 aircraft assigned to Pacific carriers come into the fleet to replace F14's at Oceana being retired, they will be located along with other West Coast F/A-18's at San Diego and not at Oceana.

2

Under any of the alternatives considered in the DEIS, additional aircraft will come to Oceana. The impacts on our community will be negligibly different whether we get the minimum of 120 new aircraft or the maximum of 180. With the impacts for this community being essentially the same for each of the alternatives, the correct decision is for all F/A-18's to come to

OP-2 The projected number of operations and the associated noise levels and air emissions have been recalculated in the EIS to account for a reduction in F-14 aircraft stationed at NAS Oceana in 1999. The reduction in F-14s is due to the retirement of F-14As, which have high maintenance costs. Pacific fleet F-14s will also be retired; they are being replaced by the F/A-18 E/F series on the west coast. This replacement is expected to occur after 1999.

Oceana.

The community impacts, other than Noise Zones and Accident Potential Zones, are not substantial. In many instances, the City of Virginia Beach in its planning has already anticipated and made adequate provision for new requirements. Road projects already authorized, and in some cases constructed, will provide direct access from Oceana onto the City's four lane divided highway system. The comprehensive, high quality public school system, which is accustomed to growth, is carefully monitoring events to ensure that public schools can accommodate all new students. The air quality issue has been resolved. Hampton Roads is no longer a non-attainment area. It is an air quality attainment area and this fact should be correctly stated in the final Environmental Impact Statement. An adequate water supply is assured from the completion of the Lake Gaston water pipeline project. Local builders and realtors are moving

quickly and aggressively to assess the need for, and to insure the availability of, required new housing facilities. Quality medical care is readily available in the private sector, if needed, with the Virginia Beach General Hospital complex being located only three miles from Oceana. Ample job and employment opportunities are available in the community for spouses and family members. There are extensive and varied recreational, cultural, social, and higher education programs and facilities conveniently located in the community.

Virginia Beach and the Hampton Roads community have proudly supported NAS Oceana for more than half a century and we strongly want to continue in that role. This large and cosmopolitan community offers an extensive array of amenities and activities of tremendous interest and benefit to Navy members and their families. Quality people are absolutely essential for the successful execution of Navy programs. Quality

people want to live and work in quality surroundings.

The relocation of the F/A 18's from Cecil Field, Florida, is not just an exercise about where to park airplanes. It is first and foremost a people matter. These hard-working and dedicated military members want a decent home for their family in a friendly community where they can prosper and be full contributing participants. They want opportunity and a decent quality of life for themselves and their families. The only alternative discussed in the DEIS that provides all of this is NAS Oceana. Hampton Roads is where the aircraft carriers are homeported, and NAS Oceana is where the aircraft that go on these aircraft carriers should also be located. Any other alternative will degrade Navy readiness, be unnecessarily and excessively expensive to our nation's taxpayers, and be extremely prejudicial to the quality of life and well-being of our Navy people and their families.

Speaker: Mr. Rick Sanford
Representing U.S. Senator John Warner
4900 World Trade Center
Norfolk, VA 23510

Thank you, Your Honor. My name is Rick Sanford. I am Senator Warner's military liaison based in the Senator's Norfolk office.

This is a statement by Senator John Warner for the public hearing on the DEIS on relocating F/A-18s to Oceana.

" Ladies and gentlemen, it is with deep regret that I am not able to personally attend this public hearing on the Draft Environmental Impact Statement for the movement of the F/A-18 aircraft from Cecil Field, Florida, to Oceana Naval Air Station. As chairman of the Senate Transportation and Infrastructure Subcommittee, I am the manager of the Intermodel Surface Transportation Efficiency Act (ISTEA), which is currently being considered on the floor of the Senate. This bill funds the country's highway transportation. If not for this bill, I would be with you this evening to express my total support for having all 180 F/A-18 aircraft come to Oceana.

" In the Senate I am proud to serve on the Senate Armed Services Committee, dealing on a daily basis with the Defense Department on various issues, and I was particularly involved in the base realignment process. As many of you know, this relocation of F-18s to Oceana was a direct result of the BRAC process. Critical to that decision by the base closure board was this community's continuing support for all the Navy facilities in the Hampton Roads area, particularly NAS Oceana.

"It is no secret that since I joined the Navy at age 17 and served as Secretary of the Navy in the early '70s I am especially committed to the Navy. Oceana, as part of the largest naval complex in the free world, is the pride of the Commonwealth and of our nation. I am pleased that the Draft Environmental Impact Statement is so clear on the fact that Oceana is the obvious choice for all home -- for the home for all of the 180 F/A-18s from Cecil Field.

"As the Navy states, 'from an operational perspective, it is clear that the best configuration of the Atlantic Fleet F/A-18 strike/fighter wing would result from relocating all the F/A-18 fleet squadrons and the Fleet Replacement Squadron to a single installation.' The Oceana option will save the American taxpayers hundreds of millions of dollars over any other alternative and will affect less than one acre of wetlands, compared to hundreds of acres of wetlands impacted by the other scenarios.

Thank you for your comments; no response required.

Sanford (Cont.)

"Virginia Beach is not only the best strategic option and the least costly alternative for the taxpayer, it also provides the best environment for our naval personnel. These intangible benefits are so crucial to the morale of our troups: Good paying jobs for spouses; excellent educational opportunities, elementary and secondary school systems; and medical care facilities; great transportation and tremendous cultural and recreational opportunities. While not accounted for in the Environment Impact Statement, I believe these elements are another important aspect of this option.

"While bringing the fighter aircraft to Oceana will not be without challenges, the entire Hampton Roads area will clearly benefit from the boost to the economy. If the aircraft are moved to Oceana, all the surrounding communities will gain from the hundreds of millions of dollars in salaries and goods and services purchased. This win-win scenario for both the Navy and Virginia Beach will result from stationing the same number of aircraft at Oceana that were here in the 1980s.

"Relocating all of the F-18s to Oceana, the single site alternative, is clearly the best option for the nation, and I urge its adoption.

"Thank you."

[Mr. Sanford submitted the prepared statement of Senator Warner, which is represented by the verbatim transcript.]

Speaker: Mr. Robley Jones
Representing U.S. Senator Charles Robb
The Ironfronts, Ste. 310
1011 East Main St.
Richmond, VA 23219

Captain Utecht, elected officials, ladies and gentlemen, I am Rob Jones, state director pursuant to Charles Robb. Having lived in this area for two decades, it brings great pleasure to return to Virginia Beach and to present Senator Robb's statement.

I quote, "I am proud of my military service, and I am proud to represent Virginia on the Armed Services Committee in the United States Senate. Virginia is home to over 91,000 military personnel, people who volunteer to sacrifice to keep our nation strong. Virginia is also home to the Atlantic Fleet and one of the most important naval air bases in the world, Oceana.

"During the base closure process, we fought hard to keep the Oceana Naval Air Station open, not simply because it's located in Virginia, but because its facilities are crucial to the protection of our nation. The Base Realignment and Closure Commission agreed with our assessment and opted to keep Oceana, but the Commission also had to make the difficult decision to close other bases and relocate those assets to the remaining facilities. This was done to save taxpayer dollars and ensure that the Department of Defense was operating as efficiently as possible while maintaining the strength we need to remain as the world's sole remaining superpower.

"There is no doubt the BRAC Commission made the right decision when it chose Oceana as the best facility for locating the new squadrons. From a military standpoint, locating the F/A-18s along with the fleet they serve makes good sense. I think we all anticipated that the addition of these squadrons would call for adjustments and sacrifice, and I think the Draft Environmental Impact Statement has done an excellent job identifying what those adjustments and sacrifices will mean. I appreciate the Navy holding this hearing, and I hope that the discussion here will help identify what mitigation we can employ to reduce the effects of this change in this area.

"I would like to conclude by acknowledging the benefits Tidewater has reaped throughout history from the impressive presence of our military here and reminding the hearing panel that Virginians have always displayed support for our military and demonstrated a willingness to pay the price of freedom."

Senator Robb regrets that he cannot be here tonight. I thank you for this opportunity to present his statement. Thank you.

Thank you for your comments; no response required.

[Mr. Jones submitted the prepared statement of Senator Robb, which is represented by the verbatim transcript.]

Speaker: Mr. Bob Stolle
Deputy Secretary of Commerce and Trade
Richmond, VA

Thank you, Your Honor. My name is Bob Stolle. I am a Deputy Secretary of Commerce and Trade in the Commonwealth, and I am here representing Governor Allen tonight. Good evening, and on behalf of the Governor, thank you for letting me participate in this hearing.

For almost four years I have had the privilege of serving with Mayor Oberndorf and Congressman Pickett on a task force that was created to address the future of NAS Oceana in the City of Virginia Beach. That effort included Senator Warner, Senator Robb, members of the Virginia Beach delegation to the General Assembly, business leaders from Hampton Roads, citizens from Hampton Roads and, of course, the United States Navy.

With all of the significant input that we had at the time from citizens, from business groups, et cetera, we believed then, as we do now, that the decision regarding the relocation of the F/A-18s from Cecil Field, if it were to be made based on operational effectiveness, cost and quality alike for the personnel that are affected by this move, the Navy would clearly choose to consolidate at a single location, and that location would be NAS Oceana. We are, of course, delighted that ARS 1 out of the Draft Environmental Impact Statement has made just that recommendation.

I would like to just very briefly review the State's participation in this effort. We are a support organization at this point to the City of Virginia Beach and Hampton Roads. We participated specifically in four different areas. One, as the mayor has already addressed, water is no longer an issue in the City of Virginia Beach with the advent of the Lake Gaston pipeline. Transportation, again, covered very nicely by the mayor, the projects that are currently underway, including the expansion of Oceana Boulevard to four lanes, are already funded. The projects are underway. The Virginia Department of Transportation is in the process of acquiring the right-of-ways, and transportation and traffic will soon no longer be an issue around NAS Oceana.

As far as the environment goes, I want to point out also Frank Daniel, who is with us tonight. He's the Regional Director of the Department of Environmental Quality who has come to perhaps field any questions that people might have during the break or after. DEQ is currently evaluating the Draft Environmental Impact Statement. Responses, as a matter of fact, from the state agencies are due tomorrow. It will probably take around two weeks to consolidate that into a report, and at this point Frank tells me that he does not expect any adverse comments from state agencies regarding the DEIS.

Thank you for your comments; no response required.

Stolle (Cont.)

Hampton Roads -- some reading the draft might get confused in there. Let me point out that Hampton Roads was, in fact, recently designated as an attainment area, and the ten-year maintenance plan developed last year by DEQ and approved by EPA was drafted specifically to include the movement of the F/A-18s to NAS Oceana. To quote Frank on this, the environmental will not be -- or the environment will be not a pivotal issue on this.

Finally, recognizing that, in fact, housing, particularly low-income housing, for some of the sailors who will be moving into this area will potentially be an issue, the Virginia Housing Development Authority has already moved to establish a home buyer education course, which is already underway at NAS Oceana and soon to be expanded. They're also for the first time making available special low interest loans to Navy personnel that will be moving into the area. We also have ongoing discussions regarding the building of base housing and public units on government property which would be done through a lease-back arrangement, and VHDA is committed to providing assistance to meet the housing needs of base personnel.

The message is regarding all of these issues that were highlighted in the Draft Environmental Impact Statement, we're on top of it. We didn't start after the EIS came out. We have been proactive in this. The Navy is not only an important part of our economy in Virginia, but it's part of our culture as well. We want to remain the best possible host to the United States Navy. We remain committed to the City of Virginia Beach and the Hampton Roads area to provide whatever assistance we can to make sure that the aircraft are transferred in a timely fashion.

Thank you.

Speaker: Mr. Stanley Walker
Virginia State Senator

Captain Utecht, Mr. Cecchini, and members of the panel, I'm Stanley Walker, Senator, State Senator. I represent the Sixth Senatorial District, which includes a portion of Virginia Beach and Norfolk. I'm delighted to be here to support Mayor Oberndorf and the speakers who have spoken before me and, I think, a great number of people throughout the Hampton Roads area.

I want to congratulate those on the team for the work on the Draft Environmental Impact Statement. ARS 1, the alternative, which is the preferred alternative, is obviously the alternative that makes the most sense, I think, for most all of the citizens in this area. I can give you many reasons, most of which have been given tonight or will be given, as to why this is the best alternative.

From my experience as a legislator that has served this area for over 30 years -- it's longer than that, but I don't want to go into too much detail on that -- in the state legislature as president pro tempore for the past ten years and currently one of the chairmen of the Senate finance committee, I'm familiar with these reasons. I'm familiar with the history, and history is one of the reasons. The future is another reason. Education is another reason. Economic and regional commitments, the City of Virginia Beach's know-how is a reason, and that this location is just best military-wise. That's a good reason.

Regarding history, this area, as you know, is rich in naval history. The presence of the Navy has been here since, it seems to me, the very beginning when you look at the history. I can recall the days before World War II. Maybe not many here can do that. The buildup of the Navy operations, I witnessed that, the excitement of observing the Navy's aircraft in that period, the expansion down through the years. The citizens of Virginia Beach and its sister cities have grown with the Navy in every phase of its growth. We know the Navy. We know how to work with the Navy. We know how to live with the Navy, and we take tremendous pride in this relationship.

We succeed as a community in so many things, and we do that because so many Navy personnel -- seamen, officers, naval aviators -- choose to stay here. I've often said to people who ask me about my constituency, I say, well, I must be the most fortunate fellow in the world because my constituency is made up of people who come from all over the United States and the world really. They are well-read. They are aware of government. They are inquisitive. They make a wonderful constituency. They give you great support, and we succeed because of that.

Thank you for your comments; no response required.

Walker (Cont.)

The City of Virginia Beach knows how to handle growth. I'm a native of this area, and I've witnessed that. And its educational system, I can vouch for it because I used to serve on the school board of a big city. Its educational system is among the very best, not only in our area, but throughout the state and throughout the country. When they have to expand space, they know how to do it. The City is second to none in handling student increases while providing the best possible educational opportunities.

Virginia Beach has also been at the forefront of economic development, having the know-how to take advantage of growth through taking initiatives in economic opportunity that creates jobs and provides a clean and beautiful city where people choose to live.

So I'd just like to close and say that we have here in this area the ingredients to follow through with alternative number one, whether you are talking about a transportation network, a sanitation/sewer system, a public school system, a higher education system. There is a community spirit, having the desire to want to do it. It's all here, and I am pleased to join with so many others in expressing my views this evening.

Thank you.

[Mr. Walker submitted his prepared statement, which is represented by the verbatim transcript.]

Speaker: Mr. Ken Stolle
Virginia State Senator
1804 Tree Line Rd.
Virginia Beach, VA 23454

Thank you, Your Honor. My name is Ken Stolle and I represent the 8th Senatorial District. It is always difficult to follow the president pro tempore. It's even more difficult to follow my younger brother, so I will be very brief tonight.

I simply want to say that we are currently in the 8th Senatorial District now. Oceana is completely within the 8th Senatorial District, and most of the flight patterns that we have seen up there are also within the 8th Senatorial District. One of my colleagues from the Virginia Assembly, Delegate Glenn Croshaw, wanted to be here. He could not be here. He got tied up in Richmond and he's on his way down here, and I was asked to make a couple comments for him as well.

Oceana is completely within Delegate Croshaw's district as well. I think that it's very safe to say that both Glenn and myself completely support the Oceana -- the increase in the jets at Oceana. I think it's also important to recognize they have been our neighbor for 50 years, and it's more than a neighbor, they are a citizen of this community, and we recognize them as a citizen of the community.

The point I would like to try and make to you tonight is simply this: That I talk to citizens in my district all the time and they couldn't get up here, nor could I get up, and give the briefing that we have seen tonight. They probably don't know the difference, nor do I, between all the different scenarios that we have, but I think the one clear message that I have received and I think that Glenn has received from the constituents in our district is that there is broad support within our districts for the increased jets at Oceana and the F/A-18s that come to Oceana. I'd say there is some legitimate concerns that need to be addressed, and that is why I am here tonight. I want to hear the concerns that need to be addressed that people have about the jets coming to Oceana, but overall, Oceana -- NAS Oceana has been a good citizen here. We want to continue that. We are very supportive, and I think overall the constituents in my district are very supportive of the F/A-18s coming here, and I thank you for this opportunity.

Thank you for your comments; no response required.

Speaker: Mr. Edward L. Schrock
Virginia State Senator
4213 Dougherty Ct.
Virginia Beach, VA 23455

I'm Senator Ed Schrock. I'm a member of the Virginia General Assembly representing the 7th Senatorial District of Virginia, which is the western half of the City of Virginia Beach; Ken Stolle having the eastern part. I also served for 24 years in the Navy, retiring October 1988 with the rank of captain.

Although the district I represent is not directly impacted by the flight patterns at Oceana, the district, like every district in this part of Virginia, will feel the positive impact of the build-up at Oceana.

Let me say right now that my wife, son and I were not privileged to be born here, but once we got here, we had the good sense to stay here because as far as we are concerned, there is no better place in the country to live, and we know, because we have lived all over the world, and chose to stay here after the Navy. For the new folks who will be coming here with this build-up, they will never live in a finer place. I can't imagine being in the military and living anyplace better than Virginia Beach and the Hampton Roads area.

In the district I represent there are excellent public facilities such as libraries unlike any you have ever seen, excellent schools, wonderful recreation centers, Virginia Wesleyan College, Old Dominion and Norfolk State University Graduate Center for higher education, and a list of other amenities too numerous to list in the time I have here with you tonight, and let's not forget the beaches. They are the best on the East Coast.

As our Mayor has said, we have a great road network, not only around Oceana, but throughout Hampton Roads. As you can see if you ride around this place, construction is ongoing to make it even better.

Unlike some of the other sites, there are other amenities that make us the logical site for the Navy personnel and their families. For their children, we are a very short distance from historic Williamsburg and Jamestown where the first colony landed in 1607. At Yorktown they can see where the British were defeated in the final battle of the Revolutionary War. In the Hampton Roads area we have the Virginia Marine Science Museum here in Virginia Beach, the finest museum of its kind anywhere in the country, the Hampton Air and Space Museum, the Mariner's Museum in Newport News, Chrysler Hall in Norfolk, the Children's Museum in Portsmouth, the Coast Guard and Lifesaving Museum in Virginia Beach, and let me say again, the finest beaches on the East Coast.

Thank you for your comments; no response required.

Schrock (Cont.)

In my 24 years in the Navy, Judy, Randy and I made many moves from one duty station to another, and I can fully understand the trials and tribulations of packing up the family and moving. The fact that tens of thousands of those military families chose to stay here after retirement speaks volumes about Virginia Beach and the entire area that we call Hampton Roads. We lived in South Carolina for a tour and liked it very much. But once you have lived in Virginia Beach, everything else pales by comparison.

I look forward to welcoming our new friends to the area and representing them in the Virginia General Assembly. I thank you for coming here, and be forewarned, if you stay here more than two days, you are not going to want to leave either.

Thanks.

[Mr. Schrock submitted his remarks, which are represented by the verbatim transcript.]

Speaker: Mr. Leo Wardrup
Virginia House of Delegates
P.O. Box 5266
Virginia Beach, VA 23461

Thank you, Judge. It's a pleasure to be here this evening with you and the members of your staff. You are very patient to bear with us as we go through this. We appreciate the opportunity to appear before you.

I am Leo Wardrup. I represent the 83rd District in the Virginia House of Delegates. Also, Judge, I'm a former Navy man, having retired some 12 years ago. I was the comptroller at Oceana, the financial manager, if you will, in the mid to late '70s when we transdecked the F-14 Tomcat from the West Coast to Oceana. Things were a little different then, but not much. We faced the same types of issues then we face today, noise, cost, potential danger areas, economic impact, citizen support and citizen concerns.

But the best analysis humanly possible then supported bringing all the F-14s to one East Coast location, Oceana. The best analysis humanly possible today supports bringing all the F-18s to Oceana.

Having been there, I know a little bit about the cost of operating a Naval Air Station. In my opinion, the analysis in the Draft Environmental Impact Statement which I have read is very clear that Oceana is the best choice for stationing all 180 F/A-18 aircraft to Cecil Field.

This choice will save the taxpayers in this country hundreds of millions of dollars over the years. As the Mayor pointed out, the choice will affect less than one acre of wetlands compared to some 130 or 135 acres of wetlands impacted by the other choices. This choice will bring all the Hornets to a city that knows and appreciates the Naval aviation in large quantities. This choice will bring all the Hornets to the sister city of Norfolk, which is the home of the largest Naval force in the world and the home port for the platforms for many of these F/A-18s.

Speaking now as a state representative, I hope you know that the Commonwealth of Virginia has done a great deal of work in preparation for stationing the Hornets at Oceana. During BRAC 1995, and to assist a regional effort in Hampton Roads, the General Assembly appropriated a quarter of a million dollars to the Hampton Roads Planning District Commission for the work that they were doing in concert with our congressional delegates and other community leaders.

Thank you for your comments; no response required.

Wardrup (Cont.)

The General Assembly has passed legislation allowing Virginia Beach to adopt an airport zoning ordinance. This ordinance establishes certain criteria and restrictions for development within a high noise and other impacted areas. These tools will enable Oceana to accommodate jets with the least amount of intrusion on our citizens.

Alternative Realignment Scenario number one is the best option for Naval aviation. It's the best option for Virginia Beach. It's the best option for the nation. As others have said this evening, we like naval aviation, Virginia Beach. We like Oceana. We like the sound of freedom. And we want that sound of freedom represented by these 180 F/A-18 Hornets to be right here in Oceana.

Thank you, Judge.

[Mr. Wardrup submitted his remarks, which are represented by the verbatim transcript.]

Speaker: Mr. Frank Wagner
Virginia House of Delegates

Thank you, Judge Utecht, and members of the panel.

My name is Frank Wagner and I represent the 21st District of the Virginia House of Delegates. I won't try to reiterate what you have already heard tonight, Captain, but clearly as you go through and you look at the wetlands, there is no decision between the alternatives.

Clearly Virginia Beach and Oceana is the best selection. Clearly when we talk with concerns of noise and safety, the difference between ARS 1 and 5 is negligible. We have seen these levels before here. They had no adverse impact on this community. We have talked about the cost to the taxpayers and that this ARS 5 is by far and away the most advantageous both to the local level and also to the national level in terms of cost to the military. But ranked first and foremost, finally, I think the Navy has to make a decision what ultimately is in the best interest of the Navy.

We have said and we have heard from local, state and federal officials. We welcome Oceana, we welcome ARS 5, and ultimately in the end the Navy must make that decision. Right now clearly throughout the Navy what we hear is quality of life is the number one issue facing it.

The cost of training a pilot, cost of training the sailors to maintain these airplanes and need to retain these individuals in the Navy clearly offering a stable community environment where you reduce and mitigate the impact of transfers in our community with infrastructure that is here to support the families, where there is ample employment opportunities for spouses of the sailors and spouses of the pilots to find a job, school with the infrastructure, higher education, it's all right here in the Hampton Roads community. It's all right here in Virginia Beach.

I believe we have addressed the issues concerning water. I believe we have also addressed the concerns and improvements we plan for our roads and infrastructure, and ultimately, I hope that the Navy in their wisdom selects Oceana and selects ARS 5 with 180 aircraft to this area.

Thank you.

Thank you for your comments; no response required.

Speaker: Mr. Arthur Collins
Hampton Roads Planning District Commission
Regional Building
Woodlake Dr.
Chesapeake, VA

Good evening, Judge. Jim Authur Collins representing the Hampton Roads Planning District Commission as chairman for Joe Frank, a number of the other commissioners representing Virginia Beach are also here this evening.

The Hampton Roads Planning District Commission has reviewed the Draft EIS and congratulates the Navy for an exceptionally thorough treatment of all relevant issues. Our review focused primarily on sections of the report dealing with air quality, water resources and public infrastructure.

As expected, EIS deals exclusively with air quality, specifically the potential impact on ozone levels. First, I would like to take a moment to place this issue in a historical perspective. In order to meet the EPA's air quality standards for ozone, an Air Quality Control Region such as Hampton Roads must not exceed an EPA standard ozone level, an average of more than one time per year over a three-year period. Hampton Roads did not meet this criteria during the initial test period which began in the late 1980s. As a result, the EPA designated Hampton Roads an ozone marginal nonattainment area in November 1991. Marginal nonattainment is the least serious category in the EPA's system of classifying air quality problems. Subsequent to the EPA's action, Hampton Roads experienced above standard readings for brief periods only two days in 1992 and three days in 1993. There have been no exceedances since July 1993. 1

I want to stress that the proposed F/A-18 aircraft and personnel to Oceana as described in ARS 1 of the Draft EIS fully conforms with the EPA-approved Air Quality Maintenance Plan for Hampton Roads and the associated EPA decision to reclassify Hampton Roads as an ozone attainment area. The HRPDC also supports EIS data and conclusions concerning the minimal impact on the water resources and public infrastructure such as roads and waste treatment. We do, however, join others in noting that the discussion of water supply adequacy in Section 3 should be updated to reflect the recent completion of the Lake Gaston project. 2

Thank you very much.

HRPDC-1 Thank you for your comments; no response required.

HRPDC-2 The discussion of the Lake Gaston Project has been updated in Section 3.1.6.1 of the EIS.

Statement by Arthur L. Collins, Executive Director/Secretary of the Hampton Roads Planning District Commission, regarding the Draft EIS for Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station Cecil Field, Florida to Other East Coast Air Stations

October 27, 1997

The Hampton Roads Planning District Commission staff has reviewed the Draft Environmental Impact Statement and congratulates the Navy for an exceptionally thorough treatment of all relevant issues. Our review focused primarily on sections of the report dealing with air quality, water resources and public infrastructure. .

As expected, the EIS deals extensively with air quality--specifically the potential impact on ozone levels. First, I should take a moment to place this issue in historical perspective. In order to meet the EPA's air quality standards for ozone, an Air Quality Air Quality Control Region such as Hampton Roads must not exceed the EPA standard ozone level an average of more than one time per year over a three-year period. Hampton Roads did not meet this criteria during the initial test period which began in the late 1980's. As a result, the EPA designated Hampton Roads an "ozone marginal nonattainment area" in November, 1991. Marginal nonattainment is the least serious category in the EPA's system of classifying air quality problems. Subsequent to EPA's action, Hampton Roads experienced above standard ozone readings for brief periods on two days during 1992 and on three days during 1993. There have been no ozone readings exceeding the EPA standard since July, 1993. This improvement may be attributed to a number of factors including emissions reductions by industrial sources, more fuel-efficient automobiles, and the use of reformulated gasoline. The introduction of reformulated gasoline commencing in January, 1995, was a voluntary policy decision by Virginia governments to further improve air quality throughout the region.

[Mr. Collins submitted his prepared statement. Because only a portion of his statement was read during the public hearing, the complete text of the statement is provided below.]

On January 15, 1995, the EPA proposed to reclassify Hampton Roads as a "moderate nonattainment area" based on the total number of ozone level exceedances since marginal nonattainment status was imposed in 1991. The EPA withdrew this proposed ruling after reviewing evidence that all ozone violations had occurred early in the evaluation period and that air quality in the region had improved dramatically since 1993.

Steps to obtain redesignation as an ozone attainment area began in late 1995 soon after Hampton Roads completed its third straight year of ozone compliance. The EPA redesignation process requires that the region be covered by an Air Quality Maintenance Plan which inventories all pollution sources, projects growth in these sources, and details how pollution levels will be maintained below EPA-prescribed levels. This Maintenance Plan becomes a revision to the state-wide Air Quality Implementation Plan, or SIP. The Virginia Department of Environmental Quality (VDEQ) submitted the required Maintenance Plan and Request for Redesignation to the EPA on August 27, 1996. On March 12, 1997, the EPA announced its intention to approve these documents unless adverse comments were received. Following receipt of comments from two respondents in North Carolina, the EPA was obligated to extend the public comment period until May 13, 1997. The EPA subsequently found no merit in the North Carolina comments, and in fact, noted that Hampton Roads had not only met, but surpassed the legal requirements for redesignation. This finding was published in the Federal Register on June 26, and Hampton Roads became an ozone attainment area effective July 28, 1997.

I want to stress that the proposed transfer of FA-18 aircraft and personnel to Oceana as described in Alternative Scenario One of the Draft EIS fully conforms with

Collins (Cont.)

the EPA-approved Air Quality Maintenance Plan for Hampton Roads and the associated EPA decision to reclassify Hampton Roads as an ozone attainment area. In fact, our Maintenance Plan allows for an increased production of ozone precursers (VOC and NOx) at Oceana which is almost double the amounts projected in the Navy's Clean Air Act Conformity Determination (Annex E to EIS). I should also emphasize that Oceana is, and will continue to be, a very minor factor in local air quality compared to automobiles, power plants and other major producers of air contaminants in the Hampton Roads region.

3 While the HRPDC supports the air quality data and conclusions contained in the Draft EIS, we have some concerns with the terminology and characterizations used in various discussions of the region's air quality status. These problems mostly concern statements which obviously were written during the development of the EIS prior to Hampton Roads' redesignation as an ozone attainment area. Our editorial comments will be submitted in writing at a later date.

4 The HRPDC also supports EIS data and conclusions concerning the minimal impact on water resources and public infrastructure such as roads and waste treatment. We do, however, join others in noting that the discussion of water supply adequacy in Section 3 should be updated to reflect the recent completion of the Lake Gaston Project.

Thank you...

HRPDC-3 The EIS has been updated to reflect the redesignation of the Hampton Roads Intrastate Air Quality Control Region from ozone non-attainment to attainment.

HRPDC-4 Please see response to HRPDC-2.

Speaker: Mr. Paul F. Hollandsworth
Association of Naval Aviation
2318 Croix Dr.
Virginia Beach, VA 23451

My name is Paul Hollandsworth. I wish I were this lucky in the lottery to win the first time. I wouldn't have to be here, I could be in Richmond now.

I would like to address the Accident Potential Zone. When I started flying Navy airplanes in 1954, the number of crashes per year were 776. This year there were 15. The number of F/A-18s that crashed this year were five; the number of F-14s, if I'm correct, were four. That does not mean that living close to an airport you don't have the option of every once in a while having an airplane parked in your backyard. However, the chances of that happening any more has certainly decreased, and the most dangerous place for an airplane from the Navy, from the ones that fly at Oceana, is around the carrier. After that, any more it is not necessarily in the landing pattern anyplace else. So I would like to alleviate those fears of people who see this so-called crash zone, Mr. Press, that you so commonly call it. And I think that that should be alleviated with these figures.

Thank you very much.

Thank you for your comments; no response required.

Speaker: Ms. Carol E. Sherman
1829 Templeton Lane
Virginia Beach, VA 23454

I'm Carol Lee Sherman. I'm a citizen that lives in the Great Neck area. It's needless to say that anybody that lives here is somehow either in the Navy or connected to the Navy financially. We would be the biggest little ghost town around if the Navy were to drop, so we are happy that you are here. However, I do have some concerns with the increase of the 180 F/A-18s.

I have been a teacher in the Virginia Beach system. I have also been in real estate, so I do see the financial advantages to you-all increasing the number of planes coming here. However, as a citizen that has four children in the public schools, I feel that the impact of the extra children in the schools is going to make our classes larger unless we expand our schools, which is going to take tax base away from the City of Virginia Beach to do this. We are going to have to move two schools, which is relatively expensive. We have already moved one, which looks like now we didn't really need to move at all. I'm also looking at the noise levels of the schools. There will be 23 schools that will be effected with higher noise levels than we already have.

1

We have talked about insulating windows and making them so that the noise can't get into the schools, but these children do go outside on the playground. It is required by the State of Virginia that they go out for this period during the day. What are we going to do about the noise outside the school walls?

2

I'm also concerned about these jets seem to be making a lot more noise than the F-14s. I live in an area which evidently has been classified as a low noise area at this point, but I have noted within the past, say, five to six months with the increase of the F/A-18s that our noise level has been increased. I don't know whether the flight patterns have changed or what, but it is much noisier outside. It's not pleasant to be out there when they are flying the way they do sometimes.

3

I do really appreciate the Navy being here. If it were not for them, our area would be in a financial slump at many times. You have buoyed our area up with your finances; however, with your concerns of the amenities that we do have here for your personnel, I think you ought to look at the microscopic picture as to how it's going to impact the individuals that do live here already.

These are my concerns. I hope that you will do something to alleviate some of them.

CES-1 Projected impacts on taxes/revenues and school capacity under ARS 1 are addressed in Sections 4.5.1 and 4.5.2, respectively, of the EIS. ARS 1 would result in an increase in school-age children, which would require the ongoing Virginia Beach school expansion program to continue. The resulting increase in total school expenditures would be at least partially offset by increased student aid and the additional local taxes paid by the new residents. Overall, the EIS states, in Section 4.5.1, "*Virginia Beach and the other communities in the region would not experience any significant negative fiscal impacts from the proposed realignment under ARS 1.*"

CES-2 Outside noise cannot be mitigated. Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration.

CES-3 No NAS Cecil Field F/A-18s have been relocated to NAS Oceana, nor have the operations of the F/A-18 "opposition force" (OPFOR) squadron homebased at NAS Oceana increased since 1991. The recent increase in operations at NAS Oceana resulted from the temporary closure of NALF Fentress. For three months, NALF Fentress operations were conducted at NAS Oceana.

Speaker: Mr. Larry Oleszko, President
Birdneck Point Community League
960 Bobolink Dr.
Virginia Beach, VA

Your Honor, my name is Larry Oleszko. I'm the president of the Birdneck Point Community League and I have a prepared statement I would like to read.

Thank you. For many years the Birdneck Point Community League has been concerned about safety and noise hazards to Birdneck Point residents resulting from the flight of Naval Air Station Oceana based aircraft operating in close proximity to our homes. We are now alarmingly concerned about the recent proposal to increase the number of aircraft to be based at Oceana, which will significantly increase the level of safety and noise hazards to our residents. We, therefore, strongly oppose any increase in the number of aircraft operating from Oceana for the following reasons: Continually increasing noise hazard and nuisance to Birdneck Point residents; safety hazards to our homes, families and children with aircraft conducting jet landings in proximity to our neighborhood; and detrimental effects to marketability and investment values of our property.

1
2
3

We strongly recommend that you oppose any further increase in the number of aircraft based at Oceana and look for ways to significantly decrease, if not eliminate completely, the presence of military aircraft at Oceana that poses serious hazard to our lives, health and well-being, and that's the end of my prepared statement.

4

I would like to address one of the slides that was shown previously and that talked about the air emissions that were put out presently talking about 396 tons per year and it's expected to increase to 800 tons per year. Also, there are statistics in the public library, that is now, on the infrastructure which talks about the number of landings and takeoff cycles quote in 1996-'97 and projected through '98 and '99. Both '96 and '97 talk about or make reference to 1,600 takeoff landing cycles increasing to 18,000 in '98 and up to 24,000 in 1999. Touch and goes for '96 and '97 will be approximately 2,300 and will be increasing to 26,000 in 1998 and 38,000 in 1999.
Virginia Beach is a young and vibrant city, and I just can't help but think what's going to happen to the children and some of the visitors and other residents of the neighborhood with the increase in noise, you know. We have seen the projected increase in the crash zone and noise zone, and with a 12 full increase in number of aircraft, I can't help think that it's going to affect the well-being of the residents.

5

That's all I have. Thank you.

BPCL(LO)-1 Thank you for your comments; no response required.

BPCL(LO)-2 Thank you for your comments; no response required.

BPCL(LO)-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

BPCL(LO)-4 Thank you for your comments; no response required.

BPCL(LO)-5 Impacts on noise and accident potential zones (APZs) under ARS 1 are addressed in Sections 4.8 and 4.4, respectively, of the EIS. Noise levels in the region would significantly increase under ARS 1 and the EIS discusses the mitigation measures that would be applicable to minimizing/preventing adverse noise impacts. APZ acreage would also increase under ARS 1; as indicated in the EIS, the Navy's *AICUZ Program Procedures and Guidelines for Department of the Navy Air Installations* would be implemented to minimize adverse impacts under all ARSs.

Speaker: Mr. Robert Knuth, Vice President
Birdneck Point Community League
1300 Kildeer Ct.
Virginia Beach, VA 23451

Good evening. My name is Bob Knuth. I'm vice president of the Birdneck Community League. We are concerned with the noise levels, we are concerned with the safety, with the increased crash zones. Nothing has been addressed as far as possibility of the additional crime statistics when you have population moving and growing of this nature. That certainly comes along. Property values — currently these noise zones aren't taken into consideration as far as property values.

1

We have had instances recently where homes have been passed by in our neighborhood because of the current levels of jet flights, and I found it very difficult one evening trying to explain to a prospective buyer of the home across the street from my residence that it was a great neighborhood. About 10 percent of the time the noise actually gets really bad. Our conversation was interrupted four times by the level of noise from the jets, and the prospective buyer said, forget it, it's not worth it.

2

I wonder what the Navy is going to do as far as noise abatement? It appears just prior to carrier deployments the level of noise increases and it stays that level until that carrier pulls out. Is it because the pilots have to get their calls in prior to leaving? Could this be spread out over a longer period of time? Could we look at the hours of the day that the flights occur? Could we look at times on weekends? Just recently within the last couple of weeks there was a Sunday that the noise levels were extremely bad.

3

The difference between 120 planes and 180 planes is not that much, 60 planes. In between ARS 1 and ARS 5, there doesn't appear to be a whole lot of difference, but the difference can be with quality of life.

BPCL(RK)-1 Based on 1996 statistics for the Navy in the Norfolk area, the number of investigations by the Naval Criminal Investigative Service of offenses under either the Uniform Code of Military Justice or civilian penal codes was as follows: 111 at NAS Oceana (population of 8,100) and 1,518 at all Naval bases in the Norfolk area (population of 81,171).

The investigations included offenses less serious than those considered in the FBI Crime Index. All investigations do not necessarily result in a conviction.

The estimated "crime rate" for all Naval bases in the Norfolk area is therefore 1,870 investigations of offenses per 100,000 base personnel. The "crime rate" for the City of Virginia Beach is 4,651 serious crimes per 100,000 people (U.S. FBI 1995 Crime Index). Therefore, there is no indication that the realignment would significantly increase the region's crime rate.

BPCL(RK)-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

BPCL(RK)-3 NAS Oceana and NALF Fentress operate 24 hours a day. Notice of unusual operations (such as early morning hour Field Carrier Landing Practice or late night deployments) is provided to the media so that citizens surrounding NAS Oceana and NALF Fentress may be informed. NAS Oceana also has an outreach program to brief civic organizations, service clubs, realtors, and other interested parties on the air station flight mission. The Commanding Officer at NAS Oceana has established a Community Leaders Forum to meet quarterly and discuss issues of mutual concern.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight

This situation is an unavoidable consequence of training requirements and the cyclical nature of air crew deployment aboard carriers. Strict procedures govern the frequency and timeliness of practice landing operations. The Navy does everything within its capability to balance out operations, but peaks in operational tempo are unavoidable because of aircraft carrier deployments.

4 I have heard what the State of Virginia and the City of Virginia Beach wants to do as far as getting the Navy to bring the planes here, but I would really like to hear what the Navy is going to do as far as helping the residents who are currently here as far as the level of noise and the safety issues. I think that there are a number of ways that we can look at the abatement through both of those.

Thank you.

BPCL(RK-4)

All Naval aviators are held to high standards of professionalism and are required to comply with noise abatement procedures. Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

NAS Oceana will continue to monitor the noise abatement procedures to reduce the impact of the realignment to the community to the greatest extent practicable.

BPCL(RK-4) (cont'd)

Notice of unusual operations is provided to the media so citizens surrounding NAS Oceana and NALF Fentress may be informed. NAS Oceana also has an outreach program to brief civic organizations (such as NAS Oceana's meeting with the Birdneck Point Community League on January 14, 1998), service clubs, realtors, and other interested parties on the air station flight mission. The Commanding Officer at NAS Oceana has also established a Community Leaders Forum to meet quarterly and discuss issues of mutual concern.

Speaker: Mr. Richard Minuto
3200 Lynnhaven Dr., Unit 305
Virginia Beach, VA 23451

Good evening, Your Honor, elected officials. My name is Richard Minuto, and I'm a nonmilitary retiree residing in Virginia Beach transplanted from Pennsylvania by choice. I'm here to voice a positive, welcoming message to the U.S. Navy and Marines. This is my first visit to a community meeting of this type.

I would like to tell you a brief story about something that occurred to me some 20 years ago that brought me here today because I didn't speak out, a surprising few minutes that has left a lifetime mark on me. I was having lunch at the Marriott Crystal City Hotel just outside Washington, D.C. As I was leaving, I noticed a highly decorated young naval aviator at the next table. I paused for a moment and said to him, I want you to know how much my family and I appreciate your efforts. The young man looked at me, paused for a moment, then said, thank you, sir; I wish you could have said that to the people in California who jeered at me as I came off the plane on my way back from Vietnam. Stunned, I looked at him squarely in the eyes and simply said, I'm sorry. I often think back to all the things that I should have said to this obviously disillusioned young man.

For those who object to the noise of the jets, I would tell the Navy and Marines, send all of your jets over my house, for in my youth I had the rumbling sound of eight-engine B-52 bombers going over my home during their takeoff, shaking the plates, pots and pans and knick-knacks throughout the house, and when the Russian Mr. Khrushchev pounded in the podium at the UN with the heel of his shoe, the dishes in my house rattled for an hour as wave after wave of bombers sent a resolute message to one more group in this century who wanted to take away our freedom.

My friends and I would hear the sounds and look at each other with quiet, understanding smiles, for as my grandfather, born in another country, would repeatedly say to us, don't ever think that freedom is free; there's always going to be some group who wants to take it away; I love this country.

As one of our earlier distinguished guests mentioned in terms of history, so I say to the harried teachers and residents of Virginia Beach, use the sound of the jets to remind the children and the tourists that we are a city who firmly believes in the saying, those who have not learned the lessons of history are destined to repeat them. Teach our children that freedom is not free so that the sound of the jets overhead reminds them that they do have guardians who are ready to go into harm's way to protect them.

Thank you for your comments; no response required.

Minuto (Cont.)

In closing, I would like to again send a positive note of welcome to the military families who will be joining us. Because of your exposure to different cultures and their way of thinking, I observe you to be a community with great depth in accepting people for what they are. Indeed, I have found you to have less problems and to have more appreciation for law and order than any other large group.

To the young naval aviator in my opening statement and those that followed him, I'm here today to join the voices of those who hear the sounds of your engines in saying to the children, you and your parents can sleep well tonight.

Thank you.

Speaker: Mr. George L. Wadsworth, President
Virginia Beach Council of Civic Organizations
1533 Princess Anne Rd.
Virginia Beach, VA 23456-3837

Judge, members of the panel, my name is George Wadsworth, and I am president of the Virginia Beach Council of Civic Organizations. Our council is made up of 85 civic leagues from all over the city whose membership will exceed 10,000 neighborhood citizens and civic leaders. Our purpose is to promote the welfare of all people of our city, uniting them in bonds of friendship and citizenship, to create and foster the spirit of cooperation among the peoples of our representative communities, to study their problems and to assist them in solving those problems, to represent their rights and interests to the proper authorities, and to conduct interesting and educational programs at our regular meetings or at other times when necessary and/or desirable.

The Virginia Beach Council of Civic Organizations was represented on the committee formed to help make the argument during BRAC-95 that NAS Oceana represented the best choice as the future home of the Navy's fleet of F/A-18 aircraft. We believed that then, and we believe that now. Other speakers before and after me will extol the virtues of this choice with regard to the facilities and opportunities our city has to enhance the quality of life of the Navy personnel and civilian employees the relocation will bring. We are in place.

Also in place are our diverse neighborhoods composed of citizens who care about and take pride in their neighborhood and in helping their neighbors. This helping hand is extended to neighbors in communities throughout our city and the surrounding cities. We have a large number of Navy retirees who have chosen the city as their home and who get involved in the community and add much to the quality of life in our city. We have and will continue to welcome them as ours.

We will welcome the expansion of the F/A-18 program and the additional Navy and civilian personnel it will bring. We further advise and pledge to work with the Navy and our citizens in helping to solve problems that may arise within our community.

Thank you.

Thank you for your comments; no response required.

Speaker: Mr. Hal Levenson
2004 Brickell Ct.
Virginia Beach, VA 23454

Thank you. My wife and I are eleven-year residents of the Great Neck section of the City of Virginia Beach. We both operate offices in our home, which lies directly in the current Oceana flight path. The reality of our lives includes the experience of jet plane noise from aircraft that roar sometimes as close as 100 to 150 yards over our housetop. We enjoy living in Virginia Beach. We enjoy our home, which we very much want to continue to live in, while leaving life and property value issues alone.

We ourselves believe in a strong national defense for our country. We certainly welcome our residential relationship with naval personnel. We do recognize that Oceana is an integral part of the city of Virginia Beach.

1 We also believe the proposed relocation of additional jets to be possibly based at
2 Oceana raises national defense issues, along with the most serious quality of life
2 and property value issues in this community, issues we believe ultimately may
2 well undermine good relationships between the Navy and the residents of
3 Virginia Beach. We believe the relocation proposal threatens, not enhances, the
3 long-term economic viability of the community.

Make no mistake about it, although many elected and appointed officials as we saw tonight believe that there's a short and intermediate term of economic gain, support for infusion of the additional jet noise in our community, we want you to know there are many of us in this city whose homes and businesses are situated along the flight path who are the suffering, silent minority on this issue. Many of us are silent out of a sense that the proposed move is a fait accompli, and perhaps it is, the power of realities being as they are.

But you can be certain, should the Navy choose to inject additional jet noise over our homes and our businesses and our schools, there will be anger and resentment, and it will not go away so easily, and it may prove -- may well prove to be counterproductive to all concerned.

At the same time as well, considering the sentiment in this room, let me emphasize my wife and I love our country. We support our military personnel. Make no mistake about it. It seems to us evident, however, that the public welfare of all concerned might well be better served if the F/A-18s in question should be based in North and South Carolina where they believe -- where we believe they will serve the interests of national security defense more effectively, where they will pose a minimum of quality of life issues, and where they will most likely be desired by if not the entire community, most of the community.

HL-1 Thank you for your comments; no response required.

HL-2 Thank you for your comments; no response required.

HL-3 The positive socioeconomic impacts of all five ARSs are addressed in the EIS. The proposed aircraft realignment is expected to have a positive, long-term impact on the economy of the Hampton Roads area due to the influx of personnel, tax revenue, and business.

Levenson (Cont.)

We appreciate the city was built up around Oceana and that Oceana is an integral part of the city, but at the same time, the reality today is that Virginia Beach is the largest city in Virginia. It's largely residential. This jet noise issue certainly did not exist when the base was initially conceived. Even at the existing level of jet noise, the existing level, the situation for many of us is barely acceptable.

4 In the late '80s and '90s, it became commonplace for government to erect large, substantial fences to block off residential areas from interstate highway noise. If the same could be done for those of us in the flight path, there might be some mitigation to the quality of our lives. The truth is that the current levels of jet noise are considerably more intrusive in many instances than highway noise in residential areas where fences have been erected.

HL-4 Sound barriers are effective only if they are located close to the source of the noise. Since the dominant source of noise is aircraft overflight, sound barriers would provide little, if any, benefit.

It may seem incredible, but in 1986 when we visited and closed on our home that we live in, we somehow failed to experience jet operations overhead. It really does seem incredible. I can assure you we would never have purchased our home at that time had we known of the sort of jet traffic. Perhaps unfortunately for us, we enjoy our home and we do not wish to move, but even then, even if we did, the issue would remain for all of us, and surely for anyone who might choose to live where we do. The idea of jet noise 100 to 150 yards overhead, the idea that that doesn't affect property values I believe is ludicrous.

In closing, let me suggest that our government and business leadership in our city has done a fine job in nurturing the growth of the community, really an outstanding job, and we're thankful and grateful for that. Make no mistake about it. We are confident they will continue to do that job, our elected leadership, whatever decisions may be made at Oceana. The obvious short and intermediate term economic benefit of additional jets can be offset in time in the community, we believe, by a continued diligent effort to grow our community consistent with obvious and salutary quality of life considerations. It will take much more work to accomplish this goal, to be sure, so we ask the Navy and the people of Virginia Beach, why risk the baby with additional noise-polluted bath water; why not leave things as they are? Why seek to jeopardize the future tranquility, the vitality, the health of our homes, our schools, and our workplaces with additional jet noise? What will the long-term future of this community be truly should we be overwhelmed by additional highly intrusive jet noise?

5

HL-5 Noise impacts under all ARSs 1 are addressed in the EIS, which also discusses mitigation measures to minimize or prevent adverse noise impacts.

Thank you.

[Mr. Levenson submitted his prepared statement, which is largely represented by the verbatim transcript. Omitted from the transcript is the following paragraph.]

National Defense Issues

6 First Strike Threat — We remind the Navy to remember the lessons of pearl harbor. We may be at peace, at the moment, and national budgetary considerations may seem paramount, but wouldn't Hampton Roads — and Virginia Beach, in particular — make an inviting target for a surprise attach from an enemy from the East? Particularly so, with additional concentrations of military equipment and personnel in the area? From a national defense perspective, why would the military wish to put so many eggs in one logistical basket?

HL-6 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

[Mr. Levenson also submitted a copy of a letter he wrote to the editor of the *Virginian-Pilot*, which can be reviewed in Part B of Appendix I, "Concerned Citizens".]

Speaker: Rear Admiral Fred Metz, Retired, US Navy
805 Circuit Ct.
Virginia Beach, VA 23454

Good evening. It's very interesting as we listen to the people here this evening. I don't know how many people have read the entire publication that we're discussing this evening, but I would like to implore you to do that. What we're discussing tonight is five options. We're not discussing whether the F/A-18s are going to come here or not. They're going to come here. We're discussing whether 60 airplanes will come here or not.

One thing that if you read the DEIS that's not discussed is probably the most important asset that I feel the Navy has, and that's the people. We've talked about money. We've talked about noise. But we haven't discussed the 5,000 people that are at Cecil Field that in 1993 their lives were disrupted. At that time they knew they were going to move. It's not an option. Cecil is going to close. They are going to go somewhere. Where are they going to go? How would you like to be a second-class petty officer with two children, not knowing whether he can buy a house, knowing he's going to go? This process has gone on too long. We have to make a decision now.

If you look at the options for that young fellow, for that young second-class, that first-class, there is only one option for him. That is ARS 1. We have to have all the airplanes here for his stability. For some reason if he was in a squadron going to Beaufort or to Cherry Point, he would be there only for a short period of time, maybe three years, and then he would have to move. There is no way that anyone in that squadron would be able to stay. It's a Marine Corps Air Station. If he was able to come to a squadron here at Oceana, later on in his career he may move somewhere else. It's cheaper to come here.

As the congressman said, we're looking at a rate of flying no different than it was in 1990. It is not fair to that young American fighting man to do anything but to go with the option to bring all the airplanes here.

What is he? He's a member of a church. He's a Boy Scout leader. He's a soccer coach. His wife is a teacher. His wife is a nurse. They are people that this community needs. They are a loss to Jacksonville. They are losing because those people are leaving, but we need to look out for them. We need to look out for that young fighting man. We're in a voluntary force right now. The only key thing that keeps that going is that young white hat, and if we do anything else but to bring him on here, we are an injustice to him.

Thank you for your comments; no response required.

Metz (Cont.)

We all should be proud that the Navy wants to bring them here. Look at our community. I first got here in 1964. I moved around a lot. By the way, I live in that noise zone just where the last gentleman was. I hear the noise, but that's the sound of freedom. What has the Navy done for this community? Look at your churches. Look at your Boy Scout troups. We need them. Everyone in this room ought to stand up and say, I want the Navy; I want those individuals to come here.

Thank you very much.

Speaker: Mr. Ronald J. Imel
Citizens' Coalition of Virginia Beach
1057 Blue Spring Ln.
Virginia Beach, VA 23452

Okay. My wife's formed -- I'm Ron Imel. My wife has formed the Citizens Coalition of Virginia Beach, and I'm proud to be a member of it. Get that out of the way.

I ain't used to public speaking, but I've got a couple of comments to make, and whether the Navy or the public like them or dislike them, I'm here exercising my freedom of speech.

We just moved to Virginia Beach five months ago. We liked it. We moved down from New York. We live in an air zone 3, which means there's jets, and when jets came over, I liked it. I grew up outside of O'Hare Airport. No big deal. You live with them. This country is defended by these men and some tolerances are necessary.

What affected me the most was one day my son and his friends were playing out in my front yard and an F-18 came over. I was told they were supposed to stay way up there over civilian people, but when it came over, my house shook, my windows rattled, and I saw my son and his friends curl up into balls, put their hands over their ears because the jet was roaring over. That's what affected me, when my son curled up with his friends, hands over their ears, trying to get rid of the sound. I know that doesn't happen, so I called the base. It was the atmospheric conditions. It was clear and I could see bright as ever outside. 1

Now, my son also attends a school here, and I know we're supposed to be talking about the Draft Environmental Impact Statement you have made. Everybody else talked about other things, and this is the way of my talking about it to my satisfaction. Excuse me, Your Honor, if it doesn't seem to roll along, but --

I have to send soap and towel -- paper towels and tissues for my son into school. I go to the school system and I see teachers trying. I see principals scraping. I've seen a few -- seen the papers. You've seen the news. Our schools are overpopulated right now. And I'm saying, more kids. Okay. That's good. But according to the information I got out of this thing, it says the Navy may or may not contribute money. There was no definite yes or no there. I would like that answered. Like the lady said up here before, insulate in. What happens when they walk out the door? 2

CCVB(RI)-1 Thank you for your comments; no response required.

CCVB(RI)-2 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required, which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

Outside noise cannot be mitigated. Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration.

Imel (Cont.)

Okay. AP, accident possibility zones or whatever they are, that's soft language to me. That means if an accident happens, that means that's where the plane is going to crash, where it's going to affect the population. That's the way I see it. So it's a crash zone to me, and I'm in it now. I wasn't five months ago. I just bought a house. I don't know if I'm staying. Most likely I will. I like Virginia Beach. I won't say I love it right now. But to people in uniform, the schools are crowded. People say we have great libraries. I walked into two. I was not impressed. People around here are great. That's what I'll give Virginia Beach. The people are great people here.

Another thing that affected me personally, Mayor Oberndorf was up here -- I'm sorry if I got your name wrong if you're still in the building -- but she said the City of Virginia Beach. Well, she can't say that. She may be elected, but to my knowledge, she didn't ever ask the public whether we wanted the 180 jets or not. She can't say that.

She may be elected, and if everything I heard up here with the guy with the slides said, he said this is a proposal. Proposal means may or may not to me. So I'd like the Navy to ask the city to get a referendum or something like that to get the people out there, because I don't think the Navy really wants to come someplace where it's not wanted. Some people -- the man with the B-52s, that man stated the facts plain and simple. He's proud. I'm proud. And you're more than welcome to have all my planes. 3

Okay. Very simply completed, I understand the Navy is here. I want to know why the public wasn't asked. I know the civilian authority put you here. I want to know why the civilian authority that put you here or gave you the choice didn't ask the people of this city if it was okay with us before they moved them here. I ain't blaming the Navy. It's about time the people of Virginia Beach told the Navy and told the city council and told the mayor, we want to be listened to, and if they ain't listening to us, come November or maybe May I may be elected into the city council and we'll work it from there. That's it.

CCVB(RI)-3 The base closure and realignment process was mandated by Congress when it enacted the Defense Base Closure and Realignment Act of 1990. Under this process, Congress reviews the specific recommendations of the Base Closure and Realignment Commission (BRAC) and chooses to either accept or reject the Commission's recommendations. The BRAC 1995 list of recommended closures and realignments, which included closure of NAS Cecil Field and realignment of the F/A-18s, was accepted by Congress. As the base closure process is a federal process, local referendum procedures are not applicable.

Speaker: Mr. George Matt
US Navy, Retired
1123 E. Bay Shore Dr.
Virginia Beach, VA 23451

Good evening, Your Honor, thank you. And by the way, it's George Matt, spelled Matt, but pronounced Mott. I did it when I moved down here from Ohio so all my friends who didn't know how to spell my name couldn't stay with me.

I would like to wholeheartedly endorse the movement of the F-18s to NAS Oceana. I live in the Bay Colony area, which is right next to the Birdneck area, and I can honestly say that I've lived there since 1961 and I do not think that the property values in that area have decreased. I spent 24 years flying airplanes for the United States Navy, and I moved to NAS Oceana 41 years ago this month. So I think that I can say that I am both familiar with and affected by the presence of these additional aircraft to be coming here.

I think the positive effects of the additional aircraft will far outweigh the negative effects that you will see by the increased number of flights in the area. In fact, Oceana with these new, quote, noise levels, unquote, I think that's merely an admission of the fact that the noise has already been there. The F-18s have been operating out of NAS Oceana for five years. We will hear more frequent incurrences of that noise -- or occurrences of that noise, but the noise is already there.

Another fact is the current administration has cut the military defense budget to a degree that the armed forces are now being lowered to the same level as the hollow forces that we experienced two decades ago. At this time the armed forces do not have enough money to buy new equipment, update older equipment and are forced to fly reduced flying hours because of a lack of funds. In addition, the pay and allowance has not kept up pace with industry, and many of the young flight officers and the enlisted personnel are leaving the Navy for higher paying jobs. In fact, both the Air Force and the Army are experiencing aviation shortages right now. They don't have enough pilots to fill the seats. And believe me, I don't think that my wife would have moved out in the middle of nowhere had I served my first duty station out in the boondocks.

We have a very good opportunity here in Virginia Beach. We have a most agreeable and cosmopolitan area that can provide jobs for those people should they wish to use them and take that opportunity to seek employment when they move here. With all the negatives holding back, like Admiral Metz said, the decision to make the process to the people that we are forcing this decision on, those young sailors and airmen who are moving up here from Cecil Field, why keep them in suspense? Let's get on with the program, and it makes both military and financial sense for success.

Thank you for your comments; no response required.

Matt (Cont.)

For those of you who had the opportunity to hear the former prime minister of Great Britain, John Major, speak last week -- I doubt that that opportunity would be afforded to the people who live at Cherry Point -- he made a very good point, and that point was, the United States is the acknowledged leader in the world today, and with that mantle of leadership comes a responsibility to keep a strong military force in order to protect our interests. This responsibility may not be entirely welcome, but to shun that responsibility is disastrous.

The move to bring the 180 F-18s to Oceana would be a step in the right direction. It is in the best interests of Virginia Beach, the squadrons that are coming here, the Navy and the United States in general that we bring them here. Again, I thank you for your time and I wholly support bringing the F-18s to Oceana.

[Mr. Matt submitted his remarks, which are represented by the verbatim transcript.]

Speaker: Mr. Rob Testwuide
US Navy, Retired
916 N. Oriole Dr.
Virginia Beach, VA 23451

Your Honor, thank you very much. We've heard many pros and cons this evening. It was interesting to me that all but one of our elected leaders failed to even mention that there may be some citizen concerns. There was only one that brought that up at all, and I think that I heard the elected officials very pro Navy, very pro helping the Navy, but not too much about caring for our citizens and the people that are here. Virginia Beach is a lot of Navy, but it's also a lot of others of us.

Now having said that, I'm going to tell you that I'm a retired Navy captain. I spent thirty years in the Navy. I was a pilot. I flew a lot, but I think we've got to look at a bigger and better solution. I'm very critical of the way the BRAC Commission is working. I think I'm very critical of the lack of foresight of some of the leaders in looking at a long-range solution that would be a win-win solution for the country, for the Department of Defense, the Navy and Virginia Beach citizens that are here.

Somebody said it's probably fait accompli that these 180 jets are coming and the noise will be here and the increased danger, et cetera. That's probably going to happen, but I would like to go on record as saying that I think some bigger thinking, some more long-range thinking, possibly what is it going to look like here in 100 years? Nobody in this city is stopping the building of many, many more homes down in the Ocean Lakes, Dam Neck area. Homes are being built more and more every day. It's only going to get worse, Your Honor, and we're not looking at the long-range problem. We're putting a Band-Aid on it.

I agree with Admiral Metz. I feel sorry for white hats. I feel sorry for officers. That's a very real issue today, but that's a now issue. We've also got to look at what the impact is on this community, its citizens.

1 I would propose that somebody look at -- it's probably outside the scope of this, but I want to be on record to say it. Something very visionary needs to be done. There's no question that naval aviation needs to be in Hampton Roads. The fleet is here. They need to be here for the synergy of training, for the jointness, et cetera, but maybe we should build a new Oceana, a new base, and let the whole country sacrifice, not just a few here, and build a new base.

But I would propose that the Department of Defense have some vision and build a new air base maybe 50 to 60 miles southwest of here in some areas out there that maybe the government should buy to help out some tobacco farmers, et cetera.

RT-1 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

Testwuide (Cont.)

Something similar to what they have in Lemoore. Lemoore Air Base is out in the middle of nowhere, very little danger to the populous.

Then I would convert Oceana into the Hampton Roads International Airport, which would greatly enhance the people coming in to us who really spend the money, and build a nice new terminal at Oceana, and 44, that would be very easy to get into. I would then propose to shut down the Hampton Roads Airport and build some more golf courses, some more recreation for the people of Virginia Beach.

This is a long-term proposal I would like to have on record. It would certainly reduce noise to the area. It would keep the Navy here. It would give them an easy place to live. It's a win-win for everybody, which is what we need. So I think we're only going to have more noise, more safety problems over the years, not just in the next five years or ten years. We need some vision in Washington. We need vision in Virginia Beach. We need more vision in the Navy.

Thank you, Your Honor.

Speaker: Mr. Fred Napolitano II
Tidewater Builders Association
2117 Smith Ave.
Chesapeake, VA 23320

Good evening, Judge Utecht. I'm a native of Virginia Beach. I was raised in the Birdneck Point area. I currently reside in the Great Neck section.

I'm here tonight representing -- as president of the Tidewater Builders' Association also known as TBA. TBA is an organization of 750 firms and businesses that make up the shelter industry in the southeastern Virginia area. We include builders, contractors, developers, bankers, surveyors, engineers, architects, equipment suppliers, members of all the trades such as plumbers, carpenters, electricians and virtually everyone involved with the construction business. Our association is in 100 percent support of the recommendation contained in ARS 1, which would have 180 F/A-18 aircraft be relocated from Cecil Field in Florida to the Naval Air Station Oceana.

As many others have said, Oceana is the best site for these new planes for numerous reasons. Relocating to Oceana offers the minimal environmental impact, reduced costs to the taxpayers sitting close to the fleet and the other unquantifiable but still important quality of life matters such as spousal employment, higher education opportunities, and our great school system.

Tidewater Builders' Association is committed to doing its part to provide a myriad of housing opportunities to all of our residents, and especially those new residents who will be moving here from Florida.

We have an abundance of affordable high-quality housing in all of Hampton Roads, but especially here in Virginia Beach where the vast majority of the new citizens of this project are expected to live. This housing includes apartments, single family attached, single family detached, low, middle, medium and high-rise buildings, resort properties, starter homes, and virtually any type of housing facility imaginable. We have it here. We have it in quantity, and it is of an excellent quality.

Tidewater Builders' Association, as always, is ready to work with the citizens of Virginia Beach in making sure that any additional new construction of residential facilities be constructed, if required, with the proper noise attenuation features to provide all residents with a quality home environment and to reduce the potential for noise complaints.

Thank you for your comments; no response required.

Napolitano (Cont.)

TBA, in fact, was very instrumental in having the General Assembly of Virginia adopt a naval legislation that allows Virginia Beach to develop and adopt its airport zoning ordinance. This ordinance requires homes that are built in Noise Zone 3, the high noise zone, to have the proper noise attenuation features built into them to provide acceptable interior noise. Presently most homes within the Noise Zone 2, for instance, meet the Virginia Energy Standards, and with triple glazed windows and doors, proper framing and insulation techniques, they add a small percentage to the cost of the home, but it is made up quickly in the savings through higher quality.

And I will close by saying, we stand ready to work with the Navy as well as the City of Virginia Beach to develop the new AICUZ map with the record of decision on the DEIS, and we look forward to providing them with an exceptional home and a great neighborhood in which to raise their families.

Thank you very much.

[Mr. Napolitano submitted his prepared statement, which is represented by the verbatim transcript.]

Speaker: Ms. Mary Pat Fortier
Virginia Beach Hotel and Motel Association
968 So. Oriole Dr.
Virginia Beach, VA 23451

My name is Mary Pat Fortier. I am executive director of the Virginia Beach Hotel and Motel Association, a trade association numbering 98 hotels and encompassing approximately 8,500 of the city's 11,000 hotel rooms, the largest hotel capacity in the State of Virginia.

I'm here to express the enthusiastic support of our board and members for the transfer of all 11 squadrons of F/A-18 aircraft from Cecil Field, Florida, to Oceana Naval Air Station in Virginia Beach.

Virginia Beach prides itself in the beauty of its unique surroundings, its place in the history and culture of our country, its recreational opportunities, its temperate climate, and most especially the warmth of its residents. It's these qualities that make it the wonderful place to live and the uniquely attractive place to visit.

We in the hospitality industry share that pride in our city and stand prepared to demonstrate that to all newcomers, most especially our servicemen and women. The hotel industry in Virginia Beach greatly values the role our military plays in our community. The sounds of freedom are often heard in our resort district and are welcomed in comment and spirit. In fact, they have become an integral part of the tourist's experience in Hampton Roads as most recently demonstrated by the enormous success of the NAS Oceana Air Show featured during the 1997 Neptune Festival.

Tourism plays an integral part in the economic health of our city and benefits from the movement of military personnel into our region. The hospitality industry employs approximately 11,000 full and part-time employees, many of them second income earners in the families of our servicemen personnel.

Our board and members of the Virginia Beach Hotel and Motel Association are committed to working closely with the personnel at NAS Oceana to assist in any and every way possible in making the transition of families from Cecil Field and other locations as comfortable and smooth as possible. We hope to welcome all of those F/A-18s to Virginia Beach.

Thank you very much.

Thank you for your comments; no response required.

Speaker: Mrs. Carolyn Dittrick

My name is Carolyn Dittrick, and I have been a 27-year resident of Virginia Beach. I have lived in both Chesopeian Colony and Point O'Woods. As you know, both of these areas are impacted by noise associated with the Oceana flight operations.

First, I fully appreciate the need and, in fact, strongly support the high level of training required for the world's finest pilots. My husband, a retired captain, was a Navy pilot, and so I am more than familiar with training requirements. My concern, however, is where this training is conducted, especially the training requiring repeated the pattern of takeoffs and landings, such as with the touch and go operations and the practices known as FCLPs. When one lives anywhere in or near the flight pattern, the repetitious aspect of almost minute-to-minute 75 decibel and greater in noise is very troubling.

1

My research shows Virginia Beach can anticipate a total of 69,000 touch and go operations in 1999. That is 50 percent more than we experience today. Today's level of activity is already too high. An increase of this magnitude will so significantly affect the quality of life that I suspect some will choose to leave.

Current as well as future residents are also aware of the impact of this level of noise on the cognitive abilities of school aged children. Research suggests that chronic exposure can result in reading deficiency and impaired speech perception for grade school children. Living and working under conditions of the threshold of pain levels is at best difficult and at worst injurious to one's health.

2

As a realtor, I am very sensitive to homebuyers' needs. School districts and location are the mainstays of the future homebuyer's decision. The increase in air operations according to the proposed AICUZ for 1999 will result in expansion of Noise Zones 2 and 3 impacting an additional 39,000 residents resulting in possible erosion of perceived home values by future homebuyers. Twenty-two schools would also be in these noise zones. These schools would require sound attenuation in order to achieve maximum 45 decibel inside.

3

Consider for a moment the public's perception of these schools being reinforced so that the noise could be reduced to 45 decibels. Would you consider moving or avoiding such an area altogether? What about outside play for children?

I can well appreciate the economic impact associated with the infusion of new military residents, but in the longer run, to the extent that Virginia Beach proper becomes known as one of the highest aircraft residential noise centers, the long run consequences will be -- may not be desirable.

4

CD1-1 Thank you for your comments; no response required.

CD1-2 In buildings without adequate sound attenuation, aircraft noise may impact the cognitive abilities of school-age children. However, as discussed in the EIS, sound levels for individual aircraft would not reach the threshold of pain. Please see Sections 3.1.8 and 4.8 for a more detailed discussion of the impacts of noise on school-age children.

CD1-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

CD1-4 Noise impacts, including the effects of noise on learning, are discussed in Sections 3.1.8 and 4.8 of the EIS.

Dittrick (Cont.)

The increased tempo of FCLP and touch and go operations is the main issue here. The impact of these increased operations can be significantly reduced by having these operations done elsewhere.

5 I would like to propose that the Navy explore the development of a second auxiliary field to accommodate the touch and go and FCLP operations. Fentress will be fully scheduled with FCLP operations, therefore, precluding them to be a fallback. Yes, the cost to the Navy for the second auxiliary airfield will be somewhat higher, but what is of more importance? By removing the most damaging types of operations from the residential areas surrounding Oceana, the quality of life and the economic health for the people of Virginia Beach will be improved significantly.

Thank you for your consideration.

CD1-5 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

[Ms. Dittrick submitted her prepared statement, which is represented by the verbatim transcript. She also submitted an attachment to the statement, which is reproduced below.]

$600,000 PROSPECTIVE BUYER FLEES VIRGINIA BEACH! REASON AIRPLANE NOISE 1991

Christine Thalmann
355 Glenwood Road
RIDGEWOOD, New Jersey 07450

Coldwell Banker
Helfant Realty Inc.
3300 Virginia Beach Blvd., Suite 100
VIRGINIA BEACH, Virginia 23452

May 14, 1991

Dear Ms. Helfant:

Since my husband retired we are free to leave the congested metropolitan area of New York City and enjoy a less hectic and expensive community.

To find such a place we visited Rehoboth Beach, Del., Ocean City, MD, Virginia Beach, VA, New Bern, NC and Prince Frederick, MD. We spent April 22 to 24 in Virginia Beach, and stayed at the Camp Grounds in our Motor Home.
Carolyn with whom we were in contact prior to our trip had arranged a comprehensive tour of Virginia Beach and Norfolk and showed us the prominent living areas, their shopping centers, schools and medical facilities. We got an excellent overview of what the area is all about and we looked at some very interesting homes that are on the market.
Overall we liked Virginia Beach very much however there is one matter that we can not cope with, it is the constant and very noisy air traffic. I am afraid we cannot deal with it and that is the only reason why we have decided not to move to Virginia Beach.

We really are very much impressed with Carolyn's professionalism and the way she showed us around. Since we had to take our one and two year old children along, it was no easy job; but she understood the special needs and moods of youngsters.
We thought we let you know how pleased we were with Carolyn and we thank you very much for her fine services.

Sincerely

Christine Thalmann

Thank you for your comment; no response needed.

Speaker: Mr. Michael Walker
3405 Champlain Ln.
Virginia Beach, VA 23452

Good evening, Your Honor. I'm here speaking on behalf of myself and what I believe is a majority of citizens and taxpayers of Virginia Beach.

We do not want the transfer of aircraft and personnel to Oceana NAS to take place. But if you do decide, in spite of our strong, sound objections to transferring the aircraft and personnel here anyway, then we wish for you to do so in the absolute smallest possible amounts. There are several very good reasons that the majority of us do not wish for this aircraft transfer to our area to take place.

1 We do not want the various forms of pollution that will be severely increased, such as noise, air, soil and water. The noise factor is probably the most obvious of the pollutant levels that will increase. Those thousands of us who live in and around the noisy flight areas around Oceana must live daily and nightly with the constant onslaught of these powerful jet engines. When company comes to our home and experiences this terrible noise, they invariably exclaim, "my God, does this happen very often"? And all we as the homeowners can do is hang our heads and say, I'm afraid this goes on all the time.

2 Besides the critically important issue of increased pollution, we also object to the planned expansion because of having our roads clogged with additional traffic. Our traffic in this area is — already greatly exceeds the capacity of our roadway system, and plans to improve them will probably not support the added congestion from the Oceana expansion to the level of congestion that now exists.

3 Another point of objection concerns schools. Ours are already filled to capacity and beyond. The increase of school aged children created by the proposed Oceana expansion -- I understand it to be several thousand -- will necessitate building additional schools, creating an unreasonable and unwanted burden on taxpayers who already feel that school spending is out of control.

4 In addition, the taxpayers must shoulder the burden of moving schools from Potential Crash Zones, and politicians seem to be speaking out of both sides of their mouth when they tell homeowners in this that the chance of F/A-18 Hornets or other aircraft crashing is so remote that the likelihood is almost nonexistent, but if they are so safe, why are we paying so much money, astronomical amounts, to move schools?

5 In addition to the building and relocating schools, we also have to spend untold millions of dollars to soundproof our schools. And that one item speaks volumes about the noise factors associated with the Oceana jets.

MW1-1 Impacts on noise, air quality, soils, and water resources under ARS 1 are addressed in Sections 4.8 through 4.11 of the EIS. Noise levels in the region would significantly increase, and the EIS discusses the mitigation measures to minimize/prevent adverse noise impacts. Air emissions will also increase. However the increase will not significantly impact the air quality attainment status of the region. The impact on soils in the areas of new construction will be minor and primarily due to short-term construction activities. Adverse impacts will be avoided by employing standard soil erosion and sedimentation control techniques. Surface water quality will be affected in the short-term by sedimentation from construction activities; the station's VPDES permit will be amended to ensure proper control of the sedimentation. Surface water quality will be affected in the long-term by increased stormwater runoff, which will be controlled by additional stormwater collection systems.

MW1-2 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions (i.e., moderate traffic levels and acceptable levels of service), specific congested areas, and planned road improvements. Impacts on transportation under ARS 1 are addressed in Section 4.7 of the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

Walker (Cont.)

About the only positive thing that can be said about moving more jets to Oceana is the additional money that would come along with them. That money is the reason that you have heard from our city council and the people that they really represent, which is a group of business people with dollar signs in their eyes --

-- ready to take advantage of and profit from the money from the Oceana jets. The rest of us citizens who probably out number these people a thousand to one have to live with your decision every day of our lives.

Please send your jets, your personnel and your money somewhere else. Thank you for the chance to speak.

MW1-3 Projected impacts on taxes/revenues and school capacity under ARS 1 are addressed in Sections 4.5.1 and 4.5.2, respectively, of the EIS. The ongoing Virginia Beach school expansion program should accommodate the additional school-age children. The resulting increase in total school expenditures would be at least partially offset by increased student aid and the additional local taxes paid by the new residents. Overall, the EIS states, in Section 4.5.1, "*Virginia Beach and the other communities in the region would not experience any significant negative fiscal impacts from the proposed realignment under ARS 1.*"

MW1-4 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of naval aviation.

MW1-5 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

Speaker: Dr. Robert E. Young
Retired, Eastern Virginia Medical School
Retired, Family Services of Tidewater
665 Fort Raleigh Dr.
Virginia Beach, VA 23451

I want to thank you, Mr. Chairman, and others for holding this public meeting and thank you for calling me from the on-deck circle. It feels a little bit like Cleveland in here now. I hope when I finish it feels more like Miami.

I'm Robert E. Young, retired social worker and EVMS professor, and I live close by in Croatan, which, I guess, is in the 65 to 75-decibel noise zone. I was sitting with a friend the other day having a cup of coffee and one of those F-14s or F-18s came over and we had to wait, and after it stopped he says, as many have said, that's the sound of freedom. I said, I'm not so sure. I don't think so.

I was drafted into the Army in the Korean War and I remember basic training, the bayonet training. We had an Asian looking dummy, and our job was to stab that dummy and either say kill or lollipop. And I complied.

I have changed a lot in these 40 years and it seems as though we keep changing the face of the dummy, but we maintain that kind of thinking, that super power kind of thinking.

What's happened to our thinking that we so blindly not only accept but aggressively seek and campaign for the funding and the placement of such instruments of international destruction. How can we talk world peace out of one side of our mouth when we devote so much of our capitol and our energies to being the leader in world war making, and how come we want that in our neighborhood. One F-14 cost $38 million. I'm not sure what the F-18 cost.

I want to shift a little bit to going back to my remembering my economic class in college learning about the multiplier effect about guns and butter. Guns do not support the local economy; butter does, and F-18s are guns. Let me spread a little bit of butter.

Thank you for your comments; no response required.

A-5-63

Young (Cont.)

Think of the bird sanctuaries we could have to replace the terrifying screech of those Navy Hornets and Canadian geese. Think how far that $38 million for one F-18 could be retooled into an industry to produce public mass transportation for Virginia Beach and all of Hampton Roads. Think of how well those military barracks could be used as temporary shelters for the homeless and those with disabilities and how a new industry for producing low cost housing could be generated. Think of how some of that prime waterfront property could be used to develop the technology for water conservation, whatever the outcome of the Lake Gaston deliberations. Think of how those brave Navy personnel and other young military men and women who truly want to serve their country could be enlisted into domestic Peace Corps that does community work with that neighborhood and the public schools. Is it too late to build dreams? Is it too late to think locally and act locally? I hope not. Maybe we can learn to say yes in our own backyard to peacetime conservations of the military.

Thank you.

Speaker: Mr. Richard Winn
700 Coach House Ct.
Virginia Beach, VA 23452

Thank you. My name is Richard Winn, and I'm a home owner in the Carriage Hill area of the Princess Anne Plaza Borough of Virginia Beach. I'm an active member of my civic league and a block captain of our neighborhood watch program. And recently I began a class with the city Neighborhood Institute so I could increase my knowledge of government, its inner workings and get a firsthand look at the services provided to the citzenry.

I have a -- my wife is a school teacher in the city of Norfolk. We have a 16-year-old daughter who is an honor student at Ocean Lakes High School, and she is in the Governor's School of Arts. They are not here this evening because my daughter plays with the Bay Youth Orchestra and they are preparing for a concert.

For us on December 15 will mark the tenth anniversary of our residency in Carriage Hill. We've enhanced our property with accent lighting, a patio, conversions, new fireplace, front porch and even a pool in the yard. I recall that after purchasing this home in 1987 the loan officer explained that flood insurance was required. I balked at the excessive expense but conceded to the premise since it was a condition for loan approval and, quite frankly, I had little, if any, choice if I wanted this particular house in this particular neighborhood. Sometime thereafter I noticed the low-flying aircraft and the booming roar that would seem to only occur when I or a family member was engaged in telephone conversation, relaxing after a day at the office or at school or watching a planned-for, world premier miniseries.

I spoke with some of my long-time neighbors and I was informed that this was the norm and I should get used to it. Well, I didn't get used to it. However, I settled for co-existence. Over the next few years I noticed that the frequency of overhead flights and the thundering boom of these aircraft subsided somewhat, and now I could open my patio door and windows and enjoy the cool spring breeze which helps to ventilate my home. With exception of the fervent return of the thundering sound during special events and air shows, life in a designated noise zone has been most bearable, and I have no problem with these events and shows.

Thank you for your comments; no response required.

Winn (Cont.)

Recently I heard on the local news and read in the Virginian-Pilot that the aircraft were coming from Cecil Field and in this proposition it would be an economic windfall, you know, to the overall community, community and government. Some would say that although this relocation may cause some inconvenience, just think, $9 million plus in tax revenue for the city of Virginia Beach, the possibility for new job opportunities and contracts, and let's not forget about the infusion of cash into the local economy; would you not agree that all of these benefits are worth the inconvenience of a little more noise in some neighborhoods and a few more students added to the classroom. And let's not forget about that most enjoyable and relaxing commute to the office or workplace. In comparison to the military localities around the nation, our beloved city is definitely sitting pretty in the catbird seat.

Okay. I've spoken with Navy representative Mr. Fred Pierson, city employees who pass -- who've passed me on to the Navy. I recieved a copy of the Draft Environmental Impact Statement and ventured to the library to view the most current map of the affected communities. What I have heard today has not convinced me that the interests of my family, neighborhood and other communities which will be adversely affected with additional aircraft noise and accident potential is truly being considered.

When I hear discussions such that the number of new flights will be less than the total ops of 1991, the current total of 109,000 would increase to approximately 237,000, or 117 percent, when I hear that the reopening of Fentress Airfield will relocate many of these aircraft, the current ops of 105,000 will increase to approximately 158,000 or 67 percent, and when I hear discussions concerning noise abatement requirements for us and for us not to worry, I reflect on the fast-talking infomercial characters who never met a product that could not be marketed or a business opportunity not worthy of your earned -- your hard-earned money or time.

[Mr. Winn submitted his prepared statement which is partially represented by the verbatim transcript. The portion of the statement not read at the public hearing due to time constraints is provided below.]

Winn (Cont.)

When I hear that the re-opening of Fentress Airfield will relocate many of these aircraft (the current total Ops of 105 thousand will increase to approximately 158 thousand or 67%), and when I hear discussions concerning Noise Abatement requirements and for us not to worry:

I reflect on the fast talking info-mercial characters, who've never met a product that could not be marketed or a business opportunity not worthy of your hard earned money and time.

As a resident of the affected community, I have a great many concerns:

What about the quality of life for us the tax paying homeowners of these communities? Do we not have a stake in the future of our neighborhoods and City? Will the LOUD THUNDEROUS ROAR of years gone by soon return? Will the increase in the number of flights jeapardize the citizenry due to the expanded CRASH and NOISE ZONES? I've read editorials, one in particular where a golfer is chastised because, to the writer, he doesn't understand the sybolism of military flights and the thunderous boom (i.e. The Sound of Freedom). From my vantage point, these aircraft are far more noisy than the bellowing bass speakers in the vehicle of a young person seeking attention and music appreciation, yet many of us cringe at the deadly impact on our ears.

1

RW-1 The EIS acknowledges that the projected realignment of the F/A-18 squadrons to NAS Oceana and NALF Fentress would increase aircraft operations and aircraft noise levels. However, although operations and the average daily noise levels would significantly increase, noise levels would not result in permanent threshold of hearing shifts. Although temporary threshold of hearing shifts are possible, individual noise levels would not reach the threshold of pain (i.e., 120 dB).

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of naval aviation.

Winn (Cont.)

2 I have no animosity for, nor negativity directed toward the Navy, for I am a Navy veteran who served honorably for four plus years. I DO, however, worry for my community. I worry regarding housing values. I worry regarding prospective buyers. I worry for the safety of my family and neighbors. And I worry for the quality of our lives. To relocate schools help to safeguard our children during the hours their being taught the three Rs, but after school's dismissed and the weekend arrives - once again they are in harm's way.

RW-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

3 Let us not look to the Financial Viability of the moment, but focus on a well thought out plan of action that takes into consideration, all the variables which are in the best interest of the Navy, City government and that of the communities and the citizens whom reside within these communities.

RW-3 Thank you for your comment; no response required.

Let's not be like Forest Gump and run all to quickly in the wrong direction only to find that those you were elected to serve are being provided with short term gain and the probability of long term pain.

Winn (Cont.)

I believe that, what makes Virginia Beach prosperous and continue to be the envy of other cities of its size and population are its citizens - I say, Don't Let The Almighty Dollar blind you in respect to the desires of the Virginia Beach community.....

We the Citizens should be your Number One Priority.... and our quality of life and peaceful enjoyment should not be taken lightly.

Thank you, and have a good evening.....

Speaker: Ms. Jacquie Whitt
1605 Wright Ln.
Virginia Beach, VA 23451

Thank you. My name is Jacquie Whitt, and I have lived in the noise zone area for at least five years. I have been a stay-at-home mother, and I have raised my son in this zone. I am opposed to bringing more jets to Oceana for the following reasons:

If I happen to be outside or inside my home when a jet flies over, it sounds as if I'm standing next to several running lawn mowers. I thought about bringing a lawn mower in here tonight but decided against it. Instead, though, I wanted to show you what is standard issue at my house now. Every person in my household is given a set of these ear protectors, and when the jet noise is consistent and lasts more than three to five minutes and it appears that a working event is happening, all members of my household are instructed to put on their ear protectors if they're feeling any discomfort with the noise. And we don't use them for -- not all noise is as bad or uncomfortable, but there are times -- two Sundays ago somebody mentioned earlier, and I remember that evening and we all wore our ear protectors.

I've had conversations with teachers that you do in two and three sound bites because you can't have -- can't state a whole sentence at one time because the jets are coming and then they go and then they come and then they go, so you stop and start your conversations. You can't watch television, which is probably not a bad thing. You can't listen to the radio, and you certainly can't read storybooks at bedtime, which brings up the other point.

The jets as they are now fly until 11:00 or 11:30 at night. I don't know anyone who puts their children to bed after eleven o'clock, and the noises are oftentimes so loud that the children are not able to sleep. And my child is not the only one. There are other children in the neighborhood who have expressed this problem.

With regards to the sound of freedom, I would like to propose that the sound of freedom is the quiet rustle of the wings of an osprey. Thank you.

Thank you for your comments; no response required.

Speaker: Mr. James M. Pendergast
Virginia Beach Vision
P.O. Box 68051
Virginia Beach, VA 23471

Good evening, Captain. My name is James Pendergast, and I am the executive director of Virginia Beach Vision, Incorporated.

Thank you for your comments; no response required.

Thank you, Captain. I'm also accompanied by the president of Vision, Mr. Harry Lester, and a number of other board members.

Virginia Beach Vision is a nonprofit organization of business, professional and civic leaders whose purpose is to provide private sector support of initiatives and efforts designed to enhance the economic growth, vitality and prosperity of our community and the quality of life of those who live, work and visit here.

Virginia Beach Vision was represented on the committee which was formed to help make the argument during BRAC-95 that NAS Oceana represented the best choice as the future home of the Navy's East Coast fleet of F/A-18 aircraft. We believed then that Oceana would be the Navy's best choice, and we believe now that Oceana was the Navy's right choice as recommended in the Draft Environmental Impact Statement. We believe that the choice is best for the nation's taxpayers, best for the operational Navy, best for its sailors and best for Virginia Beach and its residents.

In addition to being the most cost-effective alternative and the least environmentally disruptive as detailed in the Draft EIS, there are any number of other advantages which will accrue to the men and women who will be stationed here. These quality of life enhancements, though not addressed in the Draft EIS, are nonetheless of paramount importance to the morale and welfare of the sailors who will serve here and the family members who will remain here during deployments.

Virginia Beach and the surrounding communities which constitute Hampton Roads offer superior and varied spousal employment opportunities found only in major metropolitan areas. We believe Virginia Beach offers the finest public school system in the state with excellent achievement scores, a full complement of scholastic sports and a multitude of other extracurricular activities for students. We have exceptional higher education opportunities represented here by both state-supported and private colleges and universities. We have quality, affordable housing. We will have the newest and most modern military medical facility in the world with the 1998 opening of Portsmouth Naval Hospital. We have supporting medical clinics at the other Hampton Roads naval installations, in addition to numerous off-base Tricare clinics convenient to neighborhoods across the city.

Pendergast (Cont.)

We have tremendous recreational and cultural amenities which begin with a 45-mile stretch of ocean and Chesapeake Bay beaches which are unsurpassed along the Eastern Seaboard. We have a state-of-the-art amphitheater which attracts world-class talent like Elton John and Tina Turner. We have art, opera and theater. We have professional sports in baseball, hockey and soccer.

And, of course, while we have much to offer, we also have much to gain from the recommended relocation with an estimated annual impact on the regional economy of some $719 million in salaries and goods and services purchased.

Time has validated that the Navy and Virginia Beach and the Navy and Hampton Roads are a good team. We are delighted that the Draft EIS has recommended building and strengthening that team in the future, and we applaud your recommendation to relocate the entire East Coast fleet of F/A-18s to NAS Oceana.

Thank you very much.

[Mr. Pendergast submitted his prepared statement, which is represented by the verbatim transcript.]

Speaker: Mr. William A. Stokes
1400 Linlier Dr.
Virginia Beach, VA 23451

Your Honor, my name is William Stokes. I'll be 75 this coming February. I'm a native of the area. I don't happen to have my Indian headgear on tonight, but nonetheless I am a native. I grew up in Norfolk, and I've been blessed with a wonderful wife and I love living here in Virginia Beach.

When we bought our lot in Virginia Beach in 1952, it was in a new development called Linlier, and we had a beautiful sand beach, marsh grass and my own oyster bed growing in the water right out in front of our court. In a few years we had jets. In a few years we had pollution. The jets had nothing to do with the pollution of the water. That was due to the runoff and the fact that so many people were building houses that they didn't have city sewage. They had septic tanks and polluted the area. We saw the destruction of the Lynnhaven oysters in the area that was just fantastic, and every year we see our tides get higher and higher due to the global warming.

And we love our home. We built it so that it could accommodate us in our retirement years, and we feel like that we are very fortunate to be able to live there, but nevertheless, I think the quality of our life will be greatly compromised by bringing in additional jets into the area.

I believe that already there have been examples of what happens, like the lady said before about the jets flying at eleven o'clock, and on Sunday in church the jets fly through our church almost, it seems like, and there has to be some controls on the times that the jets fly. How can you bring in additional jets and have additional traffic and be able to confine them to the hours of flying today and then allow the reserves to fly on weekends? It seems like to me that there's not enough hours in the day to accommodate all the flights that will be taking place.

1

In San Diego while I was staying, they had a problem with the jets flying there and the citizens got together and they had a lawsuit established against the government in order to be able to control the hours. I certainly hope that something like this won't come about if we have additional jets coming into the area.

And we say the sound of freedom. Well, that's -- it's like Franklin, the city that has the pulp mill there, the paper mill, they said the odor smells like money. Well, the sound of freedom here sounds like money too, and we all need to be able to have careers and we all need to be able to have money in order to be able to spend it, but the sacrifice of the quality of life is not what we want to anticipate.

WAS1-1 NAS Oceana and NALF Fentress are open 24 hours a day. Modeling of the airspace and flight operations by NASMOD shows sufficient capacity at NAS Oceana and NALF Fentress to handle 180 F/A-18 Hornets. The increased operations would not affect current noise abatement procedures. At NAS Oceana, pattern work and high-power ground engine maintenance run-ups will continue to be restricted to the hours before 11:00 P.M. At NALF Fentress, restrictions on pattern operations during normal Sunday church service hours will also continue.

Stokes (Cont.)

When those Hell's Angels got out their flying, which they have been stationed here and everybody loves watching them fly as an exhibit, but they have to practice, and when they practice, there seems to me that they have to have certain areas that they zero in on in order to be able to fly. And these are areas that are established. They can't practice any other place except in these areas, so they can perform --

I would like to say that we cannot -- the citizens here will definitely have an adjustment in the quality of their life, and at my age, I don't take to adjustments too easily.

It reminds me of a story of a robin that was offered an opportunity to exchange a worm for each feather that he had, and the robin thought that was a good deal until after a period of time he found he couldn't fly, so it wasn't a good deal. His exchange was a mockery. So I think that we should prepare ourselves. If the jets come here, we have to have some controls.

I thank you for your time.

Speaker: Mr. Karl Lawson

My name is Karl Lawson, and I'm speaking on behalf of the homeless. I do not believe that there will be jobs brought to this area due to this air base, or whatever it is that you're planning on building. I believe that there is money involved in this. I firmly believe that there are other things that you could focus your attentions on, such as peace, things of that nature. I believe that if you bring these planes here, the people that will get rich will be like Mrs. Oberndorf -- how are you doing? -- and other individuals who have more money than we. I also firmly believe that I am against the building of this -- these air jets or whatever coming here to the -- to the air base, and I believe that instead of trying to bring other jets and disrupting this elderly gentleman here's life or anything of that nature, I think you should focus your attention, sir, on helping homeless people, helping people that are in serious need and forgetting your air base and leaving it where it is.

Thank you.

Thank you for your comments; no response required.

Speaker: Ms. Val B. Parnell
1409 Berkshire Ln.
Virginia Beach, VA 23451

Thank you. I'm Val Parnell. I've been raised here and grew up here all my life. I grew up around the jets, lived in Shadowlawn, and I still live at the oceanfront.

Basically I take this very seriously and looked at all the positive and the negative. I looked at the negative concerns for safety and heard your emission control levels, that we were in the allotment for the department of emissions controls, so that helped. I was worried about property values, because my family still owns property around the base, and I really truly don't believe after looking at everything, that's going to have a major impact, that it will be okay.

The positive impacts I looked at for the City of Virginia Beach as a community, we see the positive aspect of the payroll expenditures, the increase of money in our economy, millions in new construction, and it will create new jobs, not just for real estate personnel and bankers, the builders that we've heard from, the politicians, but also for the plumbers, the electricians, and it just goes down the line.

These people will also retire into our community as they have in the past, and they'll become local taxpayers and residents. There has also been a rich tradition of volunteers in our local community, such as our schools.

For the nation we're working at cutting the national deficit, and it's a true cost to relocate these pilots and their families year after year. We are going to be saving millions of dollars to relocate everyone here and the base is ready to accommodate them and we already have the plans in place.

I heard them speak earlier, some of the people, about the military families. That is a concern and should be the number one priority. We have better standards of living here in the Virginia Beach area than the other areas that you're looking at. We have more opportunities for the spouses for employment locally and throughout the Tidewater region. We have better schools and we're better equipped and we have always looked at increasing schools and building when they're needed. More opportunities to stay locally after they retire and find other jobs, stability for the family unit, less stress and more consistently for the children, I truly think this will be a positive move, and I look forward to them coming.

Thank you.

Thank you for your comments; no response required.

Speaker: Mr. Jack Hornbeck
Hampton Roads Chamber of Commerce
4512 Virginia Beach Blvd.
Virginia Beach, VA 23462

My name is Jack Hornbeck, and as a resident of Virginia Beach, it is my privilege to serve as president and chief staff officer for the Hampton Roads Chamber of Commerce, a 3,000-firm and member business organization serving the cities of Virginia Beach, Norfolk, Portsmouth, Chesapeake and Suffolk, comprising the South Hampton Roads region of Virginia. I appreciate the opportunity tonight to express the support of the Chamber for the transfer of all 12 F/A-18 squadrons from Cecil Field in Florida to to the Oceana Naval Air Station right here in Virginia Beach. However, since there are many folks who are here to speak in favor of this planned relocation and I previously submitted my comments for the record, if it is acceptable to you, sir, I'll waive the balance of my time.

Thank you for your comments; no response required.

[Mr. Hornbeck submitted his prepared statement which is partially represented by the verbatim transcript. The full text of the statement is provided below.]

OCEANA NAVAL AIR STATION
PUBLIC HEARING
VIRGINIA BEACH PAVILION
OCTOBER 27, 1997

Presented by:
John A. Hornbeck, Jr.
President and CEO
Hampton Roads Chamber of Commerce

Good Evening:

My name is Jack Hornbeck and it is my privilege to serve as president and chief staff officer for the Hampton Roads Chamber of Commerce, a 3,000 firm member business organization serving the cities of Virginia Beach, Norfolk, Portsmouth, Chesapeake, and Suffolk comprising the south Hampton Roads region of Virginia.

I appreciate the opportunity tonight to express the support of the chamber for the transfer of all 11 F/A-18 squadrons from Cecil Field in Florida to the Oceana Naval Air Station right here in Virginia Beach.

The business community through the chamber has worked very closely with the City of Virginia Beach to revise the city's comprehensive plan. This will now help pave the way to adjust the current A.I.C.U.Z. maps to incorporate the changes specified in the D.E.I.S.

Thank you for your comments; no response required.

Hampton Roads is an attainment area for air quality and we have "budgeted" for the anticipated new emissions from the relocated F/A-18 aircraft.

Over the years, our chamber members have demonstrated that they are good stewards of the environment. ARS-1 will impact three tenths of an acre as compared to the 100-135 acres affected in other scenarios. Strictly from an environmental perspective this makes ARS-1 the best alternative.

However, the issue also goes beyond that. Some years ago, I was involved in the effort to create new strategic homeports for the United States Navy. I very distinctly remember a comment made by the of the leaders of the homeport team visiting at the time. He said "the navy wants to go where it is wanted and welcomed". As a region that can trace its military roots to the very earliest days of this nation, I think we have demonstrated our commitment to our armed forces.

The economy and quality of life offered to our military friends and neighbors is second to none. We offer outstanding employment opportunities to fit what is in many ways the unique needs of the military spouse. Virginia and Hampton Roads offers one of the lowest state and federal tax burdens of any state in the nation; coupled with what is already a very competitive cost of living. We

Hornbeck (Cont.)

are also very proud of our excellent public and private K-12 schools and institutions of higher learning.

All in all, Hampton Roads has it all, including the excess capacity at Oceana Naval Air Station that can more than meet the needs of this proposed aircraft relocation.

I appreciate your time. Thank you.

Speaker: Mr. Nelson Adcock
Hampton Roads Chamber of Commerce
4512 Virginia Beach Blvd.
Virginia Beach, VA 23462

Good evening, Your Honor. My name is Nelson Adcock. I am the chairman-elect of the Virginia Beach Division of the Hampton Roads Chamber of Commerce, a 3,000-member nonprofit business organization.

I am here tonight to express the support of the business community for the transfer of all 12 F/A-18 squadrons from Cecil Field to Oceana Naval Air Station here in Virginia Beach. From an operational perspective, we understand that Oceana represents the very best configuration for the Navy, one that nearly duplicates operational characteristics that exist at NAS Cecil Field. Oceana as a single-location configuration offers what we refer to in the business community as a competitive advantage; that is to say, that Virginia Beach's location can compete effectively with other regions of the United States. We compete well on all levels when comparisons are made in training, maintenance, logistical support and quality of life.

As a taxpayer and a businessman, I am encouraged by the decisions of BRAC, and I support the goals of the BRAC process. In this regard, Oceana continues to offer a significant competitive advantage in terms of maximizing the use of existing excess infrastructure, maximizing the use of training and airspace, minimizing one-time costs and 30-year life cycle costs, and lowering overall operational costs.

The environmental effects associated with the relocation of all 12 squadrons of F/A-18 aircraft to Oceana are acceptable in view of the essential mission tied to our national defense and the community's historical acceptance of these missions. We are prepared to make the necessary sacrifices to support the mission of the Navy here.

The business community of Virginia Beach is excited to have the opportunity to welcome new service personnel into the city, and we are prepared to work in concert with our elected leadership to ensure that quality public education and other municipal services are provided to support the quality of life for all new citizens of Virginia Beach.

Thank you for your time.

Thank you for your comments; no response required.

[Mr. Adcock submitted his prepared statement, which is represented in the verbatim transcript.]

Speaker: Mr. Robert Taylor
Hampton Roads Chamber of Commerce
4512 Virginia Beach Blvd.
Virginia Beach, VA 23462

Good evening, Judge. My name is Bob Taylor. I am a lifelong resident of Virginia Beach and treasurer of the Virginia Beach Division of the Hampton Roads Chamber of Commerce, a 3,000-member nonprofit business organization. I am here tonight to express my personal support and that of the business community for the transfer of all 12 F/A-18 squadrons from Cecil Field to Oceana Naval Air Station in Virginia Beach.

As the owner of a large family business in this city, I am impacted daily by the decisions that were part of the BRAC process. In Virginia Beach and throughout Hampton Roads, nearly 25 percent of the economy is linked to the DOD expenditures. I am excited about the economic impact that an Oceana buildup will have on my business, the city and the region. The infusion of new revenue into the municipal tax stream will enable Virginia Beach to maintain the very high quality of life that we now enjoy, one that our new neighbors will no doubt find very appealing as well. Our city's continued economic growth is essential to our economic health and well-being, and Oceana's buildup is a vital part of this essential growth.

As a business leader in Virginia Beach, I realize that with this buildup there are some trade-offs; an increase in noise, an increase in traffic, and possible increases in air pollution. I have confidence in our elected leadership that any problems associated with the growth of Oceana will be minimized with strategic capital expenditures and through cooperative efforts with groups like the Virginia Beach School Board to address other impacted areas.

In today's business world, consolidations and mergers are quite simply a way of life. The consolidation of naval aircraft into Oceana is the most efficient of all of the alternatives that have been studied. The business community of Virginia Beach supports the relocation of all F/A-18 aircraft to Oceana. We stand ready to assist in the transition of the men and women moving to our city, and we are prepared to work with the government sector to minimize any negative impacts on our environment and to maximize the many benefits that an expanded Oceana will have on our region.

Thanks for your time and attention this evening.

Thank you for your comments; no response required.

[Mr. Taylor submitted two versions of his prepared statement, which are both represented by the verbatim transcript.]

Speaker: Mr. Michael Barrett
Hampton Roads Chamber of Commerce
4512 Virginia Beach Blvd.
Virginia Beach, VA 23462

Captain, thank you. My name is Michael Barrett. I live in Virginia Beach. I'm the immediate past chairman of the Hampton Roads Chamber of Commerce, a 3,000-member business organization. I happen to have been chairman of the chamber during the period of time that we went through BRAC '95. I was extremely fortunate to have been appointed by Congressman Owen Pickett to work with the Congressmen, with area mayors, including Meyera Oberndorf, members of council, the governor, business leaders, members of the Navy league, and as it was pointed out many citizens, and I think that process helped us to go through the creation of a shared vision, and that shared vision took the form in the plan called Plan 2007, and that called for a global Hampton Roads, a restructuring of our regional economy, and one of our major objectives in that plan was that Hampton Roads would be the defense establishments' primary strategic location on the East Coast. Clearly this decision to expand Oceana, to support ARS 1, to bring the jets to Oceana is in accord with that vision.

Now, that vision has been adopted by the Hampton Roads Partnership and we are in the process of implementing that partnership, and that supports, in my opinion, your Draft EIS. In other words, our support of Oceana is not just a knee-jerk economic reaction. It basically is a part of our culture and our heritage and it is now part of our strategic plan for the restructuring of our regional economy such that we finally attain global competitives.

I would point out that the Commonwealth of Virginia has just recognized the efficacy of our Plan 2007 by awarding the Hampton Roads Partnership $2.6 million to implement that this year. I believe again that that supports ARS 1.

We certainly support bringing the jets to Oceana in the full numbers of 180, and I hope that that is what your decision will be.

Thank you very much.

Thank you for your comments; no response required.

Speaker: Mr. Raymond Cheng
ECI Systems and Engineering
596 Lynnhaven Parkway
Virginia Beach, VA 23452
and
Hampton Roads Chamber of Commerce
4512 Virginia Beach Blvd.
Virginia Beach, VA 23462

Thank you, Your Honor. My name is Raymond Cheng, and I'm a business person in the City of Virginia Beach. I'm also a resident and a member of the Hampton Roads Chamber of Commerce.

I'm here tonight to express my support for the relocation of all 180 F/A-18 aircraft and operational functions from Cecil Field to Oceana.

In recognition of the time constraints, I would like to submit the rest of my comments in written form and leave the balance of my time.

Thank you for your comments; no response required.

[Mr. Cheng submitted his prepared statement which is partially represented by the verbatim transcript. The full text of the statement, with Mr. Cheng's personal edits, is provided below.]

Cheng (Cont.)

OCEANA PUBLIC HEARING
OCTOBER 27, 1997, 7:30 P.M.
PAVILION, VIRGINIA BEACH
(approximately 3 minutes)

GOOD EVENING:

RESIDENT AND **MY NAME IS RAYMOND CHENG AND I AM A BUSINESS PERSON IN THE CITY OF VIRGINIA BEACH AND A MEMBER OF THE HAMPTON ROADS CHAMBER OF COMMERCE.**

- **I AM HERE TONIGHT TO EXPRESS SUPPORT FOR THE RELOCATION OF ALL THE F/A-18 AIRCRAFT AND OPERATIONAL FUNCTIONS FROM NAVAL AIR STATION, CECIL FIELD FLORIDA TO OCEANA NAVAL AIR STATION IN VIRGINIA BEACH.**

- **I SUPPORT THE ACTIONS MANDATED BY THE DEFENSE CLOSURE AND REALIGNMENT ACT AND ENCOURAGE THE TRANSFER OF ASSETS FROM CECIL FIELD TO OCEANA. THIS TRANSFER WILL UTILIZE EXISTING EXCESS CAPACITY IN VIRGINIA BEACH AND SAVE TAXPAYER EXPENDITURES BY MINIMIZING**

Thank you for your comments; no response required.

Cheng (Cont.)

THE CONSTRUCTION OF ADDITIONAL INFRASTRUCTURE.

- ALL INDICATIONS ARE THAT THE SINGLE SITING OF ALL 12 FA-18 SQUADRONS TO VIRGINIA BEACH WILL PRESENT THE BEST POSSIBLE OPERATIONAL SCENARIO FOR THE NAVY.

- OCEANA HAS THE MAJORITY OF CAPACITY/INFRASTRUCTURE REQUIREMENTS TO SUPPORT THE ADDITIONAL 180 AIRCRAFT INCLUDING; HANGAR SPACE, RUNWAY CONFIGURATION, TRAINING/MAINTENANCE SUPPORT, AND RANGES.

- THE BUILD-UP OF OCEANA IS VITAL TO THE ECONOMIC WELL BEING OF OUR CITY AND THE REGION. THE ADDITION OF 5,600 PEOPLE REPRESENTING A $226 MILLION DOLLAR INCREASE IN PAYROLL AND $99 MILLION DOLLAR IN CONSTRUCTION ~~DOLLARS~~ IS SIGNIFICANT IN OUR SERVICE-BASED ECONOMY.

- ALTHOUGH THE INCREASE IN AIRCRAFT AND OPERATIONS AT OCEANA WILL ~~CERTAINLY~~ ADD SOME ~~ADD~~ NOISE, TRAFFIC AND AIR POLLUTION TO OUR CITY AND OUR REGION, AS ~~A BUSINESS PERSON~~ I AM CONVINCED THAT THE ENVIRONMENTAL TRADE-OFFS ARE

Cheng (Cont.)

~~ACCEPTABLE GIVEN~~ OUTWEIGHED BY THE TREMENDOUS HUMAN AND ECONOMIC BENEFITS TO VIRGINIA BEACH AND THE REGION. I AM ALSO CONVINCED THAT WORK IS UNDERWAY TO MINIMIZE ENVIRONMENTAL IMPACTS AND THAT CAREFUL EXPENDITURES WILL ACT TO METIGATE THESE IMPACTS IN THE FUTURE.

- VIRGINIA BEACH OFFERS A VERY HIGH QUALITY OF LIFE FOR SERVICE MEN AND WOMEN ASSIGNED TO OCEANA. WITH A GROWING ECONOMY, AN EXCELLENT SCHOOL SYSTEM AND THE LAKE GASTON PIPELINE COMING ON LINE, VIRGINIA BEACH IS WELL POSITIONED TO ACCOMMODATE THE NEW PERSONNEL AND FA-18'S.

- THE BUSINESS COMMUNITY IN VIRGINIA BEACH SUPPORTS THE GROWTH OF OCEANA AND WE ARE PLEASED TO SUPPORT THE TRANSITION OF PERSONNEL TO OUR COMMUNITY. THIS COMMUNITY HAS AN EXCELLENT RELATIONSHIP WITH OUR MILITARY NEIGHBORS AND WE ARE LOOKING FORWARD TO BRINGING ADDITIONAL PERSONNEL TO VIRGINIA BEACH FROM JACKSONVILLE AND OTHER LOCATIONS.

- THE DEFENSE OF OUR NATION REQUIRES THAT SACRIFICES BE MADE. THESE SACRIFICES ARE MADE BY THE MEN AND WOMEN WHO SERVE IN OUR ARMED FORCES, AND THEIR FAMILIES ~~AND BY COMMUNITIES~~ THAT PROVIDE A HOME FOR PLANES THAT MAKE NOISE, GENERATE TRAFFIC AND PRODUCE SOME ADDITIONAL POLLUTION.
- WE TOO ARE PREPARED TO MAKE THE NECESSARY SACRIFICES AS A COMMUNITY TO INSURE THAT THE ESSENTIAL MISSION OF OCEANA IS MET.
- I WANT TO RECONFIRM MY SUPPORT OF THE OCEANA BUILD-UP AND PLEDGE THE SUPPORT OF THE BUSINESS COMMUNITY IN MAKING THE TRANSITION SUCCESSFUL.

THANK YOU FOR YOUR TIME AND ATTENTION.

Speaker: Mr. William Cryan
805 Navigator Ct.
Virginia Beach, VA 23454

1 Thank you, Your Honor. The DEIS contains specific flight paths for fleet carrier landing practices at Oceana. Those flight paths, however, are not the paths currently flown by the aircraft practicing carrier landings.

My question is whether the actual flight paths will be modified in the DEIS to reflect those paths being flown and if the public copy guarantees that the tighter patterns will be followed at all times? Will the DEIS noise contours be
2 subsequently modified to reflect a larger noise and additional residences that will be effected and, in turn, how many people will be effected?

3 I also have a question concerning the upcoming plans for the Navy which is to improve the F-18 A, B and C models and go to E and F in the future.

According to the most recent trade journals, the E and F models are larger engines, therefore, more noisy, therefore, more dirty with respect to pollution. And I'm wondering if this will also be addressed in the DEIS conversions in echo and fox model of the F-18.

4 And finally, questions concerning the Navy as stated in the DEIS, that they will work with the City of Virginia Beach to mediate some of the impacts of the environmental issues. My question is, what does that really mean? Has the Navy POMED [Program Operations Memorandum] money in the out years, or is this just a promise at this time? I have a number of other questions which I have already previously submitted. I will turn over the balance of my time.

WC-1 Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns

WC-2 Projected operations at NAS Oceana and NALF Fentress were modeled using NASMOD over existing flight tracks. The noise zones that would be created by these projected operations under ARS 1 are shown on Figure 4.8-1. The population affected by the noise zones is shown on Table 4.8-1.

WC-3 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

WC-4 The Navy will continue to review its operational procedures to mitigate noise and safety impacts wherever practicable

The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required, which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

Speaker: Mr. Ned Williams
Hampton Roads Chamber of Commerce
4512 Virginia Beach Blvd.
Virginia Beach, VA 23462

Good evening, Your Honor, and thank you. My name is Ned Williams and I am a member of the executive committee and vice-chairman with the Virginia Beach Division of the Hampton Roads Chamber of Commerce, and as you may have heard, that's a 3,000-member business organization, non-profit business organization here.

I am here tonight to express support, our support and my personal support, as a lifetime resident of the Hampton Roads community for the relocation of the F/A-18 aircraft and operational functions from Naval Air Station Cecil Field, Florida, to Oceana Naval Air Station in Virginia Beach.

In the interest of the time that we have expressed with this issue tonight, I will defer and submit the remainder of the comments in writing and will appreciate your positive consideration of relocating all facilities to Virginia Beach.

Thank you.

Thank you for your comments; no response required.

[Mr. Williams submitted his prepared statement which is partially represented by the verbatim transcript. The full text of the statement is provided below.]

Williams (Cont.)

OCEANA PUBLIC HEARING
7:30 P.M. PAVILION, VIRGINIA BEACH
(three minutes approximately)
October 27, 1997

GOOD EVENING.

- **MY NAME IS NED WILLIAMS AND I AM A MEMBER OF THE EXECUTIVE COMMITTEE AND VICE CHAIRMAN WITH THE VIRGINIA BEACH DIVISION OF THE HAMPTON ROADS CHAMBER OF COMMERCE.**

- **I AM HERE TONIGHT TO EXPRESS SUPPORT FOR THE RELOCATION OF F/A-18 AIRCRAFT AND OPERATIONAL FUNCTIONS FROM NAVAL AIR STATION, CECIL FIELD FLORIDA, TO OCEANA NAVAL AIR STATION IN VIRGINIA BEACH.**

- **OCEANA, THE CITY OF VIRGINIA BEACH AND THE HAMPTON ROADS REGION ARE IN THE BEST STRATEGIC POSITIONS TO EFFICIENTLY ACCOMMODATE THE 182 AIRCRAFT AND 4,200 MILITARY AND CIVILIAN PERSONNEL THAT SUPPORT THE F/A-18 SQUADRONS. SIGNIFICANT STUDY AND ANALYSIS HAVE RENDERED THE SAME CONCLUSION; THAT OCEANA IS INDEED THE BEST OPTION AVAILABLE.**

Thank you for your comments; no response required.

A-5-92

Williams (Cont.)

- VIRGINIA BEACH HAS BEEN PLANNING FOR THE EXPANSION OF OCEANA FOR A NUMBER OF YEARS. THIS COMMUNITY IS WELL POSITIONED TO ACCOMMODATE THE 4,200 MILITARY AND CIVILIAN PERSONNEL THAT WILL BE TRANSFERRED AND THE 2,700 SCHOOL AGED CHILDREN THAT WILL BE ELIGIBLE TO ENROLL IN OUR QUALITY PUBLIC SCHOOL SYSTEM. TRANSPORTATION UPGRADES ARE CURRENTLY UNDERWAY.

- THE EXISTING HOUSING STOCK IN VIRGINIA BEACH CAN ACCOMMODATE NEW RESIDENTS IN A NUMBER OF PRICE RANGES FOR BOTH RENTERS AND BUYERS.

- THE OCEANA ALTERNATIVE SUPPORTS THE 1995 BRAC INTENTION TO AVOID THE SUBSTANTIAL CONSTRUCTION AT CHERRY POINT REQUIRED TO SUPPORT RELOCATING F/A-18 AIRCRAFT UNDER 1993 MANDATES. THE SINGLE SITE ALTERNATIVE AT OCEANA SUPPORTS LOGISTICS AND LEADS TO SYNERGISM BETWEEN VARIOUS FUNCTIONS ASSOCIATED WITH TRAINING, DEPLOYMENT AND MAINTENANCE.

- **THE CITY OF VIRGINIA BEACH, ITS CITIZENS, AND THE BUSINESS COMMUNITY ARE PREPARED TO WORK CLOSELY WITH THE NAVY TO MINIMIZE IMPACTS RELATED TO LAND USE, NOISE, AIR QUALITY AND TRAFFIC. WE ALL REALIZE THAT SACRIFICES HAVE TO BE MADE TO SUPPORT THE ESSENTIAL MISSION OF OCEANA. RECENT CITIZEN PARTICIPATION IN THE NEPTUNE FESTIVAL/OCEANA AIR SHOW IS AN EXCELLENT GAUGE OF SUPPORT FROM THIS CITY AND THE REGION. IT SHOULD BE NOTED THAT IN 1997 RECORD NUMBERS TURNED OUT FOR THE AIR SHOW AT OCEANA AND THAT BUSINESS COMMUNITY SUPPORT WAS AT AN ALL TIME HIGH.**

- **THE BUSINESS COMMUNITY IN VIRGINIA BEACH STANDS READY TO ASSIST IN ANY WAY APPROPRIATE TO INSURE THAT THERE IS A SMOOTH TRANSITION OF NEW MILITARY PERSONNEL INTO THE AREA. THIS COMMUNITY SUPPORTS THE EXPANSION OF OCEANA AND WE ARE PREPARED FOR THE IMPACTS THAT SUCH A BUILD-UP DELIVERS.**

THANK YOU FOR YOUR TIME AND ATTENTION TO THESE REMARKS.

Speaker: Ms. Sheri Imel
Citizens' Coalition of Virginia Beach
1057 Blue Spring Ln.
Virginia Beach, VA 23452

Good evening. Thank you, Your Honor. I'm Sheri Imel, president of the Citizens Coalition of Virginia Beach, and our purpose is to represent the interest and concerns of Virginia Beach residents who are going to be adversely affected by the Navy's proposed action.

I just want to say first that we understand the Navy's desire to come to Oceana. We understand what is driving the Navy's proposals and decision-making process, and we also understand the reason why the City of Virginia Beach is really looking forward to the Navy bringing in the F/A-18s, but I think we have to look at some of the negative impacts.

First of all, you have got about 50,000 people who are going to be adversely impacted in terms of noise and in terms of aircraft potential zones or crash zones, whatever you want to call it. Now, as 50,000 people, you have got a population in Virginia Beach of 400,000 people, more than that.

1 My question is, why do the 10 percent of us have to suffer and bear the brunt of the adverse impacts of the other 90 percent of the population of Virginia Beach, and why is it that we have to bear the brunt of the severe impact for the benefit of the Navy, for the benefit of the socioeconomic impacts in Virginia Beach?

Let's look at some of the benefits that we are going to get out of this. Yes, it's going to bring some more jobs, it's going to bring in some more money, but, you know, as far as -- it's not going to bring in a lot of civilian jobs. It may create a lot of jobs in the private sector. It will infuse $226 million in payroll, which will be carried into the economy, but let's look at the negative impacts that I don't think or we don't think were covered in the EIS.

2 First of all, the city has to pay to redo all those roads. How much is the city going to use of our taxpayers' funds to pay for that?

3 Secondly, we have to relocate schools. We have got to accommodate an additional 2,000 children to the school system. Where is that money coming from? It's coming from the taxpayers. How much is that going to cost? How does that compare to the $226 million?

4 Third, there is a lot of intangible impacts, like the noise. How do you put a price tag on the noise? Is it worth $226 million? I don't know. I don't think there is anybody here that knows.

CCVB(SI)-1 As stated in Section 4.8 of the EIS, approximately 38,385 additional people will be exposed to noise zones 2 and 3 under ARS 1 compared to the existing AICUZ. Noise levels are typically greater closer to the airfield. The flight patterns surrounding NAS Oceana are optimized to provide the safest training for pilots while minimizing, as much as possible, the effects on the human population.

CCVB(SI)-2 The Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach.

CCVB(SI)-3 Projected impacts on taxes/revenues under ARS 1 are addressed in Section 4.5.1 of the EIS. The increase in total school expenditures expected to result from the additional school-age children would be at least partially offset by increased student aid and the additional local taxes paid by the new residents. Overall, the EIS states, in Section 4.5.1, "*Virginia Beach and the other communities in the region would not experience any significant negative fiscal impacts from the proposed realignment under ARS 1.*"

Imel (Cont.)

5 Now, the other thing that came to my attention was the Lake Gaston water project, and the assumption of the EIS is that it will be up and running by '99, and somehow I have my -- we have our doubts about that because the state of North Carolina has been successful over many years in postponing that, and it is no reason to expect that they may not do that again. The question is, what is the City of Virginia Beach and what is the Navy going to do if Lake Gaston is not turned on. We are under restrictive water usage right now. It's going to happen.

6 Perhaps one of the most devastating impacts is going to be the noise. We have got an additional 30,000 people who are going to be impacted by noise. That's -- the noise is very annoying. We have heard a lot of testimonials here. It is just entirely unfair. What is the Navy going to do? What is the City of Virginia Beach going to do? The Navy comes in and says, we are going to put these planes in and the City of Virginia Beach says, hey, yeah, we are going to do it. How is the Navy going to mitigate those impacts? If the EIS says, close your doors, turn on your air conditioners, shut your windows. Is the Navy going to pay for our electricity bills? Is the Navy going to pay to put in new windows? I don't know. Should the Navy be thinking about something like that in terms of mitigation? Maybe yes. Maybe the city should be thinking about tax benefits or the Navy should be thinking about providing some assistance to the local residents.

I understand the Navy is putting in a noise attenuation building for ground operations and it has its community liaison office, which is all well and good. Sometimes it works, sometimes it doesn't, because when it comes right down to it, when the Navy has to run their operations, they are going to do it. If it's noisy for us, it's noisy for us and we have to accept that.

7 In conclusion, I feel that the city and the Navy should be willing to work with the residents of Virginia Beach to make sure that our concerns are heard, to make sure that, you know, for those of us who don't want to live in noise zones and for those of us who don't want to live in crash zones, that we be given the opportunity to move with some assistance. If I don't want to be in the crash zone, I don't think my neighbors want to be in the crash zone. How is the Navy going to help us? How is the Navy going to help us? How is the Navy going to help everyone in the crash zone?

Thank you very much.

CCVB(SI)-4 Thank you for your comment; no response required.

CCVB(SI)-5 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies").

CCVB(SI)-6 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Regarding the plans of the City of Virginia Beach, the Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach.

CCVB(SI)-7 Please see response to CCVB(SI)-6.

Speaker: Mr. David V. Park
US Navy, Retired
820 Atley Lane
Virginia Beach, VA 23452-3904

Your Honor, I am David Park. I am a retired Naval aviator. I have been the commander of an F/A-18 squadron. I was deputy commander of an air wing containing F-18s flying off the SARATOGA during Desert Storm and I was a commander on an air wing on board the AMERICA that had F-18s.

I would like to point out that in my Navy career I have moved 17 times, with my family 14 times. We have lived on all sides of the country and virtually every corner. We chose to stay here because we liked what we found when we got here. We liked the people, the community and the opportunities.

I would like to point out again that the issue here tonight is not to decide if the F/A-18s are coming to Oceana. It is to decide if we would like to bring the remaining 60 to a total of 180 here. Of those 180, I would like to emphasize points made in the Draft Environmental Impact Statement that those 180 will not be present at all times, nor will they ever be all operating at one time.

In my own estimate, I would say fully 60 of those airplanes will be deployed from Oceana at any given time and not present here.

I would like to talk about the Accident Potential Zones. First of all, I can assure you that every person involved in an F/A-18 operation from the maintenance person to the pilot does not want to contribute to those zones. One of the things or several of the things that are going to help reduce those Accident Potential Zones from ever becoming realities is the increased reliability built into the F/A-18 team. That was demonstrated to me very clearly when I flew in combat in Desert Storm. I flew both the A-6 and F/A-18. The F/A-18 is a much more survivable aircraft. It is because of redundant systems and increased reliability, but perhaps the most important factor that we have to consider in the safety of this airplane is the increased training and the more effective training of the quality personnel that deal with that aircraft. That quality also applies to the people that will accompany the men and women who work on those airplanes and who fly them in the form of their spouses and families.

It's been my personal experience to have been involved in many parent groups in the schools and churches here that fully half of the people who participate in these parent organizations are military members or spouses, and I think you will see a larger participation there.

And my last comment is, I would like to compliment the Navy for the record on the thoroughness and the effectiveness of the Draft Environmental Statement. Everything that I looked at in there that I would choose to speak of or to make an issue of has been very thoroughly covered by them. Thank you.

Thank you for your comments; no response required.

A-5-97

Speaker: Vice Admiral Richard C. Allen, Retired, US Navy
3304 Middle Plantation Quay
Virginia Beach, VA 23452

My name is Richard C. Allen. I retired from the Commander Naval Air Force Atlantic Fleet in April of 1996. I, like the previous speaker, chose to remain here in the Hampton Roads, Virginia Beach area.

Over numerous years of having lived in various places within the Virginia Beach complex, specifically Linlier, Point O'Woods, and Middle Plantation, my wife and I chose to remain in the area and seek further employment following retirement from 37 years in the Navy here locally.

I only want to echo tonight the numerous positive comments that I have heard and comment on one that I have not heard, which was troublesome to some members here in the audience. It had to do with the recent noise around Oceana which appeared to some as being abnormal. This may be due to the fact that Fentress has been closed for a period of time for resurfacing of the runway, an action that was initiated a couple years ago in order to correct some of the concrete deficiencies in the runway at Fentress. I believe that runway has returned to open status, and as a result, some of the abnormal flight patterns around Oceana should be reduced as far as noise levels are concerned.

I also want to echo the positive comments that were made about the Navy Environmental Impact Statement, the Draft EIS, if you will. It is extremely thorough. It takes into account all, if not nearly all, possible considerations that one could think of to look at this very complex problem. I commend the Navy on its very detailed look at the EIS. It goes above and beyond and should be recognized for having done that.

In closing, and to keep this short, I want to also thank the leadership of the City of Virginia Beach for the very positive attitude that they have taken to welcome not only the F/A-18s to Oceana and also to make personal visits to the West Coast to welcome the F-14 community here as well. The Mayor herself traveled to Miramar, California, to meet with the families and the personnel associated with the F-14 move. I know for a fact that she intends to do the same thing for the personnel moving here from Cecil Field, Florida. I believe in all fairness, having looked and studied very closely at the EIS, the only sound decision for this panel to make is to choose ARS 1 and bring all of the Hornets to Oceana for all the reasons that numerous speakers have stated.

Thank you very much.

Thank you for your comments; no response required.

Speaker: Ms. Anne J. Henry
Princess Anne Co./Virginia Beach Historical Society
506 27th St.
Virginia Beach, VA 23451
Property:
2040 Potter's Rd.
Virginia Beach, VA 23454

Good evening. I'm here representing the Princess Anne County, Virginia Beach Historical Society. I am not here to endorse either number one through number five, but to bring some concerns of our organization to you.

We own Upper Wolf Snare Plantation, which is located at 2040 Potters Road. It is in a designated historical district and just on the other side of the road from Oceana. The house was built in 1759. It's 238 years old. Our house is currently occupied because it's rather isolated. If it were not, we would be subject to vandalism. We give tours at times. Now we have a very difficult time because we have to stop because of the plane noise, but we have pretty much adjusted to that to a point. And we also have a number of the historical society functions there.

Our main concern is the noise and vibrations. We do experience vibrations, and I would like to, once again, say the house is 238 years old. It is an irreplaceable gem in our city. We lack air conditioning. I represent an economically deprived organization, shall we say. I don't know, maybe some of these 3,000 chamber members are going to fish up something for us, but we cannot afford -- we cannot afford to air condition because when you start to air condition a historical building and it is on the Virginia Register, it is extremely expensive because you have to hide everything, so we are very concerned about that. 1

We have had one very minor buffer on the south side of Potters Road removed a few years ago and that greatly increased our noise level at the house, so there is a comment -- comments have been made before. I made them before on the scoping sessions and there were letters received and note of this is in the Draft EIS, but I could not find any response to our concerns in it, and in mitigation, or any response to it.

Thank you.

PACVBHS-1 Noise levels in the vicinity of NAS Oceana would increase significantly under any of the alternatives selected. The Upper Wolf Snare Plantation would continue to experience noise levels in excess of 75 dB Ldn. Although some trees (minor buffers) have recently been removed at NAS Oceana for safety reasons, the policy of the station is to maintain vegetative buffers to minimize noise impacts wherever possible. The relocation of F/A-18s to NAS Oceana would increase noise levels at the Upper Wolf Snare Plantation; however, no additional impacts from noise vibration are anticipated. This determination of "no effect" has been forwarded to the Virginia State Historic Preservation Office.

Speaker: Mr. David M. Steinberg
3424 Kings Lake Dr.
Virginia Beach, VA 23452

Thank you. We the people of Virginia Beach were not given the opportunity to vote on this proposal. It could have been put on as a referendum in the election next week, but it was not. So my comments will be my vote as a private citizen.

When Oceana was started, Virginia Beach was a little town. It is now the biggest city in the state. We have made the choice to have a major city where people can live and work. A few years ago we considered moving Oceana to an empty, rural area where it would not be a danger to a large population, and that would be less costly than moving schools, houses, hospitals, business centers, churches, theaters and all out of the potential crash zones. We couldn't even enjoy a musical show here in the Pavilion with the high decibel vibration of the Hornets. We have lots of industries moving in, and already the rush-hour congestion and pollution are out of control. This is the greatest beach resort in the country, but tourists come for peace and quiet. These thousands of visitors from the USA, Canada and all over the world will not come to a beautiful new high-rise resort hotel if a supersonic jet practicing for an air show might smash through their window.

We built the city around Oceana. The low-flying planes make many areas unlivable, but if we have to accept that, at least don't increase the war zone. We have a city with homes, families and children. Our duty is to take care of them. Half a million of us citizens work here and enjoy the artistic, scientific and natural beauty of the beach. Let's make our lives and the lives of our children pleasant, not painful.

Thank you.

Thank you for your comments; no response required.

[Mr. Steinberg submitted his prepared statement, which is represented by the verbatim transcript.]

Speaker: Ms. Carole Steinberg
3424 Kings Lake Dr.
Virginia Beach, VA 23452

Good evening, Your Honor. The quality of life in Hampton Roads will be greatly diminished, if not destroyed, by the impact of the Hornets to Virginia Beach. The lives of our children who will be put in potential peril are worth more than all of Colchis's gold to me or to any other real mother or father. The noise level alone is dangerous environmentally to all living things, especially humans who are very young. My 13-year-old son who attends Lynnhaven Middle School told me that the present level noise from Oceana is already intolerable when they are outside during P.E. He and his classmates were forced indoors after some high decibel airplane noise this fall.

1

In addition, overcrowding Virginia Beach is not good city planning. The sudden influx of many thousands more is very poor planning for an overpopulated city with crowded schools and constant traffic snarls, not to mention the pollution from cars as well as planes. The EPA cannot seriously consider this as a suitable place to house the 180 Hornets. If they do, we'll all be stung.

2

CS1-1 Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration. Please see Sections 3.1.8 and 4.8 for a more detailed discussion of the impacts of noise on school-age children.

CS1-2 Impacts under ARS 1 on the regional population, transportation, and air quality are addressed in Sections 4.5, 4.7, and 4.9 of the EIS, respectively. Population, traffic, and air emissions all would increase under ARS 1; however, the existing environment would not be significantly impacted.

[Ms. Steinberg submitted her prepared statement, which is represented by the verbatim transcript.]

Speaker: Mr. Ronald C. Ripley
Tidewater Association of Realtors
184 Business Park Dr., Ste. 200
Virginia Beach, VA 23462

My name is Ron Ripley, and I'm representing the Tidewater Association of Realtors. The realtors -- this group is a group of approximately 2900 members. I represent all realtors throughout the cities.

My business is located in Virginia Beach and I'm a resident of Virginia Beach. We have prepared an official statement, if you will, but I'm not going to read this to you. It's generally in support of the transfer and relocation of the -- all squadrons to Oceana.

The position does address the economic benefits and the quality of life, the obvious things. It discusses the infrastructure of Oceana as being sufficient. The other speakers that have gone before me have very eloquently addressed these matters, and I think that the Environmental Impact Statement has also supported this position.

However, I will just simply make two quick points. One is that the -- and I can't speak to technical issues that are very vast in the economic study that's been done, the environmental study that has been done, but I can speak on behalf of the association from the standpoint that there is adequate capacity within the market to absorb this relocation. I think it is very significant that there is adequate capacity in the existing resale homes market, there's adequate capacity existing in the new homes sales market, and there's an adequate capacity in the existing multifamily market to absorb it. Whatever voids that are in the market, the free market will probably come to -- will move quickly to fill those voids. That's the first point.

The second point is that the industry does not expect any reduction in property values over current levels as a result of this relocation. Oceana and our community has operated -- operated very well under these capacities just a few years ago, and this is not something new to this area. As we see it, the precedent has already been set.

We thank you for this opportunity to make these comments and would be happy to address anything -- any other comments that you may have. Thanks.

Thank you for your comments; no response required.

Speaker: Mr. John Shick, Resident
US Navy, Retired
912 Duke of Suffolk Dr.
Virginia Beach, VA 23454

Good evening, Your Honor. I am a retired Navy captain. I just relocated back into this area, and as a result of quality -- I moved back here because the quality of life issues were an issue to me, Virginia Beach having been my residence for many years before. I am neither supporting nor against moving the aircraft to Virginia Beach at this time. I am just getting up on the issue.

1 I would like to make a couple observations about the DEIS, though. In a previous citizens meeting, a view graph was shown that showed the operational tempo to be projected in ARS 1 to be 12 to 15 percent greater than 1990, 1991, which as you know was during Desert Storm when we had the highest operational tempo at Oceana.

2 I look at the alternatives and it seems to me that Alternatives 2 through 5 seem to subtly -- have been subtly crafted to move you to accept ARS 1. I didn't see any indication of looking at alternatives which might input the predominant number of aircraft down in Beaufort or Cherry Point; as an example, an option which might put six aircraft squadrons down there plus the FRS. I note that there is still in the lowest, in ARS 5, there is still $67 million in construction at Oceana.

3 I also did not see any information or have not heard of any information from the city which quantified the total expected cost to the city for moving the schools, consolidating the schools, or the projected costs to the residents, the 37,000 residents who might have to do the same.

Because of that, I fully support North Carolina's request for an extension to review some of these issues, to find out if there are options other than the options which are presented in the current DEIS.

JS1-1 Thank you for your comments; no response required.

JS1-2 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of the ARSs.

Schick (Cont.)

I noted that most of the speakers spoke to the quality of life in this area, which is appropriate. They should do that. And they also spoke to the environmental issues of wetland usage and wetland abatement and the differences in the different options. I was a little concerned. I thought the representatives' comments were deficient in that they did not really speak to the concerns of the citizenry and their constituents.

Thank you very much.

JS1-3 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required, which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

Speaker: Ms. Deb Scarborough
100 Rudee Ave.
Virginia Beach, VA 23451

First of all, I want to say that I object to you putting the politicians up first. All we need to do is pick up a newspaper and we know what they're thinking and what their opinions on this are, and even though I voted for some of them, I don't share their belief. The sound of freedom to me is the penny whistle that they play at Williamsburg.

If you listen to many of the people who were encouraging for the Hornets to come to Oceana, they were business people looking at dollars. I take comfort in the simple pleasures of life. I don't -- I live in a brick home, and we heard comments about putting up extra storm windows and whatnot. I prefer not to be a prisoner in my home. I like to go outside. I like to hang up my clothes.

1 If I get up early in the morning, many mornings the smell of the fuel from the jets that have flown over at night is still in the air. The Navy said that they try not to dump over land, that they dump over the ocean, but you know, they say try. So that tells me that sometimes it does occur, and I do smell that odor in the morning sometimes when I get up early.

Also we're talking about the environment here. People have said, well, we can accommodate all the extra traffic and whatnot that will come from the extra employment that comes from the jets. Roads do not make for a better environment. The extra cars that come don't make for a better environment.

DS-1 Exhaust odors may be noticeable in proximity to either a military or commercial airfield just as odors from automobile exhausts are noticeable near a highway.

Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

Scarborough (Cont.)

2 The DEQ, I believe it is, and the EPA has given us a Clean Air bill of health just recently, and logic would tell me that if we bring extra jets and automobiles and fuel for extra houses then we'll be on that edge again for not having clean air.

3 I'd like my children to be able to go outside and play outside and not have to worry about the -- the sound of the jets going over and hurting their hearing like some other people have addressed.

4 I think that the water that we're getting from North Carolina is -- would be a good trade to give them the jets, that we already have enough, and the only Hornets I want to hear are the ones that I hear in my garden.

Thank you.

DS-2 The EIS has been updated to reflect the redesignation of the Hampton Roads Intrastate Air Quality Control Region from ozone non-attainment to attainment. The projected change in aircraft and other air emissions associated with the realignment under ARS 1 are within the state growth allotment for maintenance of the national ambient air quality standards in this region.

DS-3 The EIS acknowledges that the projected realignment of the F/A-18 squadrons to NAS Oceana and NALF Fentress would increase aircraft operations and aircraft noise levels. However, although operations and the average daily noise levels would significantly increase, noise levels would not result in permanent threshold of hearing shifts. Although temporary threshold of hearing shifts are possible, individual noise levels would not reach the threshold of pain (i.e., 120 dB).

DS-4 Thank you for your comments; no response required.

Speaker: Mr. Ed Lynk, Resident
3190 [Cidan Keeling ??] Rd.
Virginia Beach, VA 23454

My sympathy to the board and the folks sitting here and the rest of the people staying here. My name is Ed Lynk. I flew in three wars, and the sound of freedom did not emanate in Williamsburg. It emanated in the work, in the toil of our sailors, soldiers and Marines who were putting these airplanes together day and night that make noise but go out there and defend our country religiously.

Now, getting down to the fact now, you can bring 60 airplanes here, you can bring 90 here, you can bring 120. You don't deal -- you don't play with half a team. You split up the team, you split up the command. You split up the training, you split up the cohesiveness. And the maintenance falls -- not falls apart, but you have it spread all over the East Coast.

When you want to deploy a squadron, you leave those people, those families at an away station. We're talking now Cherry Point or South Carolina. You leave those families there alone. They're not part of a Navy family down there, although they will be close. You're ruining their lives as far as I can see.

I've been through this. I've been stationed at all the stations you're talking about. The only one that would offer a decent quality of life -- let's forget these people with their petty noise problem. Let's talk about the kids that are out there doing the fighting for us and going to defend us. We've been through this for years, and no one likes the inconvenience of a little noise, but God bless us, if we don't have it, we don't train the people, we don't have it when the bell rings.

Okay. Quality of life is not for us. We need some of it, but how about the 5,000 kids that come up here and need a place to live, need some decent schooling, colleges to go to, hospitals to go to, universities to go to, technical schools to go to, and we have something to give them. And let their wives when they are overseas live in a Navy community with good naval hospitals, good medical facilities, and let them have a decent life.

Splitting them up doesn't serve a thing. We have had the same number of airplanes here, the same -- noisier ones with the A-6, of course. We've had more noise here than we'll ever see, and we've had this and we endured it. We endured it.

At one time this city made every realtor tell potential property buyers that there was a noise problem in the city. I don't know what happened to that, but all of these people that walk in here tonight with their four kids diving on the ground because an airplane is 150 feet in the air, I don't know where they get that stuff.

Thank you for your comments; no response required.

Lynk (Cont.)

The more facilities, transportation, ease of maintenance, training, consistency, command structure, we need. Do you want it or not? Operationally it's the only way to go, and I thank you.

Speaker: Ms. Renee Alexander
900 Duke of Suffolk Dr.
Virginia Beach, VA 23454

Thank you. My name is Renee Alexander. I've lived here for ten years in Virginia Beach, and I am still not used to the jet noise, but I tolerate it since I know the Navy is here to stay. And more importantly, I love Virginia Beach as a city.

1 I've heard that these Hornets are even louder than the jets that we have now, and as a mother and a teacher who teaches in a portable, when those babies fly over, the learning process stops, especially in a portable, which we don't have any of those fancy windows.

I feel that since the question is not whether the jets are coming or not -- they are coming. The question is how many, 120, 180 -- if you must have these jets, let's choose the ARS 4 or 5. It does the least noise damage as far as affecting citizens and schools, yet still brings in they said 69 million for construction and 125 million for payroll, which is still quite a bit of money.

2 I understand that the Navy revenue for this city is important, but I believe that the quality of life for the people and schools is even more so.

The sound of freedom may be sweet, but for those who have houses and schools under flight patterns, it's also deafening. We have a choice. I hope the Secretary of the Navy chooses ARS 4 or 5. The city will still get money, yet those of us who live under the flight patterns will not be so greatly affected. I thank you for letting me express my opinion, yet the minority. Thank you.

RA-1 The EIS provides comparative noise levels for F-14 and F/A-18 aircraft during various modes of flight (please see Section 4.8). The EIS also addresses noise impacts in schools and the potential effects on school-age children. Although noise level reduction in portable trailers is more difficult, some degree of sound attenuation is feasible.

RA-2 Thank you for your comments; no response required.

Speaker: Mr. William Osborn
1841 Elkins Circle
Virginia Beach, VA 23456

Members of the panel, ladies and gentlemen, I came down here and I don't have too much to say because there's not too much left to say. It seems that when we lost the NADEP we lost the capabilities to totally overhaul the aircraft. Now they're asking us to bring aircraft in to Oceana. My preference would be to keep them or take them to Cherry Point because Cherry Point can do a total overhaul and take care of the aircraft.

Now, my wife is a little more sensitive than I am, a little more quiet also. The biggest problem that I have with the aircraft here, which is noise, isn't so much with the fact that the people are flying in and out. It's how they fly in and out. You can take a piece of paper and you can take these boys up there and you can make them gentlemen and pilots, but you can't give them -- they don't have the ability to act like a real person when they're coming through to land in the community. They jockey back and forth and carry on. They come in low. I realize that calling in -- we're well-known at the base. Calling in doesn't help. The reply is usually the same; oh, well, that's the best they can do; they're in training. I would prefer to have those people in training be training over the desert rather than over my house. 1

Thank you.

WO-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

WO-1
(cont'd)

NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757)433-3158.

Speaker: Mr. John Martin
2301 Barn Swallow Ct.
Virginia Beach, VA 23456

I move to the on-deck. I would like to wait for the mayor, if she's coming back, if that's possible. She did step out for a second.

I just had -- I was hoping to stay away from personal shots, and I guess a man a couple times before had to resort to personal shots. I kind of find it revolting that the mayor and the city council probably clapped the loudest during that time that he spoke, and it's a shame that -- that there's plenty of citizens in this city that live here and take advantage of its many resources, which are pretty good. The fact of the matter is they tend to forget about those same people that live here day and night, and it's pretty sad that we've got our own problems here.

We had a homeless gentleman come in earlier, and we want to spend a tremendous amount of money on relocating families from a different state. I've been laid off. I'm a DOD employee. I work for the Navy. So I know what it's like to be down-sized and laid off. So I have sentiments similar to the people that are relocating and I know what they go through, but we have problems with our own citizens here, and it's a shame that it has to come to that.

So the noise is a problem, and I don't want to sound petty like the previous gentleman said a few minutes ago, but we do have children in this area that are suffering from it. Relocating schools and spending money on relocating schools that didn't even need to be relocated, it's sad that it's come to that, and I know that there's 120 planes already coming. I'm under that assumption, and being a government employee and working at a shipyard here, there's many ships that have been relocated into our shipyard that have no room to go to the naval base. There's just no room left. The area is -- the government obviously has made cutbacks and it's sad that it's had to come to that, but we're taking a really tremendous amount of that load here. And sure the work is great and the money's great, but you know, that's not everything and the citizens directly here in this city suffer from that.

And that's pretty much all I had to say. Thank you.

Thank you for your comments; no response required.

OCEANA PUBLIC HEARING
October 27, 1997 -7:30 p.m.
Pavilion, Virginia Beach

(DIRECTORS COMMENTS)

GOOD EVENING.

- **MY NAME IS GINNY SANCILIOAND I AM A MEMBER OF THE BOARD OF DIRECTORS OF THE VIRGINIA BEACH DIVISION OF THE HAMPTON ROADS CHAMBER OF COMMERCE AND A RESIDENT OF VIRGINIA BEACH.**

- **I AM HERE TONIGHT TO EXPRESS <u>SUPPORT</u> FOR THE RELOCATION OF F/A - 18 AIRCRAFT AND OPERATIONAL FUNCTIONS FROM NAVAL AIR STATION, CECIL FIELD FLORIDA TO OCEANA NAVAL AIR STATION IN VIRGINIA BEACH.**

[Ms. Sancilio submitted her prepared statement. She did not speak during the public hearing. The full text of her statement is provided below.]

Thank you for your comments; no response required.

- FROM A BUSINESS PERSPECTIVE, I AM IN FULL SUPPORT OF THE 1995 BRAC GOALS TO UTILIZE EXISTING EXCESS CAPACITY AND TO MINIMIZE THE CONSTRUCTION OF ADDITIONAL INFRASTRUCTURE. THESE GOALS CAN BEST BE ACCOMPLISHED IN VIRGINIA BEACH UTILIZING THE ASSETS OF OCEANA.

- THE OVERWHELMING CONSIDERATION THAT SUPPORTS A SINGLE-SITE IS PROXIMITY TO THE FLEET SQUADRONS. WE OFFER THIS OPERATIONAL SYNERGY IN VIRGINIA BEACH AND WE ARE PROUD TO BE THE HOST COMMUNITY FOR THIS ESSENTIAL NATIONAL DEFENSE MISSION.

- THE ECONOMY OF OUR CITY AND THE HAMPTON ROADS REGION ARE LINKED IN A SIGNIFICANT WAY TO THE DEPARTMENT OF DEFENSE EXPENDITURES. THE ADDITION OF NEW PERSONNEL AND THE CORRESPONDING INCREASE IN MILITARY PAYROLL, COUPLED WITH CONSTRUCTION

EXPENDITURES, WILL PROVIDE A NEEDED BOOST TO BUSINESS DEVELOPMENT AND FUND ESSENTIAL MUNICIPAL SERVICES IN VIRGINIA BEACH.

- THE USE OF OCEANA ENSURES THAT TAXPAYER DOLLARS ARE SPENT IN THE MOST EFFICIENT WAY POSSIBLE. THE NAVY'S ANALYSIS THAT STUDIED CAPACITY, INFRASTRUCTURE AND OPERATIONAL READINESS IDENTIFIED OCEANA AS THE "FIRST CHOICE" AMONG SEVERAL ALTERNATIVES.

- IN THE BUSINESS WORLD CONSOLIDATIONS ARE AN ACCEPTED WAY TO INCREASE EFFICIENCY AND ADD TO THE "BOTTOM LINE". THE CONSOLIDATION OF ALL 11 F/A-18 FLEET SQUADRONS TO OCEANA WILL RESULT IN SIMILAR EFFICIENCIES IN TRAINING, MAINTENANCE, LOGISTICS AND PERSONNEL; THUS PROTECTING TAXPAYER INVESTMENTS AND INCREASING OPERATIONAL EFFICIENCY.

- THE ENVIRONMENTAL IMPACTS ON VIRGINIA BEACH ARE ACCEPTABLE GIVEN THE ESSENTIAL DEFENSE MISSION OF THE NAVY IN OUR REGION AND THE WORLD. OUR COMMUNITY HAS HISTORICALLY ACCEPTED IMPACTS ON LAND USE, NOISE, AIR QUALITY AND TRAFFIC AS NECESSARY TRADE OFFS AND SACRIFICES THAT MUST BE MADE TO PRESERVE OUR NATION'S SECURITY. WE ARE WILLING TO MAKE THESE SACRIFICES!

- THE BUSINESS COMMUNITY OF VIRGINIA BEACH AND HAMPTON ROADS SUPPORTS THE RELOCATION OF ALL F/A-18 AIRCRAFT FROM CECIL FIELD TO OCEANA AND WE STAND READY TO SUPPORT EFFORTS TO PROVIDE A QUALITY OF LIFE FOR THE MEN AND WOMEN THAT ARE MOVING HERE THAT IS SECOND TO NONE.

THANK YOU VERY MUCH FOR YOUR TIME THIS EVENING.

Ms. Mona DiSilvestro
920 Bingham St.
Virginia Beach, VA 23451

Comment:

Why one and a half hour "political rally" at the beginning of our "public hearing"? When and where will the people of this city have a voice concerning matters that vitally impact their lives before instead of after the fact? **[MD-1]**

Response:

MD-1 The purpose of the public hearing process is to provide members of the public an opportunity to present their views of the proposed action. All transcripts of the hearings, comment cards, and comment letters will be part of the permanent record and will be considered in the final decision.

Mr. George Matt
ANA USN (Ret.)
1123 East Bay Shore Dr.
Virginia Beach, VA

Comment:

1. Why should affected residents pay for so-called gains in naval population when no one can predict what the residential egress of non-naval residents from V.B. will be. **[GM-1]**
2. Commercial jets are subject to noise reduction - why not military jets? **[GM-2]**
3. Do we really know how many toxic pollutants are emitted by jet exhaust? **[GM-3]**
4. Does the Navy really care that property values could be adversely affected or that there could eventually be more HUD homes on the market? **[GM-4]**
5. Is a huge naval presence the only answer to the survival of Va. Beach? **[GM-5]**
6. Would V.B. be willing to pay relocation cost to residents affected in the name of environmental protection as they do for the "farmers" for environmental protection from envisioned (not definite) housing development? **[GM-6]**
7. If V.B. spends taxpayers money to move schools for safety and environmental reasons, what about the homeowner population not on the government payroll? **[GM-7]** We are also part of the human community.
8. It appears that Va Beach can't see the pitfalls for the dollar sign. What price glory? **[GM-8]**

Response:

GM-1 Thank you for your comments; no response required.

GM-2 Military aircraft are exempt from the Noise Control Act of 1972. However, Navy aircraft conduct noise abatement procedures to the best of their ability, commensurate with safety and operational training requirements. Section 4.8 of the EIS provides noise abatement procedures used at NAS Oceana to reduce noise impacts.

GM-3 Aircraft air emissions are discussed in Section 3.1.9.3 of the EIS.

GM-4 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

GM-5 Thank you for your comments; no response required.

GM-6 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

GM-7 The Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach

GM-8 Thank you for your comments; no response required.

Ms. Mona S. Saferstein
748 Virginia Dare Dr.
Virginia Beach, VA 23451

Comment:

Material interests rather than the quality of life seem to be the driving force behind the DEIS and the City Council report. All living things suffer from the noise level created by the existing aircraft at Oceana - an increase would be devastating. **[MSS-1]** Air pollution is worsening. **[MSS-2]** The structure of my new home is at risk from the constant barrage of vibration. Will the Navy be responsible for damage? **[MSS-3]** Will the tax assessor lower my taxes which incidentally have almost doubled since 1994 while the appreciation of my home site has diminished? **[MSS-4]** Spread the FA18's to NC where they are desired.

Response:

MSS-1 Noise impacts under all of the ARSs are addressed in the EIS. Noise levels in the region would significantly increase under ARS 1 and the EIS discusses the mitigation measures to minimize/prevent adverse noise impacts.

MSS-2 Data collected by VDEQ indicate air quality is improving in the Hampton Roads area. The U.S. EPA recently redesignated the Hampton Road area's air quality as now complying with the national ozone air quality standard. The projected change in aircraft and other emissions associated with the realignment under ARS 1 are within the state growth allotment for maintenance of the national ambient air quality standards in this region.

MSS-3 Structural damage from overflight by existing or proposed aircraft is not expected. The Navy could be responsible for repair to your home if structural damage was caused by Navy aircraft overflights. A determination would need to be conducted through the Navy's claims process.

MSS-4 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

Mr. Thomas R. Pearson
2905 DuBois Pl.
Virginia Beach, VA 23456

Comment:

This is the first of several comments: Time constraints dictate I must leave the meeting.
I am offended that members of the Press and our elected officials (some) left before hearing all of the public session; obviously the elected officials are representing the "business side" of the proposed move - NOT the citizens!

Response:

Thank you for your comment; no response required.

Mr. Robert B. Moesta
2109 Sherbrook Cir.
Virginia Beach, VA 23454

Comment:

1. Please provide the plan for sound attenuation and funding of that prior to disrupting the affected schools. **[RBM-1]**
2. Please restrict flight paths to limit expansion of noise zones. **[RBM-2]**
3. Please provide figures for the reduction of property values in the newly expanded noise zones. **[RBM-3]**
4. Please bring the entire issue to a vote. **[RBM-4]**
5. The water supply and Lake Gaston Project are being presented as complete; they are not - please address this issue. **[RBM-5]**
6. Elected city officials stated that Virginia Beach supports this plan. This plan is not supported by the residents of Virginia Beach. **[RBM-6]**
7. Please include in the EIS Scenario #6 relocation to North and South Carolina, eliminating Oceana. **[RBM-7]**
8. Please address funding for noise abatement to homes in the newly expanded noise zones. **[RBM-8]**

Response:

RBM-1 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required, which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

RBM-2 Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks. The increase in noise zones is due to the increase in the number of operations that would be conducted at NAS Oceana and NALF Fentress, and not to any change in the number or size of the existing flight paths.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

RBM-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

RBM-4 The base closure and realignment process was mandated by Congress when it enacted the Defense Base Closure and Realignment Act of 1990. Under this process, Congress reviews the specific recommendations of the Base Closure and Realignment Commission (BRAC) and chooses to either accept or reject the Commission's recommendations. The BRAC 1995 list of recommended closures and realignments, which included closure of NAS Cecil Field and realignment of the F/A-18s, was accepted by Congress. As the base closure process is a federal process, local referendum procedures are not applicable

RBM-5 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies").

RBM-6 Thank you for your comment; no response required.

RBM-7 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of the ARSs.

RBM-8 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Mr. George E. Mysok
4849 Tunlaw Ct.
Virginia Beach, VA 23462

Comment:

I totally support the movement to Virginia Beach of all 180 FA18's. The economic impact and the amount of services and additional benefits far exceed the negatives.

Response:

Thank you for your comment; no response required.

Ms. Suzanne Hayes
2316 N. Wolfsnare Dr.
Virginia Beach, VA 23454

Comment:

Under current flight patterns, I understand that our residence should not be experiencing the high level noise. **[SH-1]** However, I can honestly assure you that we do on a weekly, if not daily, basis. At this time, planes are flying lower than the requirements the pilots are supposed to be complying with as well. **[SH-2]** I ask that these two areas be addressed.

Response:

SH-1 Noise impacts differ with the runway used. For instance, when Runway 14 is utilized (about 6% of the time, depending on the wind direction), Wolfsnare Drive is under the FCLP and break patterns. With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

SH-2 Please see response to SH-1.

Mr. Pete Koch
3604 Kings Lake Dr.
Virginia Beach, VA 23452

Comment:

I fully support Alternative #1 - relocate all 180 F/A-18 aircraft to Oceana. For the sake of the personnel and families that must move from Florida, do not authorize any further delays in this process and encourage an early decision in order to facilitate relocation planning and reduce personal turbulence associated with the BRAC decision mandating their move.

Response:

Thank you for your comment; no response required.

Mr. James P. Titulaer
1404 Preserve Dr.
Virginia Beach, VA 23451

Comment:

Noise seems to be one of the key issues. I like the way you dance around between three separate noise levels. The max being 75 db. Why wasn't an in-depth study done to find out an average max level. **[JPT-1]** I'll guarantee it's 90-100 db minimum. It's at the pain threshold level. That's not acceptable for residential areas. If OSHA was involved as it would be if it was a business (that is the residential area), we would need hearing protection. That's fine for industrial areas, not for people's neighborhoods. Listening to the speakers, it sounds like only those select few who will benefit from money aspect are for the 180 jets. I, like most of Virginia Beach, will not make one dollar from this action. I don't think the jets should move here. **[JPT-2]**

Response:

JPT-1 There are many ways to express the loudness of sound produced by aircraft. Among these are maximum or average maximum levels, as well as the day-night average sound level used in the EIS. The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

JPT-2 Thank you for your comments; no response required

Ms. Margie Hults
1656 Southern Blvd.
Virginia Beach, VA 23454

Comment:

1. Why can't the Navy purchase the properties nearest the base (my neighborhood) [the crash potential zone] and use it for base housing. **[MH-1]**
2. This hearing was obviously a formality and a waste of time for the "victims" of this project. **[MH-2]**

Response:

MH-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

MH-2 Thank you for your comments; no response required.

Mr. Clarence Warnstaff
3429 Middle Plantation Quay
Virginia Beach, VA 23452

Comment:

Support the F/A 18's moving to Virginia Beach!

Response:

Thank you for your comment; no response required.

Mr. Michael B. Sawyer
941 E. Piney Branch Dr., Apt. 102
Virginia Beach, VA 23451

Comment:

I am in support of ARS 1 for the economic benefits to our local economy and I have two suggestions to improve the quality of life for citizens living in the immediate area.
1. Navy and Virginia Beach must have a dialogue about when jets should take off and land. If, through a cooperative effort, the community could see the Navy having practice flights at other times besides dinner (5-7 p.m.) or not landing after 9 p.m. or before 7 a.m. then the general population would be more at ease. If the Navy would communicate their intentions and be willing to move or adjust single point events to a more appropriate time...life would be good!! **MBS-1]**
2. Recommend to Navy personnel to live within the noise zones such that they would be more sensitive to the sound of freedom. **[MBS-2]** Do this such that 75% of new personnel would live within the noise zones. It's a good way to insure good neighbors and provide accountability.

In addition, transportation infrastructure needs would be impacted less in other parts of Virginia Beach. **[MBS-3]** Thanks!!

Response:

MBS-1 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

MBS-2 Thank you for your comment; no response required.

MBS-3 Thank you for your comment; no response required.

Anonymous

Comment:

Think terrorism when I think about the Navy.

Response:

Thank you for your comment; no response required.

Ms. Anna M. Stewart
2724 Spigel Dr.
Virginia Beach, VA 23454

Comment:

I have lived in Virginia Beach since 1977. I already know about the noise, potential for a crash and other impacts from a lot of aircraft activity because we lived with it for those years. It is an accepted trade off for the economic and industrial development that can be expected with the transfer of these high tech airplanes. I think it is an opportunity we should embrace.

Response:

Thank you for your comment; no response required.

Mr. Ken Walker
(no address)

Comment:

Will there be any increases in taxes due to the move to Oceana. **[KW-1]**

Response:

KW-1 As discussed in the EIS, taxes are not expected to increase in the vicinity of NAS Oceana as a result of any of the ARSs.

Mr. Les Lilley
1601 Tether Keep
Virginia Beach, VA 23454

Comment:

In favor of accepting F/A-18s at Oceana.

Response:

Thank you for your comment; no response required.

Mr. Billy Fountan
2344 Gen. Longstreet Dr.
Virginia Beach, VA

Comment:

We are not in favor of moving additional aircraft and noise to the area. Many retired people have settled here in hopes of finding some quiet and peace. The areas is not able to handle so many more people. The whole idea of Virginia Beach will change. If these planes have to be relocated here, please be considerate in flying times. **[BF-1]** Right now it's beginning to become very uncomfortable in the evening and on weekends. Impossible to eat in the evening. Low flying over roof tops is nerve racking. The noise is unbearable. **[BF-2]** So many planes over this growing population is an accident waiting to happen. **[BF-3]**

Response:

BF-1 NAS Oceana and NALF Fentress are open 24 hours a day. Modeling of the airspace and flight operations by NASMOD shows sufficient capacity at NAS Oceana and NALF Fentress to handle 180 F/A-18 Hornets. The increased operations would not affect current noise abatement procedures. At NAS Oceana, pattern work and high-power ground engine maintenance run-ups will continue to be restricted to the hours before 11:00 P.M. At NALF Fentress, restrictions on pattern operations during Sunday church service hours will also continue.

BF-2 NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

BF-3 The FA-18 is one of the safest aircraft ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

Mr. George Tzavaras
828 Greentree Arch
Virginia Beach, VA 23451

Comment:

I favor bringing the F/A 18s to Oceana. It's right for the Navy and right for Virginia Beach.

Response:

Thank you for your comment; no response required.

Ms. Ernestine Cook
1829 Haverhill Dr.
Virginia Beach, VA 23456

Comment:

Will the Navy buy my house since I don't want to live inundated by the F/A-18 planes that may come here? **[EC1-1]**

Response:

EC1-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Jonathan
1829 Durham West
Virginia Beach, VA 23454

Comment:

I'm all for the moving of all F18's to NAS Oceana. I love the planes, both the F14's and the -18's. I love watching them, I love seeing them. I know the F18's are louder and that actually makes me laugh. It sounds like they're ripping the sky. I love my jets. Bring them all here

Response:

Thank you for your comments; no response required.

Ms. Sally Saunders
Virginia Beach, VA

Comment:

Really want all the F18's here. However, the properties which will be put in the crash zone which were not previously located there are a great concern. Homes will depreciate. **[SS1]** Schools are put in danger. **[SS-2]** There must be a workable plan to alleviate these AICUZ problems. **[SS-3]**

Response:

SS-1 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

SS-2 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of naval aviation.

SS-3 The EIS discusses the role of AICUZ program in land use planning. An example of a workable solution is given in the EIS in Section 4.4, in which the Navy and the City of Virginia Beach have coordinated plans to relocate two schools to a compatible location.

Ms. Barbara Morrison
5525 Shadowwood Dr.
Virginia Beach, VA 23455

Comment:

VB needs Oceana and I fully support all efforts to bring additional forces to this area.

Response:

Thank you for your comment; no response required.

Ms. Pam Matthias
610 Fort Raleigh Dr.
Virginia Beach, VA 23451

Comment:
Bring all the planes

Response:

Thank you for your comment; no response required.

Mr. Victor D. Stauch, Jr.
Lt. Col USMC (Ret.)
321 Mace Hill St.
Virginia Beach, VA 23451

Comment:

I am strongly opposed to more aircraft at NAS Oceana. The noise and crash zones are at unacceptable levels of exposure and risk respectively. **[VDS-1]** Mechanical failure/pilot error are inevitable - the degradation of quality of life in residential and commercial zones is obvious. Go to NC!

Response:

VDS-1 Impacts on noise and APZs under all ARSs are addressed in the EIS. Noise levels in the region would significantly increase under all ARSs, and the EIS discusses the mitigation measures to minimize/prevent adverse noise impacts. APZ acreage also would increase under all ARSs; as indicated in the EIS, the Navy's *AICUZ Program Procedures and Guidelines for Department of the Navy Air Installations* will be implemented to minimize adverse impacts.

Ms. Marjorie Broadhurst
1672 Laurel Ln.
Virginia Beach, VA 23451

Comment:

If I could have my rathers - I would rather not add any more planes and noise to this area. We need to control noise, not add to it.

Response:

Thank you for your comment; no response required.

Mr. William A. Stokes
1400 Linlier Dr.
Virginia Beach, VA 23451

Comment:

We don't need additional noises or pollution, in spite of what they say. We definitely are exchanging quality of life!

Response:

Thank you for your comment; no response required.

Mr. Wyman Harrison, President
Environmental Research Associates, Inc.
P.O. Box 3643
Virginia Beach, VA 23454

Comment:

From our perspective, the noise associated with Oceana flight operations can best be reduced if the Navy will follow FAA flight procedures, rigorously. **[WH-1]** We insist that the Navy amend the appendix volume to its EIS to give details as to why such archaic procedures as the overhead-break allowed at Oceana. **[WH-2]** In a populated area such as Virginia Beach, there is no acceptable reason why the Navy should not follow FAA flight limitations.

Response:

WH-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

WH-2 Elimination of the overhead break and Field Carrier Landing Practice (FCLP) would unacceptably compromise training and would contribute to delays in landing pattern entry with resulting increases in flight time, fuel expenditure, and aircraft wear. Also, this would significantly compromise safety because these types of approaches are used aboard ship, and training must reflect actual operations.

Ms. Allegra M. Midgett
1820 Templeton Ln.
Virginia Beach, VA 23454

Comment:

We brought our home out of noise zone and we do not wish to have more noise or more people.

Response:

Thank you for your comment; no response required.

Mr. Boyd S. Midgett
1820 Templeton Ln.
Virginia Beach, VA 23454

Comment:

I am against the F/A-18 coming to Virginia Beach. When we moved to Virginia Beach, which was coming back home, we bought in the less noise zone. Now we will be in the #2 noise zone.

Response:

Thank you for your comment; no response required.

Ms. Georganne G. Fischer
2369 London Pointe Dr.
Virginia Beach, VA

Comment:

I have lived with the present noise pollution - many nights of non-stop air traffic beyond 11:00 p.m. I want quality in my life - not quantity. This plan would not give me that quality. And I don't believe our community would ever recuperate from this "jet lag".

Response:

Thank you for your comment; no response required.

Mr. Philip M. Stewart
2724 Spigel Dr.
Virginia Beach, VA 23454

Comment:

The most economical solution is to bring all planes to Oceana of all solutions.

Response:

Thank you for your comment; no response required.

Ms. Jacquie Whitt
1605 Wright Ln.
Virginia Beach, VA 23451

Comment:

I am opposed to bringing more jets to the area due to the noise impact. I have reached a point where I am now wearing ear protectors in my home. You never, ever get used to living like this.

Response:

Thank you for your comment; no response required.

Anonymous

Comment:

Do not want them. Do not need them. Enough is Enough.

Response:

Thank you for your comment; no response required.

Mr. Steve Husak
1792 Greensward Quay
Virginia Beach, VA 23454

Comment:

Strongly support initiative to transfer all F/A 18 aircraft to NAS Oceana, VA. It is essential that we consolidate these aircraft to preserve logistic support resources and provide a creditable defense of our Nation. This initiative is good for the Navy and the Virginia Beach economy.

Response:

Thank you for your comment; no response required.

Mr. David M. Steinberg
Fellowship of the Inner Light
Associate for Research and Enlightenment
620 14th St.
Virginia Beach, VA 23451

67th and Atlantic Ave.
Virginia Beach, VA 23451

Comment:

I thought we had a government of the people. Why was there no referendum? **[DMS-1]** The residents should vote on a major issue that affects our quality of life, the brains of our children, our safety and our total environment every day. The total cost of this noise pollution and damage is far greater than the dollars some people will make from the military spending.

Response:

DMS-1 The base closure and realignment process was mandated by Congress when it enacted the Defense Base Closure and Realignment Act of 1990. Under this process, Congress reviews the specific recommendations of the Base Closure and Realignment Commission (BRAC) and chooses to either accept or reject the Commission's recommendations. The BRAC 1995 list of recommended closures and realignments, which included closure of NAS Cecil Field and realignment of the F/A-18s, was accepted by Congress. As the base closure process is a federal process, local referendum procedures are not applicable.

Mr. Joseph Manuel Kerekes
Pentran-Peninsula Transit
3436 Dandelion Crescent
Virginia Beach, VA 23456

Comment:

Bring 'em on in! We fought for the base with all our might, let us never siphon the true life blood of this entire region. This is a good thing! We should never even consider a decision that would jeopardize future considerations of relocating to our area. Let's not cancel our blessing!

Response:

Thank you for your comment; no response required.

Mr. William W. Harrison, Jr.
City Council of Virginia Beach
Municipal Center
Virginia Beach, VA

Comment:

I wholeheartedly support the decision to move all F/A-18 squadrons to VA Beach. I look forward to working with Navy officials to coordinate the move to our city and create a "win-win" for our citizens, our businesses and all new Navy families. Welcome to VA Beach.

Response:

Thank you for your comment; no response required.

Mr. Linwood Branch
City Council of Virginia Beach
1000 Atlantic Ave.
Virginia Beach, VA 23451

Comment:

I support the decision to relocate to Oceana. This move is in the best economic interest of the country.

Response:

Thank you for your comment; no response required.

R. E. Spruit
ANA
1120 Windsor Rd.
Virginia Beach, VA 23451

Comment:

Heartily agree with bringing the F/A 18s to Oceana.

Response:

Thank you for your comment; no response required.

Ms. Eva Baker
351 Dillon Dr.
Virginia Beach, VA 23452

Comment:

My residence according to your display is in an area where the noise level would increase to +75 db. For any quality of life, this is totally unacceptable. I had enough this summer with the windows closed with the AC on and could still hear the racket. Please send the jets to NC!!

Response:

Thank you for your comments; no response required.

Mr. Edward D. Johnson
1109 Brandon Rd.
Virginia Beach, VA 23451

Comment:

I favor the F/A 18s coming to Oceana.

Response:

Thank you for your comment; no response required.

Ms. Bonnie Osborn
1841 Elkins Cir.
Virginia Beach, VA 23456

Comment:

People talk about "the sound of freedom". It is not freedom when our freedom to enjoy open windows, listen to our radio or TV, have a conversation in person or on the phone is taken away by noisy jet planes screaming overhead. It is not freedom when I can't walk outside without earplugs or my hands over my ears, and it is not freedom when our children and pets cringe or run to hide from the scary, upsetting and hurtful sound of the jets.

Response:

Thank you for your comments; no response required.

Col. Roger Dorian
USMC (Ret.)
100 Pinewood Rd.
Virginia Beach, VA 23451

Comment:

I am in favor of the first recommendation to allocate all of the fighter aircraft to NAS Oceana. It is the most practical solution to cost conscious military budget. We recognize the increase in noise levels, but that is the trade off to efficient use of the tax dollar. It is a compromise, and one I am very willing to live with. The noise level is akin to the saying, "the bark is worse than the bite".

Response:

Thank you for your comments; no response required.

Ms. Bonnie Osborn
1841 Elkins Cir.
Virginia Beach, VA 23456

Comment:

It is very disturbing and disappointing to think that our city gives more importance to increasing the plane population of Oceana above the safety and comfort of its private citizens. People purchased their homes and chose areas to live in based on noise zone areas that were set up and published. It is not right or just that these noise zones and safety levels could be changed with little consideration of the home owner. Our city has proven again and again that the dollar is more important than its people.

Response:

Thank you for your comments; no response required.

Mr. W. Leonard Moyer
719 High Point Ave
Virginia Beach, VA 23451

Comment:

Those of us living in the shadow of Oceana's aircraft feel we are already making a significant sacrifice for our country. We are willing to share the load of additional aircraft, but not the entire load. I would like to see 60 additional aircraft at each of the considered locations. **[WLM-1]**

Response:

WLM-1 Section 2 of the EIS describes the alternatives screening process and the rationale for identifying potential receiving installations in accordance with the requirements of the BRAC Commission, federal regulations, and Navy guidelines. One of the basic considerations of the screening process was that the relocated aircraft could not be split among more than two locations for operational, cost, and readiness reasons. Therefore, the three candidate facilities cannot each receive one-third of the relocating aircraft.

Ms. Lynn Nelson
Mercer Transportation
1209 Baker Rd. Ste 513
Virginia Beach, VA 23455

Comment:

I have lived here all my life and only commercially associated with the Navy. I believe the realignment can only be great for our area. We need the job base - people here cannot always have quite desk work. Our labor force needs the diversity this will bring. We have lots of blue collar workers that need higher pay.

Response:

Thank you for your comments; no response required.

Mr. and Ms. Kurt Naschke
1956 Big Boulder Dr.
Virginia Beach, VA 23456

Comment:

All proposed additions to Oceana will be welcomed as squadron strength should be increased to maintain base usage proficiency.

Response:

Thank you for your comment; no response required.

Mr. Charles G. Duvall
USN (Ret.)
2412 East Chester Dr.
Virginia Beach, VA 23454

Comment:

I have lived in the London Bridge area 42 years. I wear ear plugs in my garden during Oceana flight operations. Needless to say, I'm definitely not happy with the planned additional crush of planes coming. What really gets me is to hear the little kids in my neighborhood chant as they jump rope, "Navy pilots fly to learn - hope to God they Crash and Burn, burn one, burn two, burn three, burn four!!" Beautiful, huh?

Response:

Thank you for your comments; no response required.

Mr. Will Sessons
4506 Atlantic Ave.
Virginia Beach, VA 23451

Comment:

Oceana is the place for the F18's. It only makes sense.

Response:

Thank you for your comments; no response required.

Mr. James M. Hughes
516 Pine Song Ln. #102
Virginia Beach, VA 23451

Comment:

Economic scare of previous military reductions has blinded city business people and administrators and they have swallowed the decibels and crash potential hook, line and sinker. Quality of life for a significant portion of our population will be reduced. As a new retired citizen, I'm seriously considering if I've made a mistake. Also, what about negative impact on tourism? **[JMH-1]**

Response:

JMH-1 The proposed realignment of F/A-18 aircraft to NAS Oceana is not expected to significantly impact tourism in the region. Under the existing AICUZ Program, aircraft operations and tourism have coexisted in the Hampton Roads area.

Mr. Patrick W. Beck
812 Gloria Pl.
Virginia Beach, VA

Comment:

The noise will be too loud to live with. The dollar signs have blinded the city's vision. They must not live in the Noise Zone. Please don't let any more jets come here.

Response:

Thank you for your comment; no response required.

Mr. Michael Walker
3405 Champlain Ln.
Virginia Beach, VA 23452

Comment:

As a resident of VA Beach, I DO NOT want to see the additional aircraft sent to Oceana NAS. I sincerely believe that if the citizens of VA Beach had a chance to be heard and really thought that it would make a difference, they would overwhelmingly say the same thing I am. We/I do not want the added pollution of all descriptions, (air, noise, ground, water) - we do not want our roadways clogged with traffic - we do not want our already overcrowded schools cramped with additional students, making it necessary to build additional schools at great tax payer expense. Our city council, sadly, represents a tiny fraction of the citizens by speaking only for the business sector in respect to your planned move of aircraft and personnel to Oceana, and the millions of dollars they will bring. The majority of citizens here wish to live our lives without the noise and overcrowding this move will bring. Only the people who stand to line their pockets with money are in favor of your plans. PLEASE send your aircraft and personnel to another area.

Response:

Thank you for your comments; no response required.

Mr. Michael McCarthy
Fellowship Center (Paul Solomon Institute)
620 14th St.
Virginia Beach, VA 23451

Home: 3312 Brookbridge Rd.
Virginia Beach, VA 23451

Comment:

I live in a noise zone and I know that an F/A-18 makes an F-14 (or even an A6) sound like Rolls Royce Limos. As a 30 year professional musician and a minister of God (Prince of Peace) and experienced retail business (sorry, I'm hurrying) person, I am adamantly opposed as I see the noise level of 180 of these aircraft decimating the tourist trade (in return sales) and destroying our environment. The impact on hundreds, if not thousands, psychologically is almost impossible to calculate. Millions of dollars is the same myopic value system (good or evil calculated by "good for the economy") that almost destroyed America 15 years ago. Off to Cherry Point with them! And pray for the Carolinians.

Response:

Thank you for your comments; no response required.

Mr. Don Denkle
2004 Las Cruces Ct.
Virginia Beach, VA 23454

Comment:

Noise, pollution, both are regulated on autos and commercial jets, not military. **[DD-1]**

Response:

DD-1 Military aircraft are exempt from some specific noise and emission requirements. However, the Navy has analyzed potential impacts on noise and air quality associated with the proposed action in Sections 4.8 and 4.9 of the EIS, respectively.

Mr. Jonathan Owens
1829 Durham West
Virginia Beach, VA

Comment:

I just want to say that I love these jets, and I hope we get all 180 of them. I know it's biased on my part because I love them so much, but it also makes the most sense. It's the cheapest, most economical plan. What of the noise? I know they're loud, but that's the noise of freedom baby. If you don't like it, leave. What about potential accidents? There's more chance of you getting in a car accident than a jet crashing on you. Are you going to stop driving? I love the United States Navy, and its jets, and I'm all for the transfer of all 180 F/A-18s Hornets to NAS Oceana. May they come, I love my jets. The more the merrier.

Response:

Thank you for your comments; no response required.

Mr. and Mrs. Charles De Stefano
Triple Oaks Condo Association
425 Julie Dr.
Virginia Beach, VA 23454

Comment

We are in noise zone 2 and the planes are too loud. We do not need noisier F18's. Send them to Cherry Point. The politicians do not live in noisy neighborhoods and have to blast the T.V. for hours at a time to hear the local news. Share the noise with everybody and then ask them to comment on the problem at hand.

Response:

Thank you for your comments; no response required.

Mr. Thomas Pearson
2905 DuBoise Place
Virginia Beach, VA 23456

Comment:

- High Noise Area, Zone 3, APZ-1

I invite Navy investigators to sit in my living, doors and windows closed---as if living in a "tomb"---and measure the noise level-currently. This EXCEEDS the maximum SAFE exposure level for humans. Normal everyday functions like talking on the phone or watching T.V. are difficult now---they will be impossible when flight operations increase to approx. 69,000 annually. And nothing has been addressed as to the proposed engine upgrade to the F/A 18 hornet: **[TP-1]** These larger engines will exceed your current noise estimates.

Response:

TP-1 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

Ms. Nancy H. Stauch
321 Mace Hill St.
Virginia Beach, VA 23451

Comment:

The accident potential and noise exposures surrounding NAS are unacceptable as is - the woman with unborn child killed on Oceana Blvd in ~1989 is proof (A-6) without delving into statistical probability. Recent F-18 accidents exacerbate the chances of further tragedy in our community. The 51,500 people to be exposed to >75dB should have been at the public hearing, which was a sham with politicians evading any issues of citizens concern. Oceana is no longer a viable master jet base due to continued commercial and residential development in the past 20 years! No more jets!!!

Response:

Thank you for your comments; no response required.

H.A. Stokely
1504 N. Horseshoe Circle
Virginia Beach, VA 23451

Comment:

Proposed Changes to Oceana Operational Procedures to allow operation with minimum impact on community quality of life and safety

1. Discontinue the overhead break for planes coming in to Oceana. [HAS-1]
This maneuver is unnecessary, extremely noisy, and dangerous. It exposes wide areas of the community to noise and danger. Commercial Airports all over the world handle more traffic than Oceana and all of it is by straight in approach. Changing to this type of approach would eliminate most of the crash and noise zones that affect Oceana's neighbors. It would not compromise training or inconvenience the operators.

2. Eliminate all touch and go landings at Oceana. [HAS-2]
The long sessions of touch and go landings at Oceana expose wide areas of the community to unnecessary noise and hazard from the low flying aircraft. Use other fields with rural surroundings for ***ALL*** touch and go operations. Cherry Point would be an excellent alternate site as it within easy reach, has refueling capability and is surrounded on three sides by areas that are very sparsely populated.

3. Require that all aircraft approaching and leaving Oceana observe the FAA required 250 knot maximum speed below 10,000 feet. This requirement is universally ignored with aircraft around Oceana operating routinely in the range of 400 to 500 knots. The effect of this on the noise level in the community is inexcusable. Enforce the requirement with disciplinary action. [HAS-3]

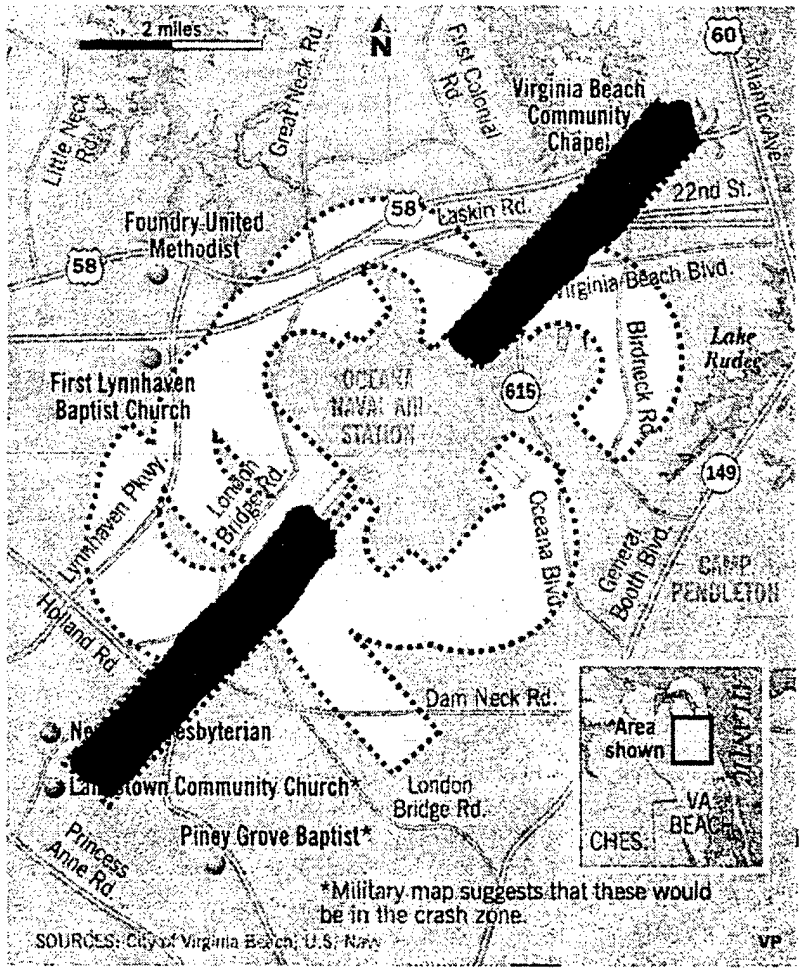
4. Use low noise departure procedures. [HAS-4]
Aircraft leaving Oceana should remain below 250 knots, reduce power and cruise between 1500 and 2500 feet altitude until they are well out over the ocean or rural areas, and turn to direct their noise away from the community before resuming their climb.

5. Make the base quiet times for church and sleep, a firm and enforced policy. [HAS-5]
Extend the quiet hours by at least thirty minutes in both directions from the existing policies.

6. Discontinue Airshow practice at Oceana except in the period just before an airshow is to be held. [HAS-6]

<u>If these simple steps were taken</u>, the improvement to community quality of life, safety and welfare would be tremendous - even with the additional aircraft operating from the base. The inconvenience to the operators would be minimal and overall safety would be enhanced.

If the Navy discontinues the overhead break and touch and go landings at Oceana - the areas in red would be the only crash zones.



Response:

HAS-1 Elimination of the overhead break and Field Carrier Landing Practice (FCLP) would unacceptably compromise training and would contribute to delays in landing pattern entry with resulting increases in flight time, fuel expenditure, and aircraft wear. Also, this would significantly compromise safety because of these types of approaches are used aboard ship, and training must reflect actual operations.

HAS-2 FCLP operations are typically conducted at NALF Fentress. The recent increase in FCLP operations resulted from the temporary closure of NALF Fentress. Conducting FCLPs at a site more than 50 miles from the aircraft base (such as between NAS Oceana and MCAS Cherry Point) does not meet the Navy's operational criteria in Section 2 of the EIS.

HAS-3 Naval aviators are responsible for compliance with established FAA flight procedures, except for those cases in which aircraft performance or safety requires deviation from these procedures.

HAS-4 Low noise departure procedures are already utilized at NAS Oceana by 1) securing afterburners no later than the airfield boundary, and 2) by climbing rapidly on departure, taking the noise up away from the community. This procedure is common at commercial airports. Remaining as low as 1,500 to 2,500 feet could result in a greater noise level experienced by the population living along the flight pattern.

Arrival and departure procedures for NAS Oceana are focused on the safe and expeditious sequencing of a mix of aircraft to and from the airfield under both Visual Meteorological Conditions (VMC) and Instrument Meteorological Conditions (IMC). While Federal Aviation Regulations (FAR), Part 91.117, does limit the speed of aircraft under 10,000 feet MSL (mean sea level) and/or in the Airport Traffic Area, it also states, "If the minimum safe speed for any particular operation is greater than the maximum speed prescribed in this section, the aircraft may be operated at that minimum speed." Navy F-14 and F/A-18 aircraft routinely use the Visual Flight Rules (VFR) overhead pattern with flights of two or more aircraft in formation, necessitating higher air speeds for greater maneuverability and an added margin of safety. This training reflects the type of approach used aboard ship, and training must reflect real operations.

HAS-5 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

HAS-6 NAS Oceana aircraft normally only practice just prior to an air show; however, since NAS Oceana aircraft do perform air shows at other sites, additional practice at NAS Oceana is required. Practicing at the air show sites other than NAS Oceana is sometimes not practicable.

W. L. Moyer
719 High Point Ave.
Virginia Beach, VA 23451

Comment:

I did not see anything with regard to the length of exposure time. With more jets the amount of time of exposure to the loud noise will increase. What is the effect of this on the hearing and quality of life for those exposed. **[WLM1-1]** How much exposure time to sounds greater than 75 db does it take to impair hearing. **[WLM1-2]** Also the stress caused by the noise duration will increase negatively impacting quality of life and emotional state.

Also, the rate of accidents for the F-18 is likely to increase as a function of the aircrafts age and the air traffic density. Twice as many aircraft can be roughly equivocated to double the air traffic density and number of sorties. **[WLM1-3]**

Response:

WLM1-1 The length of exposure time to aircraft noise sources is automatically taken into account in the Day-Night Average Sound Level (Ldn). The increase in the number of jet aircraft operations will generally cause the Ldn at any given location to increase from its present value to some higher value. The effect of noise on hearing is discussed primarily in Sections 3.1.8 and 4.8. The effects of noise on quality of life are also discussed in Sections 3.1.8 and 4.8. These effects range from speech and sleep interference to annoyance. Again, the extent of these effects at any location is determined by the noise level (Ldn) after the proposed action is implemented. Since a person does not regularly spend 24 hours a day outside, the Ldn that is experienced by any individual will be less than outdoor Ldn where he/she resides. Typical housing construction provides 15 dB (windows open) to 25 dB (windows closed) of sound attenuation. Thus, the actual Ldn that a person experiences will be a function of the Ldn at his/her home and the amount of time that he/she spends outdoors, indoors with the windows open and indoors with the windows closed.

WLM1-2 The Occupational Safety and Health Administration (OSHA) sets standards stipulating maximum durations of exposure to continuous levels of noise to protect employees from hearing loss in the workplace. These standards allow exposure to continuous noise at a sound level of 85 dB for 16 hours. The allowed exposure time is halved for each 5 dB increase in level (i.e., 90 dB is allowed for 8 hours, 96 dB is allowed for 4 hours, and so on) up to a maximum continuous sound level of 115 dB, exposure to which is allowed for 15 minutes. Exposure to continuous noise at levels above 115 dB is not allowed for any amount of time. As discussed in Section 3.1.8, an Ldn of 75 dB has been identified as the minimum level at which hearing loss may occur. Ldn is not a measure of the instantaneous sound level experienced by the listener, but rather an average of all sound levels experienced throughout a 24-hour period (with a 10 dB adjustment for nighttime noise). Thus, exposure time is already included in the Ldn calculation.

WLM1-3 The FA-18 is one of the safest aircraft ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

Mr. Thomas Pearson, Concerned Taxpayer
2905 DuBois Pl.
Virginia Beach, VA 23456
Noize Zone-3 APZ-1 Magic Hollow

Comment:

Attached is a copy of an editorial that was published Sept. 97. Submitted for inclusion and consideration.

I wish to submit the following editorial:

Has someone secretly tried to tattoo the word "STUPID" on the foreheads of the citizens in Va. Beach?? What good is moving schools out of a 'potential crash-zone' going to do? Don't those same students still LIVE IN the neighborhoods surrounding those schools?? Thus will they not still be located in the 'crash-zone'?? **[TP1-1]** The only real issue here that I see is that there is PRIME real estate located there RIGHT NEXT to Lynnhaven Mall that city "council" and the developers are just salivating to get hold of. And where is the water to support approx. 5000 new people and increased usage by the Navy itself going to come from?? Lake Gaston?? **[TP1-2]** I thought that water was to be used to raise the quality of life for the citizens already here!! I live in the 'crash-zone'...have for over 16 years: often times the planes fly DIRECTLY over my house in their approach to Runway-5 at Oceana....and the noise is quite deafening while the damage to my home and automobiles from the jet fuel/exhaust is quite real: (the F-14 Tomcat with the Pratt & Whitney TF-30 engine is only approx. 60 to 80% efficient at low-RMP landing speeds thus most of its fuel goes right out the "tail-pipe" during landings. **[TP1-3]** The F/A 18 Hornet is NOT much better.). The article by Meredith Cohn in Saturday's Pilot (page A-12) suggests that I.... at an expense I can't afford.....fortify my home to be a "sound-resistant-cave" in order to endure the INCREASE in noise. This is an unacceptable loss of personal freedom that I can't support especially when I take into consideration that my child may 'possibly' have to be bused AWAY from her neighborhood school **[TP1-4]** and, that the days of getting up in the morning to enjoy a QUIET cup of coffee or spend a QUIET evening with family and friends in backyard are gone, as the increase in flight 'operations' will effectively make "QUIET" a thing of the past. **[TP1-5]** Any person with true "inside" knowledge of base operations will tell you that closing NARF and Cecil Field was a bad move in regard to Naval efficiency....but a great "boon" to those who wish to "develop the area to death."

Mr. Thomas Pearson
2905 DuBois Pl.
Virginia Beach, VA 23456
Noize Zone-3 APZ-1 Magic Hollow

Response:

TP1-1 The concept of Accident Potential Zones (APZ) is predicated on minimizing the density of development, and consequently the concentration of people, in areas identified as APZs. Relocating a school from a site within an APZ removes a high-density land use and concentration of people (in this case students, teachers, and other staff) exposed to aircraft overflights.

TP1-2 As described in Section 4.6.1 of the EIS, under ARS 1, increased water demand in the City of Virginia Beach, City of Chesapeake, and NAS Oceana will total approximately 0.69 MGD. The Lake Gaston Project is expected to provide 50 MGD to the City of Virginia Beach, and 10 MGD to the City of Chesapeake, well in excess of the present estimated demand of 35 MGD (Please see Section 3.1.6.1 of the EIS). Therefore, the amount of water available will be sufficient to meet expected demand after the realignment.

TP1-3 There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

TP1-4 Thank you for your comments; no response required.

TP1-5 Thank you for your comments; no response required.

Mr. Thomas Pearson
2905 DuBois Pl.
Virginia Beach, VA 23456
Noize Zone-3 APZ-1 Magic Hollow

Comment:

Attached is a copy of an article sent to the Va. Pilot-newspaper. It further underscores to actual noise level increase we can expect in our area.

Let me be the first to congratulate the Navy on its INCREDIBLE "sounds of freedom - night flight operations" sound effects show, recently produced for our benefit on Halloween night. The roar and screeching of the jet engines was FAR superior in "scare" quality to the Halloween display and sound effects that my son and several of his friends spent weeks planning and constructing. And the added bonus of not being able to hear all those "trick or treater's" as they approached my door was a nice touch. I can't wait to see how they compete with the Christmas music that I annually 'pipe' outdoors and the anticipation of watching the lips move on the carolers (since I will not be able to hear them) as they serenade our homes here in Magic Hollow.....one of the HIGH NOISE areas.....will be priceless!

Response:

Thank you for your comments; no response required.

Mr. and Mrs. John M. Dorsey, Sr.
2924 Dante Pl.
Virginia Beach, VA 23456

Comments:

When the planes start flying, I want you to come to my house and stay while they are doing there thing.

I don't want to see this happen. I have had pictures fall from my walls my windows rattle can't here myself talk sometimes they fly so low that you can wave to the pilot and they wave back. I have lived here 1975. I have seen 2 planes crash here and I think you are asking for trouble.

Response:

Thank you for your comments; no response required.

Mr. and Mrs. George G. MacDonald
809 Navigator Ct.
Virginia Beach, VA 23454

Comments:

Bringing all 180 Hornets here to Oceana is not a good move. It will greatly reduce the quality of life in Great Neck Meadows, specifically. The Hornets are not only much louder than the F-14s, but having such an increase of jets into such a concentrated and populated area will very certainly change our neighborhood and city into a regularly interrupted city with heightened screeching and rumbling, leaving us all to scurry for cover and reach for ear muffs. My family bought our home 4 years ago in search of quieter area and better schools. We previously lived in Lake Placid, nearer to Oceana's busier runways, where the jets interfered in our daily lives at an extremely loud level, even rumbling our pictures on the walls and china in the cabinets. We have left that nuisance once, we shouldn't have to leave again in search of peace.

We should remember our children who play outside and have more sensitive hearing. I'd hate to think our children would begin to play inside more than outside, curbing their exercise, both at home and at school.

We request that the decision on where these Hornets should move be based on the impact it will have on the quality of life and not a few dollars in our pocket. Money does not always improve; it breeds Greed. We have a nice area here in Great Neck-that will change with these Hornets.

Response:

Thank you for your comments; no response required.

Ms. Myra M. Brown
1413 Alanton Drive
Virginia Beach, VA 23454-1649

Comment:

Aside from advances in medical technology in the last 30 years, the medical field has undergone a major revolution in clean air practices, both internal and external. The concomitant revolution in birthing and after-care procedures has given us a generation of babies with a head start in life.

The first steps were taken in both these revolutions when doctors changed their minds about certain things. I can remember when most doctors I knew carried a package of cigarettes and when the primary question during normal pre-natal care was which anesthetic would be used. Overwhelmingly, those days are in the past.

Now, gentlemen and ladies, you are the doctors. We need a revolution in navy flight operational procedures. In the interest of reducing the noise pollution which comes with military jets and in the interest of maximizing the safety considerations which apply, I urge you to undertake a program of implementing all the many behavior modification techniques at your disposal to make our elite navy pilots world-class examples of community-friendly flying practices. [MMB-1]

For more than 30 years I have lived near but not in the flight zone of Oceana Naval Air Station. For 5 of those years, I was a teacher in a school which was in that flight zone. During 3 additional years, I taught in schools which were not in that zone. The difference is well-known.

The cold war is over. Advances in communication and transportation have given us a world which is getting smaller and smaller. Security goes beyond military might to include food, clothing and shelter; educational and work opportunities; appropriate health care and safety provisions. Environmental issues are a top priority.

I understand that there are several ways in which training practices and airplane maintenance routines could be modified to allow for minimum impact on the environment while not compromising military objectives. Lets have those modifications. After all, what is sought is the best possible quality of life for families in the local community and for the families of military personnel who have been assigned to live here. [MMB-2]

In further interest of improving quality of life, please allow our N.C. neighbors, south of Virginia Beach, to share in receiving some of the planes to be dislocated from Jacksonville. It is logical to believe that the negative impact of noise and safety concerns would be less in a more rural setting than in a city where population is significantly more dense. [MMB-3]

MYRA M. BROWN
1413 ALANTON DRIVE
VIRGINIA BEACH, VA 23454

Myra M. Brown

11-19-97

Response:

MMB-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to

the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

MMB-2 Please see response to MMB-1.

MMB-3 Thank you for your comments; no response required.

Mr. Thomas V. Moore
1312 Chewink Ct.
Virginia Beach, VA 23451

Comment:

I recognize the value of Oceana to the Navy as an operational base, and as a patriot, I welcome them. I hope the Navy will be considerate neighbors in return, mainly by keeping noise to a minimum level consistent with safety. Take-offs and pass-overs with after burners should be prohibited. **[TVM-1]** The Navy should build or acquire a remote landing strip for touch-and-go's **[TVM-2]**.

Response:

TVM-1 Use of afterburners allows aircraft to reach altitude sooner, lessening impacts on the surrounding community. Department aircraft secure afterburners by the field boundary. Further, certain atmospheric conditions and aircraft configurations require the use of afterburners to achieve a safe takeoff.

TVM-2 The BRAC-95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

Mrs. Sally W. Newton
2420 Julie Ct.
Virginia Beach, VA 23454

Comment:

Please don't bring us any more aircraft. We live in a potential accident zone where the planes now fly so low the noise is deafening and frightening. Of course they also fly low over the Lynnhaven Mall. Last year one pilot lost control and nearly dropped his plane on Office Max at Lynnhaven North while I was shopping there.

Not only does this nightmare lower the quality of life in Virginia Beach, but it will cause a true tragedy sooner or later.

The politicians who are in favor of this new influx of aircraft should consider the detriment to our city. We don't want them. Keep them away from here.

Response:

Thank you for your comments; no response required.

A.6 Public Hearing, Chesapeake, VA

A.6 Public Hearing Transcript/Comment Cards, Chesapeake, VA

Speaker: Mr. Rick Sanford
Representing U.S. Senator John Warner
4900 World Trade Center
Norfolk, VA 23510

Thank you, Your Honor. My name is Rick Sanford. I am Senator Warner's military staff assistant based in the Senator's Norfolk office. I also live in Noise Zone 1 of the Norfolk Naval Air Station. I will now read Senator Warner's statement for the record.

Quote, ladies and gentlemen, it is with deep regret that I am not able to personally attend this public hearing, but as chairman of the Transportation Subcommittee, I am the manager of the Intermodal Surface Transportation Efficiency Act, ISTEA, which is now being considered on the floor of the Senate. This bill funds the country's highway transportation. If not for this bill, I would be with you this evening to express my total support for having all 180 F/A-18 aircraft come to Oceana.

In the Senate I am proud to serve on the Senate Armed Services Committee where I was particularly involved in the base realignment process. As many of you know, this relocation of F/A-18s to Oceana was the direct result of the BRAC process. Critical to that decision by the base closure board was this community's continuing support for all the Navy facilities in the Hampton Roads area, particularly NAS Oceana.

It is no secret that I am especially committed to the Navy. Oceana, part of the largest naval complex in the free world, is the pride of the Commonwealth and of the nation. I am pleased that the DEIS is so clear on the fact that Oceana is the obvious choice for the home of all the 180 F/A-18 aircraft from Cecil Field.

As the Navy states, from an operational perspective it is clear that the best configuration of the Atlantic fleet F/A-18s would result from relocating all squadrons to a single installation. The 'all-Oceana option' will save the American taxpayers hundreds of millions of dollars over any of the other alternatives. Also, it will affect less than one acre of wetlands compared to the hundreds of acres of wetlands impacted by the other scenarios.

Oceana is not only the best strategic option, and the least costly alternative for the taxpayer, it also provides the best quality of life for our naval personnel. Those intangible benefits are so crucial to the morale of our troops, good paying jobs for spouses, excellent education opportunities and medical care facilities, great transportation and tremendous cultural and recreational opportunities. While not accounted for in the Environmental Impact Statement, I believe these elements are another important aspect of this option.

Thank you for your comments; no response required.

Sanford (Cont.)

While bringing the fighter aircraft to Oceana will not be without challenges, the entire Hampton Roads area will clearly benefit from the boost to the economy. If the aircraft are moved to Oceana, all the surrounding communities will gain from the hundreds of millions of dollars in salaries and goods and services purchases. This win-win scenario for both the Navy and Hampton Roads will result from stationing about the same number of aircraft at Oceana that were there in the late 1980s. Relocating all the F/A-18s to Oceana, the single site alternative, is clearly the best option for the nation, and I urge its adoption. Thank you.

[Mr. Sanford submitted Senator Warner's prepared statement, which is represented by the verbatim transcript.]

Speaker: Ms. Jan Faircloth
Representing Congressman Norman Sisisky
4th Congressional District

My boss is in session tonight. Congress is in session. In fact, they are supposed to be working on the defense authorization conference report, and I am hear to listen, to listen to the public, because this is a public hearing, sir. Thank you very much.

Thank you for your comments; no response required.

Speaker: Ms. Betty Miller Morris
1216 Murray
Chesapeake, VA 23322

Your Honor, my name is Betty Miller Morris, and I suspect I speak for most of the people in the room tonight when I say I have to comment after watching and after looking at your charts that nobody who drew the pictures has ever spent the night in this area when the planes were flying.

I have been in on this from the beginning. The original condemnation in 1940 was of my father's farm, and I grew up across the street from the main entrance to the airfield. I could amuse you and baffle you for an hour with stories of my growing up here and the crashes that occurred on all four sides of me as the World War I pilots trained.

I can remember to this day during the Korean War the day the jet crashed into the officers' quarters on the base less than a hundred yards from my home. The first time I heard a fire engine, I'm told that I asked where the crash was. My parents got up in the night every time there was a crash and made coffee and sandwiches for the crash crew, and I was allowed to sit on the steps and watch as the men came in and reported on the death of another pilot.

The Navy does not have a credible reputation in this community for either response to complaints or for offering fair market value for condemned land. During the expansion of the condemnation of our rights in 1980 to 1990, scare tactics were used to frighten people to sell their property to the Navy at less than 40 cents on the dollar of the value. As one who held out, I was offered 240 percent of the original offer, but I had to pay $40,000 in legal fees to accomplish this.

I live on Murray Drive. I see the belly of the plane every 35 seconds as it goes over. They fly so low that I wave to them when I'm cutting grass and the pilots wave back. I know an F-14 and an F-18 when I hear it. I know how much louder these will be. It doesn't take me long to figure out how many more hours will be consumed with this amount of noise with 180 planes. They used to be honest enough to call it a crash zone. Now they want to call it an accident zone and believe that there is only a slight potential.

It's going to happen, I know that. It makes good sense for the Navy. It makes good sense for the country. I'm suggesting that the Navy get honest with those of us here who have had enough. Have an open period and let people who are ready to get out have their private homes bought at fair market value if we are under the potential crash zone and in the high noise zone and have simply had enough. There are not a whole lot of us left, but some of us are ready to give up. Thank you. 1

BMM-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Speaker: Mr. Maury A. Gunn
841 Bedford St.
Chesapeake, VA 23322

Thank you, Your Honor. I am Maury Gunn. I live in the noise zone, the crash zone, and every other zone that Fentress has. I have been living there for 14 years. You have charts back there describing your decibel levels. You have crash zones designated on charts, and all that looks good if your pilots do what they are supposed to do, if they fly the patterns that they are supposed to fly, and if they maintain the altitudes that they are supposed to have.

I'm here to talk to you tonight about free-for-all flying at Fentress Airfield, undisciplined, uncontrolled flying. I have in my pocket a book that has every phone number at Oceana that you can call to complain about a jet aircraft or an E-2 propeller driven aircraft, all of them.

1 I am told at Oceana when I call to complain, one of the people that will answer the phone will say, I will call radar and get them to put radar on them and get them up. I said, what, you are not monitoring those planes by radar? No, we don't keep radar on them. The blimps bother their traffic controllers at Oceana, so we don't monitor those planes by radar. How about the radar at Fentress Airfield? Oh, we don't have any radar at Fentress Airfield.

I submit to you, Your Honor, your Navy airplanes are flying uncontrolled over Fentress. They obey no flight patterns, they obey no altitude, and we are tired of it. Just like the lady just said, we are tired of it. We don't need any more aircraft. We are already subjected to more noise level. The F/A-18 -- the F-14 is a relatively quiet aircraft if it's up above the altitude limit, 800 feet, 800 to a thousand feet, you're supposed to have over here at Fentress. They fly 200, 300, 400 feet, and the Navy says, if you have a complaint, call. Why should we monitor your aircraft. I don't work for the Navy. I'm not employed by you to monitor your aircraft and to call you in the middle of the night and tell you that your planes are flying off of a pattern or that they are flying too low.

MAG-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

2 I submit to you clean up your act before you start asking us to take on more aircraft and to take on more noise. I was appalled to find out that it's already etched in concrete that 120 planes are already coming to Oceana. Now we are having a public hearing over 60 more aircraft; am I correct in assuming?

[THE HEARING OFFICER: Well, the Draft Environmental Impact Statement as proposed--]

You've got 120 that are already coming. Send the other 60 to Cherry Point. Those people down there want them. We don't want them here.

Thank you sir.

MAG-1 (cont'd) NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare Range, may be reached at (757) 433-3158.

MAG-2 The Office of the Secretary of the Navy will issue a final decision concerning the five alternatives evaluated in the EIS. If one of the five existing alternatives is chosen for implementation, at least 120 aircraft will be transferred to NAS Oceana.

Speaker: Mr. Jim Tincher
1716 Prospect Dr.
Chesapeake, VA 23322

My name is Jim Tincher. I'm from Chesapeake, and the first thing I want to say is, I'm not going to vote for Warner again.

I live over here in Schoolhouse Crossing where apparently it's Noise Zone 2, and on December 13th of 1995 there was a meeting or a hearing that was held here in which they were talking about the original proposals for the realignments. That night I expressed three primary concerns.

The first was with the existing noise levels; the second was that the Navy was unable to control and manage their current assets; and the third item was the property values and the quality of life and how they would be effected.

Tonight those are still my three primary concerns. With the F/A-18s we know we are dealing with significantly higher noise levels. The Navy has proven over the past two years they still can't manage properly the aircraft and the flight patterns, and now with the 120 coming, the property values are of significant concern.

Specifically, again on December 13, Dan Cecchini had the opportunity to come to my house because they were flying aircraft that night to see exactly what we were talking about, and I think he will nod his head when we say, yes, they were out of pattern; yes, they were over my house.

JT-1 Noise levels associated with all ARSs are discussed in Sections 4 through 8 of the EIS.

JT-2 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Tincher (Cont.)

Do you remember that, Dan?

Things haven't changed. You still have a problem. The Navy has not corrected it. They have made some strides, but they are failing and failing on all accounts.

In the EPA study that was given -- of the Navy's Environmental Impact Study that was given, one of the things that they talked about was the different noise levels, and I will give you some examples of what they were referring to.

A typical conversation is rated at 60 decibels at five feet. The F-14 at a thousand feet on an approach level is at 83 decibels. A lawn mower at 25 feet is 90 decibels, but I think most people that live in my neighborhood will attest that when you're mowing your lawn and an F-14 flies overhead, you can't hear it, and the reason why, they are out of their pattern, they are flying too low. An F-18 also at a thousand feet is rated at 104 decibels, and to give you an idea of the significance of that, for every 3 dB increase in the noise level, you're talking twice the volume level. A 60 dB conversation raised to 63 dBs is twice as loud. It's a nonlinear algorithm.

4 The noise levels that were presented in the slide are misleading in that those are considered what are known as LDN, which is an average noise over a 24-hour period based on a 365-calendar day year. Meaning, that if aircraft is not flying, it's no noise counts in that average. That's misleading information.

It's politics that help brought these aircraft here for the most part. I believe they are unwanted. And I think we can help get those out of here or reduce the impact through politics as well with the exception of Warner. I think if we can talk with our other representatives in Congress, we may be able to get some positive action. I was really discouraged to have heard how Warner is supporting these without trying to get the impact of or the feedback from the people that they are going to impact the most.

That's all I have.

JT-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JT-4 The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

Speaker: Mr. Harold Bergey
Mt. Pleasant Mennonite Church
2041 Mt. Pleasant Rd.
Chesapeake, VA 23322

Captain, good evening. My name is Harold Bergey, and as the current pastor, I present this request on behalf of Mount Pleasant Mennonite Church, 2041 Mount Pleasant Road.

A few weeks ago at the church we received this 1,500-plus page report of the Environmental Impact Study. This voluminous study noted almost every imaginable impact on every resident including dog, house sparrow and the opossum. Despite this exhaustive report, I could not find a single direct reference to what I consider one of the most significant impacts of all, and that is, the noise impact on services conducted by the various churches effected by flight operations at Fentress. Therefore, I'm going to resubmit a written plea that I made almost two years ago to Mr. Cecchini, and I will simply excerpt in the interest of time from this letter. 1

I say in the letter written December 21st, 1995, that Mount Pleasant Mennonite Church and NALF Fentress have been neighbors for almost 50 years. The implications of this neighborly relationship have been many and varied, but one has been consistent, and that is, that low-altitude flying of aircraft and conducting worship services are incompatible.

In light of that, we ask for two considerations. One, that regular Sunday services be a time exempted from flight scheduling; and secondly, we ask that flight scheduling be discontinued for the occasional and the infrequent special service like a wedding or a funeral. Of course, we wanted to know who to contact and what was the minimal length of notification needed in order to accomplish that, and I might ask here that if those answers are available here tonight, I would be happy to receive them, that is, what officer or command to contact and what is the minimum time of notification needed. 2

THE HEARING OFFICER: Let me do this. I will ask the panel. Is that addressed in the statement, or is that information available?

MR. SHEPARD: It's not in the statement; however, I would think that contacting NAS Oceana directly to see about the scheduling.

MPMC-1 Section 3.1.8 and Appendices D and H of the EIS provide information on how noise is measured, how noise affects hearing, speech, and performance, and also discusses the compatibility of certain land uses within each noise zone. Noise impacts under ARS 1 are discussed in Section 4.8. While there is no direct analysis of noise impacts on churches in the vicinity of NALF Fentress, the locations of churches within projected noise zones are shown on Figure 4.8-1. In addition, in order to accommodate Sunday church services in the vicinity of NALF Fentress, aircraft pattern operations are not conducted between 6:00 AM and 1:00 PM and 7:00 and 9:00 PM. Based on the analysis in the EIS, Mt. Pleasant Mennonite Church would continue to experience noise levels above 75 dB Ldn (noise zone 3).

MPMC-2 Accommodation of Sunday church services is addressed in response to MPMC-1. Accommodation of special services is considered on a case-by-case basis. The Community Planning Liaison Officer, Mr. Fred Pierson, can be contacted at (757) 433-3158, to request changes to the training schedule to accommodate special services. Due to training schedules and requirements, there may be certain specific times when the urgency of operational commitments precludes our ability to accommodate such special services.

Bergey (Cont.)

Now, in the short term, my job is to allow you the chance to raise these issues, and I'm hoping that the Navy will work vigorously to provide answers regarding those kinds of questions.] *(See Lehman transcript for point-of-contact provided at hearing.)*

Thank you, and I will submit this in written form.

[Mr. Bergey submitted his prepared statement and a copy of the letter referenced. The prepared statement and attached letter are provided below.]

Mt. Pleasant Mennonite Church

2041 MT. PLEASANT ROAD • CHESAPEAKE, VIRGINIA 23322 • (804) 482-2215

Presented at the public hearing:
Butts Road Intermediate School,
October 28, 1997

To Whom It May Concern:

As the current pastor, I present this request on behalf of Mt. Pleasant Mennonite Church, 2041 Mt. Pleasant Road.

A few weeks ago we received a 1500+ - page report of the Environmental Impact Study. This voluminous study noted almost every imaginable impact on every resident including (Passer domesticus) house sparrow, and (Didelphis virginiana) opossum. Despite this exhaustive report, I could not find a single direct reference to what I consider one of the most significant impacts of all; that is the noise impact on services conducted by the various churches affected by flight operations at Fentress. Therefore I re-submit a written plea that I made almost two years ago. (See attached letter)

Mt. Pleasant Mennonite Church

2041 MT. PLEASANT ROAD • CHESAPEAKE, VIRGINIA 23322 • (804) 482-2215

December 21, 1995

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Dear Sirs,

This letter is being written in response to your invitation for public comment regarding the assignment of F/A-18 aircraft to NAS Oceana and NALF Fentress.

Mt. Pleasant Mennonite Church and NALF Fentress have been neighbors for over 50 years. The implications of this neighborly relationship have been many, and varied. One implication, however, has been consistently true since the origin of NALF Fentress. That is; the low-altitude flight of aircraft overhead, and conduction of our worship services are incompatible. In light of this, we ask for your consideration in two specific ways in practice flight scheduling:

1 | 1. That you exempt the regular times of our Sunday services from your flight scheduling: They are as follows:
   -0930 - 1200 Sunday
   -1900 - 2030 Sunday

2 | 2. That you exempt the occasional, and infrequent special service from your flight scheduling, e.g. weddings, funerals, etc. Of course, we would want to know whom to contact, and what minimum length of notification is needed.

We sincerely hope that you will find a way to avoid interrupting our worship services with low-flying aircraft. Thank you for your consideration.

Respectfully yours,

Harold Bergey
Pastor

MPMC-3 Please see response to MPMC-1 and MPMC-2.

MPMC-4 Please see response to MPMC-1 and MPMC-2.

Speaker: Ms. Maxine Ricks
525 Hatteras
Chesapeake, VA 23322

Thank you. Sir, I am here as a mother and a grandmother to express my opinion about the fact that I do not think crowded streets, crowded roads, crowded schools, more people and more noise add to our standard of living.

We moved to Chesapeake 10 years ago to escape crowded conditions, and I am of the opinion that the military is a very much needed service, but it is not necessarily needed here. Anyone who has been through Havelock or any of the North Carolina areas knows that they could surely use the economic benefits that would come to an area that these planes and the personnel are brought to; however, we are impacted already with two -- with an awful lot of people. We do not have adequate roads. We do not even have adequate water. And I have never felt well about the fact that we are taking water from the Lake Gaston area and we want to bring in several thousand more people to take more water.

I think that the military could do well by going to the North Carolina area where it would help those people, whereas I do not feel like it is a help to bring them here.

Thank you.

Thank you for your comments; no response required.

Speaker: Mr. Michael L. Feris
Chesapeake Council of Civic Organizations
704 Forest Mills Rd.
Chesapeake, VA 23322

Captain Utecht, staff, ladies and gentlemen, good evening. My name is Michael Feris. I reside at 704 Forest Mills Road, Chesapeake, Virginia 23322. I retired from the Navy at the end of June 1994, having served just a few months short of 30 years of active Naval service. I represent the Chesapeake Council of Civic Organizations' Committee on Naval Affairs and will speak on its behalf. We appreciate the opportunity to present these remarks concerning the DEIS.

I have read most of the pertinent parts of the DEIS having to do with the impact arising out of the plan to fly F/A-18s to NALF Fentress, and I will limit my remarks to that subject.

Let me say at the outset, that we clearly understand that while the exact number of F/A-18s to relocate here must still be open to question, we accept that it is inevitable there will be F/A-18s here, and that those jets will have an impact on the surrounding community. We fully appreciate also that the use of Fentress Field by aircraft destined to land and take off from carriers at sea is crucial if we are to have that evolution occur in the safest manner possible. We would have it no other way.

A-6-16

1

That having been said, I shall like to point out that the DEIS in several ways tends to assume or at least to minimize the impact on the people in this immediate vicinity. Specifically, in the executive summary to Appendix C, Aircraft and Air Space Analysis, the statement is made that under reasonable Alternative Scenario 1, NALF Fentress will experience an increase in 51 percent in operations. The night operations would increase from 34,492 to 62,044. That's your A-17 and Table A-18.

What is not made obvious in the analysis is, that while it is true that overall annual flight operations increase 51 percent -- and that alone is chilling enough -- the greater increase occurs during night flying hours, between 2200 and 0700, by a whopping 80 percent. My table in the prepared remarks highlights that fact.

Now, if the operations were spread evenly across all days and nights of the year, this would mean that we could expect the average of 94 nightly operations to increase to 170 operations. Since we know that this is not likely to be the case, we can only conclude that on many nights the activities will be something well in excess of 170 operations, 200 operations, 250 operations. This fact is nowhere to be found in the DEIS and ought to be if the DEIS is to fairly state the true environmental impact. We would like to believe that this is an oversight.

CCCO-1 Annual night operations at NALF Fentress would increase from 34,492 to 59,043, which reflects a reduction in F-14 aircraft that was not discussed in the Draft EIS. Table 4.1-1 has been modified to separately show the increase in night operations, day operations, and total operations projected under ARS 1. To calculate the projected noise contours, the average number of day operations is used. Some days would experience more operations and some days would experience fewer operations than cited in the EIS.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Feris (Cont.)

2 In the face of these computations, it is difficult to understand the conclusion on page 3.1-139 of the DEIS that the 1997 noise exposure levels, quote, are significantly lower under the 1978 AICUZ contours. Inasmuch as Section 3.1.8, Noise, focuses primarily on the NAS Oceana vicinity using data as though Oceana and Fentress air operations were one and the same, the methodology of the analysis is therefore flawed. There is a breakdown here in logic. NALF Fentress is not NAS Oceana. The tempo of the night operations at Fentress surely exceeds that at Oceana.

To go further, the analysis seems to accept implicit that aircraft flying in and out of Fentress carefully observe the customary flight patterns. If that were the case -- and we have heard tonight that it is not -- perhaps the proposed increased activity at Fentress would be less of a nuisance than we can expect at this juncture.

From direct observation, the flight discipline evident by aircraft taking off and landing at Fentress has steadily deteriorated over the past three years. More and more often, aircraft fly well off the flight pattern at altitudes which permit individuals on the ground to make fairly accurate estimations of when the pilot last shaved.

3 Three years ago phone calls at 2300 to operations at NAS Oceana requesting that Fentress aircraft tighten their pattern more promptly, courteously and effectively were attended to. I have made those calls on numerous occasions on behalf of the residents in my neighborhood. Once recently my several calls to Oceana, while met with the customary courtesy, were useless. F-14s continued to stray well west of Centerville Turnpike at extremely low altitudes creating an impossible situation for school children to have a decent night's sleep.

4 We request two things. First, an effective control mechanism be devised to control the tendency of jet aircraft to stray well beyond customary flight paths; and second, that the decision to relocate the entire 180 Hornets to this area be revisited in light of recent aircraft accident data. I appreciate your time and consideration.

Thank you.

CCCO-2 Section 3.1.8 of the EIS states that 1997 noise exposure levels are significantly lower than under the existing 1978 AICUZ zones. This statement applies to both NAS Oceana and NALF Fentress, as shown in Figure 3.1-23. The noise analysis from which Figure 3.1-23 is derived incorporates aircraft operations at NAS Oceana, NALF Fentress, and interfacility operations. NALF Fentress was specifically designed and configured for Field Carrier Landing Practices (FCLP) required by carrier-based aircraft. Simulating landing on the deck of an aircraft carrier at night is crucial training for aviators, and therefore, more nighttime operations occur at NALF Fentress. The noise contours shown on Figure 3.1-23 are expressed in decibels for the 24-hour day-night average sound level (Ldn), which includes a "penalty" for nighttime operations because of increased community sensitivity to nighttime noise.

CCCO-3 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Feris (Cont.)

CCCO-3 (cont'd) Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

CCCO-4 Thank you for your comments; no response required.

[Mr. Feris submitted his prepared statement, which is partially represented by the verbatim transcript. The full text of the statement is provided below.]

Feris (Cont.)

Good evening.

My name is Michael L. Feris. I reside at 704 Forest Mills Road, Chesapeake, Virginia 23322. I retired from the Navy at the end of June 1994, having served just a few months short of 30 years of active Naval Service. I represent the Chesapeake Council of Civic Organizations' Committee on Naval Affairs and will speak on its behalf. We appreciate the opportunity to present these remarks concerning the Draft Environmental Impact Statement.

I have read most of the pertinent parts of the DEIS having to do with the impact arising out of the plan to fly F/A-18s to and from the Naval Auxiliary Landing Field, Fentress. I will limit my remarks to that subject.

Let me say at the outset that we clearly understand that while the exact number of F/A-18s to relocate here might still be open to question, we accept that it is inevitable that there will be F/A-18s here and that those jets will have an impact on the surrounding community. We fully appreciate also that the use of Fentress Field by aircraft destined to land and takeoff from carriers at sea is crucial if we are to have that evolution occur in the safest manner possible. We would have it no other way.

That having been said, I should like to point out that the Draft Environmental Impact Statement in several ways tends to assume away or at least to minimize the impact on people in this immediate vicinity. Specifically, in the Executive Summary to Appendix C, Aircraft and Airspace Analysis, the statement is made that under reasonable alternative scenario one (ARS 1), NALF Fentress will experience an increase of 51 percent in operations, going from 104,668 annual flight track operations to 158,194. The night operations would increase from 34,492 per year to 62,044 (Tables A-17 and A-18).

What is **not** made obvious in the analysis, is that while it is true that overall annual flight operations increase 51%, and that alone is chilling enough, the greater increase occurs during **night flying hours** between 2200 and 0700 - a whopping 80%. My table, below, highlights that fact.

Table 1: **Increase in Annual Flight Track Operations at NALF Fentress**

	Day 0700 - 2200	Night 2200 - 0700	Total
Baseline	70,176	34,492	104,668
ARS 1	96,150	62,044	158,194
Percent Increase	37%	80%	51%

Now, if the operations were spread out evenly across all days (and nights) of the year, this would mean that we could expect an average of 94 nightly operations to increase to 170 operations.

5

1

A-6-19

CCCO-5 Please see response to CCCO-1.

Feris (Cont.)

Since we know that this is not likely to be the case, we can only conclude that on many nights, the activity will be **something well in excess of 170 operations!** This fact is nowhere to be found in the DEIS, and ought to be if the DEIS is to fairly state the true environmental impact. We believe that this is an oversight.

In the face of these computations, it is difficult to understand the conclusion on page 3.1-139 of the DEIS that the 1997 noise exposure levels ". . . are significantly lower than under the 1978 AICUZ contours." Inasmuch as Section 3.1.8, Noise, focuses primarily on the NAS Oceana vicinity using data as though Oceana and Fentress air operations were one and the same, the methodology of the analysis is therefore flawed. There is a breakdown in logic. NALF Fentress is not NAS Oceana. The tempo of night operations at Fentress surely exceed that at Oceana.

To go further, the analysis seems to accept implicitly that aircraft flying in and out of Fentress carefully observe the customary flight patterns. If that were the case, and it is not, perhaps the proposed increased activity at Fentress would be less of a nuisance than we can expect at this juncture.

From direct observation, the flight discipline evident by aircraft taking off and landing at Fentress has steadily deteriorated over the past three years. More and more often, aircraft fly well off the flight pattern at altitudes which permit individuals on the ground to make fairly accurate estimations of when the pilot last shaved. Three years ago, phone calls at 2300 to Operations at NAS Oceana requesting that Fentress aircraft tighten their pattern were promptly, courteously, and effectively attended to. I have made those calls on numerous occasions on behalf of the residents in my neighborhood. Once recently, my several calls to Oceana, while met with the customary courtesy, were useless. F-14s continued to stray well west of Centerville Turnpike at extremely low altitudes creating an impossible situation for school children to have a decent night's sleep. A further call to Commander, Naval Air Forces, Atlantic was met by an equally apparent concern expressed by the Operations Officer but he, too, was unable to rectify the problem at NALF Fentress. Amazed that a 3-Star command was unsuccessful in directing change, I contacted Operations at CINCLANTFLT. Despite CINCLANTFLT's attempts, F-14s continued to roar overhead for the next hour. Amazement finally turned into exasperation. Trying to determine, at last just who was in charge, I took the issue to the Inspector General at CINCLANTFLT and lodged a formal complaint.

6

Citizens should not have to do this. I am willing to take this on at 2300 on behalf of my neighbors because I understand the Navy organization and have little reticence nor reluctance in dealing with it. Still, neighborhoods should not bear this burden.

The solution, we think is straightforward. The Chesapeake Council of Civic Organizations requests that the final Environmental Impact Statement confront this issue directly. At a minimum, the EIS should include a section which clearly:

- outlines the chain-of-command for NALF Fentress, providing Office Codes and

CCCO-6 NAS Oceana and NALF Fentress operate 24 hours a day. Notice of unusual operations is provided to the media to inform citizens surrounding NAS Oceana and NALF Fentress. NAS Oceana also has an outreach program to brief civic leagues, service clubs, realtors, and other interested parties on the air station flight mission. The Commanding Officer at NAS Oceana has also established a Community Leaders Forum to meet quarterly and discuss issues of mutual concern.

Further response to this comment has been provided under CCCO-3.

Feris (Cont.)

telephone numbers at NAS Oceana,
- illustrates, pictorially, flight patterns citizens can expect for the Fentress area,
- describes procedures for dealing with citizens' complaints when flight pattern violations continually occur,
and,
- provides for public notification when training requirements at Fentress are expected to exceed normal levels such as often happens when emergency procedures training require flight patterns well wide of the normal pattern.

Citizens are willing, we believe, to adapt to infrequent training exigencies if they have a reasonable assurance that there is an end-game. But, to be given the impression that Naval Aviators at Fentress really don't give a care and that the Command structure above them appears of not indifferent, then certainly impotent creates a lose-lose situation. This situation is entirely in the hands of Navy to turn around.

We believe that the partnership between NALF Fentress and the citizens of Chesapeake ought to be an active, dynamic one in which all parties openly acknowledge the needs of the others and make whatever accommodations are necessary in the best interests of all.

This is an opportunity for Naval Aviation Public Affairs. It is an opportunity which Navy must take to heart to avoid creating an atmosphere of distrust. The Final Environmental Impact Statement is the perfect vehicle for starters. Notices placed conspicuously in local newspapers to notify affected populations ought to be a common practice.

Our last and perhaps more sobering point has to do with aircraft training accidents.

The DEIS, using a 1981 study, a study now 16 years dated, states that ". . . the highest potential for accidents is within or adjacent to the runway (56%), followed by the clear zone (12%). The potential for accidents decreases with distance. Approximately 7% of reported accidents occurred in APZ 1, and less than 3% of reported accidents occurred in APZ 2. (Page 3.1 - 77)." Notwithstanding the opportunity to update this study based on aircraft accidents occurring in this calendar year, the redrawing of the Accident Potential Zones using Navy's 1997 standard gives us a great deal of concern irrespective of the probabilities assigned to accidents within the various zones.

7

It is axiomatic that when you concentrate all of your aircraft to one training location, you assure with near perfect certainty that the training accident that will inevitably occur, will occur in that near vicinity. Given the increased night operations activity I have described earlier, it gives us no comfort to think that someone here in Chesapeake will awake to have the debris of an F/A - 18 in his living room.

We believe that the Final Environmental Impact Statement should display a table of accident probabilities by location for each of the Reasonable Alternative Scenarios. It would be infinitely

CCCO-7 The FA-18 is one of the safest aircraft ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns, which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of Naval aviation.

Feris (Cont.)

more acceptable to have the 100% probability of an accident reduced to even 85%.

In summary, we request two things:

- First, that an effective control mechanism be devised to control the tendency of jet aircraft to stray well beyond customary flight patterns, and
- Second, that the decision to relocate the entire 180 Hornets to this area be revisited in light of recent aircraft accident data.

I appreciate your time and consideration. I would be pleased to respond to your comments or questions. Thank you.

Speaker: Ms. Maryland Hallman
2512 Pocaty Rd.
Chesapeake, VA 23322

Thank you, sir. Staff and members of the audience, my name is Marilyn Hallman. I live in the Fentress area of Chesapeake. I am opposed to this proposal in bringing 180 new jets to this area, and I'm stating the facts as I have researched and experienced it firsthand.

1 First, there is the health risk. The noise, the adverse effects of the noise exposure include temporary or permanent hearing loss. This jet noise is painful, to say the least. I've been caught outside doing yard work, or whatever, and I've been caught unaware with a jet flying over. I've had to stop what I'm doing and plug my ears because it is actually painful. About two years ago I was caught outside and I didn't go and put headphones on my head while I was doing my work outside, and for two days I had ringing in my ears.

The noise is unbearable. You come home at night after a day of work. You want to relax. You want to, you know, listen to TV or just, you know, have a nice, pleasant evening, and the jets start flying. You can't think. You can't talk on the phone. You can't even lay down and sleep because the noise is so bad.

I think some of these jets use my house as target or something. I've had them come over. I've -- they are so low that I can see the details in their helmet.

2 Another thing is the jet fuel. Jet fuel is a cancer-causing agent. This is a proven fact. A lot of these jets with determining the pattern that they're in, they're flying very low. When they fly low, they spew more jet fuel, so you see a misting of jet fuel coming out of the back of the jet.

I've heard stories of fuselage being dropped through someone's front yard and digging a ditch. I've heard stories of crashes, fuel being dumped.

I think the bottom line here is that this jet activity is simply not compatible with human life. It doesn't work. It doesn't mesh together, and I agree with the first lady who spoke, that I'm ready to get out. I can't take it. I can't take any more noise. I can't take any more jet activity than I've had in the last nine years. It's just intolerable.

MH1-1 Temporary threshold shifts in hearing are possible at the levels of noise experienced in the vicinity of NALF Fentress. However, extensive research on hearing loss indicates that it is extremely unlikely that anyone would experience a permanent threshold shift as a result of exposure to aircraft noise at 75 dB Ldn. Section 3.1.8 of the EIS presents a detailed discussion of possible effects from noise exposure.

MH1-2 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this design minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

Hallman (Cont.)

3 Most people, their homes are their biggest investments. This is basically what everyone has. Our property values are going to drop. No one's going to want to buy a house, even if it's a quality house. This isn't fair, and I think that if the Navy wants to come in and do their thing, they need to get people out of harm's way, because things will happen.

If this plan goes through and the activity is going to be stepped up and the noise is going to be worse, life will be absolutely intolerable. It won't be worth living back there anymore, and everyone should just get out.

Another thing that bothers me is that a lot of these children, the hearing -- children's hearing is much, much more sensitive than an adult's, and they cannot take the high levels of noise that an adult can when they're young. They -- their hearing is damaged at a faster rate than an adult.

4 Now, it's been proven that children who are schooled in areas where there's a high noise level do not do well. They can't study, they can't focus, and they can't concentrate. Now, that also holds true for adults, you know, but here it is we've got kids we're trying to bring up and, you know, give them a good life and everything, and they can't even learn because they're in a flight zone.

Okay. In conclusion, I would like to say, as I said before, that I just simply think that this plan is not compatible with -- with any kind of human life, and I would thank you for your attention.

MH1-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

MH1-4 In buildings without adequate sound attenuation, aircraft noise may impact the cognitive abilities of school-age children. However, as discussed in the EIS, sound levels for individual aircraft would not reach the threshold of pain. Please see Sections 3.1.8 and 4.8 for a more detailed discussion of the impacts of noise on school-age children.

Speaker: Ms. Grace Olah
1136 Land of Promise Rd.
Chesapeake, VA 23322

My name is Grace Olah. I have a farm that's located at 1136 Land of Promise Road. We bought this farm in 1943, and we have been there ever since.

1 I do have a picture here of a plat of our farm that was done in 1980 when you people took easement over our farm. I also have pictures in this portfolio that just last year I had to replace my roof on my house because of the dumping of the fuel on the roof of my house. This is uncalled for, and I do have pictures to verify what I am saying.

I am -- I will be 80 years old in 1998, February, and I have -- there are seven homes on my farm. They were built before the easement was taken over our farm. They are my children, my grandchildren and great grandchildren, and as a previous lady said -- right now I'm wearing hearing aids in both my ears. That's the only way I can hear. My hearing has been damaged. Not only that, I am -- I'm a widow and I have a heart problem, and the stress that I have been under recently from the flying of the planes, I don't feel like that I can take much more stress. So far as I'm concerned, like someone else said, I'm ready to move if you 2 would buy my farm. Thank you.

GO-1 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

GO-2 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Speaker: Mr. Bob Widener
Tidewater Builders Association
2117 Smith Ave.
Chesapeake, VA 23320

Thank you. Good evening, Judge Utecht--

--Mr. Cecchini. My name is Bob Widener, and I'm chairman of the Chesapeake Municipal Affairs Committee of the Tidewater Builders Association. TBA is an organization of 750 firms and businesses that make up the shelter industry in southeastern Virginia. We include builders, contractors, developers, bankers, surveyors, engineers, architects, equipment suppliers, members of all the trades, such as plumbers, carpenters, electricians, and virtually everyone involved with the construction business. Our association is in 100 percent support of the recommendation contained in ARS 1, which would have 180 F/A-18 aircraft be relocated from Cecil Field in Florida to Naval Air Station Oceana.

As many others have said, Oceana is the best place for these new planes for numerous reasons. Relocating to Oceana offers the minimal environmental impact, reduced cost to taxpayers, siting close to the fleet, and other unquantifiable but still important quality of life matters, such as spousal employment, higher educational opportunities and our great school system.

Tidewater Builders Association is committed to doing its part in providing a myriad of housing opportunities to all of our residents, and especially those new residents who will be moving here from Florida. We have an abundance of affordable high-quality housing in all of Hampton Roads, especially in Virginia Beach and Chesapeake, where the vast majority of the new citizens of this project are expected to live. This housing includes apartments, single-family attached, single-family detached, low, middle, medium and high-rise buildings, resort property, starter homes and virtually any type of housing facility you can imagine. We have it here, we have it in quantity, and it is of excellent quality.

Tidewater Builders Association, as always, is ready to work with the cities of Virginia Beach and Chesapeake in making sure that any additional new construction of residential facilities be constructed, if required, with the proper noise attenuation features to provide all residents with a quality home environment and to reduce the potential for noise complaints. Tidewater Builders Association, in fact, was instrumental in having the General Assembly of Virginia adopt enabling legislation that allows Virginia Beach and Chesapeake to develop and adopt its airport zoning ordinance. This ordinance requires homes that are built in Noise Zone 3, the high noise zone, have the proper noise attenuation features built into them to provide acceptable interior noise. Presently, most homes within Noise Zone 2, for instance, meet the proper attenuation levels equivalent to the present Virginia Beach -- or the Virginia Power Energy Efficient Standards. Homes within Noise Zone 3 can be readily made to

Thank you for your comments; no response required.

Widener (Cont.)

meet the standards through the use of triple-pane windows and doors, proper framing and insulation techniques. This does add a small percentage to the cost of the home. However, the cost is recouped over a very short period of time through energy savings and provides for a higher quality home.

Okay. The Tidewater Builders Association stands ready to work with the Navy and the city as they develop a new AICUZ map after the Record of Decision on the DEIS, and we look forward to providing them with an exceptional home in a great neighborhood in which to raise their families.

Thank you.

[Mr. Widener submitted his prepared statement, which is represented by the verbatim transcript.]

Speaker: Ms. Ann Palmateer
Tidewater Association of Realtors
1905 Benefit Rd.
Chesapeake, VA 23322

Good evening. Your Honor, I'm Ann Palmateer. I'm chairman of the Relocation Council of the Tidewater Association of Realtors and a member of their board of directors.

I was a wife of a military Marine Corps pilot who was a pilot for 28 and a half years, and for most of our career we lived on military installations directly under the flight path, that I used to reach out and see him fly over. I can also say that my children lived there and went to school in Navy bases right there under the flight path, and I'm living today. I'm healthy, and so are my children and my grandchildren. They all live in Chesapeake as well.

I do want to tell you, though, about our association. We've already presented a position paper that basically deals a lot with the economic impact to the area. As a long-time resident of Chesapeake and a realtor here for 21 years, I have to believe that the Hampton Roads real estate market can, in fact, handle and absorb the relocating military squadrons, and in fact, with the quality of schools and homes in Chesapeake, we will also benefit from the ripple effect of those military going to Oceana who decide that they wish to live a little bit further away from the base, such as we did.

In my opinion, there will not be a decrease in the value of housing due to any change in the AICUZ zones. I've been selling homes in Chesapeake since the late '70s and in the early '80s, and I saw no change in prices from disclosing noise or potential crash zones. In fact, I'm thinking if the law of supply and demand holds true that more demand will be created by more folks coming here, whether they be military or otherwise, and with a higher standard of their average increase in pay compared to the average here in the area, that can only help to mean more home sales. It will help maintain our values and possibly even increase them. And believe me, we have plenty of resale homes on the market today that we'd like to sell.

In closing, since I specialize in military relocating all over the United States, I can only express that we should be thankful that we're not in Jacksonville or Charleston, South Carolina. The people in Charleston after the base closed were and still are unable to sell their homes. Many are boarded up and eventually Jacksonville will have that same problem towards the end of the moves from Jacksonville. Oceana could have been closed and look where we'd be. None of us could sell and the real estate market would definitely decline very drastically, affecting other related industries to our business as well.

Thank you for your comments; no response required.

Palmateer (Cont.)

The Navy is the largest employer here, and there's your supply and demand. I think we should rally, let's support the Navy move, and let's put out the welcome signs in Chesapeake for our great military neighbors. The Tidewater Association of Realtors strongly supports the Navy proposal to relocate all its squadrons to Oceana.

Thank you, sir.

Speaker: Ms. Mary Hawthorne
1206 Winterberry Ct.
Chesapeake, VA

Good evening, Your Honor. First of all, my name is Mary Hawthorne, and I'm a resident of Country Mill, a neighborhood off Etheridge Manor Boulevard. Unfortunately, our city council had a meeting scheduled for this evening. I was hoping that a member would be here to represent us.

I have lived in this area since 1992. I will never forget the evening of the day I moved into my new home. After two stressed filled years of trying to sell my home in a quiet area of South Carolina, I finally thought I could just relax and be grateful to be a family again. On my first night in my new home and every night for the next two weeks, I laid awake listening to F-14s dogfight over my home, as well as A-6s gunning their engines. It was not beautiful music to my ears, and especially not the sound of freedom as other people have expressed their thoughts on this subject.

After numerous calls to public relations, the City of Chesapeake zoning department, and midnight calls to the flight tower, most of the flying resumed across the street rather than over my head. It was determined that the AICUZ line divided my house in half. One side of my house is a one and the other side of my house is a two. You can guess that we spend more time on the one side. The builder never revealed to us that a night training base was nearby.

1 My concerns are for the quality of life in Chesapeake. Butts Intermediate is a beautiful new school. Children have enough distractions without constant noise over their heads and teachers having to start and stop to be heard. Children
2 should not be housed in a crash zone. Because of this, will the Navy suspend
3 flight operations during the day? If so and flight ops are suspended during the day, that leaves the evening. From my experience, night training is usually from
4 9 p.m. to 3 a.m., with radar planes humming around until 5 or 6 a.m. This is during the summer. In the winter, training usually starts around 7 or 8 p.m.

5 The Environmental Protection Agency probably has not taken into account the fact that humans without adequate sleep do not function well the next day. Can we look forward to teachers and students snoozing in their class, more traffic accidents and poor job performances due to lack of sleep?

MH2-1 In buildings without adequate sound attenuation, aircraft noise may impact the cognitive abilities of school-age children. The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

MH2-2 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

MH2-3 The Navy has no plans to suspend daytime operations at NALF Fentress.

MH2-4 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

MH2-5 Appendix H of the EIS addresses many effects of exposure to high noise levels. Section H.3.5 presents a discussion of sleep interference, including the likelihood of awakening and sleep stage changes at various noise levels.

Hawthorne (Cont.)

6 I am concerned about the expanded crash zones. Virginia Beach may think this is a good economic move, but what will we, the citizens of Chesapeake, gain from this? I have often thought about selling my home to one of the families being transferred into this area and then moving to North Carolina. I'm con-

7 cerned about expanded crash zones, my property values, lack of sleep and even the cows at Bergey's not being very content anymore.

8 Who will pay for the triple-pane windows, the extra insulation, and whatever else it will take to protect your home and the occupants inside from the high decibel noise? I don't think the average homeowner can afford to do this. Will the builders in this area be willing to add the extras without a substantial rise in building costs?

The environmental impact would be very heavy for this area, one of fastest growing cities in the state. I can only hope that officials stop looking at the economics and realize sometimes other matters are more important.

Thank you.

MH2-6 The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of naval aviation.

MH2-7 Thank you for your comments; no response required.

MH2-8 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

[Ms. Hawthorne submitted her prepared statement, which is represented by the verbatim transcript.]

Speaker: Mr. Jeffrey M. Kuehn
Poplar Ridge South Civic Association
1004 Weeping Willow Dr.
Chesapeake, VA 23322

My name is Jeffrey Kuehn. I'm currently president for the Poplar Ridge South Civic Association. As such, I'm speaking on behalf of the concerns of the residents of the subdivision, which is approximately 240 houses.

The current concerns raised by residents of Poplar Ridge South are few. However, they are significant to those of us who live near Fentress Airfield. The major concern of the residents is that of noise, which you've heard quite a bit about here already tonight. Training flights of the current Navy planes and the continued exercises of the current squadrons located at Fentress Airfield generate a considerable amount of noise. Also, as you heard, they are flying low such that we can look up at times and get the numbers off the planes, and they are flying at odd hours, which is especially troublesome in the summer.

1

PRSCA-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Kuehn (Cont.)

2 When we purchased our homes in this subdivision, it was located in the region's lowest noise rating, which is obviously good for anyone who may be buying or selling a home. We are concerned that the move will place us into a higher category for noise and that this will affect the property values of our homes.

3 Our other concern is for safety. Poplar Ridge South is a subdivision which consists mostly of families with children. The potential increase of damage to our properties, homes and families is a great concern.

4 Please understand that we appreciate the great economic impact that this move will bring to the region, but we are simply trying to express our concerns for any potential impact this may have on our day-to-day lives. If the planes must be moved to Oceana, please consider restricting flight times and a way to keep aircraft in their flight patterns.

Thank you.

PRSCA-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

PRSCA-3 The FA-18 is one of the safest aircraft ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

PRSCA-4 Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Speaker: Ms. Linda Ricks Helms
Running Walk Farm
325 Earhart St.
Chesapeake, VA

Good evening, Judge. My name is Linda Ricks Helms. I leave on Earhart Street across from Fentress Airfield. I bought my property approximately 17 years ago, and I've done continuing additions to that. My property is zoned agriculture. My first love is horses. I also own a plumbing business, so I want you to know that I see both sides.

I'm aware that the military is very necessary, and I'm glad to live in a free country, but if you live at Fentress Airfield, your life isn't really free. You can't sleep when you want to sleep. You can't do what you want to do, and according to your statistics, there is no pollution to the water or the soils. I have a water trough for my horses. I train horses. I teach riding lessons, and my trough is continually loaded with fuel that has been dumped when flying over my house. 1

I, like the others who have spoken, have been able to wave at the people that are flying, so obviously they're way too low. The property to the right of my property and the property to the left of me, which I own, the air rights had been sold on them prior to me purchasing the property. They don't just fly on one side or the other and behind, but also in front, so I'm getting it all the way around. 2

I used to work nights. I was a dispatcher for the state harbor pilots, and I consider myself an intelligent person. These planes are not flying where they're supposed to be. Another thing is very often they crank up at 8, 10, 12 and 2 a.m. How would you like to have to go to work at midnight and you can't sleep prior to going to work? Or come home at six-thirty, seven o'clock at night knowing you have to go back to work at one, twelve o'clock at night and that's the time that they're flying? You can't hear yourself think. You can't hear the telephone. You can't hear anything else. 3

I'm aware of the wonderful economic things that people were talking about. They also said the lottery would bring us tremendous economic value.

LRH-1 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

LRH-2 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Helms (Cont.)

But we don't see any lottery money, and all of this economics that's coming here, well, I suggest before the Navy moves these people here they widen our roads, increase our highways and water and sewer that has been denied to older residents, that has not been given to them, but yet they continue to build homes. Oh, yes, the homes here can accommodate them, but yet the roads cannot. They continue to issue permits for building, and we are overbuilt, but they don't widen the roads, they don't give water and sewer to the residents that have been here 30, 40, 50 years. So therefore, I don't feel that's so good for the local economy. 4

I'm concerned also, because I have hearing problems, with the fact that our children that live in this neighborhood will be affected. You're saying go in your house, insulate, the triple-pane windows, insulate your attic. That means you're telling children to sit in front of the TV and play Nintendo when they should be out in the sunshine.

I work every waking hour at my home after doing my job outside in my barns and everything else, and I feel that this is terrible. Tidewater Builders Association and Tidewater Association of Realtors, I can't blame them for wanting this, but yet when they make their windfall from it, they can move. We can't.

Primary concerns are the noise and fuel, the crops and the grass. We have a dairy farm here where those cows are eating grass that's contaminated by fuel. They're drinking water in troughs that's contaminated by fuel. What's this going to do in the long range to the residents of the Fentress Airfield area? 5

We can also -- need to have the freedom to be able to enjoy our yards and our pastures and sports that we enjoy. I'm only one of thousands of horse owners in the Tidewater area. My business is close to Oceana. My home is in Fentress Airfield. I can feel them flying over the rafters of my house whenever they are doing the night qualifications. I too was denied the information by the realtor that I was in the flight pattern and that it would be like this.

LRH-3 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 PM. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

LRH-4 Thank you for your comments; no response required.

LRH-5 Please see response to LRH-1.

Helms (Cont.)

In conclusion -- I have timed it. I'm sorry for running over -- I feel like that this is not the best thing and I'm sorry that the Chesapeake residents have not come out in greater masses tonight to speak for where they have to live. I too feel like if they want to move these people here then they should pay to relocate us and give us more than fair market value after I have spent 17 years upgrading my property and have a good place for my horses so when the time comes I can retire and do the thing I love the most. 6

Thank you for listening and your consideration.

LRH-6 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Speaker: Mr. Harold L. Lehman
1443 Fentress Airfield Rd.
Chesapeake, VA

Good evening, Captain. This is not a negative statement that I'm going to make, neither pro or con. I have some concerns and I'm going to voice them tonight.

My name is Harold Lehman. My family and I reside on Fentress Airfield Road. In 1941 I was born where I live. I have been there all my life except five years during the Vietnam service. I'm proud to be an American and proud to be a Vietnam veteran. I see some of my friends here that are a lot older than I am, in their sixties and eighties.

My concerns are flight patterns. Fly where they are supposed to fly. I have a log at home where I have logged 136 calls to NAS Oceana in the last three years. They don't do any good. They fly where they want to fly. They do what they want to do. They hot dog, they do whatever they want to do.

1

Now, one lieutenant commander, command duty officer -- I'm sorry Mr. Allen ain't here because he's one of the persons I was going to talk about. He was the former commanding officer of Oceana. Once a CO and lieutenant commander told me one night, "we are going to fly as long and wherever we want to fly, so don't call us no more. Stop calling."

I have talked to Navy captains and fit wing and mat wing and Commander Allen from the CO of the Naval Air Station Oceana but to no avail. After all this failed, four of us neighbors got together one night and went over to the admiral's quarters at Oceana and knocked on the door at 11:30 at night. Trust me, that night the admiral made a difference. Trust me, but it only lasted about three weeks.

Now, I'm submitting to you this is what we are asking, and this is all I'm asking.

Put in writing your hours of operations and stick to them. Fly the patterns you say you're going to. And I'm asking no jet flights after midnight; no flights on Sunday.

HLL-1 NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare Range, may be reached at (757) 433-3158.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Lehman (cont.)

In closing, the point is, if we could not believe the Navy then, how can we believe them now?

Thank you for your time.

[THE HEARING OFFICER: Thank you, Mr. Lehman. I find it a bit ironic that I was just handed a note with a proposed point of contact for the flight patterns. With a little bit of trepidation after the last speaker, I'm going to put out the name, but again, this is a hearing where information is taken in, and I have been provided this, so for those of you who want a particular point of contact for flight patterns, I'm told it is Mr. Fred Pierson, P-I-E-R-S-O-N, and the number is 433-3158, and I do not know Mr. Pierson and I'm sure he will not be happy, but that is his number.

UNIDENTIFIED SPEAKER: Wrong number.

THE HEARING OFFICER: Wrong number? There is also a noise complaint hotline. That number is listed as 433-2162. So does that check with your records on that?]

NAS Oceana and NALF Fentress are open 24 hours a day. At NAS Oceana, pattern work and high-power ground engine maintenance run-ups will continue to be restricted to the hours before 11:00 P.M. At NALF Fentress, restrictions on pattern operations during normal Sunday church service hours will also continue.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Speaker: Mr. Mark Cary

I would like to make a comment.

My name is Mark Cary. I live about three blocks over and about four blocks down. We are transplants from Buffalo, New York, been down here about four years. We made a conscious decision to come live here in this community knowing that the air base was here. We've put up with a little bit of the noise.

I just want to recap what is going to happen in the next couple three years. Hopefully 180 pilots and their families are going to come here, and it's going to be something like 12 or 13,000 families that will move into our community. And what you're asking us to do is pretty much nothing other than put up with some sound. There's the possibility of a plane crash. Probably had more chance of being killed driving down here than getting into a plane crash. And as I say, I have got no ax to grind. I have never been in the military. My property value since we have been here has probably gone up 10 or $15,000. There is more people that are going to come into the community that want housing, so your property is probably going to go up.

So what you're asking us to do is put up with a little bit of sound. For that, you're going to put in hundreds and hundreds of millions of dollars into our community and it's not going to cost us anything. To me that's like getting the Olympics and it's not going to cost us anything. We need that economic impact into our area, and it all comes down to economics. We know that at the end of every month when we write out the bills. And what are we asking of you people?

We are asking you to protect us. We are asking you to have these pilots lay down their lives for us, and we are sitting here bitching and moaning about a little bit of noise.

I want to apologize for my neighbors for that. I think it's uncalled for, and I listen to the noise, and it doesn't bother me. I don't see where it's that bad of a trade-off for what we are going to get. We live in a Christian community. We are going to have like 13,000 families come in here.

Thank you for your comments; no response required.

Cary (cont.)

I think we ought to welcome them with open arms and open heart and welcome them into the good life that we have here. I think it's a little selfish on our part. I can understand the people who are living at the end of the runway and some of the people that were born down there, that is something that they can't, you know, they can't get away from, but we all made a decision to come live here. The airfield was there, you know. Shame on us if you're not happy with it, and yeah, maybe there is going to be some more sound, but, you know, we have got the greatest fighter pilots in the world. We ought to be proud that we are part of that, and that is just my comment.

Speaker: Mr. Tom Almberg
School House Crossing Civic League
1502 Bodine Ct.
Chesapeake, VA 23322

My name is Tom Almberg. I live in Chesapeake. I'm the Schoolhouse Crossing Civic League vice president, which is right behind the school, and as the last man said, we will welcome the pilots coming in if they are better pilots than the current ones because the pilots right now, I mean, they are supposed to be the best, but they can't seem to stay in -- I don't know how wide their flight zone is, but they can't stay in it, nor can they stay in the height that they are at -- supposed to be at. 1

Now, the noise at night will affect the kids around here. The noise during the day is going to affect the kids in school. They are not in school the whole time. Sometimes they are out on the playground. I mean, if the pilots would stay within their flight pattern, I don't think you would have as many complaints as you do now. That's all we are mainly asking, if they will stay in their flight path, then no one will have as much problem as they do. 2

SHCCL-1 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

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Almberg (Cont.)

3 As far as the real estate goes, I believe they will go down because we are now moving in some houses from a Noise Zone 2 to the Noise Zone 3, and according to some of my members in the community, they are going to leave the neighborhood for just such reason. With that comes back to supply and demand, and the supply is going to outgrow the demand because no one is going to want to live in one of the few communities where the noise zone is three in Chesapeake.

I believe this will reduce the prices in our homes and we would prefer to get compensated for that. That's all I would like to say.

SHCCL-2 In buildings without adequate sound attenuation, aircraft noise may impact the cognitive abilities of school-age children. Please see Sections 3.1.8 and 4.8 for a more detailed discussion of the impacts of noise on school-age children.

Outside noise cannot be mitigated. Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration.

SHCCL-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Speaker: Mrs. Carolyn Dittrick

Good evening, Your Honor. And I'm here from Virginia Beach. I was there last night and there were a couple of questions that came up that I just thought I would bring tonight and ask you again.

And maybe somebody could give me an answer. I'm Carolyn Dittrick and I'm a citizen and realtor from Virginia Beach who attended yesterday's meeting, and at that time it was mentioned that North Carolina was very concerned about having enough time to think through these issues and wanted an extension.

1 Can you tell me if there is going to be an extension given to people to look into the issues that they are concerned about, noise, et cetera, flying patterns?

[THE HEARING OFFICER: Well, let me ask the members of the panel. Has that issue been decided yet?

MR. SHEPARD: That issue has not been decided yet. That issue is still under review in Washington.]

Okay. How will we hear about that and when?

MR. SHEPARD: That I can't say right now.]

Will it be before the 18th that we would hear? Do you think so? Okay.

Now, I have another question that came up, and that was regarding the F/A-18 would be replaced even in the near term sometime with the E and F model and this could be even noisier than the F/A-18, which is 108 decibels at takeoff, 97 decibels in the touch and go system and 104 decibels in landing. There's nothing in the DEIS about the E and F models. Is there somewhere where we will know the answers to that before we have to proceed with what we are going to? I mean, will we know how soon these other models will be coming in and what their noise levels will be?

2

[THE HEARING OFFICER: And what I will do is just relay that to the panel and see if they do have the information available. Members of the panel, is that addressed in the Draft Environmental Impact Statement?

MR. CECCHINI: Yes, Your Honor, it is addressed in the cumulative impact section. There's a brief discussion on the E and F and we would be happy -- I'm sorry. I didn't catch your name.]

CD-1 The close of the public comment period on the Draft EIS was extended from November 18, 1997 to December 2, 1997 due to public request.

CD-2 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

Dittrick (Cont.)

Carolyn Dittrick.

[MR. CECCHINI: I would be happy to show you after the hearing.]

I certainly would appreciate that. I think that would pretty sufficiently -- I have one more question to ask, and that's in your chief of naval operations instruction, we were told that under land use, that residential use is strongly discouraged in the 75 and greater decibel areas, and it was noted that an evaluation should be conducted prior to approvals indicating need for the residential use of this particular area, and I'm sure this is very good construction, but how do you look at it with houses that are 30 years old and they are in these areas that are 75 and greater decibels? How will an evaluation occur, or will there be an evaluation by someone to determine whether flight should be going over these areas? 3

[THE HEARING OFFICER: Panel, is that addressed in any chapters of the Draft Environmental Impact Statement?]

It's in here. I have it here under table -- let me see. It says notes for Table 1, and Table 1 is for the -- let me see. It talks about noise zones, D N L levels and LDN and it's between 60 and 75 to 85, and what it says as notes for this table that they show here on the next page, it says residential use is discouraged in D N L 65-70 and strongly discouraged in DNL 70 to 75. The absence of viable alternative development options should be determined and an evaluation should be conducted prior to approvals, indicating that a demonstrated community need for the residential use would not be met if development were prohibited in these zones, and it goes further on to say in the notes table that land use is not recommended, but if a community decides use is necessary, hearing protection devices should be worn. Are we to gather from that if we are in a location that is of these high decibel levels that we really should look into hearing protection devices? Excuse me.

[THE HEARING OFFICER: Is that addressed in the DEIS?]

This is from the appendix.

[THE HEARING OFFICER: I understand. My question to the panel is, is there anything for extensive coverage of this question?

MR. CECCHINI: I don't believe so, Your Honor.

CD-3 The AICUZ land use compatibility guidelines indicate that residential development in high noise zones is incompatible and should be discouraged. The reference to hearing protection devices is included because, in high noise zone areas, some individual aircraft events may generate significant noise levels. Depending upon the receiver's location on the ground relative to the aircraft, some degree of hearing protection may be advisable. However, individual response to aircraft noise is subjective.

Dittrick (Cont.)

THE HEARING OFFICER: Ms. Dittrick, one of the purposes of this hearing is to identify where people believe there may be deficiencies or areas that have not been addressed, and as I noted earlier, this hearing is your most public weapon in which you can make your concerns known because by law the final Environmental Impact Statement, which has to be completed before there is a decision in this matter, must address all comments raised during these hearings. Again, whether it be an oral statement as Ms. Dittrick has right now or in writing, so if it's a concern of yours, I need you to make sure that you state your concerns specifically so that it can be addressed and you can identify it when the final report comes out.]

All right. So should I submit this with my page that I have here?

[THE HEARING OFFICER: I would do that.]

I will do that. Thank you very much.

Speaker: Ms. Pamela Wright

Good evening. My name is Pamela Wright. We moved here in June of '97 from Charleston, South Carolina. We were part of the relocation or the closure of the Charleston Naval Base down there. We stuck it out until the very end. We -- most of the people moved right soon after the base closed. We stayed the two years after

I have to say, that when we first heard that the base was closing, it was a fear factor that a lot of the politicians and the businesses put into the people that we weren't going to survive without the Navy.

Well, I'm here to tell you that Charleston did survive. They did very well without the Navy. They were on the upswing. My house sold in two weeks after we decided to move up to this area, even the areas directly around the base that were lower income homes, and they were very low income homes, were beginning to sell again. What we did get rid of was low-life areas that included prostitution, drugs, crime. And so those are the things that I'm not too encouraged about to bring more military into this area.

As far as the realtors notifying the people that they are in an area that is high noise, I know it's a law that they do that, but we weren't informed as late as September -- we just closed on our house in September -- until we got to the closing date, that we were in an area that was high noise. That was a little late to back out of the deal at that point. I totally identify with all these people that have been here for years that were sucked into this thing because the Navy decided they wanted their property, and most of the people that I think have spoken tonight that are in favor of this are only in favor of it because it's going to pocket -- it's going to pad their pockets.

Thank you for your comments; no response required.

Speaker: Ms. Kathi Shonerd

All right. With respect to the inclusion of additional F/A-18 operational aircraft to NAS Oceana, I wish to comment with absolute opposition.

In Chesapeake, Virginia, the safety, welfare and well-being of the populated Great Bridge area residents are extremely at risk, not to mention the two Butts Roads schools the planes will be flying over and practicing their touch and goes, along with other numerous schools that will suffer from the added noise. These practicing planes do not stay on pattern due to the lack of a TACAN antenna that was supposed to be put up. Fred Pierson said that the TACAN antenna was taken up by the Marines when they left and that the Navy couldn't afford to buy one. He said that. A few months after that he said that they did buy one and couldn't afford to put it up, they couldn't afford to erect it, so there it sits. The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress. 1

My question is: Is when the TACAN antenna was up, the planes were able to stay on pattern better instead of flying haphazardly all over Great Bridge, but without the TACAN antenna they are flying everywhere, out of zone, too low, and my question is, why doesn't the Navy have enough money to put the TACAN antenna up? To me it seems -- to me it seems that they should put it up in the welfare of the residents in the area, no matter what it cost. I mean, lives are at stake, stress levels. And so that my question, I guess, is the TACAN antenna going to be put up that the Navy purchased, but that Fred Pierson said they couldn't afford to put up?

[THE HEARING OFFICER: Has the TACAN antenna issue been addressed at all in the Draft Environmental Impact Statement?

MR. CECCHINI: Yes, Your Honor, it is discussed. It is a possibility for Fentress. I believe it is discussed.

THE HEARING OFFICER: Does it address whether it will be implemented, or is that just a planned option?

MR. CECCHINI: I don't think it lists a time frame, and I think we would be happy to take Ms. Shonerd's request for the final to get that question answered.

KS-1 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

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Shonerd (Cont.)

THE HEARING OFFICER: Ms. Shonerd, I cannot give you a decision at this hearing. I can give you the chance to raise that question, which I have done, and if you have any further questions you would like to raise, please do so.]

Okay. It just doesn't make sense that the TACAN antenna was purchased for thousands of dollars or whatever it cost and it just sits there, so that was my concern. And when the TACAN antenna was up, they did seem to turn where they are supposed to at Centerville Turnpike and Blue Ridge Road. That's our understanding where the pattern is supposed to turn, that the left wing is supposed to be down at that area and turning, but without -- when the TACAN antenna left they just started flying all over the place. They set off car alarms all over our neighborhood, and we are not even zoned for them to pattern over our area. Without the TACAN antenna they are flying too low, especially the E-2s and C-2s. Not necessarily the jets are flying too low over our neighborhood, but the E-2s and C-2s from NAS Norfolk set off car alarms all night long from flying too low and because they are flying out of zone. Therefore, it seems to us that they can't handle what they already have to handle here in this area with the E-2s, C-2s, F-14 Tomcats and the F-16s that we already have, they can't seem to handle that. So I don't see how they plan on handling the F/A-18 aircraft coming in from Cecil Field.

1

2

And if the Navy sincerely cares for their pilots and concerns for their expensive aircraft, then it should be relatively clear that in the best interest of safety and private governmental sectors, the only solid decision would be to send the FA-18 Hornets to Cherry Point, North Carolina, and the other half to Beaufort, South Carolina. They are much more eager for them to come to their facilities which are definitely much less populated, and it would end up being safer for all concerned because they can't handle, at least in the Great Bridge area, what they have now, and it's getting on -- it's affecting us stress wise all night long, and we are not even zoned for them.

3

KS-2 NAS Oceana and NALF Fentress are open 24 hours a day. Modeling of the airspace and flight operations by NASMOD shows sufficient capacity at NAS Oceana and NALF Fentress to handle 180 F/A-18 Hornets. The increased operations would not affect current noise abatement procedures. At NAS Oceana, pattern work and high-power ground engine maintenance run-ups will continue to be restricted to the hours before 11:00 P.M. At NALF Fentress, restrictions on pattern operations during normal Sunday church service hours will also continue.

KS-3 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of all ARSs.

Shonerd (Cont.)

4 When we built our house six years ago, they said that the only thing that we were zoned for were for the NAS E-2s and C-2s to fly to Fentress and to fly back to NAS Norfolk, not to pattern all night long, and I called one night -- this is an example of calling, and an airman -- I asked them if they could tighten up the pattern because they were flying again out of zone, and he said, yeah, I will tighten it up all right, ass tight. I said, not only are we getting harassed by the planes that are not supposed to be where they are, but we are getting harassment when we call in to ask them to tighten up the pattern from different airmen and different individuals.

KS-4 NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

[Ms. Shonerd submitted her prepared statement, which is partially represented in the verbatim transcript. The text of the statement and attachment are provided below.]

Mark & Kathi Shonerd
806 Boydon Lane
Chesapeake, VA 23322-8036

October 28, 1997

To whom this may concern,

With respect to the inclusion of additional F/A-18 operational aircraft to NAS Oceana, we wish to comment with absolute opposition.

In Chesapeake, Virginia, the safety, welfare, and well being of the populated Great Bridge area residents are extremely "at risk". Not to mention the two Butts Roads schools they will be flying over practicing their "touch and go's"; along with other numerous schools that will suffer from the added noise. The practicing planes do not stay on pattern due to the lack of a TAC-AN antenna. Consequently, they end up flying all over areas that are not zoned because they do not know where they are supposed to be.

In the past two years Fred Peircen of Oceana Environmental Control and Lt. O'Brien of NAS Norfolk have attested to numerous complaints from our growing and populated Great Bridge area. For a short period of time a TAC- AN antenna was put up at Centerville Turnpike and Blue Ridge Roads which helped the rookie pilots know where to turn when in a pattern. Unfortunately, according to Fred Peircen, the Marines took it with them when they left Fentress Airfield and the Navy couldn't afford to buy one for themselves. How, with the congested private sector, can they practice day after day and night ~~and night~~ and ~~not~~ afford not to buy and erect one. It recently came to our attention, again, by "good old Fred", that alas; the Navy had purchased the TAC AN antenna but could not afford to erect or put it up. So there it sits! Without a TAC-An antenna, the pilots of these planes end up flying haphazzardly out of the pattern and zones in which they are designated . For example, we are not zoned for them to pattern over us, but they do it anyway. Without the TAC-AN antenna, they end up flying all over Great Bridge, all night long and all day long. Not only do they fly out of zone, but they also fly too low, setting off car alarms. This continues to put thousands of innocent lives at risk, not to mention the stress it causes on a daily basis.

I could go on and on with solid, substantial, reasons as to why the F/A-18 jets should go where they are wanted, needed, and welcomed, but we are not given ample time. However, the recent crashes/accidents speak for themselves; that is to say the NAS Oceana's F-14 Tomcats, F/A-16s, the C-2s and E-2s, from NAS Norfolk more than congest the air space in the Fentress/Great Bridge area in that they cannot handle what they already have; let alone adding more "fuel to the fire", (no pun intended), by bringing in the F/A-18 jets from Cecil Field to the Oceana/Fentress area.

If the Navy sincerely cares for their pilots and are concerned for their expensive aircraft, then it should be relatively clear that in the best interest of safety for the private and governmental sectors the only solid decision would be to send the F/A-18 Hornets to Cherry Point, North Carolina and the other half to Beaufort South Carolina. They are much more eager for them to come to their facilities which are definitely less populated. It would end up being safer for all concerned.

Sincerely, from our hearts,

Kathi and Mark Shonerd

A-6-50

VIRGINIA BEACH

Low-altitude flights a hazard near Oceana

An item in the Aug. 13 Pilot noted that there would be increased flight operations at Oceana Naval Air Station for about two months while the runway at Fentress Field undergoes repairs. Actually, the movement of more aircraft to Oceana has been increasing the pace of operations there for some time.

The city of Virginia Beach is building a new school in the Hilltop area (replacing Linkhorn Park Elementary) for the purpose of moving the children out of the crash zones surrounding Oceana. For weeks, I have watched as Oceana aircraft made hundreds of passes at low altitude directly over the school under construction. Putting the new school at that location reflects very bad judgment by the city. It also shows that the Navy is oblivious to the hazard to our community when it conducts low-altitude operations over crowded communities.

Letters to Navy officials asking that they control and restrict this kind of flight around Oceana have been unanswered or contained only superficial rationalizations about how necessary this all is. I guess we'll have to wait for another tragedy before we can get their attention.

H. A. Stokely

Virginia Beach, Aug. 13, 1997

A-6-51

Speaker: Ms. Deborah Tereszkiewicz

My name is Deborah Tereszkiewicz. Do you need me to spell that? T-E-R-E-S-Z-K-I-E-W-I, C like Charles, Z like zebra. I live at 2200 Carolina Road. I have been there since 1982, and I really have no written statement, but the last person that spoke, it sort of moved me to come up here and speak.

1 I have been calling 433-2162 since 1982, and I have definitely seen a decrease in the concern when you call and speak to these people. At first they were courteous, they seemed to care, and I would say at least the last five years I have called they are nonchalant, they are very smart aleck and they ask you really silly questions. I think they are playing a game with you. Well, ma'am, what kind of plane was it? Well, I'm not in the Navy. It's loud and it's big. How high -- how low is it flying? Well, I don't know, but it almost hit my antenna and the pilot's eyes are blue.

2 You know, it's bad enough to have to put up with the constant noise and aggravation, and I also run a small boarding barn, I have horses, and hopefully when I retire I want to have a nice boarding facility and be able to support myself, and I can't imagine anybody wanting to come and board horses at my place with the constant air noise that we have been experiencing, not to mention what we may experience in the future.

DT-1 NAS Oceana takes seriously all noise complaints. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates his investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

DT-2 Thank you for your comment; no response required.

Speaker: Mr. Mark McCleery

Thank you. My name is Mark McCleery. M-c-C-l-e-e-r-y. I live in Chesapeake over in School House Crossing. I moved here three years ago knowing full well there was an airfield behind me. I don't feel it's right to complain about the noise. However -- if they're flying in their pattern. I think I'm really disappointed tonight that you couldn't answer the question who is accountable for the flight patterns over at Fentress, and I was just really disappointed about that. You did your committees, your research. We call in our concerns when they're out of their patterns, and nobody is accountable. Who is accountable over there when we call? Can you -- that's all I'd like to know, is who is accountable. You know, when we call, is it making a difference? I don't think so. I don't think that whoever is accountable is taking our concerns. I just want to know who is accountable.

1

[THE HEARING OFFICER: I do not know right now. I passed on the name that was given to me. I note that there were a number of people in the audience that dealt with that name, and there's certainly a varying degree of satisfaction with respect to the response. We've been able to vigorously highlight the response, or lack thereof, and that will be part of the record, but I personally am not able to give you the point of contact on that. But it will be highlighted in the record, so I thank you for your comments in that regard.]

Thank you.

MM-1 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

McCleery (cont.)

MM-1
(cont'd)

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Speaker: **Mr. Bryan Wheeler**
Fentress Rd.

Good evening. My name is Bryan Wheeler. I live on Fentress Road, and I guess really the whole thing here is most of the people here that are complaining are people like myself who live here, and quite frankly, the possibility of us not -- of us overcoming this is pretty slim, so I guess the question I might ask of you: How can you lessen the impact on the people that are here? Has anyone considered the fact that when you first used this as an airfield there weren't many people here? Now that there are people here and you want to add more planes, is it feasible, because of the speed of your planes, to move the airfield to another location, as opposed to leaving everybody exposed to the danger that you've got now? Has anyone addressed that? 1

[THE HEARING OFFICER: Has that option been addressed in the Draft Environmental Impact Statement?

MR. CECCHINI: No, sir.

THE HEARING OFFICER: You'll have the opportunity to have it addressed when the Final Environmental Impact Statement comes out, Mr. Wheeler.]

Thank you.

BW1-1 It is recognized that the populations of Virginia Beach and Chesapeake were lower when NAS Oceana was established. NAS Oceana has recently adopted mitigative procedures to help reduce noise impacts on the community and will continue to evaluate flight procedures to further reduce those impacts. (Please see Section 4.8 of the EIS).

The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

Speaker: **Mr. Johnny Urban**

Good evening, Judge. My name is Johnny Urban. I'm a resident back here in the School House Crossing. I just want to echo -- I know, Captain, you've heard quite a few comments with regard to the flying out of the zone and things like that, so if you took a vote, I think that one would win. I don't think the realtors would. And I think the people realistically know that we're probably resigned to accept this move in some form or fashion, whether it be 120 or 180, whatever the mix will be.

1 I come forward to present an idea as something that might be investigated. I think the idea for the training is to train efficient, effective pilots so they stay in their patterns when they go out to sea or wherever they may go. With that in mind, thinking about the Navy's position years ago with regard to the hazardous material problems they used to have, one of the measures they put in place was fines for spills, which enforced accountability for those hazardous material missteps. The question I have is: Is it feasible or should the board look into something on those same types of lines with regard to the placement of a TACAN and/or monitoring the levels that have been suggested they would be at from some type of a recording system and maybe set a level, and when that level is exceeded or those zones are exceeded, that the Navy has to pay a fine to that effect?

[THE HEARING OFFICER: I thank you for presenting that option. Again, that option will be addressed when the final report comes out.]

Thank you, sir.

JU1-1 Several environmental statutes allow fines and penalties to be assessed against federal agencies. In those cases, Congress has expressly provided for imposition of fines and penalties. There is no corresponding Congressional authority to assess fines against the Navy.

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All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

Speaker: Ms. Linda Ricks Helms (continued)
Running Walk Farm
325 Earhart St.
Chesapeake, VA

Captain, may I ask one more question?

I just wanted to -- one of the things that I didn't get to say -- and I tried to cover a lot of territory in a short time -- is that I understand in your impact statement, which I don't have a copy of, that they were supposed to rate what it did to the birds and the trees and so forth, but the ear of a horse, besides the human, is about 10 to 15 times as keen because they have very, very poor sight. Has anybody thought about the domestic animals, how this affects them besides the humans? I just wanted to know has that been addressed.

[THE HEARING OFFICER: Members of the panel, has that area of concern been addressed in the Draft Environmental Impact Statement?

MR. CECCHINI: No, that has not been specifically addressed in the draft. It will be addressed in the final.

THE HEARING OFFICER: So I would ask that you put out the specifics of what you would want addressed so that concerns can be acknowledged and spoken to.]

Well, my land, as many, many people in this room, is zoned agriculture, which means we're entitled to have livestock, and of course, as I stated to you before, I -- I do horses, but I have -- I have dogs, cats, goats and horses. And it hurts my ears, and I know that my horse can hear things 10 or 15 times quicker than I can when we're on a trail ride because she can't see. She depends on my eyes and I depend on her instincts. So I'm addressing the domestic animals that most all of us own some of, and particularly in my case I'm concerned about my horses. I know their hearing is acute.

I've also been on a trail ride at NAS Oceana when the jet was probably no more than 100 feet over top of my head and seen these horses fly out from underneath their riders, and I know that it hurt their ears. These horses -- most people that ride on these kind of rides, it's an 18-mile ride on the installation at Oceana. These horses are well accustomed to long rides and all kinds of things happening to them, but a plane is not the norm being that close to their head or ours and the community, having built up around this.

[Ms. Helms was given the opportunity to resume her comments after all speakers had completed their presentations.]

LRH-7 The effects of aircraft noise on domestic animals was studied by the U.S. Air Force *(U.S. Air Force Position Paper on Effects of Aircraft Overflights on Large Domestic Stock. HQ USAF/CEVP, dated October 3, 1994).* The U.S. Air Force concluded that high speed, low level overflights (i.e., overflights below 1,000 feet above ground level and faster than 250 knots) will not usually affect large domestic stock (cattle, horses, sheep, and goats). However, under certain circumstances large domestic stock could be affected by noise events, generally resulting in panic reactions. These circumstances would be rare because large animals acclimate quickly to aircraft noise. Panic reactions are most common in horses and least common in dairy cattle.

Helms (Cont.)

8 Also Fentress Airfield was designed for use during World War II. It wasn't designed for this time period, and you're comparing it to a report that is 20 years old. You should compare the population with what happened 20 years ago.

LRH-8 The EIS uses the 1990 population census data throughout the document for consistency in comparison between the existing environment and the environment under the proposed action, and between alternatives. The 1978 AICUZ has been recognized by the cities of Virginia Beach and Chesapeake in their comprehensive plans and local zoning ordinances. It is representative of NAS Oceana operations for purposes of long-range planning and is therefore used as a baseline for comparative analyses with each ARS.

Speaker: Mr. Jim Tincher (continued)
1716 Prospect Dr.
Chesapeake, VA 23322

Yes. Just one quick question in reference to a lot of questioning that Ms. Dittrick had in regard to the noise levels at 75 dB or greater and what the EPA is going to do to alleviate those pain thresholds, and the other thing, how is that going to be addressed for those areas that are being moved into that new higher zone that previously were not? Is that addressed? 5

[THE HEARING OFFICER: Members of the panel?

MR. CECCHINI: Your Honor, noise impacts of 75 or a greater than 75 decibel noise zone are talked about fairly extensively in Chapter 3 of the document DEIS and somewhat in Chapter 4 as well under the noise sections.

THE HEARING OFFICER: And have you had the opportunity to review that? It appears from the question you have --]

I have looked at that briefly, and I don't have the data up here with me to cite it, but I do recall the warnings that the EPA is stressing for those noise levels. And, again, the question is, how is that going to be addressed for those areas that are being forced into that dB zone that previously were not under the current flight patterns in the noise zones? 6

[THE HEARING OFFICER: What I'm going to ask you to do to follow up on it is there are copies of the DEIS available to the community.]

I have one.

[THE HEARING OFFICER: And make sure you grab a comment card before the hearing is over tonight and it can be turned in any time before November 18, so be specific in your question so that you can get a satisfactory answer.]

[Mr. Tincher was given the opportunity to resume his comments after all speakers had completed their presentations.]

JT-5 The EIS acknowledges that the projected realignment of the F/A-18 squadrons to NAS Oceana and NALF Fentress would increase aircraft operations and aircraft noise levels. However, although operations and the average daily noise levels would significantly increase, noise levels would not result in permanent threshold of hearing shifts. Although temporary threshold of hearing shifts are possible, individual noise levels would not exceed the threshold of pain (i.e., 120 dB).

JT-6 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Mr. Kevin Cosgrove
Hampton Roads Chamber of Commerce
Virginia Beach, VA

OCEANA PUBLIC HEARING
OCTOBER 28, 1997 - 7:30 P.M.
Butts Road Intermediate School
(approximately 3 minutes)

GOOD EVENING.

MY NAME IS KEVIN COSGROVE, AND I AM THE 1998 CHAIRMAN OF THE VIRGINIA BEACH DIVISION OF THE HAMPTON ROADS CHAMBER OF COMMERCE, A 3,000 MEMBER NON-PROFIT BUSINESS ORGANIZATION.

- **I AM HERE TONIGHT TO EXPRESS THE SUPPORT OF THE BUSINESS COMMUNITY FOR THE TRANSFER OF ALL 11 F/A-18 SQUADRONS FROM CECIL FIELD TO OCEANA NAVAL AIR STATION HERE IN VIRGINIA BEACH.**
- **FROM AN OPERATIONAL PERSPECTIVE, WE UNDERSTAND THAT OCEANA REPRESENTS THE VERY BEST CONFIGURATION FOR THE NAVY - ONE THAT NEARLY DUPLICATES OPERATIONAL CHARACTERISTICS THAT EXIST AT NAS CECIL FIELD.**

[Mr. Cosgrove submitted his prepared statement. He did not speak at the public hearing; therefore, the full text of his statement is provided below.]

Thank you for your comments; no response required.

Cosgrove (Cont.)

- **OCEANA AS A SINGLE LOCATION CONFIGURATION OFFERS WHAT WE REFER TO IN THE BUSINESS COMMUNITY AS A "COMPETITIVE ADVANTAGE", THAT IS TO SAY THAT VIRGINIA BEACH'S LOCATION CAN COMPETE EFFECTIVELY WITH OTHER REGIONS OF THE UNITED STATES.**

- **WE COMPETE WELL ON ALL LEVELS WHEN COMPARISONS ARE MADE THAT ANALYZE TRAINING, MAINTENANCE, LOGISTICAL SUPPORT AND QUALITY OF LIFE.**

- **AS A TAXPAYER AND A BUSINESSMAN, I AM ENCOURAGED BY THE DECISIONS OF BRAC AND I SUPPORT THE GOALS OF THE BRAC PROCESS. IN THIS REGARD, OCEANA CONTINUES TO OFFER A SIGNIFICANT "COMPETITIVE ADVANTAGE" IN TERMS OF MAXIMIZING THE USE OF EXISTING EXCESS INFRASTRUCTURE, MAXIMIZEING THE USE OF TRAINING AIR SPACE, MINIMIZING ONE TIME COST AND 30 YEAR LIFE CYCLE COSTS, AND LOWERING OVERALL OPERATIONAL COSTS.**

Cosgrove (Cont.)

- **THE ENVIRONMENTAL EFFECTS ASSOCIATED WITH THE RELOCATION OF ALL 11 SQUADRONS OF FA-18 AIRCRAFT TO OCEANA ARE ACCEPTABLE IN VIEW OF THE ESSENTIAL MISSIONS THAT ARE TIED TO OUR NATIONAL DEFENSE AND THE COMMUNITIES HISTORICAL ACCEPTANCE OF THESE MISSIONS. WE ARE PREPARED TO MAKE THE NECESSARY SACRIFICES TO SUPPORT THE MISSION OF THE NAVY HERE.**

- **THE BUSINESS COMMUNITY IN VIRGINIA BEACH IS EXCITED TO HAVE THE OPPORTUNITY TO WELCOME NEW SERVICE PERSONNEL INTO THE CITY AND WE ARE PREPARED TO WORK IN CONCERT WITH OUR ELECTED LEADERSHIP TO INSURE THAT QUALITY PUBLIC EDUCATION AND OTHER MUNICIPAL SERVICES ARE PROVIDED TO SUPPORT THE QUALITY OF LIFE FOR ALL THE NEW CITIZENS OF VIRGINIA BEACH.**

THANK YOU VERY MUCH FOR YOUR TIME AND ATTENTION TO THESE COMMENTS.

Mr. Jeffrey H. Gray
Hampton Roads Chamber of Commerce
Virginia Beach, VA

COMMENTS OF JEFFREY H. GRAY

Submitted for Public Hearing on October 28, 1997
Butts Road Intermediate School

- My name is Jeff Gray and I am a member of the Board of Directors of the Virginia Beach Division of the Hampton Roads Chamber of Commerce and a resident of Virginia Beach.
- I am submitting these comments tonight to express support for the relocation of F/A-18 aircraft and operational functions from Naval Air Station, Cecil Field Florida to Oceana Naval Air Station in Virginia Beach.
- From a business perspective, I am in full support of the 1995 BRAC goals to utilize existing excess capacity and to minimize the construction of additional infrastructure. These goals can best be accomplished in Virginia Beach utilizing the assets of Oceana.
- The overwhelming consideration that supports a single-site is proximity to the fleet squadrons. We offer this operational synergy in Virginia Beach and we are proud to be the host community for this essential national defense mission.
- The economy of our City and the Hampton Roads region are linked in a significant way to the Department of Defense expenditures. The addition of new personnel and the corresponding increase in military payroll, coupled with construction expenditures, will provide a needed boost to business development and fund essential municipal services in Virginia Beach.
- The use of Oceana ensures that taxpayer dollars are spent in the most efficient way possible. The Navy's analysis that studied capacity, infrastructure and operational readiness identified Oceana as the "first choice" among several alternatives.
- In the business world consolidations are an accepted way to increase efficiency and add to the "bottom line." The consolidation of all 11 F/A-18 fleet squadrons to Oceana will result in similar efficiencies in training, maintenance, logistics and personnel; thus protecting taxpayer investments and increasing operational efficiency.

A-6-63

[Mr. Gray submitted his prepared statement. He did not speak at the public hearing; therefore, the full text of his statement is provided below.]

Thank you for your comments; no response required.

Gray (Cont.)

- The limited environmental impacts on Virginia Beach are acceptable given the essential defense mission of the Navy in our region and the world. Our community has historically accepted impacts on land use, noise and traffic as reasonable and necessary trade offs to preserve our nation's security and to enhance our region's economy. We are willing to make these sacrifices.

- The business community of Virginia Beach and Hampton Roads supports the relocation of all F/A-18 aircraft from Cecil Field to Oceana and we stand ready to support efforts to provide a quality of life for the men and women who are moving here that is second to none.

Thank you very much for considering my comments this evening.

JEFFREY H. GRAY
ATTORNEY AT LAW

WILLCOX & SAVAGE, P.C.
ONE COLUMBUS CENTER, 10TH FLOOR
VIRGINIA BEACH, VA 23462
(757) 628-5516
FAX (757) 628-5566
E-MAIL jgray@wilsav.com

Mr. Ron Hallstrom
544 Margaret Dr.
Chesapeake, VA 23322

Comment:

Strongly oppose due to environmental impacts.

Response:

Thank you for your comment; no response required.

Mr. Archie W. Matthews
1668 Mt. Pleasant Rd.
Chesapeake, VA 23322

Comment:

Bring them on. Just try and keep most flights in flight zone. I am one (we are) family that was born and reared in this area. We respect our service people and would much rather see them than enemy planes. Some land owners would complain - but!! Did any of them turn down money for air rights?? I think not. Just bring our people here but think safety.

Response:

Thank you for your comments; no response required.

Ms. Patricia D. Kirby
2017 Mt. Pleasant Rd.
Chesapeake, VA 23322

Comment:

Planes from Fentress keep me up enough at nite. They need to go to N.C. where they want them. I fought to keep my house, I really don't want the jet to take it away or lose my peace and quiet I get in the country.

Response:

Thank you for your comments; no response required.

Mr. Robert E. Tye
632 Centerville Turnpike S.
Chesapeake, VA 23322

Comment:

I am concerned about the increased noise level of F18 over the present F14 jets as my home is on the fringe of the current flight pattern. Also, more flights mean more potential for crashes and loss of life. Moving 180 F18's to Virginia Beach, Oceana airfield might produce a positive economic impact in Virginia Beach, but since Fentress Airfield is a touch and go practice airfield for training pilots, Chesapeake will only get the additional noise, accident potential, and a negative impact on real estate values. **[RET-1]**

Response:

RET-1 Positive economic impacts of all ARSs on the Hampton Roads area, including the City of Chesapeake, are discussed in Sections 4 through 8 of the EIS. The increase in noise levels and reconfiguration of APZs under ARS 1 are discussed in Sections 4.8 and 4.2, respectively. As discussed in Section 4.2, property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

Mr. Michael L. Simmons
Gray Eagle Farm
4175 Elbow Rd.
Virginia Beach, VA 23456

Comment:

The Navy needs to base its aircraft and train its crews someplace. I would prefer it be here. People have encroached on Oceana and Fentress for years - If you don't like noise, don't buy/rent there - there are plenty of other houses available. When I see/hear an aircraft overhead I thank God it is one of ours.

Response:

Thank you for your comments; no response required.

Mr. Bruce Wright
524 Fairfield Dr.
Chesapeake, VA 23322

Comment:

The tidewater area already has too many military commands in this area. The traffic congestion is bad and getting worse. **[BW-1]** Send the jets to another area that needs the economic boost more than we do. We already deal with the noise of being woke up at midnight and later at night.

Response:

BW-1 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions, specific congested areas, and planned road improvements. Impacts on transportation under all ARSs are addressed in Sections 4 through 8 of the EIS. Section 4.7 states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

Mr. Donald Respess
1317 Murray Dr.
Chesapeake, VA 23322

Comment:

Don't want anymore planes flying over my house. We live in the flight pattern. The noise is bad enough now. Chesapeake citizens are gaining nothing from this except (A - LOT MORE NOISE!) If Virginia Beach wants the new addition, give it to them and do away with using Fentress Airfield. **[DR1-1]**

Response:

NALF Fentress is required to support FCLP training for squadrons based at NAS Oceana. Please see Section 2.2.6.1 of the EIS.

Ms. Doris N. Zook
2025 Mt. Pleasant Rd.
Chesapeake, VA 23322

Comment:

We have a home and business that is our life. The noise the jets make now keeps us awake at night making us close our windows. Please send the additional jets to an area that is less populated. I believe this area does not need more noise or more chances of having our house destroyed by a crash.

Response:

Thank you for your comments; no response required.

Mr. & Mrs. Gary Shepherd, Jr.
740 Forest Mills Rd.
Chesapeake, VA 23322

Comment:

We didn't pinch and save for 25 years to build a half million dollar house and have it destroyed by the planes flying low enough to crack the walls **[GS-1]**. We are very dissatisfied with the Navy's decision to bring 180 jets here!!

Response:

GS-1 Structural damage from overflight by existing or proposed aircraft is not expected. The Navy could be responsible for repair to your home if structural damage was caused by Navy aircraft overflights. A determination would need to be conducted through the Navy's claims process.

Mr. Johnny Urban
Schoolhouse Crossing Civic League
1524 Prospect Dr.
Chesapeake, VA 23322

Comment:

What studies or measures have been performed to estimate the impact on the closure of NADEP Norfolk, which NADEP JAX in turn inherited those capabilities, and the cost to support repair services that will have to be shipped from Jacksonville. **[JU-1]** The F18 NADEP will be left in Jacksonville while planes move here. This will be a long term cost to the Navy.

Response:

JU-1 The F/A-18 NADEP is located in North Island, California, not Jacksonville, Florida. Therefore, the F/A-18 realignment under any of the alternatives will not be impacted by the location of the F/A-18 NADEP.

Mr. Glenn Berkhahn
1520 Prospect Dr.
Chesapeake, VA 23322

Comment:

The present Fentress fly-zones are identical to the proposed Fentress fly-zones. Navy pilots practicing touch and go landings at Fentress do not adhere to the current fly-zones, flying well outside the zone and sometimes in full afterburner with their wings tucked back (F14). What is the Navy going to do to force the F18 pilots to adhere to the proposed Fentress plan if they can't force their pilots to adhere to the old plan? **[GB-1]** Do repeated phone calls to the Oceana hotline informing Oceana that the Fentress pilots are <u>again</u> "out of the pattern" never seem to yield satisfactory results? **[GB-2]** Why is the Oceana Naval Brass at Oceana never informed about the hotline calls so the Navy can take action to correct the actions of the Fentress pilots flying out of the pattern? **[GB-3]**

Response:

GB-1 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Under most conditions, the Field Carrier Landing Practice (FCLP) pattern is to the east of Prospect Drive. This road is located under NAS Oceana controlled airspace and NAS Oceana's approach to Runway 05 and under the Ground Control Approach

(GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress. Aircraft in the FCLP pattern would not have their wings "tucked back".

GB-2 NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

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GB-3 Please see response to GB-1 and GB-2.

Ms. Karen Russell
637 Margaret Dr.
Chesapeake, VA 23322

Comment:

I oppose the ARS1 Plan for the following reasons:
1. Noise: At times currently is more than my family can stand. The pilots fly so low that the pictures hit the walls due to the vibration. They fly at night and it will wake you and your children up from a sound sleep now. I can hardly imagine how it will be if this option is adopted. **[KR-1]**
2. Overcrowding: We (Chesapeake and Virginia Beach) cannot handle the influx of 4,200 - not to mention the children that they will be bringing into an already overcrowded school system. **[KR-2]** Streets will be almost impossible to drive down without hitting constant traffic jams. **[KR-3]**

For this area, which includes Virginia Beach, I believe the ARS5 option is the best. I feel that Chesapeake was left out of the discussions in the beginning and I'm glad that we have an opportunity to comment tonight as well as to our representatives in Washington and City Council.

Response:

KR-1 Noise impacts under ARS 1 are addressed in Section 4.8 of the EIS. Noise levels in the region would significantly increase under ARS 1 and the EIS discusses the mitigation measures that would be applicable to minimizing/preventing adverse noise impacts.

KR-2 Socioeconomic impacts under ARS 1 are addressed in Section 4.5 of the EIS. Virginia Beach would receive the majority of the new residents (74.2%), with Chesapeake receiving approximately 9.3% of the new residents. The EIS states, "*Given the current size of Virginia Beach and south Hampton Roads as a whole, these net increases in population would have only a minor effect on the demographic characteristics of the areas. The influx of new persons into Virginia Beach would create a 2% increase in the total population of the city over its current levels. ..... Other communities in south Hampton Roads would be even less affected by the proposed realignment under ARS 1.*" The aggressive capital expansion program planned by the Virginia Beach School District is expected to provide sufficient capacity to accommodate the increase in school-age children under ARS 1.

KR-3 Transportation impacts under ARS 1 are addressed in Section 4.7 of the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

Mr. Alan Curling
3118 Joseph Avenue
Chesapeake, VA 23324

Comment:

The residents of the areas surrounding NALF Fentress do not know that the accident potential zones have been updated and re-aligned. **[AC-1]** People who move into the area are not aware that the house they buy could be in this zone. The public is still being advised of these zones based on the 1978 map. Every resident of the areas surrounding these bases should be mailed a new map showing the updated accident zones.

Response:

AC-1 APZ's around NALF Fentress have not been officially updated. The APZ's depicted in the EIS are projected for each ARS and were developed to give the Navy's decision-maker information to allow for a comparative analysis of alternatives prior to making a final decision. Once a final decision is made on the number of F/A-18 aircraft that are to be relocated to NAS Oceana (Record of Decision), the Navy will update the APZ's as part of an Air Installations Compatible Use Zones (AICUZ) plan update. The results and recommendations of the AICUZ plan are not binding on the local community. The plan depicts noise zones and APZs and recommends appropriate land uses. The local municipality is responsible for incorporating the AICUZ into land use planning and zoning. The cities of Virginia Beach and Chesapeake both require property disclosure statements for potential buyers within a noise zone or APZ.

Mr. Christopher H. Falk
837 Beaver Dam Rd.
Chesapeake, VA 23322

Comment:

If the flight pattern differs from the F15 to the F18, will the purchasing of air rights be considered. **[CHF-1]**

Response:

CHF-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Ms. Judy Graham
1500 Periherson Ct.
Chesapeake, VA 23322

Comment:

I have lived in this area for the past 20 years. I knew the airfield was here when I moved here. I feel the Navy and Fentress were here long before me and hopefully it will continue. I realize the higher risk of noise and crash possibilities are there but the benefits far out weigh the obstacles. Thank you for allowing me to participate in this study.

Response:

Thank you for your comments; no response required.

Mr. Jeffrey Hall
1321 Murray Dr.
Chesapeake, VA 23322

Comment:

I would like to express my dissatisfaction with the Navy's plan to relocate 180 F18's to Oceana. This move will significantly impact the quality of life my family and I have worked so hard to enjoy. My major concerns are increased noise, aircraft accident potential, reduced property values, school overcrowding and increased utility bills. **[JH1-1]** If the Navy wants to pursue this I feel they should at least offer to buy the homes located in the crash zones. **[JH1-2]** You should consider a less populated area. The information provided indicates that the decision has already been made. **[JH1-3]** I feel you are just wasting my time!

Response:

JH1-1 The EIS discusses the impacts on noise, accident potential zones, housing, education, and utilities for all ARSs. Specifically, under ARS 1, these impacts are addressed in Sections 4.8, 4.4, 4.5.1, 4.5.2, and 4.6, respectively, of the EIS. Noise levels in the region would significantly increase under ARS 1 and the EIS discusses the mitigation measures that would minimize/prevent adverse noise impacts. APZ acreage also would increase under ARS 1; as indicated in the EIS, the Navy's *AICUZ Program Procedures and Guidelines for Department of the Navy Air Installations* will be implemented to minimize adverse impacts. Section 4.5.1 summarizes the housing supply and demand that is expected to occur under ARS 1 and concludes that the housing supply and market prices in Virginia Beach and Chesapeake are expected to be only very slightly affected. As noted in Section 4.5.2, the aggressive capital expansion program planned by the Virginia Beach School System is expected to provide sufficient capacity to accommodate the additional children, continuing an accommodation program that has been ongoing for the past several years.

JH1-2 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

JH1-3 Thank you for your comments; no response required.

Ms. Debbie Hall
1321 Murray Dr.
Chesapeake, VA 23322

Comment:

I disagree strongly with the Navy's plans to bring in the F18 into the Oceana-Fentress area. My husband and I have work extremely hard to be able to purchase our "dream home" in the Fentress area. I feel my children are in the best schools (Hickory). If future plans with these F18's go through, I feel my property value will decrease greatly. **[DH-1]** The noise level is already awful and I have great concern regarding accidents that could possibly happen near my home. **[DH-2]** Building new schools then bringing these F18's into our area is not giving parents a feeling of safety for their children. If this plan is approved and the Navy proceeds with the F18 operation, I feel the Navy should be held responsible to compensate homeowners if they feel the need to sell for full appraised value of their home. **[DH-3]** Is the Navy willing to do this?

Response:

DH-1 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

DH-2 Impacts on noise and APZs under each ARS are addressed in Sections 4 through 8 of the EIS. Noise levels in the region would significantly increase under ARS 1 and the EIS discusses the mitigation measures that would minimize/prevent adverse noise impacts. APZ acreage also would increase under ARS 1; as indicated in the EIS, the Navy's *AICUZ Program Procedures and Guidelines for Department of the Navy Air Installations* will be implemented to minimize adverse impacts.

DH-3 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Mr. Joe Marzitello
464 Curri Tuck Dr.
Chesapeake, VA 23322

Comment:

I say move all the aircraft here. The airfields were here before the people. When I moved here I knew that Fentress was near my house.

Response:

Thank you for your comments; no response required.

Ms. Laurel Thompson
Long Ridge Rd.
Chesapeake, VA

Comment:

Very concerned about the flying over my house and as it is now listed as a crash zone. The Navy in 1978 swore that it would never fly only east of Pocaty Rd. Now we have found that this is a lie. How many more lies are we going to be told.

Response:

Thank you for your comment; no response required.

Mr. Louis F. Knight
1117 Murray Dr.
Chesapeake, VA 23322

Comment:

Sometimes jets are quiet for a while. Then they fly for hours (or days) on end in the same pattern. It would help a great deal if the pattern and schedule were changed often. **[LFK-1]**

Response:

LFK-1 This situation is an unavoidable consequence of training requirements and the cyclical nature of aircrew deployment aboard carriers. Strict procedures govern the frequency and timeliness of practice landing operations. The Navy does everything within its capability to even out operations, but peaks in operational tempo are unavoidable because of aircraft carrier deployments.

Ms. Marianne Paynter
528 Margaret Dr.
Chesapeake, VA 23322

Comment:

We moved to a spacious rural area for privacy and retirement. We like the quiet environment but we do get a lot of noise from Fentress Airfield. We would not approve of further air traffic in our locality.

Response:

Thank you for your comments; no response required.

Mr. William W. Paynter
528 Margaret Dr.
Chesapeake, VA 23322

Comment:

We have enough air traffic as it is. An increase of more planes would only cause us to have to leave the area. Our air rights have not been sold but we still have intrusion of planes daily.

Response:

Thank you for your comments; no response required.

F. J. Driscott
2513 Longdale Ct.
Chesapeake, VA

Comment:

All blue and gold - bring them all - you needed to replace the A-6.

Response:

Thank you for your comment; no response required.

Ms. Jane Campbell
1505 Bodine Court
Chesapeake, VA 23322

Comment:

Exactly how does the DEIS address the needs of the community that these planes will be a detriment to? **[JC-1]**

Please consider (strongly) measures too provide some relief to these inconveniences that the Navy will be providing to our community.

1. Keep them in the pattern!

2. Set hours (reasonable) taking into consideration our quality of life. Not the convenience of the Navy pilots.

3. Do it before the planes arrive! **[JC-2]**

Response:

JC-1 The EIS discusses the potential impacts of the proposed realignment on the regional economy, community services and utilities, transportation systems, air and water quality, noise environment, and land use.

JC-2 Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

NAS Oceana and NALF Fentress are open 24 hours a day. The increased operations would not affect current noise abatement procedures. At NAS Oceana, pattern work and high-power ground engine maintenance run-ups will continue to be restricted to the hours before 11:00 P.M. At NALF Fentress, restrictions on pattern operations during normal Sunday church service hours will also continue.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Ms. Rebecca Darragh
1308 Murray Dr.
Chesapeake, VA 23322

Comment:

There are several factors that bother me about the planes going to Oceana/Fentress.

1. We live close to Fentress they fly over our house we knew this when we moved here but were told there was a 800 ft min height they had to sustain that is not the case we have constant planes flying at an altitude of no more than 300 feet. **[RD-1]** This is not acceptable we have children, dogs, and a horse. This constant buzzing the house, back etc. is a constant problem. My children have stood on our balcony and waved to the pilots and they have waved back. When you can see what the pilot looks like this is obviously not 800 feet.

2. The Navy considers 75 decibels or greater mandatory hearing protection. What are we as private citizens suppose to do to protect ourselves children and animals at this level of noise. **[RD-2]**

3. In your proposal you have no new areas incorporated that would be subjected to the 75 decibels or greater areas. What about the people who already live in these areas. What is the Navy going to do for us? **[RD-3]**

4. The fact that a lot of Fentress is rural is no fair to those of us who moved out here to get away from the city. I worry about the potential for an accident or crash now that we are in a crash zone 3. I have to worry for my family now that you are increasing the amount of training exercises at Fentress. **[RD-4]**

5. The added planes purpose the problem of jet fuel. If not flown at the proper height (which we no they do not) we can expect more people having to replace there roofs, the possibility of jet fuel in our pools, we already get jet fuel in our water troughs of our animals. **[RD-5]** Jet fuel has been proven to cause cancer!

6. The pilots at Fentress currently are on a free for all and we are tired of it. There is no monitoring system. They fly wherever and however high they feel like it. **[RD-6]** If you are out they buzz the barns garages and houses. What about the citizens of Chesapeake rights. This is a great concern to myself and all my neighbors.

Please take this into consideration and start looking out for the citizens of Chesapeake.

Response:
RD-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800

feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

RD-2 Please see Section 4.8 for a discussion of noise levels and impacts.

RD-3 The Navy will continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever practicable.

The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

RD-4 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of naval aviation.

RD-5 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

RD-6 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Mr. Gerald L. Miller
449 Maxwell St.
Chesapeake, VA 23322

Comment:

I was born in this neighborhood and have lived here most of my 47 years. The Navy "took" my family's farmland to create the Fentress Airfield. The Navy should consider themselves "guests" of the Fentress area and at least insure their jets are considerate of the noise pollution they inflict on our neighborhood. Hence, there should be a well established system of controls for the pilots who are "guests" of the neighborhood. **[GLM-1]** There should be a well-known system for neighbors to report low-flying jets out-of-routes. **[GLM-2]** Please insure this for our community. Please do not bring in additional jet noise.

Response:

GLM-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

GLM-2 NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

Mr. Andrew Ernest
1309 Pamlico Blvd.
Chesapeake, VA 23322

Comment:

I'll keep this short and sweet: No more planes, please! The ones we have are loud enough already.

Response:

Thank you for your comments; no response required.

Ms. Joyce Y. Bruce
437 Slate St.
Chesapeake, VA 23322

Comment:

I am opposed to F/A-18's being assigned to Oceana. The only obvious benefit is to the City of Va. Beach-economically. To the homeowners affected by the increased noise it will be a large NEGATIVE economic impact. Who will compensate these homeowners? **[JYB-1]** Their property values will decline. **[JYB-2]** Government backed loans will be harder (if not impossible) to obtain in some areas affected. **[JYB-3]** Chesapeake residents and homeowners will suffer the greatest negative impact.

My suggestion, to please VA. Beach & Chesapeake, is relocate Fentress facilities to a remote area of North Carolina & let V.B. have the F/A-18's. **[JYB-4]**

Response:

JYB-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

JYB-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JYB-3 Please see Section 4.2.2 for a discussion of the impact of the increase in noise zones and APZs on the availability of federally guaranteed mortgage loans.

JYB-4 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

Mr. Joseph D. Russell, Jr.
637 Margaret Dr.
Chesapeake, VA 23322

Comment:

My neighbors and I, who live in King James Colony, are concerned that currently, jets flying to, from, and around Fentress Airfield are poorly monitored & controlled now....they often go off-route and fly directly over this subdivision, which is NOT their flight plan. **[JDR-1]** The potential for increased numbers of jets and flights will likely far worsen this situation without greatly improved flight plan monitoring. **[JDR-2]** Of the Navy's options, #4 is found least objectionable.

Response:

JDR-1 King James Colony lies under NAS Oceana controlled airspace and within the Field Carrier Landing Practice (FCLP) pattern for Runway 23 at NALF Fentress. While the pattern was designed to lessen overflight of Kings James Colony, aircraft do not follow fixed lines in the sky. Aircraft patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Under most conditions, the FCLP pattern is to the west of the King James Colony. Aircraft spaced for safety reasons, interfacility between NAS Oceana and NALF Fentress, and/or utilizing the NAS Oceana Ground Control Approach (GCA) box pattern, may occasionally fly over the subdivision.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

JDR-2 Please see response to JDR-1.

Ms. Betty Jo Cantrell
Century 21 Accord Realty
1341 S. Military Hwy.
Chesapeake, VA 23320

Comment:
As a relocation director I get to hear the comments from the other side (Cecil Field). The residents of Virginia Beach and Chesapeake should be ashamed of the way they are responding to the movement of the F/A-18s. I have lived in Virginia Beach for 20 years. My husband is retired Navy. We came here in 1967 so he could re-enlist and have been here since then. We've raised our 3 sons and daughter in what we consider the "only place to be". Our eldest son is a Commander stationed at Mayport. We know what relocating is all about. I say bring ALL F/A-18s here and give a crying towel to those who want to whine.

Response:

Thank you for your comments; no response required.

Ms. Karen C. Kea
Century 21 - Accord Realty
1341 S. Military Hwy.
Chesapeake, VA 23320

Comment:

I support the realignment of F/A-18 aircraft to our area. We are fortunate to live in an area where there is a military presence - the increase/buildup of the military is great for our economy - it keeps our housing market strong and helps maintain/increase our housing values.

Response:

Thank you for your comments; no response required.

Mr. Thomas L. Van Petten
805 Montebello Cir.
Chesapeake, VA 23320

Comment:

I am in favor of putting all the F-18 aircraft at Oceana. This would be an economic boom for both Virginia Beach and Chesapeake. I believe the noise will not increase very much, if at all. The use of Fentress Field has always benefitted Chesapeake.

Response:

Thank you for your comments; no response required.

Mr. John M. Ryder
601 School House Rd
Chesapeake, VA 23322

Comment:

November 22, 1997
Comments on DEIS for Realignment of F/A-18 Aircraft
From John M. Ryder
601 School House Road
Chesapeake, VA 23322

I find it hard to believe that an extensive study and analysis was performed, because all the alternatives recommended had most or all of the 180 jets going to NAS Oceana. There was not one alternative that excluded Oceana.

One speaker asked if the study had considered relocating Fentress airfield. That seems like a reasonable alternative to be considered. It was not. I question the validity and comprehensiveness of a study that did not consider such a logical alternative. I suggest that the study be redone to include this consideration. It only takes one accident involving a school to kill hundreds of children and impact hundreds of families. **[JMR2-1]**

I was very shocked and disgusted that everyone who spoke in favor of the move to Oceana had a monetary interest. The Tidewater Builders Association and the Realtors Association were in favor of all jets going to Oceana. This will mean more homes to build and more homes to be sold. These are people who live in our community and they are putting their pocketbooks ahead of our quality of life. By the way, jet noise does affect a buyer's decision, contrary to the comment made by one of the realtors. When I purchased my home on School House road, I made several trips to the neighborhood when the jets were flying to determine if the noise level was acceptable. It was acceptable at that time 2 years ago. It would not be acceptable with this proposed relocation and I would have purchased a home somewhere else. **[JMR2-2]**

I was appalled at the lack of response to all the phone calls made to report flying too low and out of the flight zone, etc. No one is accountable. These pilots are supposed to be the best in the world, yet they can't stay in the flight zone or at the proper altitude. They must not care. **[JMR2-3]**

If these planes are relocated to Oceana and it does cause property values in the neighborhoods around Fentress airfield to decrease, I think the United States government should pay the previous market value to all homeowners who wish to move. Most of us have our life's earnings invested in our homes. **[JMR2-4]**

I suggest developing several alternatives that relocate these jets to facilities other than NAS Oceana. **[JMR2-5]**

The economy in Tidewater is fine. It does not need a boost. I do question whether our economy would indeed see a boost if this happens.

Sincerely,

John M. Ryder



Response:

JMR2-1 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

JMR2-2 Thank you for your comment; no response required.

JMR2-3 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

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NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

JMR2-4 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JMR2-5 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible,

reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of the ARSs.

Ms. Debra Tereszkiewicz
2200 Carolina Rd
Chesapeake, VA 23322

Comment:

I have lived in my home since 1982. I am opposed to having more (and larger) jets flying over my house and property. I cannot begin to tell you how many sleepless nights I've had - awakened by such loud noise - planes flying TOO LOW and OUT OF PATTERN **[DT1-1]** - they rattled my windows and sounded like they were going to land on my roof! I realize the pilots must train, but please keep them in their pattern (then they would not even be flying over my house), and please instruct those at Oceana who handle the complaints to be professional and courteous to those people who call. In the past couple of years when I have called phone #433-2162, I seem to get someone who does not care and is very smart mouthed. **[DT1-2]** I don't call for lack of nothing better to do, it is a valid complaint. There have also been occasions where I can't even go outside to enjoy my horses during the day (low flying screeching noisy planes spook the horses - could have been injured on 2 occasions so far). Also, why not eliminate flying hrs. - no planes after 10pm so we can get some sleep! **[DT1-3]** Instead of spending millions moving jets around to where people are living and trying to enjoy some kind of quality of life, why not spend the money to build training areas in the desert - fly over the desert where no one is living. Build living quarters for pilots and their families there so they can live with the noise 24 hrs. a day. **[DT1-4]**

Response:

DT1-1 The area surrounding NALF Fentress is located under NAS Oceana controlled airspace. In addition to Field Carrier Landing Practice (FCLP) operations conducted at NALF Fentress, other aircraft transit the area on approach to NAS Oceana's Runway 05 and utilize the Ground Control Approach (GCA) box pattern. Aircraft on approach or in the GCA box may be mistaken for those flying in the FCLP pattern at NALF Fentress.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent

TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

DT1-2 NAS Oceana takes all noise complaints seriously. Calls arriving on the Noise Abatement Hotline (757) 433-2162 are received by the assistant operations duty officer (AODO) who coordinates investigation of each incident with the control tower. All noise inquiries are forwarded to the community planning liaison officer (CPLO) for further investigation and follow-up calls. The CPLO then forwards all noise complaints to the air station commanding officer. Violations of noise abatement procedures are forwarded to squadron commanding officers for appropriate action.

All AODOs receive training in correct telephone procedures, and all telephone calls are recorded to ensure quality control. Mr. Fred Pierson, the CPLO for NAS Oceana, NALF Fentress, and Navy Dare County Range, may be reached at (757) 433-3158.

DT1-3 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

DT1-4 As discussed in Section 2, the proximity of the aircraft to both training areas and carriers is an important consideration in identifying acceptable basing locations.

B.1 Federal Agencies

Fax Cover Sheet

To: DAN CECCHINI, USN, ADWFEC

~~Attn:~~

Date: 10-24-97 No. Pages: ____ (excluding cover sheet)

From: MIKE BRYANT, REFUGE MANAGER

U.S. FISH & WILDLIFE SERVICE

Additional Information

I manage the refuge surrounding the bombing range. I read about the public meeting you had on Oct 23, 1997 at the NC Aquarium on Roanoke Island. I was unaware of the EA and the meeting.

My first concern is not being aware of the EA or the meeting.

Please send me a copy of the EA and give me time to respond.

1

Mailing Address: P. O. Box 1969 Manteo, NC 27954

Shipping Address: 708 N. Hwy 64 Manteo, NC 27954

USFWS-1 Mr. Bryant was sent a copy of the Draft EIS on October 28, 1997. In response to public concern that the October 23, 1997, public hearing in Manteo, North Carolina, was not well publicized, an additional public hearing was held in Manteo on November 17, 1997. Mr. Bryant attended the second public hearing. Notice of this hearing was published in the *Federal Register* on October 31, 1997, and in local newspapers. In response to public request, the close of the public comment period was extended to December 2, 1997.

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

November 13, 1997

ER-97/540

Mr. J. Daniel Cecchini
Atlantic Division,
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida to Other East Coast Installations, as requested.

General Comments

1 In discussing the potential impacts of the proposed realignment to habitat resources such as wetlands, fish and wildlife resources, or Federally-listed species, the Draft EIS only considers those resources that are actually contained on the each facility. Yet the discussions of the various alternatives indicate that significant impacts would likely occur beyond the boundaries of the installations. These impacts include traffic congestion, demand for housing, and accelerated economic development. It seems logical to assume that these off-installation impacts would also translate into more and improved roads, more housing projects and apartment complexes, and more business and commercial development. For this reason, the Navy should expand their consideration of impacts to natural resources such as wetlands, fish and wildlife resources, and Federally-listed species to include areas outside of the actual installations thereby including secondary impacts.

2 In a similar consideration for off-installation impacts to fish and wildlife resources, the Draft EIS indicates that the relocated aircraft would utilize established military training areas, including military training ranges, training routes, offshore warning areas, military operating areas and restricted areas. Changes in usage for these areas would be primarily to "operational tempo". What remains unclear from the Draft EIS discussions, however, is whether these operational tempo changes involve significant increases in the number of low altitude, "higher disturbance" flights over sensitive coastal habitat areas such as

USDOI-1 The proposed realignment of F/A-18 aircraft and associated personnel under all ARSs will impact existing traffic conditions, housing availability, and economic activity, as discussed in the EIS. Based on the large number of housing units in the cities of Virginia Beach and Chesapeake, the increase in demand for housing would not significantly impact the existing housing market. Planned roadway improvements would mitigate traffic impacts. These projects, which are not within the purview of the Navy, are intended to alleviate existing conditions. The Navy is unaware of any off-station projects currently under development or planned to support the realignment of F/A-18 aircraft and associated personnel. A comprehensive assessment of potential development sites for new housing or commercial or business establishments is beyond the scope of this EIS.

USDOI-2 Impacts to military training areas including military training routes, offshore warning areas, restricted areas, training ranges, and military operating areas resulting from all ARSs are discussed in the EIS.

In general, F/A-18 flight operations in offshore warning areas and military operating areas would involve high-altitude operations such as air-to-air combat training. No impacts to natural resources such as marine bird rookeries or other waterfowl habitats are anticipated.

marine bird rookeries or important water fowl habitats. While a discussion of these potential impacts may also be contained in the environmental documents covering individual training areas, the Draft EIS should at least reference these discussions and indicate whether the increasing number and frequency of low level flights could be anticipated to impact sensitive fish and wildlife habitats outside of the installation boundaries.

Specific Comments

ARS 2

This alternative would not adversely impact wetlands. In addition, there will be no directimpacts to federally protected species.

ARS 4

This alternative will adversely impact wetlands and associated fish and wildlife resources. The DEIS states that "construction of the parallel runway and relocated CALA Pad would result in the permanent loss of 85.36 acres of wetlands and the conversion of 4.76 acres of forested and shrub-scrub wetlands to emergent wetlands. An additional 9.30 acres of disturbed wetland would be lost in association with the three-module hangar/parking apron."

Executive Order 11990, Protection of Wetlands, states that "each agency shall provide leadership and shall take action to minimize the destruction, loss or degradation of wetlands." Therefore, we recommend that one of the less damaging alternatives be chosen.

3

However, if this alternative is chosen, we recommend that project plans be developed to avoid impacting wetland areas and reserve the right to review any required federal or state permits at the time of public notice issuance. Wetland impacts should be avoided and minimized to the maximum extent practicable, pursuant to mitigation sequencing [Clean Water Act Section 404 (b)(1) Guidelines]. Unavoidable adverse wetland impacts should be compensated for by way of wetland restoration, enhancement, preservation, or creation. Mitigation for the unavoidable wetland impacts should comply with the Corps of Engineers (Corps) Standard Operating Procedure. We discourage wetland and forest fragmentation and support the designation of protected wildlife corridors that include both uplands and wetlands.

Federally protected species would not be directly impacted by this alternative.

Realignment of F/A-18 aircraft will result in a slight increase in the number of "low-altitude" flights along military training routes; however, the increase is not expected to significantly affect fish and wildlife resources. As discussed in Section 4.2, the number of operations conducted on all primary military training routes would increase approximately 6% above existing 1997 operations. Under ARS 1, the number of operations would increase from 7,840 to 8,329, or less than two sorties per day over all training routes. No significant changes in noise levels would occur along these military training routes for any of the ARSs.

Projected operational increases, noise levels, and impacts on the training ranges and restricted areas are also discussed in Section 4.2 of the EIS. While the EIS did not quantify the number of low-level flights, the projected noise levels would increase by 2 dB or less; therefore, fish and wildlife resources in the vicinity of these areas are not likely to be adversely impacted by any of the ARSs. As discussed in Section 4.3.2 of the EIS, studies done on raptors, waterfowl, and other birds show that, while direct aircraft overflights may disturb a small percentage of birds, there is no definitive correlation between aircraft overflights and reproductive success.

USDOI-3 If ARS 4 is selected for the proposed action, the final design plans for new construction at MCAS Beaufort will be developed to minimize impacts to wetlands and other sensitive ecological areas to the maximum extent compatible with operational requirements. Wetland acreage that will be lost will be compensated through wetland restoration, enhancement, preservation, or creation, as discussed in Section 7.1.11.3 of the EIS. The wetland mitigation plan, including compensation for lost wetlands, will be developed in consultation with the U.S. Army Corps of Engineers (USACE) and appropriate state agencies through the Section 404 permit process.

ARS5

4 We commend the Navy for identifying potential impacts to Federally-listed species associated with proposed construction activities at MCAS Cherry Point (under Alternative ARS 5). We support the Navy's initiation of a comprehensive survey to identify the presence of Federally-listed species at MCAS Cherry Point and view it to be a necessary step to assess potential impacts, under requirements of both NEPA and ESA.

Since the Navy has identified wetlands at the MCAS Cherry Point facility which could potentially be impacted by construction activities under Alternative ARS-5, we support their stated intention to identify suitable mitigation should this alternative be selected.

Thank you for the opportunity to review and comment on this draft EIS. If you have questions regarding these comments, you may call me at 404/331-4524, for FAX me at 404/331-1736.

Sincerely,

James H. Lee
Regional Environmental Officer

CC: OEPC, WASO
FWS-ES, Atl.,BBell

USDOI-4 Section 8.1.12.3 has been updated with new information. The American alligator is the only federally-listed threatened and/or endangered species that could potentially be impacted by construction activities under ARS 5. If ARS 5 is selected for implementation, the Navy will initiate consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
9721 Executive Center Drive N.
St. Petersburg, Florida 33702

October 31, 1997

Mr. Dan Cecchini
Code 2032DC
Department of the Navy, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Dear Mr. Cecchini:

The National Marine Fisheries Service has reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Construction Projects Associated with the Realignment of F/A-18 Aircraft to Naval Air Station (NAS) Oceana as a result of the 1995 Base Closure and Realignment Act (VDHR File #94-1184-F). The DEIS considers five alternatives for realignment of 11 F/A-18 fleet squadrons (132 aircraft) and the fleet replacement squadron (48 aircraft) from NAS Cecil Field, Florida, to NAS Oceana, Virginia; Marine Corps Air Station (MCAS) Cherry Point, North Carolina; and MCAS, Beaufort, South Carolina.

Fishery resources for which we are responsible and potential project impacts on these resources in the vicinity of the MCAS Cherry Point, North Carolina, and MCAS Beaufort, South Carolina, are adequately addressed in the DEIS. We therefore have no comments.

Sincerely,

Andreas Mager, Jr.
Assistant Regional Administrator
Habitat Conservation Division

Thank you for your comment; no response required.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
RED WOLF RECOVERY
ALLIGATOR RIVER NATIONAL WILDLIFE REFUGE
P.O. BOX 1969
MANTEO, NORTH CAROLINA 27954

December 1, 1997

Commander, Atlantic Division, Naval Facilities Engineering Command
Attention: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini,

1 The proposed preferred alternative (ARS 1) in the Draft Environmental Impact Statement to realign aircraft and operational functions from Naval Air Station Cecil Field, Florida to NAS Oceana will severely impact the ability of the U.S. Fish and Wildlife Service (Service) to fulfill its mandate under the Endangered Species Act to restore the red wolf to northeastern North Carolina.

The Code of Federal Regulations (50 CFR 17.84 (c)(10)) mandates that the Service monitor the red wolves via radio telemetry. Currently, the only way the Service can monitor the wolves is via fixed wing aircraft flights above and below 500'. The preferred alternative action will prohibit the Service from conducting such flights within most of the current range of the NE North Carolina red wolf population.

2 The current effort to restore red wolves to northeastern North Carolina has been very successful. This success has been due, in part, to the efforts of the Service to conduct red wolf restoration in conjunction with existing land uses (trapping, hunting, Navy bombing runs, etc.). In light of the proposed action, if the Service is to continue this multiple use approach to wolf restoration in eastern North Carolina and meet its federal mandate, alternate monitoring methods will need to be employed. If the preferred alternative is chosen, the Department of the Navy should mitigate its effect on the Service's ability to fulfill its federally mandated obligations by providing funds to employ alternate monitoring techniques such as (but not limited to) satellite radio tracking. Equipment and satellite time to monitor the red wolf population in NE North Carolina at the current level of intensity will cost approximately $100,000 per year. Manpower to trap and re-collar wolves is not included in this cost.

Sincerely,

B. T. Kelly

Brian T. Kelly
Wildlife Biologist/Field Projects Coordinator
919-473-1131 ext 21
brian_t_kelly@mail.fws.gov

cc: Tom Augspurger, ES Raleigh, NC
Mike Bryant, ARNWR, Manteo, NC
V. Gary Henry, ES Asheville, NC

USFWS1-1 Based on the analysis in the EIS and Appendix C, minimal impacts to USFWS aircraft dependent management activities are anticipated at the Alligator River Wildlife Refuge. Please see response to USFWS1-2.

USFWS1-2 Based on an analysis of impacts in the EIS and Appendix C, the Navy has determined that no mitigation is required. The largest projected increase at the Dare County Range would be for ARS 1, in which all F/A-18 aircraft would be transferred to NAS Oceana. ARS 1 would only result in approximately five sorties per day (on the average) over existing 1997 operations. In addition, even though the number of operations will increase from 16% to 28% for the Navy portion of the Dare County Range (depending on the alternative), the actual time that the range is considered "active" or "hot" would increase very little over existing conditions. The percent utilization of the Navy Dare County Range would increase from 57% in 1997 to 67% in 1999. Consistent with current procedures, citizens and state and federal officials will be allowed access to airspace over and adjacent to the Dare County Range whenever the range is declared "cold." Upon request, the range may be declared "cold" when not being scheduled by the military. Appendix C of the EIS includes the Dare County utilization table and a detailed discussion of potential impacts to the Dare County Region.

The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

United States Department of the Interior

BACK BAY NATIONAL WILDLIFE REFUGE
PLUM TREE ISLAND NATIONAL WILDLIFE REFUGE
4005 Sandpiper Road
Virginia Beach, VA 23456-4325

December 1, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini, (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini,

The staff of the Back Bay National Wildlife Refuge (Refuge) reviewed the DRAFT EIS (DEIS) EVALUATING THE REALIGNMENT OF ATLANTIC FLEET F/A-18 FLEET AND OPERATIONAL FUNCTIONS FROM NAVAL AIR STATION (NAS) CECIL FIELD, FLORIDA, TO OTHER EAST COAST INSTALLATIONS for its impacts on the wildlife resources utilizing the Refuge and have identified several areas of concern. Please note that these comments only reflect input from the Refuge, and do not preclude further comments by other Divisions of the U.S. Fish and Wildlife Service.

1 All the Alternative Realignment Scenarios will increase flights into and out of NAS Oceana VA, and require altering flight patterns, Accident Potential Zones and Noise Zones. Our primary concern is the current, and expected increase, in overflights of Refuge airspace, with their resulting noise impacts and disturbance factor to migratory waterbirds, particularly during the winter when wildlife use of Refuge impoundments is greatest. We request that all aircraft passing through Refuge airspace observe the Federal Aviation Administration's (FAA) minimum ceiling restriction of 1,500 feet above ground level over national wildlife refuges, along with other applicable FAA regulations.

Other concerns include:

2 **Helicopter use** -- Currently an occasional military helicopter overflies the Refuge beachfront well below the FAA 1,500 foot minimum ceiling. This usually occurs during the summer, but also during other times of the year. Such flights always flush up the flocks of snow geese and other waterfowl using the Refuge since the birds are very sensitive to helicopter blade and small aircraft engine noises. These unnecessary flights cause the birds to expend critical energy reserves needed for survival, migration, breeding, etc.

3 **Fuel Jettisoning** -- This prelanding practice is not permitted over the Refuge, or in the vicinity of Refuge boundaries. This prohibition should continue to be strictly monitored and enforced.

4 **Bald Eagles** -- The Refuge supports small numbers of bald eagles during the spring and fall

Dec-02-97 16:41 Back Bay NWR 7577216141 P.01

BBNWR-1 Although the operational tempo on existing flight tracks will increase, flight tracks/patterns at NAS Oceana will not change as a result of the proposed action. Fish and wildlife resources in the vicinity of Back Bay National Wildlife Refuge would not be impacted under any of the ARSs. In Advisory Circular 91-36C, the FAA recommends that aircraft avoid flying over national parks, wildlife refuges, national seashores, and wilderness areas at altitudes lower than 2,000 feet. The Navy has a self-imposed restriction of 3,000 feet over these areas except when operating in Special Use Airspace or on published military training routes. All aircraft stationed at NAS Oceana will adhere to FAA minimum altitude recommendations and Navy restrictions.

BBNWR-2 The issue of helicopter noise is unrelated to the proposed action and was not evaluated in the EIS. Please contact NAS Oceana or NAS Norfolk directly to discuss your concerns about low-level helicopter overflights of the refuge.

BBNWR-3 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, unless in an emergency situation. Above 6,000 feet, the fuel has enough time to completely vaporize and dissipate and thus has a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental

migrations, together with a pair of nesting bald eagles in the North Bay Marshes vicinity, south of Sandbridge Road and east of Hell Point Creek. This threatened species has produced six eaglets during the past three years. Our hope is that these offspring will produce a second nest this year elsewhere on the Refuge. Excessive disturbances could affect the success of the current nesting pair, and dissuade other eagles from utilizing the Refuge.

A map is included as locational information, and to help in understanding the extent of Back Bay National Wildlife Refuge's boundaries and airspace. Our biological and management staff will be pleased to discuss this issue with you, and provide the support and information needed to assist you in reaching the best possible solution. Thank you for the opportunity to comment on the Draft EIS.

Sincerely,

Paul D. Caldwell

Paul D. Caldwell
Deputy Refuge Manager

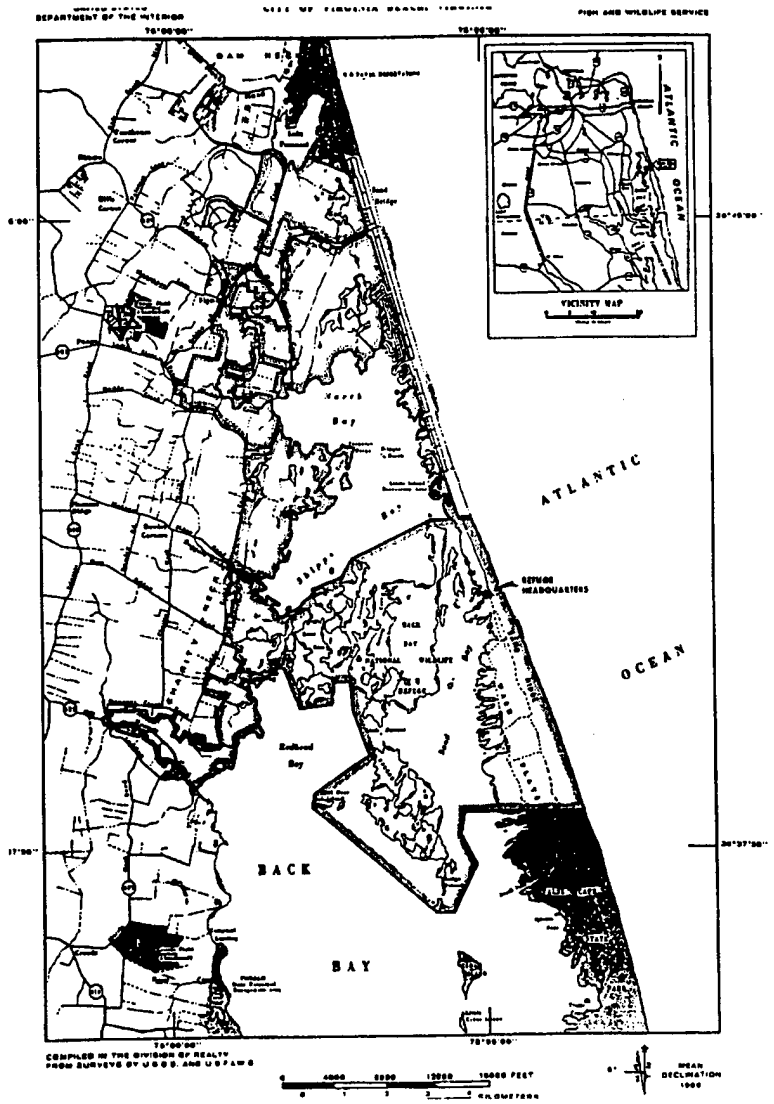
Attachment

4

impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

BBNWR-4 The projected increase in operations would not significantly affect the nesting bald eagles at the Back Bay National Wildlife Refuge. Please see response to BBNWR-1.

Dec-02-97 16:41 Back Bay NWR 7577216141 P.02


ATLANTIC
OCEAN
BACK
BAY
VICINITY MAP

U.S. Department of Housing and Urban Development

Virginia State Office
Office of the State Coordinator
The 3600 Centre
3600 W. Broad Street, Suite 378
Richmond, VA 23230-4920

DEC - 2 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attention: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

We have completed our review of the Draft Environmental Impact Statement (DEIS) for Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil, Florida to other East Coast Installations. In general, this document appears to be comprehensive and thorough in its consideration of environmental impacts.

The Department of Housing and Urban Development's regulations at 24 CFR Part 51 include standards and criteria by which all of our proposed actions are reviewed with respect to Noise, Accident Potential and Runway Clear Zones. This may result in a limitation or prohibition of financial assistance or project approval. Our actions must be compatible with the recommendations in the current AICUZ plan for the airfield.

We have reviewed from your DEIS, each of the five alternative realignment scenarios (ARS) with respect to noise, and note that each reflects increases in land area affected by the 65-75 Db contours and the 75-greater Db contours. We note too, the respective changes to the Runway Clear Zones and Accident Potential Zones. Whichever ARS is finally selected, the revised noise contours, Accident Potential Zones and Runway Clear Zones associated with that ARS, will have a definite effect on our consideration of project proposals in the vicinity of NAS Oceana or NALF Fentress.

Thank you for the opportunity to comment. We look forward to continued communications with your agency, and to receiving the Final EIS when it becomes available. Should you have any questions or wish to call, I may be reached at 804-278-4500, Ext.#3212, FAX at 804-278-4603 or e-mail:WILLIAM_STOKEN@HUD.GOV.

Very sincerely yours,

William S. Stoken, Jr.,
Environmental Officer

http://www.hud.gov/local/ric/ric_ofcs.html

1

USHUD-1 The effect of an increase in the AICUZ noise zones and accident potential zones (APZs) on the availability of federally guaranteed mortgage loans is discussed in Section 4.4.2 of the EIS.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

DEC 0 2 1997

Mr. Dan Cecchini
Code 2032 DC
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

Re: Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida, to Other East Coast Installations

Dear Mr. Cecchini:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. EPA has assigned this DEIS a rating of EC-2 (Environmental Concerns/ Insufficient Information) based on the following comments developed by Region III and Region IV. A copy of EPA's ranking system is enclosed for your information.

Of primary concern are the noise, transportation, air and water quality, environmental contamination, and terrestrial environment impacts associated with the realignment of F/A-18 fleet squadrons and the F/A-18 Fleet Replacement Squadron (FRS) aircraft and operational functions from Cecil Field, FL to each of the three facilities: NAS Oceana, VA; MCAS Beaufort, SC; and MCAS Cherry Point, NC. "The F/A-18 fleet squadrons and FRS from NAS Cecil Field total 180 aircraft (11 squadrons of 12 aircraft each [132 total aircraft] and a FRS of 48 aircraft), and are supported by 4,200 military and civilian personnel." The alternatives considered were to site all F/A-18 fleet and FRS aircraft at one installation (NAS Oceana) to replicate, to the greatest extent practicable, the operational and logistical characteristics currently experienced at NAS Cecil Field, or to split the Atlantic Fleet F/A-18 fleet squadrons and FRS assets among more than two locations.

As outlined in Table 2.5-1 of the Comparison of Alternative Realignment Scenarios (ARS), a common denominator to each of the five alternatives is that NAS Oceana would be a receiving installation in each scenario. When making a comparison of the ARSs, two facts were derived. First, NAS Oceana will have the greatest increase in airfield operations under each alternative. Second, the degree of impact to NAS Oceana is not significantly different among alternatives. As stated in Table 2.5-1, the greatest increase in the number of operations at NAS Oceana is expected under ARS 1, with a 118% increase at NAS Oceana and 51% increase at NALF Fentress. This figure gradually decreases within the ARSs to the least increase under ARS

DEC-03-1997 10:21 EPA REG 3 EAPD 215 566 2783 P.02

4 in which NAS Oceana would experience a 93% increase and 39% increase in operations at NALF Fentress. It is obvious that NAS Oceana will experience a significant increase in airfield operations regardless of the alternative selected. Thus, the following comments focus heavily on NAS Oceana.

NOISE

- EPA is concerned with the substantial increase in noise impacts to NAS Oceana and its neighboring communities. The Department of Defense is exempt from any standards implemented by the Federal Aviation Association. Therefore, all that is expected of the Navy is to ensure that they fully disclose the noise impacts which would result from the increased operations proposed at NAS Oceana. To the best of our knowledge, the Navy fulfilled its obligation. However, the following comments should be considered.

- As listed on page 4.8-11, NAS Oceana (in 1995) adopted mitigation procedures to help reduce noise impacts. In addition, specific mitigation measures were listed that would be evaluated if ARS 1 is selected for implementation. One measure is to conduct engineering evaluations of existing and proposed schools with 70 Leq or greater noise levels to determine if sound attenuation is required. "The desired goal for indoor classrooms is 45 dB, assuming that closed windows and air conditioning units provide 25 dB attenuation."

1

- Three points should be noted with regards to the above mentioned mitigation measure. First, as noted on pages 6.1-29 and 8.1-30, the Navy "...would be willing, if requested, to work with local officials to conduct detailed engineering evaluations at those schools of particular concern". However, "...the Navy does not have the authority to add sound attenuation to schools...". Thus, the responsibility of reducing noise impacts falls on the local school authorities. The DEIS did not discuss the efforts of the local school authorities to address noise issues. In fact, it should be noted that there were no local school authorities listed in Section 16 of the Distribution List.

2

- Second, despite the potential mitigation of installing air conditioning units in the schools so that windows can be closed to help attenuate noise, noise levels could still be disruptive to the learning process. It is important to emphasize that there are seasons where no air conditioning would be needed (depending on the school, windows may ordinarily be left open during those seasons), and some school classroom and recreational activities may be conducted out-of-doors. These activities would still be impacted by the intrusive overflight noise levels that would interrupt speech and/or be otherwise disruptive and annoying. Page 3.1-134 further stresses this point in that "Although many factors could contribute to learning deficits in school-age children (e.g., socioeconomic level, home environment, etc.), the growing body of evidence suggests that chronic exposure to high aircraft noise levels can impair learning." Page 3.1-132 states that "Single-event noise levels above 65 dB can result in speech interference." Thus, closed windows and the installation of air conditioning units, is not inclusive of impacts that occur within a school yard.

DEC-03-1997 10:21 EPA REG 3 EAPD 215 566 2783 P.03

USEPA-1 The Navy recognizes that the costs to local school authorities of noise mitigation is a significant impact. Because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy cannot comment on specific mitigation measures and associated costs. The City of Virginia Beach has requested that the Navy work with local officials in their efforts to conduct detailed engineering evaluations at those schools of particular concern.

At the request of the Mayor of the City of Virginia Beach, the Navy has provided noise impact information to facilitate local planning for both existing and planned educational facilities. Per a telephone conversation with Mr. Robert Mathias, Assistant City Manager of Virginia Beach, on December 23, 1997, the city is in the process of evaluating sound attenuation options for existing schools and ensuring that new schools are constructed in accordance with sound attenuation recommendations. The Community Planning Liaison Officer (CPLO) at NAS Oceana confirmed that Virginia Beach and Chesapeake school officials received the Draft EIS within one week of its release to the public. Local school authorities have been added to the distribution list and will receive a copy of the Final EIS.

USEPA-2 Installation of HVAC systems will significantly reduce noise levels in the classroom. However, outside noise levels cannot be attenuated and speech interference during aircraft events is possible.

USEPA-3 Mitigation measures developed by NAS Oceana are site specific. The NAS Oceana CPLO has shared them with MCAS Beaufort and MCAS Cherry Point CPLOs. Implementation of any or all of these mitigation measures at any installation is at the discretion of the Commanding Officer at that installation.

USEPA-4 Local governments have enacted zoning ordinances to minimize incompatible development and incorporate sound attenuation measures. Please see Sections 3.1.4, 3.2.4, and 3.3.4 for a discussion of local zoning ordinances in the vicinities of NAS Oceana, MCAS Beaufort, and MCAS Cherry Point. Information on local real estate disclosure requirements have been added to these sections of the EIS.

3 - Third, similar mitigation procedures developed by NAS Oceana (listed on page 4.8-11) should be adopted by MCAS Beaufort and MCAS Cherry Point. The mitigation measures on pages 6.1-29 and 7.1-30 are listed as options (i.e., not commitments) and are non-specific (e.g., "flight tracks" as opposed to specific tracks that would avoid sensitive receptors). Pages 6.1-32 and 7.1-30 state that "Specific mitigation options would be evaluated if this alternative is selected for implementation." The EIS should discuss any similar mitigative measures for Beaufort and Cherry Point sites since the level, perceived effectiveness, and cost of mitigation could influence the selection process.

4 - To further the discussion of noise, it is stated on page 3.1-76 "To protect the operational capability of military airfields, the DoD works with local communities to promote future land use development in the vicinity of military airfields." Again, it is important to emphasize that the Navy does not have the authority to restrict land use requirements. Rather, the responsibility falls on the local governments. The DEIS did not discuss the efforts of local governments to avoid or limit the establishment of residential communities within the vicinity of air stations or the existence of building codes. If there are requirements for zoning and building codes, it should be discussed within the EIS. Also, if there are noise disclosure requirements that apply to real estate transactions, it should be discussed in the EIS.

5 - EPA suggests the addition of another mitigation procedure. The Navy should make affected communities aware of night time and weekend operations as well as the need for the practice flights at these times. Knowledge of these operations enables the community to expect the activity as opposed to startling them.

6 - As noted on Tables 4.8-1, 5.1-6, 6.1-6, 7.1-6 and 8.1-6, footnote "a" should be clarified and the reason for the difference should be more clearly explained.

TRANSPORTATION

7 - EPA is concerned with the potential traffic congestion associated with the addition of approximately 7,000 new trips generated by NAS Oceana under ARS 1 as indicated in Table 2.5-1. The Average Annual Daily Traffic analysis does not provide a clear picture of the existing or future conditions of the transportation facilities surrounding NAS Oceana during peak travel times (i.e., 6 am to 9 am and 4 pm to 7 pm). We strongly suggest that a peak hour traffic analysis, under existing and future conditions, be conducted for the transportation facilities immediately surrounding the NAS under all alternatives. Information on the Level of Service, volume to capacity ratio, and key turning movements should be provided to clarify the effects of the additional trips generated by ARS 1.

- Table 3.1-33 lists the proposed improvements for roadways in the vicinity of NAS Oceana. There should be evidence that the improvements conform to a Transportation Plan and Transportation Improvement Program. In addition, information should be provided on the status

DEC-03-1997 10:22 EPA REG 3 EAPD 215 566 2783 P.04

USEPA-5 NAS Oceana and NALF Fentress operate 24 hours a day. Notice of unusual operations (such as early morning hour Field Carrier Landing Practice or late night deployments) is provided to the media so that citizens surrounding NAS Oceana and NALF Fentress may be informed. NAS Oceana also has an outreach program to brief civic organizations, service clubs, realtors, and other interested parties on the air station flight mission. The Commanding Officer at NAS Oceana has established a Community Leaders Forum to meet quarterly and discuss issues of mutual concern.

USEPA-6 The footnote has been removed from the tables. The tables have been reformatted to make them easier to understand.

USEPA-7 Information on the establishment of level of service (LOS), volume to capacity ratios, and key turning movements is briefly described in Section 3.1.7.3. For purposes of this EIS, LOS was based on existing documented traffic flows and highway characteristics. Detailed evaluations of peak-hour factors (PHFs), key turning movements, lane evaluations, and intersections are typically part of detailed design evaluations and were not performed as part of this report.

The *Highway Capacity Manual* specifies that LOSs in planning level evaluations are based on Average Annual Daily Traffic (AADT).

A peak-hour traffic analysis would unrealistically inflate traffic flows associated with the projected realignment. A peak-hour traffic analysis calculates or assumes peak-hour factors (PHFs), typically between .9 and .95. The incorporation of a PHF into a traffic flow computation would lead to traffic volumes well beyond those occurring during peak hours. In addition, because a significant portion of the peak-hour traffic associated with a military installation occurs before the AM and PM peak-hour of the adjacent street traffic, transportation impacts were evaluated based on AADT volumes.

Increased traffic volumes associated with the proposed action may impact existing traffic conditions in the short term. However, projected traffic volumes and LOS for the region incorporate planned roadway improvements. The projected LOS with the proposed realignment does not degrade the projected LOS without the realignment.

8 of the implementation of the roadway improvements. Specific information such as project approvals, permits, funding sources, etc should be provided as well as justification that the road improvements coincides with the relocation to NAS Oceana. Any issues that could stop or delay the construction of these projects should be clearly identified, for example, lack of NEPA approval, adverse NEPA rating, or Section 404 permit concerns.

9 - Of particular concern to NAS Oceana is the proposed Southeastern Parkway and Greenbelt (former Southeastern Expressway). This project, which would abut NAS Oceana, has not yet reached the Final EIS stage of review. EPA adversely rated the Supplemental DEIS for this project and, to date, still has outstanding concerns about the project primarily related to avoidance and minimization of impacts (particularly wetlands, and compensation for direct, indirect and secondary impacts). Therefore, the uncertainty of project implementation of the Southeastern Expressway should be factored into decisions regarding NAS Oceana.

10 - In addition, the area surrounding the proposed road improvements should be characterized to ensure that there are no adverse environmental impacts associated with them. Also, a number of the improvements listed on Table 3.1-33 were not identified on the maps. Please clarify the location of all proposed road improvements so their relationship to the NAS Oceana can be evaluated. A congestion management strategy should be developed to address the additional trips if any of the proposed improvements are not constructed.

11 - Page 3.1-118 identifies three gates to the station, the main gate, the back gate, and golf course gate. The traffic analysis should discuss how the use of these gates could help to address potential traffic congestion problems. An incident management plan which involves the diversion of traffic to different gates should be developed. In addition, the Navy should discuss alternate transportation management options (local mass transit system proposed by county, staggered work hours, van pools, car pools, parking fees) to reduce the impact of ARS 1 on the area roadways.

AIR QUALITY

12 - EPA suggests that an appropriate CO hot spot analysis be performed to account for the increased parking to impact NAS Oceana (both personnel vehicles and service vehicles). A CO hot spot analysis is also suggested for traffic intersections near the base's gates and within a few blocks of the base that would be affected by the increase in traffic.

ENVIRONMENTAL CONTAMINATION

13 - Page 3.1-162 states that "NAS Oceana has a RCRA Part B permit which limits the volume of hazardous waste generated and stored at the station." As stated on page 4.14-1 "The amount of increased hazardous waste generated is estimated to be approximately 57,000 lbs., which is a 41% increase over wastes generated in 1995." The DEIS did not discuss whether the increase in hazardous waste generated and stored at the station will exceed the current capacity

DEC-03-1997 10:22 EPA REG 3 EAPD 215 566 2763 P.05

USEPA-8 The roadway improvements listed on Table 3.1-33 are local government and state projects undertaken independent of the proposed realignment. These improvements are part of the regional transportation system master plan (*City of Virginia Beach FY 1995/96-2000/01 Capital Improvement Program*) and are intended to alleviate existing traffic conditions. Rapid population and job growth have increased regional traffic. The population of the region has grown 20% over the last decade (1980 to 1990), and employment has grown 36% over the same period (*Hampton Roads Planning District Commission - Transportation Demand Management 1994*). The poor traffic conditions are exacerbated by more vehicle usage, failure to build new roads, and suburbanization of the area. The EIS addresses the cumulative impacts on traffic conditions for all ARSs.

The most serious traffic concerns are indicated on London Bridge Road and Oceana Boulevard. Phase 1 of the London Bridge project was completed in the fall of 1997, and the Oceana Boulevard project is scheduled to be completed in the fall of 1998. Specific information, such as project approvals, permits, funding sources, etc., for projects addressed in the EIS are under the control of the City of Virginia Beach and the Virginia Department of Transportation.

USEPA-9 The proposed Southeastern Parkway was identified in Table 3.1-33 as "pending further study." However, the proposed Southeastern Parkway was factored into the regional traffic projections and projected LOS by the HRPDC. Therefore, the projected impacts on traffic associated with the proposed action may be greater than discussed if the Southeastern Parkway is not constructed.

USEPA-10 Two roadway improvements identified on Table 3.1-33 are new highway construction. The locations of these new highways are not finalized and, therefore, are not shown on the maps. A congestion management strategy is beyond the scope of this EIS. Please see response to USEPA-7 and USEPA-8.

USEPA-11 All NAS Oceana gates can be used, which will optimize traffic flow. Gate use can be modified as necessary after the proposed action has been implemented and base traffic is counted and observed. A detailed traffic analysis can be used to construct a gate management plan. Mass transit systems and voluntary carpooling are available and encouraged at NAS Oceana.

designated in the permit. Nor did it mention if there is a need for additional capacity and whether a permit modification will be needed.

14 - In addition, as stated on page 2.4-5, the construction of a Corrosion Control Hangar is proposed. This facility will be used to wash and strip corrosive material and paint the F/A-18 aircraft. The DEIS does not state how this waste will be handled.

15 - Page 3.1-149 states that "Exceedance of permit limits for oil and grease and pH has occurred intermittently in the past." What measures will be implemented to prevent this happening since there is likely to be a greater quantity of oil and grease generated?

16 - Page 4.6-4 states that the proposed realignment is not expected to significantly impact the regional landfill capacity due to the relatively small increase projected for solid waste generation. However, an analysis estimating the amount of additional waste to be generated by the additional 5,600 employees would support the Navy's claim that the existing landfills have the capacity to handle the additional waste.

17 - The information provided within Section 3.1.14.2 (Installation Restoration Program Sites) appears to be accurate. Since this DEIS was published, the Navy has since evaluated other technologies for the remediation of the contaminant groundwater plumes. This should be noted in the FEIS.

18 - Section 3.1.6.6 (Jet Fuel) does not state the area where the military construction (MILCON) project, P414, is to take place. Nor does it identify the location of the tank removal on a map/figure. These construction projects should be identified on a map. The FEIS should provide a map showing all expansion areas in relation to solid waste management units to determine if impacts or exposure risks may result from an expansion of operations at NAS Oceana.

19 - With the increase in maintenance activities and fueling activities, there is an overall concern that the risk of spills may increase. Currently, the Navy has asked EPA to define the volume considered for reporting under the corrective action order. Apparently, frequent "small" spills from refueling have occurred. The FEIS should address how the Navy handles these spills.

20 - EPA received inquiries from concerned citizens regarding the emergency fuel dumping that occurs in flight and its related health impacts. The DEIS did not mention this activity; thus, it should be addressed in the FEIS.

DEC-03-1997 10:23 EPA REG 3 EAPD 215 566 2783 P.06

Staggered work hours are also being considered as a transportation management option.

USEPA-12 Performance of a carbon monoxide (CO) hot spot analysis to account for increased vehicle parking is not necessary. Because parking is distributed throughout NAS Oceana; there is no single location (parking lot) with a large concentration of vehicles. A CO hot spot analysis was not performed for off-base intersections because planned and funded roadway improvements target those road segments and intersections with LOSs of D, E, or F. These roadway improvement projects were chosen based partially on their LOS classification and anticipated increases in traffic volume. Since these roadway improvements would mitigate any CO hot spots, the analysis is not needed.

USEPA-13 The RCRA Part B permit does not have to be modified. The projected increases can be accommodated within the terms of NAS Oceana's existing permit.

USEPA-14 Any waste generated by the proposed removal and application of corrosion control materials will be managed in accordance with NAS Oceana's RCRA Part B permit.

USEPA-15 NAS Oceana will continue to monitor discharges, evaluate any exceedances of permit limitations, and implement corrective measures in coordination with regulatory agencies. In addition, NAS Oceana continually evaluates its oil spill control plan and implements improvements as needed.

USEPA-16 An analysis of the amount of solid waste generated by the transferred employees has been added to the text.

USEPA-17 Section 3.1.14.2 of the EIS has been updated.

USEPA-18 These projects are not part of the proposed action. The new 210,000-gallon day tank is currently under construction; the 420,000-gallon aboveground storage tank is scheduled for replacement because it is one of the older tanks. These projects are independent of the F/A-18 realignment.

USEPA-19 NAS Oceana continually evaluates its oil spill control plan and implements improvements as needed. In addition, the frequency and volume of "small spills" on paved surfaces is not considered a potentially significant impact and is therefore not addressed in

WATER QUALITY

21 - Page 3.1-7 states that the airspace used by aircraft stationed at NAS Oceana extends from the Chesapeake Bay. Since there is great emphasis placed on restoring and protecting the Bay, EPA is concerned with the impacts, if any, that the increased operations will have on the Bay.

22 - It was noted (on page 3.1-45) that a 1990 water quality study was conducted by the Navy to determine if its air-to-ground training was having an adverse impact on the estuarine environment. However, only water column samples were taken at Piney Island to make this determination. The results of the analysis did not reveal any substantive problems. Sediment samples in the vicinity of the targets would have been more revealing of the actual impact of the munitions used in the Navy's training.

TERRESTRIAL ENVIRONMENT

23 - As a result of increased activity in the Dare County Range, EPA is concerned with the impacts from practice bombs to the red wolf, a federally-listed mammal species in Dare County and the three nationally significant natural areas (Alligator River Swamp Forest, the Faircloth Road Pond Point Pocosin, the U.S. 264 Low Pocosin) which are identified within the Dare County Range.

24 - Page 3.1-159 states that "Based on aerial photographs of NAS Oceana, there is an overall lack of forested areas, or similar habitat, throughout the base." Page 4.12-1 states that 3.1 acres of forested land and 20 acres of forested, shrub, and maintained lawn would be removed to allow for the proposed construction. The text also reads "Because the NAS Oceana property includes numerous other areas of similar vegetation, the overall impact of this action is considered minor." This descrepancy should be resolved and an accurate characterization of the forested area is needed to determine impacts to wildlife and to ensure that the proper food and shelter are provided for their survival. To mitigate for the loss of trees, where feasible, new trees should be planted to compensate for the loss of forested areas.

CULTURAL RESOURCES

25 - Page 3.1-162 states that the Upper Wolfsnare Plantation is listed on the National Register of Historic Places. "The structure and the lot on which it stands is also designated as a local historic district by the City of Virginia Beach." The exact location of this national landmark should be depicted on a map and it should be determined if the changes proposed to the station would negatively impact the visual character of the national landmark.

DEC-03-1997 10:23 EPA REG 3 EAPD 215 566 2783 P.07

B-1-18

the EIS. All spills are reported and remediated in accordance with established spill response procedures.

USEPA-20 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet AGL, unless in an emergency situation. Above 6,000 feet, the fuel has enough time to completely vaporize and dissipate and thus has a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions. Emergency fuel dumping over land is an extremely rare event. In the event fuel must be released over land, the Navy attempts to perform the release to minimize any impacts by releasing at a sufficient altitude to dissipate the fuel. The EIS has been amended to address the health-related impacts associated with jet fuels.

USEPA-21 Airspace above the lower Chesapeake Bay, other than that surrounding NAS Norfolk, is used primarily by the Navy for transiting military training routes (MTRs) (see Figure 3.1-4). F/A-18 aircraft relocated from NAS Cecil Field would use offshore warning areas and the ranges in eastern North Carolina for training. The effect of the projected increase in air traffic over the lower bay on the water quality of Chesapeake Bay will be minimal. Previous water quality studies that were conducted in "high use" military aircraft training areas, including the BT-9 Target Range, indicated that these overflights have no measurable impact on water quality. Therefore, there is no reason to suspect that the projected minimal increase in air traffic above the lower Chesapeake Bay will impact water quality.

Estimated NO_x air emissions associated with all ARSs would not have a significant impact in the Hampton Roads Intrastate Air Quality Control Region and would have minimal if any impact on NO_x levels in the Chesapeake Bay.

USEPA-22 Sediment samples were not collected from the Piney Island Target Range (BT-11), but they were collected from the Brant Island Shoal Target Range (BT-9). Sediment analysis at BT-9 indicates no significant difference between the target range and the reference area. The similarity of military use in both areas allows for a reasonable assumption that sediment data from the Piney Island Range should not differ significantly from the

7

GENERAL

26 - Page 3.1-153 lists the construction projects proposed for ARS 1. These buildings/additions/renovations should be listed on a map. They include: parking apron alterations, F/A-18 Flight Simulator Building, NAMTRAGRUDET Training Facility Renovations/Additions, Strike Fighter Weapons School Additions and Parking, Corrosion Control Hangar, F/A-18 Aviation Maintenance Additions and Parking, Bachelor Enlisted Quarters, Aircraft Acoustical Enclosure, Building 122 Renovations, and Aircraft Hangar and Parking Apron Expansion.

Thank you for the opportunity to review and comment on this project. If you need specific information, the staff contacts for this review are Karen Del Grosso of Region III (215-566-2765) and Gerald Miller of Region IV (404-562-9626).

Sincerely,

Roy E. Denmark, Jr., Deputy Director
Office of Environmental Programs

Enclosure

DEC-03-1997 10:24 EPA REG 3 EAPD 215 566 2763 P.08

Brant Island Shoal Range. Although there was no sediment data collected, there is no reason to believe that sediment data analysis would yield results indicating any adverse effects. This conclusion is based on the above analysis as well as similar analyses at other Navy and Department of Defense (DoD) aircraft ranges.

USEPA-23 Although red wolves are present within the boundaries of the Dare County Range, no effects to the red wolf population are anticipated. The range targets, where the majority of impacts from inert practice bombs occur, are mowed and otherwise cleared of tall vegetation. Therefore, these areas do not provide optimal cover for wolves and would be avoided, especially when the range is active. The estimated increase in activity at the Dare County Range under ARS 1 is approximately five sorties per day. Because bombing activity to date has apparently not affected wolf populations, which are considered healthy, the Navy assumes increased range activity will not affect the wolves. None of the significant natural areas are within the range target. As mentioned in 3.1.3.3 of the EIS, fires started by ordnance may help perpetuate the significant vegetation types present in the area.

USEPA-24 Section 4.12.1 has been updated to resolve the apparent discrepancy. Although there is a relative lack of forested areas in developed areas of the base, approximately 27% (1,500 acres [607 hectares]) of the base is forested. Therefore, the loss of 3.1 acres (1.3 hectares) of forest and 20 acres (8.1 hectares) of mixed habitat (including some forest) represents a very small portion of forested acreage at NAS Oceana. The associated effects on wildlife would be minor.

USEPA-25 Construction at NAS Oceana would not be visible from the Upper Wolfsnare Plantation. Vegetative buffers will be maintained. The Navy has determined that implementation of the proposed action would not effect the Upper Wolfsnare Plantation. This determination has been forwarded to the Virginia SHPO.

USEPA-26 The proposed projects associated with ARS 1 are shown on Figure 2.4-1.

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA 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. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for 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). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
The EPA believes 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.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA 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 action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA 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. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

U.S. Department of Transportation
Federal Aviation Administration

Norfolk Air Traffic Control Tower
1245 Miller Store Road
Virginia Beach, VA 23455

December 4, 1997

Mr. Dan Cecchini
Naval Facilities Engineering Command
1510 Gilbert St.
Norfolk, VA 23511

Dear Mr. Cecchini:

As a key component of the National Airspace System and a proactive member of the greater Hampton Roads community of aviation Norfolk Tower views quality of life issues and environmental concerns with the desire to provide the most efficient service possible without compromising the standard of living that prevails in this area.

Norfolk Tower has reviewed the draft Environmental Impact Statements (DEIS) for the proposed realignment of F/A 18 aircraft to NAS Oceana. This study indicates that NAS Oceana has sufficient runways, taxiways and ramp space to accommodate the relocation of the F/A 18's from NAS Cecil Field to NAS Oceana. In addition, it supports the theory that sufficient ranges and Special Use Airspace (SUA) exist in the local area to handle the increased activity such a move would generate. Norfolk Tower supports the relocation of the F/A 18's to NAS Oceana, however, we are greatly concerned that this study did not address the impact the proposed transferring of F/A 18's would have on civilian and other military traffic in Southeastern Virginia. 1

As I am sure you are aware Norfolk and Oceana's area of responsibility lie within the heavily traveled corridor for aircraft transiting up and down the East Coast. FAA studies indicate that this traffic is projected to increase substantially over the next five years. In addition to this overflight traffic the close proximity of Norfolk International Airport, NAS Chambers Field, Langley Air Force Base, Newport News/Williamsburg Airport and NAS Oceana causes many unique and challenging demands on air traffic control. The different types of aircraft utilizing these airports, the military missions both training/deployments that originate out of these airports and integrating the civilian/ military traffic in Southeastern Virginia requires increased awareness and careful preplanning.

Because of the above mentioned situations we request the following comments be taken into account when developing the final study:

1) As the study indicates the benefits a surveillance radar system located at Elizabeth City Coast Guard Air Station would provide to all users in Northeastern North Carolina would be immense. Improved radar coverage would provide all users a safer flying environment, enhanced service to several airports, and improved traffic information/flows to aircraft transiting to and from R5314 and Stumpy Point MOA. Norfolk Tower believes this radar system to be critical to air safety in this ever expanding market and urges the continuation of this project in order to satisfactorily meet current needs and future demand. 2

2) The final study should take into account the following:

a) Norfolk Tower currently serves as the "feeder" facility for the routing of all departure and arrival traffic into and out of NAS Oceana that is not flight planned for W386, W72, W122 or R5314 This approach control facility transitions NAS Oceana air traffic to/from Washington Center over any of the numerous and strategically placed fixes serving the terminal area. Routing/fixes at Cape Charles, Harcum, Franklin, Cofield, DRONE, WAIKS, and STEIN provide for expeditious ingress/egress to/from NAS Oceana, as opposed to the recommendation of the study for the utilization of the SCHOL fix. 3

NATCT-1 The increase in military traffic as a result of the proposed realignment will require increased coordination between military and civilian air traffic control organizations. The Navy will coordinate with the Federal Aviation Administration (FAA) to ensure that current letters of agreement and procedures are adequate to support operational requirements and minimize impacts on civilian and other military traffic in southeastern Virginia.

NATCT-2 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

NATCT-3 The SCHOL fix was approved by the FAA. The fix is used infrequently to provide transition to military training routes VR 1753, 1754, and 1755 to the northeast.

b) the anticipated impact generated by the increased traffic along the East Coast, as well as, the effect on greater Hampton Roads aviation requirements.

3) We recommend that a regional approach to airspace management be developed to address all users' needs. This group should consist of representatives from the FAA, the United States Air Force, the United States Navy, Virginia and North Carolina Departments of Aviation, commercial and cargo airline interests, and the corporate and general aviation community.

4) Norfolk Tower further recommends the establishment of a positive control environment known in the industry as Class "B" airspace. The regulatory provisions of this type of airspace would enhance air safety and maximize air traffic system efficiency. The principle benefactors would be the customers that currently rely upon NAS Oceana, Langley AFB, NAS Chambers Field, and Norfolk International Airport to meet their unique and dedicated aviation needs.

5) Additionally, explore the concept of a regional approach control dedicated to serving Southeastern Virginia, from one central location. This would create a safer environment and foster aviation growth, as well as, accrue the following benefits:

a) Better management and utilization of airspace.
b) Less bureaucracy in airspace matters thus allowing for timely response to users' needs.
c) Stability in workforce. Military controllers constantly transferring/training because of the maximum of five year shore consultments.
d) No adverse impact to users.
e) Updated equipment: ASR-9 (surveillance radar with weather information), MSAW, ARTS IIIA, backup radar system (CENRAP), equipment reliability.
f) Utilization of Norfolk Approach's new radar facility which is capable of handling one large approach control.

Substantial Cost savings:

a) Decommission Oceana ASR-8, no need for ASR-8 at Oceana, results in less technicians needed, savings on spare parts, electrical savings.
b) Reduced staffing at Oceana (less controllers needed to man joint approach control or GCA unit).
c) Need for new approach control building or updated equipment at NAS Oceana no longer would exist.

Norfolk Tower believes the adoption of our recommendations will provide for safer, more efficient utilization and management of the Eastern Virginia airspace theatre creating a positive environmental outcome. Although our concerns speak to technical airspace matters, we believe our proposals will promote system integrity, efficiency and ensure current and future environmental concerns can be effectively addressed.

Thank you for the opportunity to comment. If you have any questions concerning this report, please don't hesitate to contact my office at (757) 460-5142.

Sincerely,

Felix Saenz
Air Traffic Manager

cc: Ken Scott, Executive Director, Norfolk Airport Authority
Keith McCrea, AICP, Virginia Department of Aviation
Marshall Sanderson, North Carolina Department of Aviation

NATCT-4 Procedures are in effect to accommodate transatlantic traffic, weather diverts, and VFR traffic throughout the area.

NATCT-5 The Navy will participate in regional airspace meetings should the FAA's headquarters determine that such meetings are necessary.

NATCT-6 The establishment of Class "B" airspace would require a Notice of Proposed Rulemaking by the FAA. The proposed realignment of F/A-18 squadrons to NAS Oceana does not necessitate such a designation.

NATCT-7 Thank you for your comments; no response required.

B.2 Congressional Representatives

United States Senate

COMMITTEE ON ARMED SERVICES
WASHINGTON, DC 20510-6050

November 10, 1997

Honorable John H. Dalton
Secretary of the Navy
Washington, D.C. 20350-1000

Dear Mr. Secretary:

We are writing to express our concern over the Navy's apparent change of plans regarding the relocation of two F/A-18 squadrons from NAS Cecil Field to MCAS Beaufort.

In its 1993 and 1995 reports to the BRAC Commission, the Department of the Navy recommended that two Navy F/A-18 squadrons be moved from Cecil Field to Beaufort. Conversely, the Draft Environmental Impact Statement (DEIS) of September 1997, states that the current preferred alternative realignment scenario is to transfer all 180 aircraft (eleven F/A-18 fleet squadrons, 132 aircraft, and the FRS, 48 aircraft) from NAS Cecil Field to NAS Oceana.

During BRAC 95, the Department of the Navy's stated goals, to reduce excess infrastructure, minimize excess capacity, generate savings, and effect joint basing of Navy and Marine Corps aircraft, were consistent with those of the Department of Defense. These objectives would be fully satisfied by redeploying two operational Navy F/A-18 squadrons to MCAS Beaufort and the remaining East Coast active Navy F/A-18 squadrons to NAS Oceana. In the case of Beaufort, the two squadrons would fully utilize excess capacity, and costs would be kept to a minimum by making reasonable, real-world assumptions regarding deployment patterns, military construction and maintenance. Most importantly, this alternative realignment scenario would provide an opportunity to collocate one air wing with Navy and Marine Corps F/A-18 squadrons.

Training together, as they would fight together, was a guiding principle behind basing both Navy and Marine Corps fixed wing squadrons at Beaufort as they prepared to deploy in integrated carrier air wings. In the DEIS, joint basing is only passively mentioned.

Furthermore, excess capacity is seemingly no longer a factor under the DEIS. The preferred alternative realignment scenario retains excess capacity for two F/A-18 squadrons at MCAS Beaufort and creates additional capacity at NAS Oceana.

1

2

ST-1 Consistent with the 1995 BRAC Commission recommendation to realign F/A-18 aircraft to air stations with sufficient capacity, this EIS employed a capacity analysis that eliminated from consideration any installations with less than two modules of existing hangar capacity. Requiring at least two modules of existing hangar capacity furthered one of the basic operational considerations discussed in Section 2.1 of the EIS, specifically, carrier air wing unit integrity. Carrier air wings typically contain two or three Navy F/A-18 squadrons; thus, one squadron could not be stationed alone. Additionally, Marine Corps F/A-18 squadrons are assigned to four of the Navy's ten operational air wings sometime during their training cycle in preparation for that air wing's next deployment.

Post-deployment, air wing squadrons primarily focus on unit level training. Marine squadrons return to Marine Corps control and the pursuit of Marine training objectives. Navy squadrons remain under air wing control, where their training objectives are greatly enhanced by collocation. It is therefore operationally advantageous for Navy squadrons in the same air wing to be based together.

Advanced integrated training of a carrier air wing's individual squadrons as a larger, cohesive warfighting unit is normally accomplished by training detachments to NAS Fallon and at-sea exercises. It is here that all aircraft types in the air wing come together to form the warfighting team that will deploy aboard ship.

ST-2 As discussed in Section 2 of the EIS, excess capacity was used to guide the development of alternatives. It is recognized that excess capacity would remain at both MCAS Cherry Point and MCAS Beaufort if the preferred alternative is implemented.

There are disparities between the BRAC 95 and DEIS costs. The assumptions underlying each are completely different and were obviously intended to meet very different objectives. In the case of the BRAC, the assumption was to save money and reduce excess capacity. Conversely, the DEIS assumptions seem tailored to one goal-- to satisfy the "operational preference for a single site."

3

According to the Navy DEIS figures, it will cost over $100.0 million more to send the F/A-18 squadrons to Beaufort and Oceana in 1997 than it did in 1995. Under BRAC, it was relatively inexpensive to send the two squadrons to Beaufort. However, using the DEIS formulation, the same scenario turns out to be much more expensive than single-siting all 11 squadrons at Oceana.

Mr. Secretary, we urge the Department of the Navy to stay with the BRAC recommendation to move two F/A-18 squadrons from NAS Cecil Field to MCAS Beaufort. We continue to believe that it is in the best interest of the Department of Defense and the Department of the Navy to achieve the original BRAC 93 and 95 goals of reducing excess capacity while minimizing associated costs and encouraging joint basing.

Thank you for considering our views.

Sincerely,

Lloyd D. Spence Strom Thurmond Ernest F. Hollings

ST-3 The BRAC 1995 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. With that direction, the Navy conducted a multistage screening process that identified five technically feasible alternatives that maximize use of existing capacity and support infrastructure and also accommodate various operational military criteria. During detailed analysis of these alternatives in the EIS, the Navy determined requirements for additional facilities to support the F/A-18 realignment. These requirements had not been previously identified in the BRAC analysis. As a result, while excess capacity remained a key criteria, the cost estimates for new construction in the EIS are higher than the initial cost estimates in the BRAC 1995 Commission's supporting data.

DEC. 2.1997 4:34PM NO.616 P.2/4

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United States Senate
COMMITTEE ON APPROPRIATIONS
WASHINGTON, DC 20510-6025

December 2, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attention: Dan Cecchini (Code 2032DC)
1510 Gilbert street
Norfolk, VA 23511

Dear Mr. Cecchini:

I have reviewed the Draft Environmental Impact Statement associated with the realignment of the F/A-18 fleet and Fleet Replacement Squadron aircraft and operational functions from Naval Air Station Cecil Field to other Navy and Marine Corps air stations on the eastern coast of the United States. I thank the Navy in advance for taking the time to consider all the comments that are being submitted on these very important issue that will affect military readiness as well as the quality-of-life for military personnel and civilians residing near air stations in the eastern U.S. Such important decisions cannot be taken lightly, but must be made with a goal to optimize military preparedness, socioeconomic impacts, and proper environmental stewardship.

1 The Navy's draft captures some of the elements that should be a part of its ultimate relocation decision. I am disappointed, however, that it does not provide enough quantifiable information so that pros and cons of the limited scenarios presented can be compared. For example, it is not possible to determine if the Navy's apparent preferred option, relocating all of the planes to Oceana, is optimal. The draft provides insufficient information to assess whether the operational downside to multiple relocation, if there is one, is greater or less than the environmental upside, which is apparent.

Even lacking quantitative information, if a location for realignment is the already heavily populated Hampton Roads, it is clear that sending all of these F/A-18 squadrons there will cause residents to face daunting increases in noise pollution and traffic congestion. I will be most interested to see how much weight the final EIS places on the degraded conditions under which elementary students would end up trying to learn, all as a result of the unfortunate locations of their schools in the new primary noise envelope around Oceana. Likewise, the number of churches will be impacted by a realignment to Oceana is phenomenal.

It is important, also, to note that the DEIS fails to address adequately a host of issues relating to the environment and quality-of-life. A short listing of these issues would include: the increasing rate of urbanization in some locations; the potential for increased mortality/morbidity

B-2-5

LF1-1 As stated in Section 2 of the EIS, the Navy prefers, for logistics and operational reasons, to single-site all F/A-18 aircraft at NAS Oceana. From operations, training, logistics support, and life-cycle cost perspectives, single-siting all F/A-18 aircraft is preferred to siting aircraft in multiple locations (please see Section 2.1 of the EIS). The EIS provides a detailed evaluation of five different ARSs. Under four of the five ARSs, aircraft would be transferred to two locations. As noted in the discussion of F/A-18 siting criteria in Section 2 of the EIS, dual-siting of F/A-18 aircraft is reasonable. Section 2 also discusses the operational advantages and disadvantages of all five ARSs, and Sections 4 through 8 of the EIS assess a wide range of environmental impacts, including noise and traffic, for each location/ARS. The Office of the Secretary of the Navy will use this detailed analysis to make a final decision.

due to accidents in densely versus sparsely populated areas; second-tier environmental impacts due to multiplier-effects, including the increased pressure that more people will place on the Chesapeake Bay watershed if Oceana is chosen as a single location for the squadrons; degraded air quality as a result of more people in heavier populated areas versus sparsely populated areas; and the effects that thousands of additional flights annually will have on the biota at state parks or national wildlife refuges. These oversights on the environmental side, which is the source of the need for this impact statement in the first place, are enough to declare this DEIS fatally flawed and to send it back so that the Navy can complete a sufficient assessment.

2

What is even more disturbing, however, than the fact that critical environmental issues have been addressed inadequately, is that some issues have not been addressed at all. For example, there is no discussion of the extent of past and future state/local support for infrastructure. The Navy did not address these costs in either the aggregate or in detail for each scenario. This is most disappointing, because each scenario contemplated will impose costs for infrastructure improvements--including schools, roads, noise mitigation, *etc.*--on the state and local governments. From a public-support view point, there is no substantive discussion of the communities' attitudes toward these realignment options.

3

The draft gives short shrift to consideration of the long-term conditions that are likely to exist in the communities surrounding Oceana, Cherry Point, and Beaufort. As the relocation decision will affect communities for many years, there needs to be much more development of not just the impacts that a relocation would cause based on current conditions, but of how impacts may have a greater or lesser adverse effect in the different communities depending on future independent circumstances that differ at each potential location. For example, what analyses have been done to determine the impact of any need to void other potential community projects, business opportunities, or other socioeconomic benefits if too many squadrons are placed at any one location?

4

Perhaps it is not surprising that the DEIS fails to give proper treatment to the future conditions that are likely to exist around all the air stations that could accept the Cecil Field squadrons; the draft fails, as well, to consider specific preparations to accept F/A-18s that were made at Cherry Point--which would become a true waste of the taxpayers' dollars if left idle--following the 1993 Defense Base Closure and Realignment Commission.

5

From a military standpoint, the Navy does not indicate which scenario it believe would best serve inter-service operation goals, nor does the Navy discuss in any meaningful way the strategic and operation advantages and disadvantages of putting all the planes in one place versus dividing them between several bases. I am very concerned that questions related to potential sabotage, terrorism, and target density have not been adequately discussed or examined. Moreover, there is little or no discussion of comparative operational or training efficiencies.

Because we were concerned about the limited scope of the Navy's assessment of the critical elements of this relocation decision, the Senate Committee on Appropriations specifically asked the Navy to have prepared an independent study including "a weighted comparison of the pros and cons of all scenarios in order to determine an optimal solution for relocation." I believe

LF1-2 All of the subjects mentioned are discussed in the EIS at a level of detail sufficient for decision makers to accurately assess the impacts from each ARS. For example, Table 4.4-1 of the EIS provides the change in acres of various land use types within APZs, and Table 4.8-1 provides population changes within noise zones. Net emissions changes are also discussed in the EIS to assess air quality impacts.

Discussions of existing socioeconomics, land use, and community services all reflect increasing urbanization in the Hampton Roads area. The preferred alternative would have only a minor effect on this urbanization, given that the proposed increase in personnel under ARS 1 represents less than 2% of the 1990 population of south Hampton Roads. Potential indirect effects from the realignment, such as impacts of urbanization on Chesapeake Bay, are speculative and unquantifiable.

Existing infrastructure and community services are discussed for each of the three potential receiving installations and include any state and local improvements that occurred before 1997.

LF1-3 The EIS analyzes the impacts of five different ARSs for the full build-out year (1999). The EIS also discusses the potential long-term cumulative impacts of the relocation and other past, present, and reasonably foreseeable actions in the vicinity of NAS Oceana, MCAS Cherry Point, and MCAS Beaufort. The proposed action would not preclude community projects, business opportunities, or other socioeconomic benefits to the community. In an assessment of taxes/revenues for all ARSs, the Navy determined that Virginia Beach and the other communities in the region would not experience any significant negative fiscal impacts from the proposed realignment.

LF1-4 Consistent with the National Environmental Policy Act, the EIS assesses the potential direct, indirect, and cumulative impacts of the proposed action. To assess the impacts of not implementing the proposed action at a particular location is highly speculative and beyond the scope of this EIS.

that such a broader and more thorough assessment will help the Navy and the Congress to decide what is the best course of action for our national security and our environment.

I look forward to your positive consideration of the matters that I have raised in this letter.

Sincerely,

Lauch Faircloth
United States Senator

LF1-5 Section 2 of the EIS presents an analysis of the advantages and disadvantages of single-siting and dual-siting. Assessing first strike threat possibility and the concentration of military assets is beyond the scope of this EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

EVA M. CLAYTON
1st District, North Carolina

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December 2, 1997

Mr. J. Daniel Cecchini
Atlantic Division, Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

RE: DEIS, Realignment of F/A-18 Aircraft from NAS Cecil Field (SCH #98-0230)

1 I find it disturbing that the Navy stated a preference prior to conducting an equitable evaluation of all the reasonable alternatives for the Realignment of F/A-18 Aircraft and Operational Functions from the Naval Air Station at Cecil Field.

2 When Cecil Field closes the Navy will have two master jet bases on the East Coast: Oceana and Cherry Point. Both air stations will share the training area and target ranges in eastern North Carolina. If all of the F/A-18 squadrons go to Oceana they will have more than 350 aircraft operating in a metropolitan area while Cherry Point will have 130 aircraft operating in an essentially rural area. If the two air stations were more balanced it would best utilize excess capacity, maximize aviation safety and reduce operational congestion. Alternative Realignment Scenario (ARS) 5 would provide such a balance.

3 The DEIS concludes that relocating all of the squadrons to Oceana will result in significant aircraft noise and traffic impacts and will increase aviation safety hazards in the Virginia Beach area. It underestimates the noise impact associated with all squadrons going to Oceana and fails to fully analyze the cost of mitigating the noise impacts which are projected. It fails to adequately address increases in the average daily noise levels and the impact on children when they are playing outside as well as the educational impact on the students in the 22 schools affected by ARS 1. Under ARS 5, four schools would be affected and again there are no estimates for the cost of mitigating the noise impact. It further fails to consider the noise impact on the metropolitan area surrounding Oceana or the expansive natural buffers at Cherry Point and the relatively small number of people affected.

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EMC-1 The Navy developed and evaluated its alternatives based upon the BRAC 95 mandates and the Navy's operational needs. The preferred alternative was derived from a detailed analysis of the alternatives. Please see Section 2 for a discussion of the alternatives screening process.

EMC-2 Aircraft operations would be conducted at the respective airfields, training areas (i.e, training routes, warning areas, military operating areas, restricted areas), and target ranges based on the mission requirements and the ability of each range or airspace to support those mission requirements. NAS Oceana has sufficient airfield capacity to support the proposed realignment under ARS 1. MCAS Cherry Point has sufficient airfield capacity to support the proposed realignment under ARS 3. ARS 5 would require construction of a new runway at MCAS Cherry Point.

EMC-3 The EIS addresses aircraft noise impacts on schools and school-age children. For ARS 1, the EIS states (please see Section 4.8) that the projected increases in noise will range from 9 to 21 dB Ldn over existing conditions and that disruption in speech communications would occur in some areas. However, the EIS further states that, of the 22 schools analyzed, 7 could minimize (educational) indoor interference by closing windows and incorporating air conditioning. The EIS adequately assesses the aircraft noise impacts on all potentially affected regions in Virginia, North Carolina, and South Carolina.

Because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy did not develop cost estimates for noise mitigation at schools and churches. The Navy recognizes that the costs to educational institutions of noise mitigation is a significant impact. The Navy has offered to work with local officials to conduct detailed engineering evaluations at those schools of particular concern. Outside noise cannot be mitigated. Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration. Please see Sections 8.1.8 and 8.2.8 for discussions of noise zones and affected populations near MCAS Cherry Point and NAS Oceana for ARS 5, respectively.

4 The DEIS also fails to address the vehicular emissions, shows discrepancies between the population growth projections it uses and the projections used by Virginia, and does not address the effect of the redirection on compliance with the newly promulgated ozone and fine particle air quality standards. By contrast the DEIS states that all of eastern North Carolina is in attainment for all criteria pollutants under the new ozone and fine particle standards.

5 The existing water shortages in the Virginia Beach area and the potential for growing water shortages by the influx of the additional people under ARS 1 are not fully addressed. The ARS 1 shows no projections for child development costs for all squadrons while the ARS 5 projects a cost of $1.3 million for only five squadrons. Why isn't there a comparable need regardless of the location selected?

6

7 The military construction costs for Oceana were understated in BRAC 95 while in my opinion standards applied to Cherry Point inflated the cost of Cherry Point. When the DEIS applied P-80 standards to Oceana it revealed a requirement for BEQ space, hanger modules and parking apron expansion along with numerous other projects totaling $93.5 million for locating all squadrons at Oceana. Even the $93.5 million is probably an understatement of actual costs and I refer you to the analysis (dated November 25, 1997) prepared by Governor Hunt's Military Liaison, Col. David A. Jones, USMC (Ret.) for specific examples.

8 Col. Jones also provides an alternative to the costly Parallel Runway which the DEIS claims will be needed at Cherry Point under ARS 5. "In ARS 3 the FCLP requirement is satisfied by the existing runway configuration at Cherry point. In ARS 5 when 2 additional squadrons are added, the DEIS claims a requirement for a 33 million dollar parallel runway. There is another far less costly alternative. During peak periods when the facility at Cherry Point cannot meet the FCLP demand those excess sorties could be flown at Pentress. If the Navy finds it operationally effective to fly from Oceana to BT9 (2450 sorties) and BT 11 (6217 sorties) to accomplish their annual training objectives, there should be no objection to flying to Pentress for operational training during those few times during the year when the capacity for FCLPs on Cherry Point is exceeded. The DEIS should explore this option and the associated cost savings."

9 The fact that these aircraft will train in North Carolina airspace regardless of where they are stationed should be considered along with the need to balance out the negative training aspects with the positive economic benefits of locating the aircraft at Cherry Point. Relocating some of the F/A-18 Hornets at Cherry Point would be a tremendous boost to a mostly rural area where the military is the primary employer. This is especially true given the effects of recent drawdowns.

Cherry Point offers a number of advantages. First, no

EMC-4 Under all ARSs, mobile emissions caused by the personnel and dependents relocated from NAS Cecil Field to the Hampton Roads area are accommodated in Virginia's mobile emissions budget for Hampton Roads by the loss of military personnel and dependents leaving the Hampton Roads area due to downsizing and force restructuring. The reference for this conclusion has been added to the EIS and conformity analysis (Appendix E). Consistency of the air quality baseline year with other components of the EIS is not considered significant. The 1993 baseline is the correct baseline year to use for the conformity analysis. As stated in the EIS and conformity report (Appendix E), VDEQ chose 1993 as the baseline year for use in its ozone maintenance plan emission budget. It is a logically and technically sound air quality analysis procedure for the conformity analysis to also use 1993 NAS Oceana emissions. This allows direct comparison of the change from 1993 to 1999 due to each ARS, the same procedure VDEQ uses to evaluate the ability of its maintenance plan to maintain the ozone standard. The General Conformity Rule requires a demonstration of compliance with, in this case, Virginia's State Implementation Plan (SIP). The ozone maintenance plan and mobile source emission budget for Hampton Roads recently added to Virginia's SIP defines NAS Oceana's emission growth allotment. The Navy demonstrates compliance with the emission growth allotment in the approved SIP and therefore demonstrates conformity.

The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the SIP are developed that identify measures to be implemented for attainment of the new standards. SIP revisions, if any, addressing the new standards are not expected until after 1999. Until that time, the current standards remain in effect. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard.

significant noise, traffic or environmental impacts were identified in the DEIS. Second, Cherry Point has excess infrastructure support capacity in certain categories (BEQ housing, medical facilities). Third Cherry Point is closer to fleet practice ranges than either Oceana or Beaufort. Fourth, it offers certain cost and operational advantages compared to Beaufort due to its proximity to Oceana, where the majority of aircraft would be located under any of the five ARS.

Marine Corps Air Station at Cherry Point (MCAS) has the necessary capacity, a compatible mission and appropriate facilities to support the F/A-18 operations in ARS 5. A comparison of all the factors should certainly mandate that at least some of the squadrons be placed at Cherry Point.

Sincerely,

Eva M. Clayton

Eva M. Clayton
Member of Congress

EMC:sek

There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with ARS 1 are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

The EIS states that all of eastern North Carolina is in attainment for all criteria pollutants under the NAAQS currently in effect. The new standards are enacted but not in effect until North Carolina implements them. The EIS does not state that eastern North Carolina is in attainment with the new standards.

EMC-5 Section 4.6.1 estimates the potential impact of ARS 1 on the regional water supply based on the projected increase in population and using average consumption rates that were provided by the local water authorities. In 1997, the capacity of the regional water supply was restricted. However, with the completion of the Lake Gaston Project, the regional water supply would not be significantly impacted by the projected increase in population under ARS 1.

EMC-6 Child development requirements are site-specific for each base and loading scenario. The requirement for child development/care facilities was determined by the following method. First, the Navy quantified the ability of each base to accommodate additional child development/care requirements (i.e., determined excess capacity of facilities). The identified excess capacity was then compared to requirements for each base and F/A-18 loading scenario. For ARS 1 at NAS Oceana, it was determined that no additional child development/care facilities would be required. It has been determined that construction of an 8,643-square-foot child development center would be required to accommodate five F/A-18 squadrons at MCAS Cherry Point.

EMC-7 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. With that direction, the Navy conducted a multistage screening process that identified five technically feasible alternatives that maximize use of existing capacity and support infrastructure and also accommodate various operational military criteria. During detailed analysis of these alternatives in the EIS, the Navy determined requirements for additional facilities necessary to support the F/A-18 realignment. These requirements had

not been previously identified in the BRAC analysis. As a result, while excess capacity remained a key criteria, the cost estimates for new construction in the EIS are higher than the initial cost estimates in the BRAC 1995 Commission's supporting data. The new construction required at NAS Oceana under ARS 1 and ARS 2 has been amended to include additional BEQ space. Please see Tables 2.4-1 and 2.4-3.

EMC-8 As discussed in Section 2.2.4.1 of the EIS, use of air-to-air and air-to ground training ranges less than 100 nautical miles (NM) from the air station is cost effective and operationally desirable. Both BT-9 and BT-11 are located within 100 NM of NAS Oceana and can be used to support F/A-18 training range requirements. Requirements for facilities to accomplish Field Carrier Landing Practice (FCLP) are discussed in Section 2.2.4.2. Because of fuel consumption rates and the time it takes to complete required training, FCLPs cannot reasonably be conducted more than 50 NM from the air station. Flying greater distances to an OLF would require the aircraft to either land and refuel or conduct more flights to accomplish the required amount of training. For these reasons, which are discussed in greater detail in the EIS, NALF Fentress cannot be used by F/A-18 aircraft stationed at MCAS Cherry Point to accomplish required FCLP training.

EMC-9 The fact that F/A-18 aircraft will conduct training in eastern North Carolina regardless of the chosen alternative is recognized. In addition, the positive economic impacts to eastern North Carolina associated with relocating aircraft to MCAS Cherry Point is also recognized (please see Sections 5.1.5 and 8.1.5 of the EIS). These factors will be considered by the Office of the Secretary of the Navy prior to making a final decision on the proposed action.

B.3 State Agencies

North Carolina

North Carolina
Department of Administration

James B. Hunt, Jr., Governor — Katie G. Dorsett, Secretary

September 22, 1997

Mr. Dan Cecchini
Department of the Navy, Atlantic Divisio
Naval Facilities Engeneering Command
1510 Gilbert Street
Norfolk VA 23511-2699

Dear Mr. Cecchini:

Subject: Draft Environmental Impact Statement - DEIS-Evaluate Potential Socioeconomic and Environmental Consequeses of thre Realignment of F/A 18 Aircraft and their Associated Personnel to Naval Air Station Oceana, Virginia Beach, VA and/or Possible Some Relocation to Cherry Point , NC

The N. C. State Clearinghouse has received the above project for intergovernmental review. This project has been assigned State Application Number 98-E-0000-0230. Please use this number with all inquiries or correspondence with this office.

Review of this project should be completed on or before 11/01/1997. Should you have any questions, please call (919)733-7232.

Sincerely,

Jeanette Furney

Ms. Jeanette Furney
Administrative Assistant

State of North Carolina
Department of Environment
and Natural Resources
Division of Coastal Management

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
Roger N. Schecter, Director

DEHNR

October 2, 1997

Mr. Charles W. Walker, P.E.
Head, Environmental Planning Branch
Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Dear Mr. Walker:

We received your letter dated September 12, 1997 concerning the proposed construction projects associated with the realignment of F/A-18 Aircraft to NAS Oceana as a result of 1995 base closure and realignment act (VDHR File #94-1184-F) on September 22, 1997. The letter was attached to a copy of the DEIS for the above referenced federal activity.

1 In your letter, you state that a consistency determination will be prepared and included as part of the final EIS. This appears to indicate that the official consistency determination was to be provided as part of the final EIS. However, your 9/12/97 letter also contains a statement which says "Based on the analysis contained in the DEIS, the Department of the Navy concludes the proposed action is consistent to the maximum extent practicable with the enforceable policies of the North Carolina Coastal Management Program." Since this position is not specifically stated to be a draft position for purposes of the DEIS review, then under the CZMA and 15 CFR 930 guidelines we must presume that the formal consistency review officially began on receipt by our office of the DEIS documents on 9/22/97.

2 Pursuant to CZMA and 15 CFR 930 guidelines, the state has 45 days (November 6, 1997) to develop its position on the consistency determination. Since this deadline occurs so early in the NEPA review process, even before the close of public comment for the DEIS, then pursuant to 15 CFR 930.41(b) we request that the deadline be extended to 30 days after our receipt of the FEIS. This should provide us enough time to assess the adequacy of the information necessary to evaluate the proposal's consistency with the North Carolina Coastal Management Program (NCCMP) and to provide a state position. The extension requires your concurrence.

NCDEHNR-1 As discussed in the Navy's letter to your office dated November 13, 1997, the Navy concurs that the review period began on September 22, 1997.

NCDEHNR-2 As discussed during a phone conversation between Mr. Dan Cecchini (Department of the Navy) and Mr. Steve Benton (DEHNR Division of Coastal Management) on November 5, 1997, the Navy granted the state an extension until December 2, 1997, to develop its position on the Navy's consistency determination. This conversation was confirmed by the Navy's November 13, 1997, letter.

Thank you for your consideration of the North Carolina Coastal Management Program. In consideration of the need for states to provide an indication of potential consistency problems as early as practicable, we will inform you of any NCCMP issues we uncover as early in the DEIS review process as possible. Please call me at (919) 733-2293 if you have any questions about the status of our review or our extension request. We look forward to hearing from you soon about our request for the review extension described above.

Sincerely,

Stephen B. Benton
Consistency Coordinator

cc: Roger Schecter, Director, NC Division of Coastal Management
Dan McLawhorn, NC Department of Justice
Bill Flournoy, NC DENR Office of Legislative Affairs

STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR
RALEIGH 27603-8001

JAMES B. HUNT JR.
GOVERNOR

December 1, 1997

Rear Admiral Michael W. Shelton
Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Admiral Shelton:

I want to let you know that I am vitally interested in the Draft Environmental Impact Statement regarding the realignment of F/A-18 aircraft from NAS Cecil Field to NAS Oceana, MCAS Cherry Point or MCAS Beaufort. It is a comprehensive document that deals with very complex issues and there are some areas of concern that I feel need to be further addressed.

At my request my military advisor, Colonel David Jones, has submitted, through the State Clearinghouse, extensive comments detailing several areas of analysis in the Draft Environmental Impact Statement that are of concern to us. These concerns deal with the need for a common standard of cost comparison, analysis of life cycle costs, base loading, and comparisons for purposes of long-term savings. I hope that the concerns raised in the comments submitted through the State Clearinghouse will be given every consideration in your review process.

My warmest personal regards.

Sincerely,

James H. Hunt Jr.

1

B-3-8

JHH-1 Thank you for your comment; please see responses to Colonel David Jones Appendix I, Part B "State Agencies", North Carolina, NCOG1-24.

North Carolina
Department of Administration

James B. Hunt, Jr., Governor | Katie G. Dorsett, Secretary

November 25, 1997

Mr. Dan Cecchini
Department of Navy, Atlantic Division
Naval Facilities Engeneering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Dear Mr. Cecchini:

Re: SCH File # 98-E-0000-0230; Draft Environmental Impact Statement DEIS-Evaluate Potential Socioeconomic and Environmental Consequeses of thre Realignment of F/A 18 Aircraft and their Associated Personnel to Naval Air Station Oceana, Virginia Beach, VA and/or Possible Some Relocation to Cherry Point , NC

The above referenced project has been reviewed through the State Clearinghouse Intergovernmental Review Process. Attached to this letter are comments made by agencies reviewing this document.

Should you have any questions, please do not hesitate to call me at (919) 733-7232.

Sincerely,

Chrys Baggett

Mrs. Chrys Baggett, Director
N. C. State Clearinghouse

Attachments

cc: Region P
Melba McGee, DEHNR

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NCDENR

JAMES B. HUNT JR.
GOVERNOR

WAYNE MCDEVITT
SECRETARY

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

MEMORANDUM

To: Chrys Baggett

From: Bill Flournoy

Re: DEIS, Realignment of F/A-18 Aircraft from Cecil Field (SCH# 98-0230)

Date: November 24, 1997

The N.C. Department of Environment and Natural Resources has reviewed the draft Environmental Impact Statement (DEIS) for the realignment of F/A-18 aircraft from Cecil Field, as recommended by BRACC 95.

The follow comments and those attached from divisions of this department reflect concerns about the quality of this NEPA documentation. The comments focus on issues of methodology, content, and accuracy. Taken together these deficiencies make the DEIS difficult to review and understand. As a result of these deficiencies the DEIS may be misleading in its conclusions and mistaken in its assumption of impacts and this will be readdressed elsewhere in these comments.

Five alternative realignment configurations are proposed. In all five alternatives, training activities and their related impacts will occur within North Carolina and its overlying airspace. In only two of the alternatives will any of the aircraft and their related economic benefits accrue to the state. This raises a question of equity that will be readdressed elsewhere in these comments.

To further compound this in-state versus out-of-state relationship, there is a clear indication from the DEIS that impacts at the training areas are not considered as important to the military services as impacts at their home airfield locations. This is evident in the general lack of basic data about these areas, and understanding of the land use and economic context within which they exist. This will be readdressed elsewhere in these comments.

While the four inch think DEIS is impressive in its bulk, that does not automatically equate to its completeness and comprehensiveness. Relevant information and issues got lost in the process and many cumulative impacts never rose to the surface for review. These and related topics will be readdressed elsewhere in these comments.

The four foregoing topics are significant deficiencies in the NEPA documentation for F/A-18 realignment from Cecil Field. Taken individually and together they fail to identify, dismiss, and underestimate the consequences of potential actions. As a result, the foundation for projecting impacts is too flawed to yield acceptable results. Therefore, the following comments concentrate on the foundation issues rather than projected impacts.

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ALTERNATIVES

1

Life Cycle Cost Analysis is discussed at 2.3.6. From this presentation it appears that operational costs do not include all pertinent elements. The distance from training areas will influence accumulated aircraft flight hours and that will influence operational costs. Elements such as aircraft fuel use, parts costs associated with wear and more frequent routine maintenance, and greater hours of aircraft maintenance are a reasonable part of life-cycle costs. Yet, they were either not considered in the discussion or it was inadequate in its explanation. If it was not considered, then the summary of life-cycle costs presented at Table 2.3.1 is inaccurate and unsuitable for decision making.

AFFECTED ENVIRONMENT

2

Military training routes are discussed at 3.1.2.1 and graphically depicted at Figure 3.1-4. The key on the figure does not include all the MTRs to be used, and does not label all of the MTRs shown on the map. While these are not serious problems, they do not promote easy undertstanding of the DEIS.

Table 3.1-2 presents existing (1997) operations on MTRs. This is a snapshot in time and may not accurately characterize the level of use that can be expected on the MTRs in the future. A more representative approach would review use over a number of years and select a level of use that considers the temperal and variable influences that can increase or decrease use in any one year. The following table illustrates how use can change over time (these may not be the best numbers for this purpose, but they are the only ones available to this reviewer).

MTR	VR-0073	VR-0085	VR-1043	VR-1046	VR-1752	VR-1753	VR-1758	VR-1759	VR-1074
F-15E DEIS Seymour Johnson	3278		988	1667	1682	2772			4890
DSEIS Cherry I & Core MOA	1788	516	868	748	1500	2435	1370	47	2568
F/A-18 DEIS 1997 Sorties	987	544	755	642	612	1094	962	181	686

The difference in use on most MTR's are multiples of the 1997 snapshot in time presented in this DEIS. These differences may result from budget reductions, aircraft inventory changes due to retirement and deployment, some other reason, or a combination of causes. Whatever the reason(s), they should be analyzed to determine whether the 1997 sorties are a low-end purtibation, that are likely to change in any given year. If that is the case then they cannot be relied upon to be an adequate foundation for environmental assessment.

Beyond the previous issue that is immediately critical to this DEIS, there are broader implications.

NCDENR-1 Life-cycle costs associated with travel between the air station and the ranges in eastern North Carolina are similar whether the air station is NAS Oceana or MCAS Cherry Point. As long as the distance to a range is 100 nautical miles (NM) or less, all programmed training can be accomplished without any changes to the framework of existing syllabi. After the training syllabi is completed, air crews will use any available time to conduct some additional training (i.e., extra repetitions) at the range or additional practice landings upon return to home base. Excess fuel also provides some added safety margin in the form of fuel reserve should deteriorating or poor weather conditions be encountered upon return.

Therefore, the elapsed flight time per sortie and the consequent costs of fuel, parts, and maintenance due to airframe wear and tear will vary insignificantly between the five ARSs.

NCDENR-2 Table 3.1-2 is intended to present current utilization and noise levels of the military training routes (MTRs) based on the best available data. The data in Table 3.1-2 is not representative of future utilization, which is addressed in Sections 4 through 8. This EIS is based on existing and projected training requirements as well as existing utilization of MTRs and ranges. The legend on Figure 3.1-4 of the EIS has been amended to include all of the MTRs.

If the projections used in earlier NEPA documentation are so different from actual/current use, then how much confidence can be placed in the use projections of this DEIS? This question goes to the heart of the NEPA process.

3

Military Operating Areas are discussed at 3.1.2.3. Stumpy Point MOA is the only area maintioned in the text. Since the Pamlico MOA was not mentioned, it is not known whether it might have been misidentified as part of Stumpy Point MOA or whether it actually will not be used by the realigned F/A-18s. If the DEIS had properly characterized the MOAs then this could have been determined by that description (size, area concerned; FAA bounderies, floor, and ceiling). Unfrotunately, that was not possible.

Further, the DEIS did not discuss any MOAs in Virginia, even though the Farmville MOA is shown on Figure 3.1-3. Certainly there are MOAs in Virginia within an acceptable training distance of Oceana. Yet the DEIS does not identify them, establish whether they were considered, or why they were qualified or unqualified for use. Those that were qualified could then receive a more detailed, site specific characterization.

Restricted Areas are discussed at 3.1.2.4. As with MOAs, the DEIS does not mention any restricted area within Virginia. Again, a proper characterization of restricted areas would have identified all of them and explained why each was included or excluded, with those that were qualified receiving more detailed attention.

4

The discussion of Restricted Areas fails to acknowledge that flight tracts used to access target ranges extend throughout the restricted areas, and that MTRs enter and exit restricted areas. This fact changes the benign characterization presented in the DEIS. Restricted Areas are subject to use impacts and some may be significant. For example, the FEIS for the Mid-Atlantic Electronic Warfare Range (MAEWR) reported the following for R-5306A: "These contours represent the base, i.e., the noise exposure contours that exist today without the installation and operation of the MAEWR. They show the community of Roe in Noise Zone 1 (less than 65 Ldn); the area between Roe and Goodwin Hills to the ferry landing in Noise Zone 2 (Ldn 65-75)." ... "Sensitive noise receptors Down East include eight churches, a community hospital, and a retirement home. The Cedar Island Ferry landing and adjacent motel as well as the northern portions of the community of Roe realize the greatest effects as they are in the 70 to 75 DNL zone."

For the reason presented in the previous paragraph the DEIS erred in not characterizing all restricted areas and the affected environment beneath them. At a minimum the DEIS should include noise sensitive areas, parks, refuges, population concentrations, threatened and endangered species, and the economic foundation for each of the potentially affected areas. In so doing the NEPA documentation will accurately characterize the affected environment, after which the analysis of environmental consequences can establish whether any impacts are significant.

Table 3.1-5 presents 1997 operations in restricted areas that are exclusive of missions to target ranges. Again, the operations within restricted areas on target range flight tracks cannot be

NCDENR-3

There are only four military operating areas (MOAs) in Virginia. The Farmville MOA, located in southern Virginia, is scheduled by the Air Force and is used primarily by Langley AFB units. It is not used frequently because it has a small vertical range (300 to 5,000 feet above ground level [AGL]) and low altitude. While the Farmville MOA may be used for an occasional sortie, the majority of Navy air-to-air training would be conducted in the warning areas. The remaining MOAs are the Pickett MOAs (A/B/C) associated with the Fort Pickett Range; the Hill MOA associated with Fort A.P. Hill; and the Demo 1, 2, and 3 MOAs adjacent to Quantico, Virginia. These MOAs are not used by F-14 squadrons out of NAS Oceana or the squadrons out of MCAS Cherry Point. Based on the F/A-18 training requirements, these areas will not be used on a regular basis because of the configuration of the airspace and the availability of better-suited work areas (e.g., W-72 and the Navy Dare County Range). The Stumpy Point MOA was identified as a potential training site.

Sorties at the Pamlico MOA (A and B) were not modeled because this MOA is used infrequently by the squadrons based at MCAS Cherry Point or NAS Oceana. The Pamlico MOA (A and B) is identified in only a few mission profiles as a possible training area. Specifically, it is a secondary training area to W-122 in three AV-8 FRS air-to-air profiles. Some EA-6B missions that use the MAEWR sometimes operate on the edge of R-5306A in the Pamlico Sound, but these missions do not require activation of the MOA. Flights conducting operations at the Stumpy Point Target (R-5313) typically schedule the Stumpy Point MOAs and Pamlico A MOA for maneuvering room/airspace protection.

NCDENR-4

The text of the EIS has been amended to indicate that some MTRs terminate at the target ranges within the restricted areas. The EIS identifies the noise levels within the range/target areas and the noise levels within the restricted areas, including the BT-9 and BT-11 target ranges, separately. A general discussion of land use under restricted areas has been added to Section 3.1 of the EIS. Because the projected change in noise levels for restricted areas and target ranges in the restricted areas are both negligible, a detailed analysis of land use impacts was not conducted.

separated from other missions within the areas. Dissecting use may make analysis easier, but all use must be recombined for assessment of impacts because all use contributes to direct and cumulative impacts. In such case, the operational characteristics of R-5314 are important and should have been reported in this table.

5 Further, the restricted areas are large areas that do not lend themselves to a single Ldnmr. To better understand noise impacts, it would be better to report three Ldnmr as noise indicators: ambient background, areawide average, and high average (under flight tracks). An alternative would be to report a noise footprint and zones, overlayed on the ambient background. Such characterization would integrate noise analysis with the previously mentioned analysis of the area beneath the restricted area. This would better reflect the intent of NEPA documentation.

6 Target Ranges are discussed at 3.1.3. As with the MOAs and Restricted Areas, the DEIS does not mention any target ranges within Virginia. Again, a proper characterization of target ranges would have identified all of those within training distance of Oceana and explained why they were included or excluded from more detailed attention.

7 The DEIS also does not define the boundaries of the target ranges. Thus, the area being characterized as the affected environment is unknown. Where the target ranges end and the restricted areas begin is also unknown. This deficiency creates uncertainty about the quality of the NEPA documentation, it creates confusion for the reviewer, and inadequately characterizes both training areas and their interaction/inter-relationships.

8 Table 3.1-6 presents 1997 aircraft operation at three target ranges. Again, this is a snapshot in time and, as previously presented in comments on MTR, this may not accurately reflect the level of use that should be expected, nor should it be the basis for environmental assessment. Further, the Ldnmr presented in the table averages noise exposure levels at any point within each respective range. While this might be acceptable for areas owned or controlled by a military service, more precise analysis may be reasonable for impacts on other public or private lands and waters, but this conclusion cannot be reached because of the deficient description of the target range boundaries and the resulting characterization.

9 BT-9 (Brant Island Shoal) is discussed at 3.1.3.1. It is a water based target so it is curious, if not in error, for discussing land use but not characterizing water use. Proximity to the AIWW, existence of a prohibited navigation area, and surrounding use by sailors and commercial fisherman are all pertinent to the analysis of potential impacts. This foundation should have been provided in the description of the affected environment.

10 The discussion of Aquatic Resources at BT-9 is inadequate because it does not address the fact that the range is authorized for explosives up to the equivalent of 100 lbs of TNT. While the text discusses aquatic resources, it does not identify those species negatively impacted by concussion. Even though it reports that the Navy will only use inert ordinance, it does not identify the circumstances under which higher explosives might be used, the frequency of use, or the species

NCDENR-5 The EIS reports a single onset-rate adjusted day-night average noise level (Ldnmr) because it best represents the noise level in an area where specific flight tracks are non-existent. This methodology was not available when previous environmental documentation for the Mid-Atlantic Electronic Warfare Range was published.

NCDENR-6 The EIS did not address target ranges in Virginia because projected F/A-18 training profiles indicated training within the region would be accomplished at the ranges in eastern North Carolina. There are no air-to-ground ranges in Virginia within range of NAS Oceana suitable for conducting F/A-18 air-to-ground training on a continual basis.

NCDENR-7 The boundaries of the target ranges are shown on Figures 3.1-7 and 3.1-10. These figures have been amended to include the restricted area boundaries.

NCDENR-8 The EIS provides 1997 data as a reference point for comparison of projected utilization under ARSs 1 through 5. The Ldnmr noise metric is an appropriate noise metric to define the noise impacts at the target ranges given the variable ingress to and egress from the ranges/targets. The noise levels provided in Table 3.1-6 are sufficient to determine land use compatibility in the surrounding range/target areas. The Ldnmr noise metric is also an improvement over the previously used Ldn contour method for depicting noise exposure. A general discussion of land use under restricted areas has been added to Section 3.1 of the EIS. Because the projected change in noise levels for restricted areas and target ranges in the restricted areas are both negligible, a detailed analysis of land use impacts was not conducted.

NCDENR-9 Water resources and water use at the area surrounding the BT-9 Target Range are discussed in Section 3.1.3.1 of the EIS. Recreational and commercial fishing, two of the most important water uses in Pamlico Sound, are discussed in detail. The U.S. Army Corps of Engineers (USACE), Wilmington District, designated a surface prohibited area, with a 3-mile radius centered on the target. This area, which is shown on Figure 3.1-7 of the EIS, is closed to all boating. Therefore, there is no water use within the range itself. Increased activity at the range would not affect the surface prohibited area; therefore, no impact on water use would occur.

that are likely to be permanently or periodically on site. Concussion is an impact on that affected environment, even if the Navy is not responsible.

11 BT-11 (Piney Island) is discussed at 3.1.3.2. It is an island and waterbased target range, so again, characterization of water use is as important as land use in that location.

12 The discussion of Terrestrial Resources at BT-11 includes attention to soils. While the DEIS reports soil types, it does not mention soil chemistry from the perspective of use induced changes. The military services should have this information to support proper management of the target range. Moreover, this information is necessary to properly assess the impact of past and present use on the affected environment, as a foundation for projections of the consequences of the proposed action.

13 The discussion of Terrestrial Resources at BT-11 includes attention to vegetation. While the DEIS reports that occasional fires started by flares or other ordnance helps promote continuation of the fire dependent needlerush vegetation community, it makes no specific comparison with a natural fire regime. How much more frequent the use induced fires may be was not established, nor was whether this may be "too much of a good thing" for this wetland system. Such perspective is important to an understanding of the affected environment.

14 The discussion of Terrestrial Resources at BT-11 also includes attention to wildlife. While the DEIS reports that wildlife species between Piney Island and the Cedar Island NWR are similar, it offers no data from Piney Island to support such conclusion. Two considerations are important here. In the absence of comparative data from both sites, the comparison is invalid and the wildlife on Piney Island will remain uncharacterized. Of equal importance is the need for comparison with a comparable but unimpacted environment. Cedar Island NWR lies beneath the flight tracts used by BT-11, so it is significantly affected by aircraft noise and its species composition and density should not be used as a comparison representing an undisturbed natural environment.

15 Dare County Range is discussed at 3.1.3.3. It is on a peninsula and, while not as important as in the case of BT-9 and BT-11, characterization of water use is still a topic that deserves attention along with land use.

Unlike the discussion of the affected environment at BT-9 and BT-11, there is no discussion of water quality at the Dare County Range. The DEIS acknowledges that streams and creeks traverse the range, so this topic should have been addressed. A meaningful discussion would include information about water chemistry on the range.

16 The discussion of Terrestrial Resources at the Dare County Range includes attention to soils. As with this topic discussion at BT-11, soils chemistry should be reported as an indication of the relationship between past and present use and its impact on the affected environment.

5

NCDENR-10 The BT-9 Target Range has been in continued use for more than 55 years and is authorized for explosives to the maximum equivalent of 100 lbs. TNT. There are no documented or reported cases of adverse impacts resulting from high explosive concussion for any aquatic resource at BT-9. Although Marine Corps F/A-18 aircraft and other range users will continue to employ high explosive ordnance, the Navy F/A-18 aircraft transferred from NAS Cecil Field will use only inert ordnance at the BT-9 range. Therefore, none of the ARSs would cause concussion impacts at the site.

NCDENR-11 The majority of targets at BT-11 are land based. Water resources and water use at the BT-11 Target Range are discussed in Section 3.1.3.2 of the EIS. Recreational and commercial fishing, two of the most important water uses in Pamlico Sound, are discussed in detail in Section 3.1.3.1. The USACE, Wilmington District, designated a surface prohibited area, with a 1.8-mile radius centered on a target in Rattan Bay. In addition, there are three surface restricted areas of 0.5-mile radius each. All of these areas are shown on Figure 3.1-8. No boating is permitted in the surface prohibited area; activity is permitted in the restricted areas only during hours when the range is not in use (primarily at night). Increased activity at the range will not affect the surface prohibited and restricted areas; therefore, no impact on water use would occur.

NCDENR-12 The soils at the BT-11 and Dare County ranges are saturated with water, high in organic carbon, nutrient deficient, and of low pH. All of the soils on BT-11 are subject to frequent ponding from storm overwash, with salt concentrations ranging from three to five parts per trillion (ppt). Live bombing of BT-11 or the Dare County Range has not occurred for many decades and the targets are restricted to inert ordnance. Because only inert ordnance is used at BT-11, potential chemical impacts to soils are limited to compounds associated with the signal cartridges (i.e., titanium tetrachloride and red phosphorus). As described in Section 4.3.2 of the EIS, the toxicity of titanium tetrachloride in soil is not well characterized; however, this compound reacts rapidly in air or water. Therefore, it would not accumulate in soil, and long-term impacts on the soil would be minimal. Red phosphorus also reacts in air and water; moreover, it is relatively nontoxic in laboratory animals. Because phosphorus is an essential nutrient for plant growth, it is unlikely that the trace amounts left in soils will have any adverse effect or persist or

ENVIRONMENTAL CONSEQUENCES AND MITIGATION MEASURES

17 Airfield Operations is discussed at 4.1. For a decade or so this state has advocated the need for an improved and consistent methodology for assessing the carrying capacity of Special Use Airspace (SUA). NASMOD appears to be a step in the right direction and an improvement over the process used in earlier NEPA documentation. Nevertheless, NASMOD is not yet a complete methodology that is capable of accurately projecting the capacity of SUA. At this time, NASMOD includes no environmental component or constraint. Thus, it may project a higher capacity, based solely on operational consideration and FAA operating hours that were approved prior to NEPA review requirements, then can be sustained environmentally.

The DEIS does not recognize this deficiency in the methodology, so when it declares that a SUA has sufficient capacity this must be understood in the context of the methodology's limits. In this DEIS, if a SUA has been determined through the use of NASMOD to have access capacity, this does not mean that such use is environmentally acceptable.

18 Military Training Areas are discussed at 4.2. It begins with the conclusion that implementing ARS 1 would not result in the establishment of any new military training areas. There is a difference between the existing training areas meeting all training needs and only adequately satisfying minimum training requirements. The DEIS is not clear as to which is the case. This distinction is important because the "would not result" finding could leave an unaddressed latent-demand that would have to be resolved at a later date. A finding that the proposal will "only adequately satisfy minimum training requirements" would alert reviewers that future actions may be contemplated to improve the function or capacity of SUA. A parallel consideration is how much capacity remains at any given level of scheduling and use. For example, the DEIS only reports on one MOA and its use will be reduced. This could lead to an assumption that F/A-18s require no MOA related training, or that all such training will occur in Warning Areas, or that there will be a latent demand for establishment of the Cherry I and Core MOAs. While remaining capacity is discussed in the DEIS, the explanation is not entirely clear or easy to use.

19 The DEIS asserts that noise levels were not projected for MOAs because they primarily involve high-attitude operations. This is a questionable statement that must be, but was not supported with documentation. The floors of the following MOAs seem to dispute the statement: Farmville, 300 AGL; Fort Bragg North A and South A, 500 AGL; Gamecock C and I, 100 AGL; and Stumpy Point, surface. The FAA also sent ECHO 1 & 2 MOA to public notice with a floor of 500AGL. Also the proposed Cherry I and Core MOAs were presented with a floor at 500 AGL. If operations within MOAs were primarily at high-altitudes then the floors on the previously named existing and proposed MOAs are unnecessarily low and should be reviewed for amendment. For this DEIS, it would be appropriate for noise assessment and environmental consequences to be documented on all MOAs to be utilized.

20 Military Training Routes are discussed at 4.2.1. As previous comments presented, a snapshot of existing operations on MTRs may be a flawed base case that will not support accurate use

accumulate in soils. Therefore, no significant "use induced" changes to soil chemistry are anticipated.

NCDENR-13 According to the Natural Heritage Program of the State of North Carolina (Couvillion 1996), the brackish marshes at Piney Island represent an exemplary natural area of state significance that supports several species of concern (please see Section 3.1.3.2 of the EIS). In addition, the *Inventory of the Rare Species, Natural Communities, and Critical Areas of MCAS Cherry Point*, prepared for the North Carolina Natural Heritage Program, states that while fires associated with military use are frequent, especially during the growing season, "The frequent burning enhances the areas as habitats for many wildlife species...and should be allowed to burn." This implies that the natural community is healthy and that the present incidence of fire is not negatively affecting the vegetation. While the proposed action may result in an increase in the incidence of fires, the actual occurrence would depend on such diverse and unpredictable variables as weather, seasonal usage patterns, tidal stage, type and accuracy of the ordnance, etc.

NCDENR-14 A detailed study of wildlife at Piney Island has not been completed; however, as stated in several references in the EIS (i.e., LeBlond et al. 1994; Davis et al. 1991), ecosystems at Piney Island and the Cedar Island National Wildlife Refuge (NWR) are similar. Wildlife species present in a habitat reflect the vegetative cover, hydrology, climate, and human influence on an area, among other factors. Data on all of these factors suggest that the two ecosystems are very similar. The survey of wildlife at Cedar Island indicates the species typically present in a black needlerush community in eastern North Carolina. Therefore, the assumption that similar species would be present in a nearly identical vegetative community less than 5 miles away is justified. The species of concern identified at BT-11 are also present at Cedar Island NWR. Furthermore, the characterization of affected environment does not attempt to compare Piney Island to an undisturbed natural community but to characterize the existing conditions. According to National Environmental Policy Act (NEPA) directives, the EIS is meant to analyze potential impacts from the proposed action compared to existing conditions; therefore, comparison to undisturbed areas is outside the scope of the EIS analysis.

NCDENR-15 Although Milltail Creek, Whipping Creek, Callaghan Creek, and Long Shoal River traverse the Dare County Peninsula, they do

21 projections. This is compounded by the lack of land use characterization for the area beneath the MOAs which frustrates the analysis of environmental consequences. An Ldnmr of even 50 can be considerably above ambient background noise levels and be borderline unacceptable for some land uses. The DEIS does not provide the data necessary to allow review of such potential impacts.

22 Restricted Areas are discussed at 4.2.4. As previous comments presented, separating sorties within restricted areas from those on target ranges within the restricted areas creates a flawed base case. [Note: an inaccurate citation to Section 3.2.5 is found herein. This is just one example of many miscitations within the DEIS that confuse reviewers efforts to comprehend the potential impacts.] The need for land use characterization, as discussed in the previous paragraph for MTR, is also applicable to restricted areas and is necessary to allow analysis of environmental consequences.

23 The three military training areas (MOAs, MTRs, and Restricted Areas) discussions at 4.2 of the DEIS are summary explanations of why more detailed documentation was not presented. Given the methodological deficiencies and conceptual flaws previously discussed in comments on the affected environment, there is a strong argument for baseline inventory and chraracteration of all SUA and the lands and waters beneath them. The failure to fully describe the affected environment of all SUA in the DEIS eliminates the possibility of review of environmental consequences. In the absence of sufficient information in the DEIS, reviewers do not have the opportunity to independently analyze the alternatives. This is not to suggest that NEPA document preparers should have no control over the issues and depth of discussion, but it is suggesting that the documentation in this DEIS unnecessarily limits discussion in areas preconceived to be environmentally insignificant. Thus, those areas become insignificant by self fulfilling prophesy.

24 Target Range BT-9 is discussed at 4.3.1. It reports an environmental consequence of a 2 dB increase in noise to an Ldnmr of 62. As previously discussed in these comments on the affected environment, there are several deficiencies in the baseline foundation for this analysis. This results in a range wide average noise level, rather than a more accurate noise footprint with identified noise zones. A noise footprint is an accepted methodology for assessment and would be more appropriate in this instance. Affected concentrations of population and natural resources must be documented. The boundaries of the range must also be defined, and flight tracks to the target identified to support the review of environmental consequences.

25

26 The discussion of Land Use consequences at BT-9 states that no major communities are located near the range, but fails to define its terms. As previously noted in these comments, the FEIS for the MAEWR included a more precise analysis that shows the weakness of the conclusion in this DEIS that noise levels in surrounding areas would be significantly lower than in the range itself. Such generalization may be supported by the noise averaging utilized in the DEIS, but it is not sufficient assessment methodology.

27 In the discussion of both Water Quality and Aquatic Resources at BT-9 there is reference to an

not traverse the northern bombing target used by the Navy at the Dare County Range. Consequently, no impacts to these water bodies from increased use of the northern bombing target are expected. The text of the EIS has been revised to reflect this information.

NCDENR-16 The chemical characteristics of the soils at the Dare County Range are qualitatively discussed in Section 3.1.3.3. The soils are saturated with water, high in organic carbon, nutrient deficient, and of low pH. Please see response to NCDENR-12.

NCDENR-17 The Naval Aviation Simulation Model (NASMOD) was developed by the Navy for the express purpose of analyzing complex airfield/airspace/range areas with multiple users and multiple training requirements. Capacity of Special Use Airspace (SUA) is determined by the SUA's ability to support training requirements given the specific demand for the SUA, type and length of mission requiring the SUA, and the hours of operation of the SUA. In each of the ARSs, sufficient capacity existed for the military operating areas (MOAs), restricted areas, and ranges to meet the projected training requirements. That is, over a one-year period during the carrier workup cycle, all mission requirements were completed. ARSs 4 and 5, however, required the addition of parallel runways to support projected Field Carrier Landing Practice (FCLP) requirements. Environmental constraints are not an input to capacity determination; rather, the environmental impacts of the projected level of sorties or operations, as the output of NASMOD, help quantify the feasibility of a proposed scenario.

NCDENR-18 The proposed realignment of F/A-18 squadrons will not require the establishment of new training areas. Current airspace and training areas have sufficient capacity to meet all current and reasonably foreseeable training requirements, as demonstrated in the NASMOD analysis. Because most of the training associated with MOAs will be conducted within warning area airspace, the NASMOD identified a reduction in use of one of the MOAs. The Cherry I and Core MOAs were not modeled because the F/A-18 aircraft would not need to use these new training areas.

NCDENR-19 Projected training requirements for the F/A-18 squadrons indicate that most training will be conducted at higher altitudes. The MOAs cited in the comment are used by a variety of other Navy and Marine Corps aircraft which may have training requirements as low as the floors of the MOAs cited. Only the

emergency response plan that is being developed to strengthen rescue and spill procedures. While it could mitigate the impact of future incidents, there is no assurance that it will be realized or provide the level of protection implied. The objectives and standards for the program are not presented, there is no timetable for action, and no assurance that affective final action will be taken to mitigate consequences.

28

Target Range BT-11 is discussed at 4.3.2. Again, an average noise level is projected for the range, rather than a more precise noise footprint with noise zones. Thus an Ldnmr of 69 dB can be projected, which represents a 1 dB increase over existing levels. The FEIS for the MAEWR included more detailed analysis of flight tracks and noise footprints that identified noise sensitive areas in proximity to BT-11, as well as more precise noise levels. By generalizing, the DEIS avoids triggering the FAA's threshold of significance which is a 1.5 Ldn increase in noise over any noise sensitive area located within the 65 Ldn contour.

29

In discussion of Land Use consequences at BT-11, conclusions are presented that might not be supported by more detailed assessment methodologies.

The discussion of environmental consequences on Terrestrial Resources includes several deficiencies. First it reports that red phosphorus smoke and titanium tetrachloride smoke have been shown to be toxic to laboratory animals, but then concludes that no adverse impact is anticipated on animals on Piney Island. No evidence or research is cited in support of this conclusion, soil chemistry has not been tested, nor have representative animals at the range. Then the DEIS reports that no data are available on the toxicity of unreated titanium tetrachloride to birds and mammals, but then reports that a residue of the unreated compound is not expected to accumulate on Piney Island. Again, there is no site specific evidence to support such a conclusion. Next the DEIS reports that ducks examined at BT-11 produced fewer young and they have depressed growth, but that noise was not proven to be the cause. Since no cause was proven, this leaves an unresolved significant impact the cause and responsibility for which is undetermined even thought the only impacts at Piney Island are target training related. Finally, the DEIS observers that birds rapidly acclimate to aircraft overflights so a 1 dB increase in noise exposure would not affect local bird populations. This misrepresents the fact that just because birds do not flush, it does not automatically mean that there is no other affect. It also continues to rely upon a range wide average noise level, rather than noise footprints and zones that would identify concentrations of noise within the range. The discussion of environmental consequences must be based upon a more rigorous scientific methodology.

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Dare County Range is discussed at 4.3.3. Again an average noise level is projected for the range, rather than a more specific noise footprint with noise zones. It reports an unchanged Ldnmr of 65 dB over 1997 levels, with a 37% increase in operations. The DEIS bases its impact projections on the assumption of an average utilization level of 67%, while the FEIS for the Cherry I and Core MOA assumed Navy Dare scheduling of 80-90% and utilization of 75-80%, and similar scheduling and slightly higher utilization at Air Force Dare. Further, the DEIS for F-15E bed down at Seymour Johnson found that the DCR presently operates at about 78 percent utilization

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B-3-17

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Stumpy Point MOA was identified in the EIS as a potential F/A-18 training location. Most air-to-air missions will be conducted in the warning areas.

NCDENR-20 Table 4.2-1 compares the existing and projected annual number of sorties based upon the best available data.

NCDENR-21 The only MOA identified as a primary use area for the F/A-18s is the Stumpy Point MOA. A majority of operations conducted by F/A-18s in the Stumpy Point MOA will be high altitude, and a detailed land use analysis of areas beneath the MOA is not warranted. In addition, actual operations in the Stumpy Point MOA are projected to decrease under all of the ARSs. The level of analysis provided in the EIS is sufficient to allow the public and the Navy's decision makers to compare and evaluate each ARS.

NCDENR-22 The presentation of sorties and noise levels for restricted areas and targets within the restricted areas provides the reader with a better understanding of the operational activity of the area. The citation has been corrected to read Section 3.1.2.4.

NCDENR-23 All of the subjects mentioned are discussed in the EIS at a level of detail sufficient for decision makers to accurately assess the impacts from each ARS.

NCDENR-24 The Ldnmr noise metric is an appropriate noise metric to define the noise impacts at the target ranges given the variable ingress to and egress from the ranges/targets. Noise footprints resulting in noise contours are more appropriate in an airfield environment with clearly defined flight tracks. The projected noise level at BT-9 under ARS 1 (62 dB Ldnmr) is the noise level within a 5-nautical mile radius of the target.

NCDENR-25 Please see response to NCDENR-24.

NCDENR-26 Section 4.3.1 has been amended to clarify land use impacts in the vicinity of BT-9.

NCDENR-27 The EIS is correct in stating that noise levels at BT-9 would be greater than the surrounding areas. The EIS has been amended to distinguish between the noise levels within the range/target areas and the noise levels within the restricted areas, including the target range areas.

and that this could rise to 94 percent, and thereafter concluded that the Dare County Range would continue to be a high noise level environment. Given the inconsistencies in assessment expectations and acknowledged level of impact at Dare County range, there is justification for more specific noise assessment methodology to be used.

34 The discussion of Land Use at Dare County Range concludes that no consequences would result from noise. This conclusion is reached even though flight tracks are not identified or their related noise levels characterized, adjoining restricted areas are not assessed or their flight tract related noise levels acknowledged, and the DEIS never provides an affirmative definition of the boundaries of the range under assessment. Further, the discussion concludes that no major communities are located within 5 miles of the range without discussing the threshold between major and minor communities. Finally, the discussion concludes that noise levels in residential communities would be similar to existing conditions without addressing what those specific communities or noise levels might be. The discussion of environmental consequences must be based upon the best possible information, and that information must be specifically relevant to the topics at issues.

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37 The discussion of Water Quality and Aquatic Resources at Dare County Range have numerous deficiencies. First, the impact of activities at Dare County Range cannot be determined by comparison with Brant Island Shoal. Dare is a land based range and Brant is water based, so there is little similarity between the affected environments, nor transferability of impact data. Moreover, water quality as a topic is not ever discussed in Section 3.1.3. for Dare County Range, so there is no foundation for analysis of related environmental consequences. Finally, no conclusive supporting data, no data at all for that matter, is presented to confirm a finding that range operations have not affected aquatic resources in the area.

The discussion of Alternative Realignment Scenarios 2 (Section 5) through 5 (Section 8) use Scenario 1 (Section 4) as a base case for comparison. Therefore, the preceding comments on Section 4 are also relevant to the other scenarios. Throughout all of these scenario discussions, the methodology for reaching conclusions about environmental consequences is so weak that the results are of questionable value. Consequently, the discussion of mitigation measures may not address all of the topics or degrees of environmental consequences that should have been identified.

CUMULATIVE IMPACTS

The basic approach to the discussion of cumulative impacts in the DEIS is too narrowly drawn, it is exclusive rather than inclusive. While this section claims to review the cumulative impacts of military and civilian use of regional airspace around the three involved airfields, it fails to analyze use around training areas other than target ranges. Likewise growth trends as reflected in land use, natural resource systems, and economic patterns around training areas is not directly addressed. The selective confinement of cumulative impact analysis is not consistent with the intent of the NEPA statute or regulations. The following comments are equally applicable to ARS

NCDENR-28 Each air station being considered has a formal spill response plan to ensure that all emergency spills are contained, reported, and remediated in accordance with all state and federal laws.

NCDENR-29 The EIS was revised to state that noise levels would not increase over existing levels at BT-11. In the absence of clearly defined flight tracks at the range/target, Ldnmr is the appropriate noise metric to use. The 1.5 dB threshold of significance as endorsed by the FAA (and the Federal Interagency Committee on Noise [FICON]) is identified in terms of Ldn for airfield environments and not Ldnmr as used to describe sporadic events at a range.

NCDENR-30 No site-specific studies have been conducted at Piney Island on the effects of red phosphorus and titanium tetrachloride smoke on wildlife. However, adverse impacts to wildlife at Piney Island from the smoke are not anticipated because the smoke would dissipate in the open environment of the range. The laboratory studies in which effects were observed exposed rodents to high concentrations of the smoke in enclosed spaces.

No studies have been conducted at Piney Island to determine if unreacted titanium tetrachloride is present in site soil or surface water. However, because the compound is a liquid that reacts rapidly when exposed to air or moisture, it is not expected that a residue of the compound would accumulate in soil or surface water at the site.

NCDENR-31 Section 4.3.2 of the EIS has been updated to more clearly present potential noise impacts on waterfowl at BT-11. The series of studies by Fleming et al. (1996) indicates that aircraft noise does not have physiologic or energetic effects on adult waterfowl at the range. However, the level of growth and survivorship of young seen at BT-11 was lower than at a background location. Noise is presented as a potential cause, but other environmental factors (weather, location, etc.) may also contribute to the effect. Also, the test was conducted using caged birds, so effects may not be the same in the field. The maximum Ldnmr is not projected to increase at BT-11 under any of the ARSs. As noted by Fleming et al. (1996), waterfowl generally acclimate to noise rapidly (as measured by physiologic factors including heart rate and enzyme activity). Therefore, effects from the small noise increase are likely to be minor.

1,2,3,4, and 5.

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Military Training Areas are discussed at 9.1.1. The statement that the analysis presented in Section 4.2 is a cumulative assessment of projected use of existing SUA within the region is incorrect. It is projected proposed use, not cumulative impact analysis. The failure of the DEIS to differentiate between these two concepts and their related methodologies is a considerable deficiency. The statement that projected utilization would not impair the efficiency or exceed the capacity of any SUA is incomplete. It fails to consider the environmental limits on capacity, in addition to the operational (NASMOD) limits. This limited perspective of cumulative impact in the DEIS is a considerable deficiency. The statement that according to noise analysis, the cumulative use of SUA would not significantly increase noise levels is misleading. It is not based upon the most precise application of appropriate noise analysis, and does not reflect true cumulative impact analysis. For example, the noise impacts along MTRs are cumulative in that many turning points are shared among multiple MTRs, and some parallel MTRs are close enough to be cumulative. Yet these impacts are not explored. Further, MTRs cross through Restricted Areas and that can constitute a cumulative impact. These examples represent failures of the DEIS to adequately address cumulative effects.

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In the discussion of Interaction between Military and Civilian Aircraft Operations there is no characterization of civilian aircraft operations. The number and type of operations, flight locations, elevations, purpose and potential for interaction with military aircraft are all unaddressed. The methodology for assessment of this interaction is also unexplained. Thus, the assumptions underling the analysis cannot be verified, and independent analysis of these aircraft interactions cannot be undertaken. The text concludes that the proposed action may result in a negative cumulative impact on civilian aircraft use, and that the relationship of DoD and civilian aircraft represents a negative cumulative impact. Yet, the degree of severity is not explained. Nor does the DEIS discuss the locations of greatest congestion, hazard, or impact. Thus, the types of aircraft or operations to be impacted, and the results/consequences of the impacts are not explored.

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Further the DEIS suggests that the Navy is in the process of determining an appropriate site for an air surveillance radar system that could mitigate any adverse impacts of aircraft interaction. The terminology is interesting in that it says that the radar could, rather than will, mitigate impacts. There appears to be no commitment to the establishment of this radar system, and no assurance that it will be operational. Again, the terminology is that the radar system will mitigate any impact although it may be more appropriate to say that it could mitigate some of the impacts. It is unlikely that the radar system will provide low-level coverage throughout all MTR and SUA, as well as undesignated airspace within the entire region. The DEIS does not explore the spacial coverage or stratification of coverage associated with the potential radar. Due to proximity, there is little doubt that the radar system will serve the area of R-5314 well, but the DEIS does not include sufficient information to support broader conclusions.

The cumulative impacts at Target Ranges is discussed at 9.1.2. This single paragraph concludes

NCDENR-32 The data from Fleming et al. (1996) do not rely solely on flushing as a potential effect from aircraft noise. The studies included measurements of body mass changes, hormone levels indicative of stress, heart rates, and reproductive success. Adult birds acclimated to noise events based on these parameters. Activity at BT-11 is expected to increase by approximately six sorties per weekday under ARS 1. Although a variety of noise parameters and presentations could be used to express the effect on noise levels, the Ldnmr noise metric is believed to provide an accurate overall picture of noise changes that is adequate to assess potential effects at the range.

NCDENR-33 As presented in Appendix C, the following is the definition of training utilization rate in the NASMOD report: scheduled hours (block) divided by published available hours. The Air Force calculates utilization by dividing scheduled hours by actual *range open* hours. The projected Navy use rate for the Dare County Range contained in the FEIS for the Cherry I and Core MOA was based on the best data available at the time the document was published. The use of the Ldnmr metric to define the noise environment is appropriate particularly for training ranges with multiple allowable compass heading ingress and egress routes.

NCDENR-34 Noise levels are cited for the Dare County Range, which includes the existing prohibited area. Table 4.2-4 has been updated to show noise levels for R-5306A, including BT-9 and BT-11, using the Ldnmr metric. Comparing the projected results to the baseline condition leads to the correct conclusion that the noise levels will remain essentially unchanged. Although there is a projected 38% increase in range operations at BT-9, the F/A-18 operating altitudes on the range would only result in a 2 dB increase in the overall Ldnmr noise levels.

NCDENR-35 Section 4.3.3 has been amended to clarify land use impacts in the vicinity of the Dare County Range.

NCDENR-36 All of the subjects mentioned are discussed in the EIS at a level of detail sufficient for decision makers to accurately assess the impacts from each ARS. For example, Table 4.4-1 of the EIS provides the change in acres of various land use types within APZs for ARS 1, and Table 4.8.1 provides population changes within noise zones. Net emissions changes are also discussed in the EIS to assess air quality impacts.
Please see response to NCDENR-15.

41 that the analysis presented in Section 4.3 is a cumulative assessment of projected use of military target range airspace. Prior comments on Section 4.3 address the deficiencies identified in that discussion which disqualifies Section 4.3 from even rising to the level of direct affects assessment. Further, a discussion of target range airspace alone, does not constitute a cumulative impacts analysis.

42 Cumulative Socioeconomic and Community Services impacts are discussed at 9.1.3. This is a discussion of the issue as it applies to Oceana, but it is silent about such impacts at or around the training areas to be used in support of the alternative. Thus, the discussion is not only not cumulative, it is not even complete.

43 Cumulative Noise impacts are discussed at 9.1.7. Prior comments on Section 9.1.1 provide examples of potential cumulative noise impacts that have not been addressed in this DEIS. Therefore, the conclusion that the proposed action would have no cumulative impacts with existing aircraft noise on-station or off-station is highly questionable.

While the range of cumulative impact topics discussed in this DEIS is an improvement over past DoD NEPA documents, it is far from adequate. The majority of potential cumulative impact topics were discounted by prior determination, rather than by a process of assessment. Thus, individually minor but potentially significant impacts avoided review and a determination of their collective impact. This is not an acceptable procedure, and its weakness is compounded by the previously identified methodological deficiencies that inadequately address impacts.

44 Another example of inadequate cumulative impact assessment can be found in the topic of range use. The section on the affected environment presents a snapshot of ordinance use at the ranges, but the DEIS never reviews multi year or cumulative effects. For example, 3203 tons of ordinance was dropped on BT-11 from FY 82 through FY 86. The DEIS used antidotal evidence to support its conclusions about the impacts of past use, and there was no effort to project or otherwise determine the cumulative impacts of continued use.

UNAVOIDABLE ADVERSE IMPACTS

Previously identified deficiencies in the methodology used for impact assessment in this DEIS have severely limited the identification of potential impacts. The averaging and generalization of potential impacts led to the dismissal of potential impacts in some locations and justification for not conducting more detailed review or analysis. As a consequence the DEIS did not prepare an adequate foundation for discussion of the topic of this section.

RELATIONSHIP BETWEEN SHORT-TERM USES OF THE ENVIRONMENT AND THE ENHANCEMENT OF LONG TERM PRODUCTIVITY

Previously identified deficiencies in the methodology used for impact assessment in this DEIS

NCDENR-37 Please see response to NCDENR-15.

NCDENR-38 The NASMOD program was developed by the Navy to assess the capability of airfields and Special Use Airspace (SUA) to support the proposed realignment. Naval aviation training requirements and operational procedures were incorporated into the program with a high degree of accuracy.

The airfields and SUA analyzed were not constrained by environmental capacity limitations. Each alternative scenario was evaluated and environmental impacts were addressed.

The EIS has been amended to address those MTRs where the routes overlap or intersect. In addition, the noise level analysis for the restricted areas has been amended to include the noise levels at the BT-9 and BT-11 target ranges.

NCDENR-39 Agreements are currently being negotiated with the State of North Carolina to provide state aircraft access to Special Use Airspace (SUA) for emergency response and routine flights. The realignment of the F/A 18 aircraft will not affect these agreements.

The NASMOD analysis conducted for the EIS did not include state operated aircraft because the level of sorties/flights will not affect capacity in the SUA areas of eastern North Carolina. The Navy's goal is to provide real-time joint use of the SUA.

NCDENR-40 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

NCDENR-41 Please see response to NCDENR-36.

NCDENR-42 The proposed realignment of F/A-18 aircraft to NAS Oceana, MCAS Cherry Point, and MCAS Beaufort will increase the population in and around those bases, impacting the socioeconomics and community services of the local communities. All ARSs would increase operations at the BT-9, BT-11, and Dare County target ranges. However, neither the socioeconomics nor community services of the communities around those ranges will be directly, indirectly, or cumulatively impacted.

have severely limited the identification of potential impacts. The averaging and generalization of potential impacts led to the dismissal of potential impacts in some locations and justification for not conducting more detailed review or analysis. As a consequence the DEIS did not prepare an adequate foundation for discussion of the topic of this section.

This section also failed to report on relationships identified in the DEIS. For example, the opportunity for increased conflict between civilian and military aircraft was identified, but none of the earlier sections (environmental consequences or cumulative impacts) explored this conclusion in sufficient detail to allow this section to report any findings. If military use of airspace degrades its use for commercial air traffic or state aircraft missions (management, enforcement, and emergency response) then how will that affect the long-term productivity of the region. The issues are both natural resource based and economic, and its answer will determine the character and growth potential of the affected environment. 45

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Previously identified deficiencies in the methodology used for impact assessment in this DEIS have severely limited the identification of potential impacts. The averaging and generalization of potential impacts led to the dismissal of potential impacts in some locations and justification for not conducting more detailed review or analysis. As a consequence the DEIS did not prepare an adequate foundation for discussion of the topic of this section.

APPENDIX - AIRFIELD AND AIRSPACE ANALYSIS

Navy Dare County Range and Phelps MOA are discussed at 2.4.2 of the Appendix. It includes the statement that this analysis (NASMOD) addresses only the Navy Dare Range (i.e., northern half of 5314). Thus, the Air Force Dare Range (i.e., southern half of 5314) must have been ignored in the analysis. If that is the case then the NASMOD analysis is only for part, rather than all of potential users of the affected environment. That would prejudice findings about impacts, environmental consequences, and cumulative affects. 46

Military Training Routes are discussed at 2.4.10 of the Appendix. It reports that the combined historical utilization of the four Cherry Point VR routes is approximately 1400 sorties annually. This is curious since the DSEIS for Cherry I and Core MOA reported that just two of the MTR (VR 1043 & VR 1046) had more than 1600 sorties in 1988. Further, the draft EIS for F-15E Beddown at Seymour Johnson reported the same two MTR with a baseline annual use of more than 2200 and projected annual use of more than 2600. Since the only historical data was included in the NASMOD discussion at Table B-12, it is not possible to determine the reason for this discrepancy and low end average. The following table compares basecase and projected usage from prior NEPA documentation. Since Table B-12 only includes Oceana and Cherry Point demand, it presents a skewed perspective of usage and a faulty foundation for analysis. 47

NCDENR-43 Please see response to NCDENR-42.

NCDENR-44 The water and sediment quality study conducted by Sirrine Environmental Consultants at BT-9 and BT-11, which is described in Sections 3.1.3.1 and 3.1.3.2 of the EIS, did not identify any water or sediment quality impacts that could be attributed to the use of these areas for training, despite several decades of continuous use by the military (i.e., a cumulative impact from past use was not evident). Future adverse impacts are not expected given that F/A-18 aircraft transferred from NAS Cecil Field will use only inert ordnance at BT-9 and BT-11. Marine Corps F/A-18 aircraft and other range users will continue to employ high explosive ordnance at BT-9. As a result, none of the ARSs have the potential to cause concussion impacts at the site.

NCDENR-45 Agreements are currently being negotiated with the State of North Carolina to provide state aircraft access to Special Use Airspace (SUA) for emergency response and routine flights. The realignment of the F/A-18 aircraft will not affect these agreements. Though the possibility of conflict between military and civilian aircraft was identified, it was not significant enough to pursue further analysis. The goal of current airspace management practices of both the Navy and the Marine Corps is to ensure real-time joint use of airspace for both military and civilian users.

NCDENR-46 The NASMOD study for the EIS describes the potential use of the Navy Dare County Range (northern half of R-5314) by *all* users, including the Air Force "overflow" demand from the Air Force Dare County Range. Historical range data and projected Navy training requirements indicated that the proposed Navy F/A-18 squadrons at NAS Oceana will not require the use of the Air Force Dare County Range. The EIS provides the noise analysis for both the Navy and Air Force Dare County Ranges.

MTR	VR-1043	VR-1046	VR-1074	VR-1753	VR-073
F-15E DEIS Basecase Seymour Johnson	868	1389	4310	2434	2928
F-15E DEIS Projected Seymour Johnson	988	1667	4890	2772	3278
DEIS Cherry I & Core MOA	868	748	2568	2435	1788
FA/18 DEIS ARS-1	35	647	309	1453	526
FA/18 DEIS Basecase	22	292	324	748	478

If the numbers used do not reflect total historical, and therefore reasonably foreseeable future use then the NASMOD analysis is not a suitable foundation for impact assessment.

48

The Proposed Cherry I and Core MOAs are discussed at 2.4.13 of the Appendix. It reports that this area was not included in the NASMOD study. The NEPA documentation for these MOAs was completed in 1992, with the DEIS being completed in 1987 and utilizing a five year time horizon for the foreseeable future. Over the past decade virtually every aspect studied in the DEIS has changed in quality, quantity, scale and perceived significance. No action on the proposed Cherry I and Core MOAs should be taken on the basis of the prior EIS which is now archaic..

Benefits of Enhanced Radar Coverage is discussed at 4.5 of the Appendix. The State identified the need for this radar coverage more than a decade ago. It is needed sooner rather than later and regardless of where the F/A-18 aircraft are stationed.

Summary and Conclusions are discussed at 5.0 of the Appendix. It is worth noting here that the NASMOD analysis should not be assumed to be more than it is. NASMOD is an airspace and airfield operations analysis. It does not determine environmental constraints that may limit airspace capacity beyond what may be dictated by air safety issues and time limits. Thus, NASMOD's findings are only part of the equation needed to determine an areas carrying capacity.

This department has long advocated the need for better methodology for determining carrying capacity within training areas. This NASMOD process is a step in the right direction, at least as far as it goes. The process would be further improved if its developers and users could take a page out of the highway engineers handbook and begin to project level of service (LOS) associated with existing and future use. This additional information could give meaning to statements such as those in this DEIS that the relationship of DoD and civilian aircraft represents a negative cumulative impact. LOS could give a recognizable conclusion to analysis and give the FAA a methodology that will yield results that are friendly to NEPA documentation and decision making. More discrete analysis to determine LOS should show hotspots and differences in congestion or complexity within training areas. It would also be an indicator of air safety problem

NCDENR-47 The historical data for military training routes (MTRs) scheduled at MCAS Cherry Point was provided by Cherry Point Central Scheduling. The historical number of MTR sorties provided in the NASMOD report for comparison purposes is an approximation based upon historical scheduling rates for all users of the four MTRs cited. Exact utilization of these routes is not available because verification of a mission's completion on a specific route is not conducted by the central scheduling agency. Hence, reported MTR utilization in various environmental documents is based upon the best data available at the time the document was published. More importantly, while Table B-12 of Appendix C provides only the MCAS Cherry Point and NAS Oceana demand on those MTRs, Sections 3 and 4 of the EIS also include existing and projected Air Force demand for those MTRs based on existing and projected Air Force utilization.

NCDENR-48 In 1987, the Marine Corps published the Draft and Final EISs for the proposed establishment of the Core and Cherry I MOAs. In March 1991, as a result of recommendations made by the Council of Environmental Quality (CEQ), the Marine Corps published a Draft Supplemental EIS for the proposed establishment of the Core and Cherry I MOAs. This document contained a description of mitigation measures the Marine Corps would implement to minimize noise impacts over Cape Lookout National Seashore. The document also contained an extensive analysis of the cumulative impacts associated with existing and proposed military facilities, military Special Use Airspace, and surface water restricted areas located on, above, and adjacent to coastal Northern Carolina. In October 1992, the Marine Corps published the Final Supplemental EIS for the proposed establishment of the Core and Cherry I MOAs. The Marine Corps proposal to establish the Core and Cherry I MOAs is currently pending action by the Federal Aviation Administration. The Marine Corps is in the process of providing updated information concerning the impacts associated with the proposed establishment of the Core and Cherry I MOAs. The existing NEPA documentation is applicable, however, and the Marine Corps will continue to rely upon that documentation in pursuit of Core and Cherry I MOA establishment.

areas across the region. This would be based on the integration of all use in an area, and would support cumulative impact analysis.

The following table compares actual hours of utilization with the baseline scenario from Table B-27 and B-33 for both target ranges within R5306A.

FY 82	FY 83	FY 84	FY 85	FY 86	F/A-18 Baseline
1169	1236	1284	1653	1724	1958

While the progression of increased use appears to more closely follow a trend than the use presented in tables earlier in these comments, there is still no assurance that the F/A-18 baseline numbers accurately reflect existing use. Greater use of trend analysis and improved explanation about the source of data is needed to support DEIS assessment methodology.

49

Noise is discussed generally at H.1 of the Appendix. Its statement that aircraft noise consists of two major sound sources: aircraft takeoffs and landings and engine maintenance operations or run-ups illustrates the general disregard the DEIS has shown for training areas. Overflights is a third major sound source and it is the principle source at target ranges, restricted areas, MOAs and MTRs. Further, it is the least researched of the three sources, and the assessment methodology and prediction models developed for airfields are not well suited to the analysis of overflight impacts. More research is being conducted on overflight noise and the special conditions and characteristics of the populations and resources likely to be impacted as opposed to airports and surrounding urban populations. For example continuing research on overflight noise has indicated that "time above" is the metrics that may best show the impacts on natural resource users, rather than average over time. Another valuable assessment tool may be a graphic showing the percentage of time the conditions assumed in noise modeling (temperature, wind speed, impedance/vegetation, etc.) actually exist at the affected environment, and how the model results will deviate with variation from the assumptions. While such research and related methodologies are still evolving and have not yet been integrated into currently accepted assessment methodology, the DEIS presented a discussion of traditional noise assessment with no mention of evolving research on overflight noise/impacts and its preliminary findings. The DEIS discussion of impacts at training areas is deficient as a result and unnecessarily discounts the scale and effects of overflight noise.

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Noise Metrics is discussed at H.2 of the Appendix. Day-Night Average Sound Level is discussed therein. While this department has been critical of time-average sound levels in the past, it has not been from a misunderstanding of the basis for the measurement. Day-Night average sound level is subject to criticism for several other reasons: (1) its theoretical basis is the airport environs, (2) its methodology assumes an urban ambient noise level, (3) frequent single noise events are typical, (4) annoyance can be influenced by an economic or philosophical connection with the noise source, (5) the affected population is expected to be indoors, and (6) the majority of the affected

NCDENR-49 Tables B-27 and B-33 provide annual BT-11 and BT-9 utilization (hours) for the baseline scenario, respectively. In the baseline scenario, which reflects existing conditions, no Navy F/A-18 hours are cited. The F/A-18 hours cited reflect Marine Corps F/A-18 utilization from aircraft stationed at MCAS Beaufort, South Carolina.

NCDENR-50 Although Appendix H of the EIS does not specifically discuss overflights within training areas such as restricted areas, military operating areas (MOAs), and military training routes (MTRs), the EIS did not disregard the analysis of effects of proposed operations in those areas. The EIS utilized the best available methodology via the MR_NMAP program. The MR_NMAP program is a validated noise assessment methodology adopted by the Department of Defense (DoD) specifically designed to assess the noise exposure in training areas including low-altitude operations. The methodology evolved from years of study of military operations in training areas and includes, for example, the potential impacts from startle effects due to high-speed, low-altitude overflights. Please see Section 3.1.8 of the EIS for a more detailed discussion.

public is not in pursuit of solitude. All of these reasons contribute to the current weakness of this methodology where applied to overflight noise issues. The problem is not that time-average sound levels is an inappropriate metrics. It is simply that it is not precise in all conditions, but it is being applied in this DEIS as if it is. 51

CONCLUDING COMMENT

These comments have identified numerous deficiencies in the methodology, application of analysis, and conclusions reached in the DEIS. The following comments from divisions of this department will identify additional deficiencies. A piecremental response to each comment will not accomplish the full disclosure and analysis intent of NEPA. Taken together these deficiencies have eroded the fabric of the environmental documentation. The only way to restore the foundation for and credibility of analysis, as well as present reviewers and decision makers with a whole-piece-of-cloth is to issue a supplemental EIS. To issue a final EIS before participants in the NEPA process have an opportunity to review a sufficient draft EIS will not fulfill the spirit or purpose of NEPA. In a December 8, 1989 letter to Rep. Walter B. Jones on the FEIS for the MAEWR the CEQ, advised that: "the Navy should have supplemented the draft document and provided an additional public comment period." The scale of change required to respond to the deficiencies in this DEIS makes this a similar case. 52

The following comments from divisions of this department address DEIS issues from the more focussed responsibility and mission of each agency. They reinforce and provide more specific documentation of some of the topics raised in the preceding comments.

This department appreciates the opportunity to review and comment on the DEIS. Regardless of the alternative chosen, the vast majority of training area use and impacts will accrue to North Carolina. The intent of these comments is to seek a clear and complete description and understanding of those potential impacts. It is imperative that the affected public and decision makers understand the consequences of the proposed action.

attachment

NCDENR-51 The length of exposure time to aircraft noise sources is automatically taken into account in the Day-Night Average Sound Level (Ldn). The increase in the number of jet aircraft operations will generally cause the Ldn at any given location to increase from its present value to some higher value. The effect of noise on hearing is discussed primarily in Sections 3.1.8 and 4.8. The effects of noise on quality of life are also discussed in Sections 3.1.8 and 4.8. These effects range from speech and sleep interference to annoyance. Again, the extent of these effects at any location is determined by the noise level (Ldn) after the proposed action is implemented. Since a person does not regularly spend 24 hours a day outside, the Ldn that is experienced by any individual will be less than outdoor Ldn where he/she resides. Typical housing construction provides 15 dB (windows open) to 25 dB (windows closed) of sound attenuation. Thus, the actual Ldn that a person experiences will be a function of the Ldn at his/her home and the amount of time that he/she spends outdoors, indoors with the windows open, and indoors with the windows closed.

NCDENR-52 In response to an emergent concern that was not identified in scoping or prior to release of the MAEWR DEIS, the Navy issued a focused supplement to that document.

The EPA rating of EC2 as well as other comments received on this EIS indicate that, while some issues may require clarification, augmentation, or additional quantification, the document is essentially sufficient. This document, which includes all agency and public comments and Navy responses, provides a sufficient level of detail for the public and decision makers to accurately assess the impacts from each ARS.

DIVISION OF PARKS AND RECREATION

October 7, 1997

MEMORANDUM

TO: Melba McGee
Office of Legislative and Intergovernmental Affairs

FROM: Marshall Ellis

SUBJECT: Draft EIS for the Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station Cecil Field, Florida, to Other East Coast Installations.
Reference #98-0230

The North Carolina Division of Parks and Recreation has reviewed this document and would like to offer the following comments:

1 As noted in our comments on the scoping notice for this project (dated September 20, 1996), the division remains concerned about the effects of loud, low-flying aircraft operations over any state park, state natural area, or any area designated as a Registered Natural Heritage Area. In our September 20 memorandum, we requested that the document provide accurate, detailed maps showing the locations of all training routes, their entry and exit routes, as well as complete information on the flight elevations that will be utilized by aircraft operating in North Carolina as a consequence of this realignment. These maps must show sufficient detail and landmarks to enable reviewers to easily locate areas of environmental concern. Cartoon maps and generalized area maps are of little use when considering potential impacts to ecologically sensitive areas.

2 We also requested that all units of the North Carolina State Parks System that are affected by the proposed realignment be identified as noise sensitive areas and that all flights over any state park unit maintain a minimum horizontal clearance of three nautical miles or a minimum vertical clearance of at least 3,000 feet above ground level. Although neither the text nor the maps provide clear information, the following state park units could be affected by this realignment: Fort Macon, Carteret County; Goose Creek, Beaufort County; Hammocks Beach, Onslow County; Jockey's Ridge, Dare County; and Pettigrew, Washington and Tyrrell counties.

3 Please note that some parks units that are affected by this realignment have received funding from the federal Land and Water Conservation Fund (LWCF). Under that program's rule 6(f), it is possible that excessive aircraft noise over LWCF-funded areas could be considered a conversion from a state park's mandated use as a recreational area. Under LWCF rules, such conversions would require compensation.

4 Although the document provides exhaustive detail on the numbers and types of aircraft operations, our concerns regarding airspace use over ecologically significant areas are

NCDPR-1 Sufficient data are provided in the EIS to assess impacts. A more detailed description is available in the 1997 Wyle Labs, Inc., noise analysis report. This report, which includes additional information to support conclusions reached in the EIS, has been forwarded to the Division of Parks and Recreation.

NCDPR-2 The FAA recommends, via Advisory Circular 91-36C, that aircraft avoid flying over national parks, wildlife refuges, national seashores, and wilderness areas at altitudes below 2,000 feet. The Navy restricts overflights below 3,000 feet over these areas except when operating in Special Use Airspace or on published military training routes. No altitude restrictions apply to state park systems.

NCDPR-3 The Land and Water Conservation Fund Act (16 USC §4601 et. seq.) addresses the conversion of recreational lands only in the context of voluntary request from state governments to convert recreational lands to non-recreational use. The conversion process does not provide for compensation for the effects of aircraft overflight or other actions on recreational lands.

incompletely addressed in the DEIS. The maps outlining MTRs in North Carolina (Figure 4-3 in Appendix C: Normal R-5314 Ingress Flight Paths in Dare County, and Figure 3.1-4 Military Training Routes in the Vicinity of NAS Oceana and MCAS Cherry Point) are extremely general and are of virtually no use in reviewing potential impacts to ecologically sensitive areas. It is not readily apparent what, if any, ecologically sensitive areas will be affected, or how, by the realignment scenarios.

At a minimum, we recommend that each ARS's discussion on "Environmental Consequences and Mitigative Measures" include a section that identifies and addresses potential impacts to noise sensitive areas that will be affected by this realignment. This discussion should include detailed maps that show the location of ecologically sensitive areas, such as state parks, state natural areas, Registered Natural Heritage Areas, National Wildlife Refuges, etc. These discussions should include a detailed, concise description of the current and anticipated airspace use over the area. It is particularly important that this include information on current and anticipated flight elevations above ground level and numbers and types of aircraft involved. Much of this information is already contained in the text, but it is difficult to locate; the addition of flight elevations and citations in the text that will direct us quickly to the appropriate charts and maps would be useful.

Thank you for the opportunity to review this document. We look forward to receiving the final version.

/me

NCDPR-4 Please see response to NCDPR-1.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
William L. Meyer, Director

DEHNR

MEMORANDUM October 27, 1997

TO: Mike Kelly, Deputy Director
Division of Solid Waste Management

THROUGH: Bruce Nicholson, Head
Special Remediation Branch

FROM: S. Franch, Environmental Chemist
Superfund Section

SUBJECT: Department of Navy, Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station Cecil Field, Florida, to MCAS Cherry Point under Alternative Realignment Scenarios 3 and 5.

1 The Cherry Point Marine Corps Air Station (NC1 170 027 261) site has been added to the National Priorities List (NPL). The Cherry Point Marine Corps Air Station was an aircraft assembly and repair shop during the second world war. Today it serves as an aircraft maintenance, material and support facility for the 2nd Marine Aircraft Wing. It also provides training, support, and supplies for the Fleet Marine Force of the Atlantic units. The numerous known waste source areas, originating from spills, dumping, piles and landfill activities, have been grouped into Operable Units based on geographic clusters of contaminated areas. There are 15 Operable Units (OU) or regions whereby each may contain multiple subsites.

The proposed project involves one of two possible scenarios. Alternative Realignment Scenario (ARS) 3 proposes to relocate three F/A-18 fleet squadrons to MCAS Cherry Point, while ARS 5 proposes the relocation of five F/A-18 fleet squadrons to MCAS Cherry Point. Both scenarios involve the renovations of several hangars, parking apron alterations and construction of an aircraft maintenance department facility (AIMD). In addition, ARS 5 would require the construction of a child development center, a clinic, expansion of the flight simulator, and construction of a parallel runway with a relocation facility. The attached map denotes the proposed project alterations and additions with locations of contaminated areas.

The construction of a parallel runway would pave over OU-1, Site 35 and OU-6, Site 12. Neither of these two sites have been remediated to completion. Hangar 130, that is part of BRAC Site 7, has been show to have volatiles in its soils. In addition, all three hangers in this

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NCDSWM-1 Section 3.3.14.2 states that MCAS Cherry Point is on the National Priorities List (NPL).

vicinity are on a petroleum contaminated groundwater plume. Renovation of these hangars should be conducted by properly trained personnel. The proposed construction of the flight simulator, AMID and clinic are near the contaminated industrial zone or OU-1. It is possible that soil and groundwater may be contaminated in this proposed building area. In addition, the Child Development Center would also be in an area that has not been prevoiusly tested for contamination. Consequently, the soils and groundwater of these proposed areas of new construction should be evaluated for a complete hazardous substances scan prior to construction.

2

Based on the aforementioned findings, it is recommended that both scenarios be examined by Mr. John Myers at MCAS, Environmental Affairs Dept., PSC Code 8006, Cherry Point, NC 28533-0006, telephone (919) 466-4903. It appears that both scenarios will have an impact on the remediation of several areas. If you have any questions, please call me at ext. 314.

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NCDSWM-2 The plans and specifications for any projects located near OU-1, Site 35, OU-6, and Site 12 would have to incorporate procedures for handling potentially contaminated soils and/or groundwater. In addition, properly trained personnel would be required to oversee testing of any potentially contaminated soils or groundwater. The Navy would also ensure that construction would not interfere with any remediation activities. As recommended, the child care facility would require a survey to determine if hazardous substances are present.

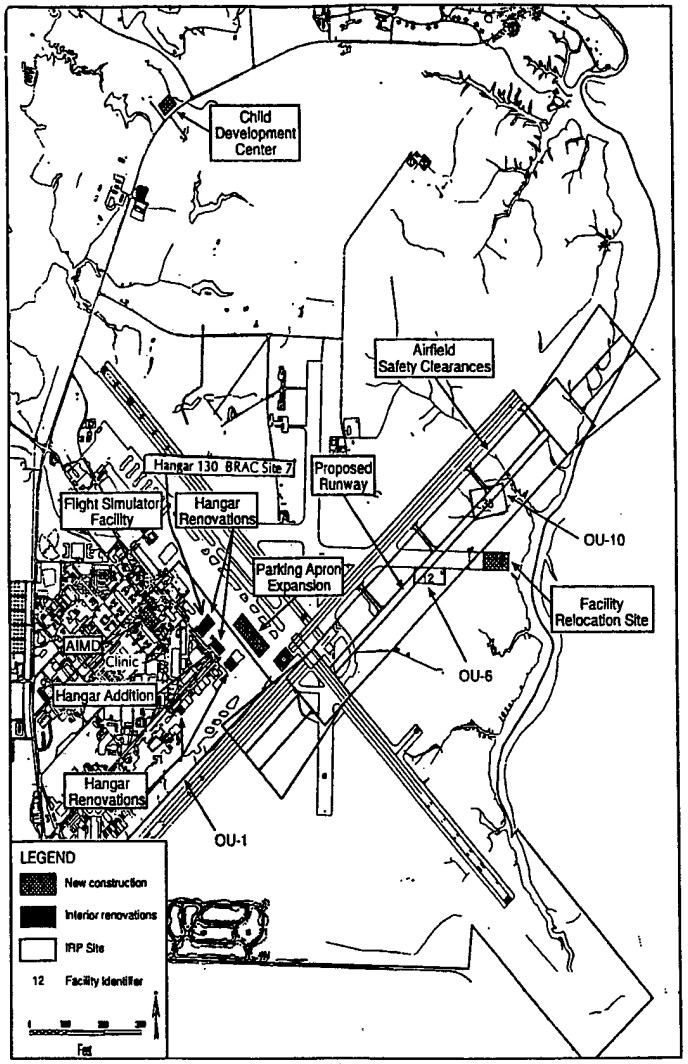


Figure 3.3-11
Installation Restoration Program Sites Near
Proposed Construction Sites - MCAS Cherry Point

State of North Carolina
Department of Environment
and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
William L. Meyer, Director

DENR

September 29, 1997

TO: Michael A. Kelly - Deputy Director
Waste Management Division

FROM: Larry D. Perry - Supervisor
Eastern Area Compliance Unit

SUBJECT: Draft Environmental Impact Statement
Realignment of F/A-18 Aircraft and
Operational Functions from Naval Air Station
Cecil Field, Florida to other East Coast Installations

The Hazardous Waste Section has reviewed the noted project and offers the following comments:

- The realignment of F/A-18 squadrons to MCAS Cherry Point is projected to generate more hazardous waste at the station, because of the increased maintenance and repair activities associated with the aircraft. This facility currently manages its hazardous waste in compliance with the Resource Conservation and Recovery Act (RCRA).
- This office has no objections to the proposed activities. The increase in hazardous waste generation can be accommodated within the existing hazardous waste management system at the facility. MCAS Cherry Point is a permitted Part B TSD facility and should contact the Hazardous Waste Permitting Branch (now Facilities Management Branch). This notification is necessary in order that the appropriate permit modification might be completed.

If any problems or questions should arise, do not hesitate to call this office at (919)733-2178 Ext. 213.

LDP/jsp

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Thank you for your comment; no response required.

State of North Carolina
Department of Environment
and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
William L. Meyer, Director

October 6, 1997

MEMORANDUM

TO: Michael Kelly, Deputy Director
Division of Solid Waste Management

FROM: Philip J. Prete, Head
Field Operations Branch

Subject: Realignment of F/A-18 Aircraft, Cherry Point, Craven County
Environmental Impact Study

The Solid Waste Section has reviewed the attached project proposal and has seen no adverse impact on the surrounding community and likewise knows of no situations in the community which would affect the project.

1 MCAS Cherry Point should make every feasible effort to minimize the amount of waste generated in this project. Materials should be segregated and re-used or recycled where feasible. Those materials that are not recycled must be disposed of at a properly permitted disposal facility.

Questions regarding solid waste management in Craven County should be directed to Mr. Bill Morris, Waste Management Specialist, Solid Waste Section at the Washington Regional Office, at (919) 946-6481.

PJP/lcf

cc: Bill Morris

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NCDWM-1 MCAS Cherry Point participates in on-station recycling as discussed in Section 3.3.6.7 of the EIS. Construction and demolition waste associated with ARSs 3 and 5 would be recycled as feasible. As stated in Section 3.3.6.7, all materials not recycled are disposed of in a properly permitted disposal facility.

Clayton, NC
October 27, 1997

MEMORANDUM

TO: Melba McGee, Office of Leg. Affairs

FROM: Don H. Robbins, Staff Forester DHR

SUBJECT: Navy/DOD DEIS for the Realignment of F/A-18 Aircraft from NAS Cecil Field, Florida to Other East Coast Installations in Virginia, North Carolina and South Carolina

PROJECT: #98-0230

DUE DATE: 10-24-97

We have attempted to review the above subject highly technical document for addressment of our forestry concerns. We have the following comments:

I. **Summary of our past scoping concerns - These were as follows -**

"1. Airspace impacts to our pilots.
2. The need for safety of our pilots.
3. The need for low level radar coverage.
4. Possible increase of woods fires starting from military operations.
5. Proposed action causing the need for an outlying airfield in Eastern North Carolina.
6. The need for faster and more effective radio communications between our pilots and military personnel before and during flying operations.
7. Possible impacts to forest resources to include loss of woodland from construction activities."

2

II. **Their Section #1 under Introduction, Table 1.2-1 (List of issues identified in Scoping Comments) reflects the following concerning our forestry concerns -**

Items	Issue	Number of Comments Received	DEIS Section
1	Concerns Over Safety and Efficiency of State Resource Management Emergency Response Aircraft	6	4.2
2	Increased Use of Special Use Airspace and Military Training Routes for Aircraft Operations	9	4.2
3	Impacts of Bombing Activities on Soil, Surface Water, Groundwater, Sediments and Wildlife Tissue	7	4.3
4	Potential for Forest Fires Due to Off-Target Ordnance Drops	3	4.3
5	Increased Requirements for Radar Coverage and Air Traffic Control (Airspace Management)	12	9.0
6	Impacts on Safety of Civilian, Commercial and General Aviation Flights	6	4.2; 9.0
7	Potential for Increased Incident of Accidents Due to Training	2	4.3
8	Potential Need for an OLF in Eastern North Carolina	1	2.0
9	Increased Communication between State and Military Pilots During Flight	1	9.0
10	Loss of Forest Resources Due to Increased Construction	1	6.1.12; 8.1.12

NOTE: We could not locate any addressment above as indicated for items #1,3,4,6 (as pertains to State aircraft), 7,8, and 9 at the designated DEIS sections or any other sections in the document. We did locate some addressment for items #2, 5 and 10 in the document which we will discuss later on in this memo.

III. **Items that have been adequately addressed are:**

Impacts or loss to forest woodland acres and descriptions - It appears that loss of woodland acres would range from minimal loss for Alternatives 1, 2 and 3 up to 95 acres for Alternative 4. Alternative 5 involves 45 acres. We need no further discussions for potential impacts to woodland as a result of proposed construction activities.

IV. **Items that we cannot locate any addressment on are as follows -**

1. Concerns over safety and efficiency of State Resource management of emergency response aircraft.
2. Impacts of bombing and the potential for forest fires getting started due to off-target ordnance drops.
3. Need for a new OLF in Eastern North Carolina.
4. Need for increased and better communication between state and military pilots during flight.

We would like to see some addressment of these items and/or at least show us where they have been addressed in the document.

V. **Items that have been addressed but need further clarification are -**

1. Need for Low Level Radar Coverage in Northeast North Carolina - Their page # C-129 in Section C under NASMOD indicates the following -

"4.5 Benefits of Enhanced Radar Coverage"

"The Navy is in the process of determining a site for an air surveillance radar system in northeastern North Carolina. At this time, the Elizabeth City Coast Guard Air Station is the proposed site for installation of this radar. The radar system is proposed to be installed and operational by the end of 1997 with data feeds to FACSFAC VACAPES and Norfolk Approach Control, with Norfolk Approach Control providing the radar services. Radar coverage in this area will offer significant benefits to all civilian and military users. The implementation of a new radar site will provide all airspace users with better service and a safer flying environment while enhancing military training. The primary benefits to the flying community will include:

Increased Flight Safety. Improved radar coverage will allow air traffic controllers to provide more efficient positive control of flights on instrument flight plans and offer more effective VFR traffic advisory service.

Enhanced Services to Civil Airfields. With improved radar coverage, at least five additional civil airfields will be able to receive VFR and IFR services below 5,000 feet, including radar separation from other aircraft and vectoring to initial approach fixes for the final approach.

Improved Traffic Flow and Services to Dare County/Manteo Airport - With improved radar coverage, a new instrument approach to Runway 04 at the Dare County/Manteo Airport can be designed and implemented, meeting all current restricted airspace separation criteria."

Our Response to this - We welcome the new proposed radar, but it was our understanding that it would not be ready until 1999 plus. Also, they mentioned civilian and military aircraft, but do not mention state aircraft that must operate in this area. Also will this radar coverage benefit our pilots that fly at 500' AGL? Our Division has approximately 1000 fires

NCDFR-1 Agreements are currently being negotiated with the State of North Carolina to provide state aircraft access to Special Use Airspace (SUA) for emergency response and routine flights. The realignment of the F/A-18 aircraft will not affect these agreements.

NCDFR-2 In current practice, the availability of a bombing range and the types of ordnance allowed on the range at a specific time are directly affected by input from the forest service regarding the fire index.

Of note, the inherent accuracy of the F/A-18 leads to very few off-target hits, and the number of hits out of the target complex itself is negligible. Supporting historical figures are available from several ranges (e.g., Pinecastle, Townsend, Avon Park).

NCDFR-3 The Navy does not plan to build an outlying landing field (OLF) in eastern North Carolina to support the F/A-18 realignment.

NCDFR-4 Existing procedures provide civilian, state, and military pilots the capability to communicate with range and ATC facilities. Pilots can contact FAA flight service stations to determine if military training routes are scheduled. In addition, direct phone lines have been established between Dare County Range Control, Norfolk Approach Central, Washington Air Traffic Central Center, and the Fleet Area Control and Surveillance Facility (FACSFAC) to improve communications.

NCDFR-5 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

per year in this area that we must respond to that involves a lot of air operations. We are committed to early detection to get to these fires before they become large fires. This means preplanned patrol flights and scouting to detect these fires. Also with the reduction in the number of lookout fire towers, we have to depend more and more on aerial detection so that all fires can be attacked while they are small. We are also concerned about the potential increase of fire ignitions from DOD operations, if DOD activities increases as proposed.

6

2. State aircraft operating in Eastern North Carolina - Their Section C under NASMOD reflects here and at other sections the following -

> **"2.5.5.8 Civilian"**
> "These users operate a wide range of aircraft types, both commercial and private (e.g., Boeing 747, Cessna 172). These users are observed in the warning areas and are usually transiting the airspace. The primary flows of civilian air traffic are routed around or above the NAS Oceana and MCAS Cherry Point airspace and nearby warning areas, MOAs, and Dare County range, and do not impact or interact with military aircraft".
>
> "The military and civilian operations near R-5314 and Dare County Regional Airport at Manteo (on Roanoke Island in northeastern North Carolina) has been studied by ATAC analysts, and a summary of the analysis is included in Section 4."

Our Response to this - Here again they do not mention state aircraft above. We get the impression that State aircraft has been left out of the NASMOD Review of the Airfield and Airspace Analysis. All five alternatives will cause a heavy increased usage of target ranges, bombing ranges, air fields, MTR's, MOA's and restricted special use airspace in Eastern North Carolina that ranges from increases of 1 percent up to 118 percent plus. Their NASMOD review implies that all of the special use airspace can accommodate the increased usage. However, we still cannot help wondering what impacts this will cause our state pilots from carrying out their mission and be able to gain access when needed to this SUA? Their proposed increased usage appears as follows -

7

A. Airfield operations - 18 to 118 percent increase.
B. NALF operations - 39 to 51 percent increase.
C. Target and bomb ranges - 16 to 41 percent increase.
D. MTR's - 8.6 to 9.8 percent increase.
E. MOA's - They indicated "No significant changes would occur in utilization of MOA's". We have concerns with this.
F. Restricted Areas - They indicate that, "use would not exceed capacity." We also have concerns about this, although current restricted areas do not bother our operations as much as MOA's and MTR's do. New restricted areas would cause us some problems if they were created.

It also appears to us that if Alternative #1 is selected, that N.C. Special Use Airspace will be used more than if one of the other alternatives is selected.

NCDFR-6 Please see responses to NCDFR-1 and NCDFR-2.

NCDFR-7 The NASMOD analysis conducted for the EIS did not include state operated aircraft. The level of sorties/flights will not affect capacity in the Special Use Airspace (SUA) areas of eastern North Carolina. The Navy's goal is to provide real-time joint use of the SUA.

5

3. The possible creation or need for new special use airspace as a result of the proposed action - Their Section #9 on Cumulative Impacts indicates that the proposed action would, "not result in the establishment of any new special use airspace", other than the three pending ones indicated below as follows -
   - The creation of the Core and Cherry 1 MOAs near Pamlico Sound in North Carolina;
   - The creation of the Phelps MOA; and
   - The creation of special use airspace over the Greater Sandy Run Area near Camp Lejeune, North Carolina.

   We, of course, hope that no new restricted airspace is needed as a result of the proposed action.

4. Continuing on with their Section #9 under Cumulative Impacts, Page #9.1-5 indicates -

   "Interaction between Military and Civilian Aircraft Operations"
   "Although various components of special use airspace in Eastern North Carolina have sufficient capacity to support ARS 1 and other DoD aircraft activities, logistics of operations by civilian aircraft may become more complicated as a result of increased DoD operations and the establishment of the proposed special use airspace (Core and Cherry 1 MOAs, Phelps MOA, and the GSRA restricted airspace). The proposed action, when considered in combination with the four special use airspace proposals, may result in a negative cumulative impact on civilian aircraft use in Eastern North Carolina. The relationship of DoD and civilian aircraft represents a negative cumulative impact. Steps are currently being taken by the Navy to more effectively manage special use airspace to allow for better real time use of the airspace."

   "Currently, the controlling agency for the majority of all airspace in the region is the FAA's Washington Air Route Traffic Control Center, FACSFAC VACAPES is the scheduling authority for all over-water warning areas. MCAS Cherry Point Air Traffic Control (ATC) has approach control responsibility inland up to and including 18,000 feet AGL, and coordinates use of the following special use airspace: A-530, R-5306A (including BT-9 and BT-11), R-5306C, R-5306D/E, and the Hatteras F MOA (special use airspace shown in Section 3, Figure 3.1-3)."

   Our Response to this -
   A. They are acknowledging that civilian aircraft operations may become more complicated as a result of increased DoD operations and the establishment of the proposed SUA pending actions. They do not, however, mention any impacts to state aircraft and operations. They do mention negative cumulative impacts to civilian aircraft use in Eastern North Carolina.
   B. We are glad that steps are currently being taken by the Navy to more effectively manage special use airspace to allow for better real time use of this airspace. We truly hope that this comes about.

8

NCDFR-8 Please see the response to NCDFR-1.

5. Possible Future Need for a New Outlying Airfield in Eastern N.C. - As previously mentioned, we did not locate any addressment on this subject, but did find the following information -

   A. It appears that ALF, Marine Corps Auxiliary Landing Field (MCAL) Bogue is too short and thus is undesirable for F/A 18 fleet squadron type operations.

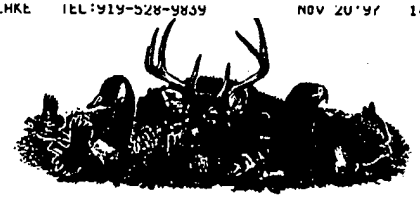
   B. Thus, if the new aircraft comes to MCAS Cherry Point, that a new parallel runway will need to be constructed on base which supposedly eliminates the need for a new separate outlying airfield. We need further clarification on this. If a new field is needed off of the base, we would still favor the Open Grounds Farm site in Carteret County. Our previous comments on this were as follows -

   "If an Outlying Airfield is needed in Eastern North Carolina, we would still favor the Open Grounds Farm Site in Carteret County as the preferred site. We definitely would not want either one of the Beaufort County sites to be selected."

9

pc: Stan Adams, Derryl Walden, John Shepherd, David Jarman, Mike Thompson,
Warren Boyette - CO
Harry Sumner - GrFC
Jim Sain, John Pearson - R1
Ralph Cullom - D4
Bill Flournoy - Office of Leg. Affairs
Col. Dave Jones - Governor's Military Liaison
File

NCDFR-9 Please see the response to NCDFR-3.



North Carolina Wildlife Resources Commission

512 N. Salisbury Street, Raleigh, North Carolina 27604-1188, 919-733-3391
Charles R. Fullwood, Executive Director

November 19, 1997

MEMORANDUM

TO: Bill Flournoy
Office of Legislative and Intergovernmental Affairs

FROM: Franklin T. McBride, Manager
Habitat Conservation Program

SUBJECT: Draft EIS for Realignment of F/A-18 Aircraft from Cecil Field, Florida to Other East Coast Installations
Reference # 98-0230

The North Carolina Wildlife Resources Commission has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed realignment of 180 F/A-18 aircraft and 4,200 individuals from Florida to other air stations on the East Coast. Our comments are provided in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat.401, as amended; 16 U.S.C. 661 et seq.) and the National Environmental Policy Act (42 U.S.C. 4321-4347).

Even though the DEIS does an exhaustive job of describing airfield operations, we feel that environmental impacts associated with low-level aircraft training were not addressed at the same level of detail. We request that the following concerns be thoroughly addressed in the Final EIS.

1. We are concerned about the projected increase (30-40%) in the number of low-flying aircraft operations over sensitive areas such as wildlife refuges, state parks, natural heritage areas, state game lands and waters where large numbers of waterfowl are wintering. We request that detailed maps be provided that indicate exact locations of all training routes and flight elevations of F/A-18's operating in North Carolina as a result of this realignment. 1

2. We question why so much of the training has to occur in North Carolina. The DEIS should discuss the possibility of the F/A-18's training on targets in Virginia or other states. It appears that most of the adverse environmental impacts associated with this realignment will be experienced in North Carolina. 2

NCWRC-1 Low level F/A-18 operations will primarily be limited to existing military training routes (MTRs) and target ranges. Figure 3.1-4 depicts all primary training routes that will be used by F/A-18 aircraft. For ARS 1 (which is representative of the other alternatives), the number of operations on all primary MTRs is projected to increase from 7,840 to 8,329 (which includes all military users), equating to an increase of less than two operations per day spread out over all training routes. No significant changes in noise levels would occur along MTRs regardless of the alternative selected for implementation. With respect to bombing range operations, the EIS discusses projected operational increases, noise levels, and impacts resulting from each alternative. The Navy determined that noise levels would not increase significantly and fish and wildlife resources in the vicinity of affected bombing ranges (BT-9, BT-11, and Dare County) would not be adversely impacted, regardless of the alternative chosen. As discussed in Section 4.3.2 of the EIS, studies done on raptors, waterfowl, and other birds show that, while direct aircraft overflights may disturb a small percentage of birds, there is no definitive correlation between aircraft overflights and reproductive success. All F/A-18 aircraft, regardless of the chosen alternative, will comply with all Federal Aviation Administration and Navy minimum altitude restrictions over sensitive ecological areas (i.e., wildlife refuges, national parks, etc.).

Special Use Airspace (SUA) descriptions (except National Security Areas and controlled firing areas) are contained in FAA Order 7400.8. Textural and graphic descriptions of all MTRs are contained in the DoD area Planning Publication AB/1B.

NCWRC-2 The three primary ranges that afford F/A-18s adequate training within a reasonable distance of their proposed home stations are located in eastern North Carolina. The percentage of operations occurring at North Carolina ranges, and the effects of these operations, are a direct result of the modeling process used in the NASMOD.

3. We request that the military evaluate the potential for moving some of the targets from the North Carolina's sounds to the Atlantic Ocean, thus reducing the environmental impacts on inside waters while increasing public recreational opportunities in these areas. North Carolina's population has experienced rapid growth in the last decade, which has resulted in significant increases in boating, fishing and other water based recreation.

4. Finally, we remain concerned that the significant increase in aircraft activity and associated noise will have an adverse effect on the large numbers of waterfowl wintering in the wildlife refuges and coastal waters of North Carolina. The FEIS should thoroughly address this issue.

Thank you for the opportunity to review and comment on this DEIS. If you have questions concerning these comments please contact me at (919) 528-9886.

NCWRC-3 BT-9 and BT-11 are essential training resources for Navy and Marine Corps aircraft and will not be moved to deep water. The identification, prosecution, and attack of water-based bombing targets such as surface vessels is a major objective of the Navy's operational mission. The Navy currently uses deep water ranges to the maximum extent possible, consistent with established readiness requirements. This deep water training, however, does not negate the need for the low level training provided by BT-9 and BT-11. BT-9 and BT-11 training is unique in that it occurs near the shoreline and includes low-altitude aerial maneuvers needed to evade simulated enemy threats or deliver bombs and strafing fire to selected targets. The ability of military pilots to do this whenever and wherever called upon requires consistent and continuous training activities at BT-9 and BT-11.

NCWRC-4 The coastal bays and sounds of eastern North Carolina are important wintering grounds for many species of waterfowl in the Atlantic Flyway. According to Fleming et al. (1996), adult waterfowl at BT-11 (which is noisier than BT-9 or other areas of Pamlico Sound) did not suffer adverse effects from high noise levels. Because all wintering waterfowl are adults or nearly adults, no significant long-term effects on these birds are anticipated.

October 17, 1997

MEMORANDUM

TO: Melba McGee
Office of Legislative and Intergovernmental Affairs

FROM: Alan Klimek, Director

SUBJECT: Project No. 98-0230
Draft Environmental Impact Statement
"Realignment of F/A-18 Aircraft and Operational Functions From Naval Air Station Cecil Field, Florida, to Other East Coast Installations"
Pamlico County

The Division of Air Quality has reviewed the above report. The proposed project assesses five alternative scenarios for relocating F/A-18 aircraft and personnel from the Naval Air Station at Cecil Field, Florida to other locations on the East Coast. Two of the alternatives (ARS 3 and ARS 5) involve relocation of aircraft to the Cherry Point Marine Corps Air Station. Cherry Point Marine Corps Air Station's existing air permit would most likely need to be modified as a result of the construction and operation activities proposed. Mr. Vic Copelan, Washington Regional Air Quality Supervisor, 919-946-6481, should be contacted to discuss the modifications if either of the two alternatives are chosen. 1

In addition, the construction contractors should take care to comply with open burning provisions during construction activities. Adequate wetting, reseeding and covering of disturbed areas should be utilized during earth moving operations to mitigate any adverse impact from fugitive dust emissions. 2

Should you require further information in this regard, please advise.

c: Holly Groce

chrypt.spp

NCDAQ-1 If ARS 3 or ARS 5 is selected, MCAS Cherry Point will prepare the necessary air permit applications for the construction and operation of regulated air pollutant sources.

NCDAQ-2 If ARS 3 or ARS 5 is selected, MCAS Cherry Point will review all air regulations pertaining to open burning and fugitive dust control and implement mitigation activities as required.

North Carolina
Department of Administration

James B. Hunt, Jr., Governor — Katie G. Dorsett, Secretary

December 2, 1997

Mr. Dan Cecchini
Department of Navy, Atlantic Division
Naval Facilities Engeneering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Dear Mr. Cecchini:

Re: SCH File # 98-E-0000-0230; Draft Environmental Impact Statement DEIS-Evaluate Potential Socioeconomic and Environmental Consequesces of thre Realignment of F/A 18 Aircraft and their Associated Personnel to Naval Air Station Oceana, Virginia Beach, VA and/or Possible Some Relocation to Cherry Point , NC **ADDITIONAL COMMENTS**

The above referenced project has been reviewed through the State Clearinghouse Intergovernmental Review Process. Attached to this letter are comments made by agencies reviewing this document.

Should you have any questions, please do not hesitate to call me at (919) 733-7232.

Sincerely,

Chrys Baggett

Mrs. Chrys Baggett, Director
N. C. State Clearinghouse

Attachments

cc: Region P

116 West Jones Street Raleigh, North Carolina 27603-8003 Telephone 919-733-7232
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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

NCDENR

JAMES B. HUNT JR.
GOVERNOR

WAYNE MCDEVITT
SECRETARY

MEMO

To: Chrys Baggett
State Clearinghouse

From: Bill Flournoy

Subject: 98-0230
F/A-18 Realignment
MCAS Cherry Point Option

Date: November 25, 1997

The attached comments were received by this office after the response due date. These comments should be forwarded to the applicant and made a part of our previous comment package.

Thank you for the opportunity to respond.

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State of North Carolina
Department of Environment
and Natural Resources
Division of Water Quality

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
A. Preston Howard, Jr., P.E., Director

DENR

November 24, 1997

MEMORANDUM

TO: Bill Flournoy

FROM: Colcen Sullins WS 1/24

RE: Revised Comments on DEIS for US Department of the Navy
F/A-18 Realignment; MCAS Cherry Point Option
DENR No. 98-0230, DWQ No. 11800

The project consists of an Environmental Impact Statement (EIS) for the closure of Cecil Field in Florida and assessing the environmental impacts of five realignment scenarios, two of which include impact areas within the state of North Carolina. Those alternatives include "ARS 3" and "ARS 5", described in the EIS as follows:

ARS 3 - Realignment of three F/A -18 fleet squadrons (35 aircraft) to Marine Corps Air Station Cherry Point and realignment of eight fleet squadrons and the FRS (144 total aircraft) to NAS Oceana.

ARS 5 - Realignment of five F/A -18 fleet squadrons (60 aircraft) to MCAS Cherry Point and realignment of six fleet squadrons and the FRS (120 total aircraft) to NAS Oceana.

According to the EIS, the ARS 3 option would have no loss of wetlands and it appears that ARS 5 would have significant wetland loss. The DEIS should be clarified as to the exact nature of the wetland impacts from ARS 5. Based on our evaluation, the DEIS implies that the ARS 5 option will impact 48.81 acres of palustrine wetland and an additional 50.59 acres of estuarine impact through the proposed construction of a new parallel runway and associated clear zones, and the culverting and filling of two tributaries to Hancock Creek. 1

The Division of Water Quality (DWQ) has reviewed the EIS and has the following comments on the proposed project:

1. MCAS Cherry Point is located in the Neuse River Basin, which is classified as having nutrient sensitive waters. The NC Environmental Management Commission recently adopted temporary rules for the Neuse River Basin (15A NCAC 2B .0233) that provide a management strategy for maintaining and protecting existing riparian buffers by requiring a 50 feet vegetative buffer along all permanent streams in the basin. The rules currently do not provide exemptions for airports. The proposed estuarine and creek 2

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NCDWQ-1 A total of 48.81 acres (19.8 hectares) of palustrine wetland and 50.59 acres (20.5 hectares) of estuarine wetland fall within the footprint of the proposed runway expansion associated with ARS 5. Section 8.1.11 has been amended to clarify that 45.38 acres (18.4 hectares) of wetlands would be permanently lost from the construction of the runway, primary surface, and Type I clear zone. Approximately 7.17 acres (2.9 hectares) of palustrine forested wetland would be cleared of trees to provide safe operations and converted to emergent or scrub-shrub wetland. The remaining 46.85 acres (19.0 hectares) of wetlands are within the Type II and Type III clear zones and transition areas, and no significant impacts are anticipated.

The Type II and Type III clear zones overlap approximately 45 acres (18.2 hectares) of Hancock Creek, which would not result in significant impact. While non-point source runoff may increase to the creek, no significant physical alterations would be required. The tributaries to Hancock Creek would require culverting to allow for safe operation of the runway.

disturbances planned for alternative ARS 5 would not comply with these rules. Therefore, ARS 5, as currently proposed, would require a variance to these rules be granted by the North Carolina Environmental Management Commission before these disturbances could occur. Please direct the project applicant to Ms. Beth McGee, with the Management Planning / Development Unit at 919-733-5083, ext. 575, for further information on the Neuse Rules and the procedures for requesting a variance.

2

2. The Division of Water Quality (DWQ) would be responsible for the issuance of the Section 401 Water Quality Certification for project alternative ARS 5, which, according to the information provided in the DEIS, would impact waters of the state including wetlands. The applicant should be reminded that approval of the 401 Certification would be contingent upon water quality concerns being satisfactorily addressed and impacts to wetlands being avoided, minimized and mitigated to the maximum extent practicable. Questions regarding the 401 Certification should be directed to Eric Galamb (919-733-1786) in DWQ's Water Quality Non Discharge Branch.

3

3. DWQ recommends that the Department of the Navy choose an alternative that has minimal environmental impacts and complies with water quality regulations of North Carolina (including the Neuse Rules).

4

The applicant can reach me at 919-733-5083, ext. 550 if they have any questions on these comments.

mls:\980230 F/A - 18 Realignment/ Cherry Point

cc: Eric Galamb - 401 Unit, WQ Lab
Beth McGee - Management Planning / Development Unit

NCDWQ-2 Following the completion of the EIS and the selection of an ARS in the Record of Decision, the Navy will contact appropriate permitting agencies to discuss the requirements for all identified permits and regulations applicable to the project. The Navy will adhere to all applicable regulations. Where a proposed ARS is in apparent conflict with a regulation, the Navy will work closely with the regulatory agency to develop a solution agreeable to both parties.

NCDWQ-3 The Navy is aware of the permitting requirements for ARS 5. Following the completion of the EIS and the selection of the preferred alternative in the Record of Decision, the Navy will begin the process of obtaining appropriate permits. The proposed action is guided by the Clean Water Act, which requires Section 401 Water Quality Certification. The project is also guided by Executive Order 11990, *Protection of Wetlands*, which dictates a policy of avoidance, minimization, and mitigation for any federal project that potentially impacts wetlands.

NCDWQ-4 Thank you for your comment; no response required.

STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR

JAMES B. HUNT JR.
GOVERNOR

MILITARY LIAISON

NOV 1997
RECEIVED
SECRETARY'S OFFICE
DOA

MEMORANDUM

TO: Chrys Baggett

FROM: Col David A. Jones, USMC (Ret.)

SUBJECT: DEIS, Realignment of F/A-18 Aircraft from NAS Cecil Field (SCH #98-0230)

DATE: November 25, 1997

As the Governor's Military Liaison I have reviewed the Draft Environmental Impact Statement (DEIS) for the realignment of F/A-18s from NAS Cecil Field to NAS Oceana, MCAS Cherry Point or MCAS Beaufort and would like to offer the following comments:

(a) **P-80 Comparisons**

There appears to be a genuine effort to apply a common standard when assessing the relative capacities of the three air stations. During BRAC 95, the Navy claimed the only cost of moving all the squadrons to NAS Oceana was 28.3 million in military construction (milcon). This was for a simulator, maintenance building and a training facility. At that time, the State of North Carolina contended that different standards were applied at Oceana and at Cherry Point. Standards which kept the costs down at Oceana while the costs at Cherry Point were projected artificially high. When P-80 standards were applied to Oceana during the DEIS it was revealed there was, in fact, a requirement for BEQ space, hangar modules and parking apron expansion, as well as numerous other projects totaling 93.5 not 28.3 million dollars in order to accommodate all the squadrons at NAS Oceana.

116 W. JONES STREET
RALEIGH, NC 27603-8001

P.O. BOX 968
NEW BERN, NC 28563

NEW BERN 919/514-4795

MEMORANDUM
November 25, 1997
Page 2

1 ***Even at 93.5 million, the milcon requirement at Oceana is understated. For example, when the planning was done for Cherry Point using P-80 standards, 3 modules were required to house the 48 aircraft Fleet Replacement Squadron (FRS). The DEIS only reflects 2 modules for the FRS at Oceana. Why? Additionally, the DEIS states that after the 20.9 million BEQ is built to house 460 sailors there will be a shortfall of 1100 BEQ spaces for E1 - E4 personnel aboard the Air Station. Satisfying this requirement will cost approximately 50 million in milcon and should be reflected in the DEIS. The DEIS can then show the mitigation and cost savings of using the available BEQ excess capacity at Cherry Point. Put another way, if there is not a requirement for additional BEQ's at Oceana, why isn't the 460 space BEQ reduced or eliminated by the shift of five squadrons away from Oceana in ARS 5.***

2

3 ***Conversely, the cost to bring squadrons to Cherry Point is overstated. Even if you accept the Aircraft Intermediate Maintenance Department (AIMD) facility cost of 13.2 million, which seems questionable given the fact that 5 years ago two separate AIMD's operated out of existing facilities at Cherry Point, the cost which is the most out of line is the 199 million for AIMD support over a 30 year period. In the first place, why is the projection for 30 years? The F/A-18's are scheduled for replacement long before 30 years. Cost projections should not extend beyond the operational life of the aircraft. Secondly, how were AIMD people and equipment divided. Support requirements are based on the number of squadrons/aircraft being supported. In ARS 5 one third of the F/A-18s are stationed at Cherry Point. Were proportional numbers of AIMD personnel and equipment assigned to Cherry Point along with the aircraft? The DEIS should provide a detailed explanation of the cost breakdown for the AIMD at Cherry Point and the reason for using 30 year life cycle costs. Additionally, the DEIS should consider the proximity and availability of NADEP Cherry Point as a positive factor for specialized maintenance support.***

NCOG-1 The applicable Naval Facilities Engineering Command (NAVFAC) P-80 standard has been updated. NAVFAC replaced previous factors with a single factor based upon scheduled and unscheduled maintenance applied to the total number of aircraft in nonstandard squadrons. Applying the new factor, two hangar modules are required to support the Fleet Replacement Squadron (FRS). As discussed in Section 2.6 of the EIS, the "BRAC 93 scenario" of single-siting all F/A-18s at MCAS Cherry Point was re-evaluated and updated based on current criteria. When the updated P-80 criteria are applied, two modules are required for the FRS instead of three.

NCOG-2 Current Navy policy is to house all E1 through E4 personnel on base. Navy policy permits E5 through E9 personnel to receive a housing allowance rather than reside in government housing. When determining the need for construction of new bachelor housing, E5 through E9 personnel are not generally taken into consideration.

Because of a shortage of BEQ spaces for E1 through E4 personnel at NAS Oceana under ARS 1 and ARS 2, the EIS has been amended to include an additional BEQ project at NAS Oceana. Similarly, the life-cycle costs for all ARSs have been updated to reflect changes in the housing allowance for bachelors living off base. Please see Section 2 of the EIS for amended bachelor housing costs.

NCOG-3 All previously utilized and existing AIMD facilities were analyzed by a joint Marine Corps/Navy team, and it was found that no excess capacity was available for AIMD facilities with the exception of the parachute shop. Because of the expeditionary nature of the Marine Corps air support mission, much of the aviation maintenance support equipment, which deploys with the air group, is configured as mobile facilities. For this reason, Marine Corps maintenance facilities must be a combination of permanent construction and mobile facilities, while Navy aircraft maintenance facilities are all of permanent construction. The Commander, Naval Air Force, U.S. Atlantic Fleet, developed the equipment and facilities requirements for a full stand-alone AIMD to include airframes, aviation armament, avionics, engines, aviation supply, and shops and storage for ground support equipment.

NCOG-3
(cont'd)

There are two different types of assets, aircraft and facilities, and two different corresponding expected service lives. The expected service life is 12 years for military aircraft and 50 years for military facilities (U.S. Dept of Commerce data from 1925-1985). The Navy's primary investment in this BRAC relocation is facilities; the aircraft have already been procured. The Navy has and will perform a life-cycle cost analysis, both for procurement and maintenance of new aircraft systems under those procurement actions.

The Navy's facilities will certainly outlast the life of the F/A-18 given the respective service lives. Historically, the Navy used a period of 25 years for the economic life of facilities, which was based on NAVFACINST P-442, "Economic Analysis Handbook," dated June 1986. However, based on guidance contained in the U.S. Office of Management and Budget (OMB) Circular No. A-94, dated October 29, 1992, the Navy used a period of 30 years for this life-cycle analysis.

Manning requirements for ARS 1 were validated by a fleet Manpower Analysis Team Efficiency Review. For all other ARSs, Commander, Naval Air Force, U.S. Atlantic Fleet (COMNAVAIRLANT), developed staffing standards using Navy Manpower Analysis Center (NAVMAC) models, which are based on Aircraft Maintenance Organization models (ACMO II and ACMO VII) for staffing standards. In addition, an analysis was performed for each ARS to show estimated costs of required support equipment. These estimated equipment shortages and costs were derived using modeling processes from Support Equipment Requests Management Information System (SERMIS) and the Federal Logistics (FEDLOG) databases. Many of the "F/A-18 specific" equipment shortage items are no longer manufactured. In addition, there is an acquisition delay on some of the more common automated test equipment.

MEMORANDUM
November 25, 1997
Page 3

(b) Variable Housing Allowance (VHA)

The DEIS acknowledges the variance of VHA rates between the areas surrounding the three air stations, but there is no way to determine from the DEIS how those differences were computed and factored into the VHA comparisons. A detailed breakdown of the methodology and costs factors used should be provided.

4

(c) Child Development Center

In ARS 5 there is a cost of 1.3 million for a child development center "designed to satisfy the new demand that would occur by locating the five F/A-18 squadrons to MCAS Cherry Point." Why is there no demand for comparable services at NAS Oceana with the addition of 11 squadrons plus the FRS in ARS 1. This inconsistency should be explained.

5

(d) Parallel Runway at Cherry Point

In ARS 3 the FCLP requirement is satisfied by the existing runway configuration at Cherry Point. In ARS 5 when 2 additional squadrons are added, the DEIS claims a requirement for a 33 million dollar parallel runway. There is another far less costly alternative. During peak periods when the facility at Cherry Point cannot meet the FCLP demand those excess sorties could be flown at Fentress. If the Navy finds it operationally effective to fly from Oceana to BT 9 (2450 sorties) and BT 11 (6217 sorties) to accomplish their annual training objectives, there should be no objection to flying to Fentress for operational training during those few times during the year when the capacity for FCLPs on Cherry Point is exceeded. The DEIS should explore this option and the associated cost savings.

6

NCOG-4 VHA rates were taken from the published 1996 VHA Rates (Per Diem, Travel and Transportation Committee, Office of the Secretary of Defense [OSD]) for each Military Housing Area (MHA). For analysis purposes, the "with dependent" rates were used. Rank distribution was determined using the NAVFAC P-80, Table 710.

NCOG-5 Child development requirements are site-specific for each base and loading scenario. The requirement for child development/care facilities was determined by the following method. First, the Navy quantified the ability of each base to accommodate additional child development/care requirements (i.e., determined excess capacity of facilities). The identified excess capacity was then compared to requirements for each base and F/A-18 loading scenario. For ARS 1 at NAS Oceana, it was determined that no additional child development/care facilities were required. It has been determined that construction of an 8,643-square-foot child development center would be required to accommodate five F/A-18 squadrons at MCAS Cherry Point.

NCOG-6 As discussed in Section 2.2.4.1 of the EIS, use of air-to-air and air-to-ground training ranges more than 100 nautical miles (NM) away from the receiving installation is not cost-effective or operationally desirable. Both BT-9 and BT-11 are located within 100 NM of NAS Oceana and can be used to support F/A-18 training range requirements. Requirements for Field Carrier Landing Practice (FCLP) are discussed in Section 2.2.4.2. Due to fuel consumption rates and the time it takes to complete training, FCLPs cannot be conducted more than 50 NM from the air station. Flying greater distances to an OLF would require the aircraft to either land and refuel or conduct more flights to accomplish the required amount of training. For these reasons, which are discussed in greater detail in the EIS, NALF Fentress cannot be used by F/A-18 aircraft stationed at MCAS Cherry Point to accomplish required FCLP training.

MEMORANDUM
November 25, 1997
Page 4

(e) **Socioeconomic Data Inconsistencies**

7 *In ARS 1 the increase in military and civilian payroll is 225.8 million. In ARS 5 the increase in military and civilian payroll is 125 million at Oceana and 50.3 million at Cherry Point for a total of 175.3 million overall. What accounts for the approximately 50 million dollar difference?*

(f) **Total Flight Operations for F/A-18 Fleet Squadrons**

PAGE		ARS 1	TOTAL
	Oceana	62,708	
4.1.3	Fentress	29,340	
		92,048	92,048
		ARS 3	
	Oceana	44,406	
6.2.4	Fentress	19,220	
		63,626 }	
6.1.2	Cherry Point	23,064 }	86,690
		ARS 5	
8.2.4	Oceana	35,368	
	Fentress	17,560	
		59,928 * }	
8.1.2	Cherry Point	32,688 * }	85,616

* One Squadron accounts for a difference of 20,240 operations.

8 *As can be seen from the above data, the total number of F/A-18 fleet squadron operations drops approximately 6000 operations when ARS 1 is compared to ARS 3 and ARS 5. A more glaring inconsistency is found*

NCOG-7 The increase in military and civilian payroll under ARS 1 would be approximately $171 million. The increase in military and civilian payroll associated with other planned personnel movements at NAS Oceana would be approximately $55 million. The cumulative impact is therefore $226 million. Sections 4.5, 5.2.5, 6.2.5, 7.2.5, and 8.2.5 have been amended to show the direct and cumulative impacts on military and civilian payroll at NAS Oceana.

NCOG-8 The difference in operations is primarily due to the changes in squadron and air wing assignments under each ARS. Appendix C of the EIS provides the assumed carrier deployment cycles and includes a discussion of the air wing assignment process used to model each ARS. The contribution of different air wings to airfield operations, air-to-air operations, and air-to-ground operations varies during the 18-month workup cycle. Because the workup cycle was modeled over a one-year period, some air wing assignments were adjusted to achieve a balance or average of local operations at each installation.

MEMORANDUM
November 25, 1997
Page 5

in the comparison of total operations in ARS 5. How can one additional Fleet squadron at Oceana account for a difference of 20,240 operations?

(g) FCLP Comparison F/A-18 Fleet Squadrons

		ARS 1		
Page		**Day**	**Night**	**Total**
4.1.3	Oceana	1,180	1,180	2,260
	Fentress	18,780	10,560	29,340
		19,960	11,640	31,600
		ARS 3		
		Day	**Night**	**Total**
6.2.4	Oceana	220	660	880
	Fentress	12,440	6,780	19,220
		12,660	7,440	20,100
6.1.2	Cherry Point	8,368	2,298	10,666
		ARS 5		
8.2.4	Oceana	220	480	700
	Fentress	10,826	6,734	17,560
		11,046	7,214*	18,260*
8.1.2	Cherry Point	9,586	2,554*	12,240*

** How can the difference of only one Fleet Squadron cause such a disparity?*

9 ***As the chart above shows, the total number of FCLP's remains reasonably consistent between ARS's 1, 3 and 5. In ARS 5, however, the numbers do not reflect the difference of only one fleet squadron***

NCOG-9 Please see response to NCOG-8.

MEMORANDUM
November 25, 1997
Page 6

between Oceana and Cherry Point. What is the explanation for this disparity?

(h) General Inaccuracies and Misstatements

During my review I noted the following errors:

10 Page 2.4-37. In table 2.4-12 Life-Cycle Cost of alternative realignment scenario 5 states: "Construction and Renovation at MCAS Beaufort"....should be MCAS Cherry Point.

11 Page 2.5-3. Under ARS 5 it states: "A new 3 module hangar would be constructed and an existing hangar would be renovated." It should say" " Interior modifications to four building and an extension to one hangar would be required."

12 Page 2.5-7. Economic dollar comparisons, as noted in paragraph (e) above are not consistent.

13 Page 6.1-5. The second paragraph refers to the operation of two additional F/A-18 squadrons. It should say three additional F/A-18 squadrons.

(i) Base Loading. When NAS Cecil Field closes, the Naval Service will have 2 master jet bases on the East Coast; Oceana and Cherry Point. With all the F/A-18s at Oceana their base loading will be in excess of 350 high performance aircraft all operating in a built up urban area. At the same time Cherry Point will have 130 aircraft operating in what is essentially a rural area. Both air stations will be sharing the same ranges and training airspace. From the standpoint of maximizing the use of excess capacity, aviation safety and reduced operational congestion there should be more balance between the 2 master jet bases. The DEIS should more thoroughly address these issues as well as the long term viability of operating large numbers of high performance aircraft in a metropolitan area.

14

NCOG-10 Table 2.4-12 has been amended.

NCOG-11 Table 2.5-1 has been amended.

NCOG-12 Table 2.5-1 has been amended.

NCOG-13 Section 6.1.4.2 has been amended.

NCOG-14 Aircraft operations would be conducted at the respective airfields, training areas (i.e, training routes, warning areas, military operating areas, restricted areas), and target ranges based on the mission requirements and the capabilities of each range or airspace to support those mission requirements. NAS Oceana has sufficient airfield capacity to support the realignment under all proposed ARSs. MCAS Cherry Point has sufficient airfield capacity to support the proposed realignment under ARS 3. ARS 5 would require construction of a new runway at MCAS Cherry Point.

MEMORANDUM
November 25, 1997
Page 7

(j) Air Quality Issues

The following comments are offered primarily with reference to Sections 3.1.9, 4.9, 8.9 and Appendix E of the DEIS. Specifically, Section 4 of Appendix E states that the Navy has demonstrated conformity with the Virginia SIP required by Federal Conformity Rules. One issue raised by a review of Section 4 of Appendix E is that the Navy's conformity analysis did not include mobile source emissions associated with the vehicular traffic of the approximately 4,100 personnel who would be moved from Cecil Field, to Oceana under ARS 1. In particular, the commuting mileage associated with personnel traveling from their residences to and from Oceana is not appear accounted for. Even under the Navy's own guidelines for demonstrating conformity for Navy actions, these commuter trips and their associated emissions of VOC, NO_x and other pollutants must be analyzed.

15

We call the Navy's attention to the projected increase in NO_x emissions associated with ARS 1 of 395 tons per year. It is stated on Page E-41 of the DEIS that the Virginia emissions budget in the Maintenance Plan SIP contains an allotment of 800 tons per year of NO_x for NAS Oceana/Fentress and, thus, conformity can be demonstrated. By not including the vehicular emissions associated with Navy personnel transferred from NAS Cecil Field, the total NO_x emissions associated with the realignment may be significantly more than the 396 tons per year estimated in the DEIS. In fact, our estimate is that over 500 tons per year may be associated with the vehicular emissions of transferring personnel. We urge the Navy to incorporate those vehicular emissions in the estimate of other mobile source emissions included in the present analysis.

However, even if the Navy concludes that non-commute vehicular emissions are not required to be included in the Navy's conformity analysis, the Navy should verify and document in the final EIS where these vehicular have been accounted for. For example, it is not clear whether these emissions are accounted for under another conformity determination, possibly one associated with the Virginia Transportation Improvement Program, or some other federal action. In short, the mobile source emissions associated with transferring Cecil Field

NCOG-15 Mobile emissions caused by the personnel and dependents relocated from NAS Cecil Field to the Hampton Roads area are accommodated in Virginia's mobile emissions budget for Hampton Roads by the loss of military personnel and dependents leaving the Hampton Roads area due to downsizing and force restructuring. The reference for this conclusion has been added to the EIS and conformity analysis (Appendix E).

personnel should be expressly estimated and accounted for in the final EIS. Otherwise, the air quality impacts of the realignment of all FA-18 squadrons to NAS Oceana under ARS 1 may not be fully analyzed.

Another issue raised by our review of the DEIS is the discrepancy between the population figures used in the DEIS and those used by Virginia to support the recent redesignation of the Hampton Roads area to attainment for ozone. For example, the DEIS projects a population growth rate of 1.42% between 1980 and 1997 for the south Hampton Roads area. Furthermore, it projects a population growth rate of 1.62% for the years 1997 through 2010. These projected population increases compare to a growth rate of .834% for the Hampton Roads area used by Virginia in gaining approval of its Ozone Maintenance Plan. (62 Fed. Reg. June 26, 1997 at p. 34410.)

As those familiar with air quality analyses can attest, population growth projections are the technical underpinning for estimating vehicle miles traveled ("VMT"), which in turn is the basis for estimating air emissions from vehicular traffic. Thus, if population growth projections are unrealistically low, the VMT and associated air emission estimates will similarly be unrealistically low. This possible underestimation of mobile source emissions, due to an unrealistic projection of population growth in the Virginia Maintenance Plan, is significant for the Navy's Cecil Field action. The Navy must demonstrate conformity with the Virginia SIP. However, the Virginia Maintenance Plan includes only a very small margin with respect to NO_x emissions. NO_x emissions are projected to increase through the year 2000 and decrease only slightly thereafter through the year 2008. The net effect is that Virginia's NO_x emissions budget is extremely tight and an increase of only a few tons per year will cause Virginia to exceed its Maintenance Plan Budget. Thus, if any significant category of air emissions have not been accounted for, the addition of such emissions could cause Virginia's air emissions budget for NO_x to be exceeded. Without verification of whether the vehicular emissions from transferring NAS Cecil Field personnel have been fully accounted for either in the Navy's analysis or elsewhere, the Navy can have little confidence that its demonstration of conformity is valid. Thus, we urge the Navy to take a closer look at the mobile source emissions category to determine whether the vehicular

16

NCOG-16 Please see response to NCOG-15.

emissions of transferring personnel will be a "budget buster." Is the Navy confident that Virginia can meet its Maintenance Plan Budget if all NAS Oceana-related emissions are included? In any case, the discrepancy between the population growth projections in the DEIS and those used by Virginia during the redesignation process should be reconciled in the Final EIS.

Finally, the DEIS is deficient by not analyzing the effect of the redirection on compliance with the newly promulgated ozone and fine particle air quality standards. NO_x has been identified by the U.S. Environmental Protection Agency as a precursor to both ozone and fine particle formation. VOC emissions are known to be a precursor to ozone formation. The question which is completely unaddressed in the DEIS is whether increased VOC and NO_x emissions associated with the redirection to Oceana will contribute to a violation of either of these new standards. We recognize the difficulty of analyzing the impacts of any significant increase in air emissions on the attainment of these new standards. However, the complete silence of the DEIS with regard to this important issue stands out as a significant deficiency, especially in light of the fact that the new ozone and fine particle standards now have been promulgated and are in the process of being implemented by the USEPA.

17

In summary, we continue to have significant concerns regarding the integrity of the Navy's conformity analysis. In any case, the DEIS documents clearly that MCAS Cherry Point offers a distinct advantage in terms of air quality when compared to NAS Oceana. As stated in the DEIS, all of eastern North Carolina is attainment for all criteria pollutants under the new ozone and fine particle standards. Thus, where air quality constraints are a factor in basing all 180 aircraft at Oceana, there are no air quality constraints to directing some or even all of the operational squadrons to Cherry Point.

k) Noise Issues

Our comments with respect to the treatment of noise issues are made with reference to Sections 3.1.8, 4.8, 8.1.8 and Appendix H of the DEIS. The DEIS clearly demonstrates the advantages from a noise

NCOG-17

The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementations Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. SIP revisions, if any, addressing the new standards are not expected until after 1999. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard. There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with ARS 1 are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

perspective of basing some or all of the F/A-18s at Cherry Point. The fact is that location of some or even all of the F/A-18s squadrons at Cherry Point will result in a significantly smaller noise impact than the Navy's preferred alternative. For example, Table 8.1-6 sets forth the population estimated to be impacted by the 1999 noise contours at Cherry Point. As noted in this table, an estimated 4,425 people will be impacted by the location of five fleet squadrons at Cherry Point. This should be compared to Table 8.2-14, which indicates that an estimated 120,088 people will be significantly impacted by the location of six operational squadrons plus the FRS at Oceana. Although these two tables do not evaluate the same number of squadrons being located at each base, a comparison of these tables illustrates the difference in noise impacts of these two basing alternatives.

Another illuminating comparison is the number of schools which fall within the greater than 65 Ldn contours at each location. Table 8.1-8 shows that under ARS 5, four schools in the vicinity of Havelock are be within the noise zone. This should be compared with Table 4.8-3, which reveals that a total of 22 schools in the Virginia Beach/Chesapeake area will be subject to significant noise levels. In fact, 17 out of the 22 schools near Oceana/NALF Fentress will be subject to (averaged) noise increases greater than 10 Ldn under ARS 1. Several will be exposed to increased (averaged noise) levels in excess of 15 Ldn.

The advantages of basing the F/A-18 aircraft at Cherry Point is demonstrated nowhere more dramatically than in comparing Figure 3-16 and Figure 4-1 in the Wyle Laboratories report (Wyle Report), which provides the technical foundation for the noise sections of the DEIS. Figure 3-16 shows that the noise contour lines, using a 60 Dnl contour as the minimum, do not merge in the area between Oceana and NALF Fentress. In Figure 4-1, however, the Dnl contour band under ARS 1 merges into a huge area surrounding these two installations and encompassing many thousand residents and base personnel. The Wyle Report describes this huge noise plume in the following manner:

> "The two distinct regions of noise exposure due to Baseline operations at each airfield would

MEMORANDUM
November 25, 1997
Page 11

> merge to become one. The 60 dB DNL contour forms a corridor about nine miles wide and extends from about three miles south of NALF Fentress to the Virginia Beach coastline and beyond into the Atlantic Ocean." (Wyle Report ¶. 4-14).

18 It is interesting to note that these two figures and the above quoted statement from the Wyle Report are just two of the numerous omissions and inconsistencies between the Wyle Report and the DEIS. We find no evidence that these figures, which dramatically illustrate the significant noise impact advantages of Cherry Point, have been included anywhere in the DEIS. Furthermore, we find that the wording of the results in the Wyle Report is more emphatic and its characterization of the significant noise impact associated with realignment of the F/A-18 squadrons to Oceana is less favorable to Oceana than in the DEIS. For example, the Wyle Report compares the estimated population impacted by significant noise contours to a 1997 base line exposed population. The DEIS, on the other hand, compares the 1997 noise contours only to the 1978 AICUZ contour lines. Because naval air operations have decreased at Oceana since 1978, the most accurate comparison for noise purposes present noise levels compared to projected noise levels following the redirection. Using this more representative comparison, the estimated new area exposed to significant noise levels around Oceana approximately 100,000, rather than the 38,983 people mentioned in the Table 4.8-1 of the DEIS.

19

20 The effect of these and other inconsistencies between the Wyle Report and the DEIS is to under-represent the noise impacts associated with redirection of the F/A-18s to Oceana. This tendency to under-represent noise impacts arises, in part, from the averaging methodology used by the Navy in analyzing noise impacts. These methodological issues are addressed more specifically in the attached comments of Dr. Larry Royster, Acoustical Consultant, with the firm of Environmental Noise Consultants, Inc. The comments of Dr. Royster are incorporated by reference into these comments. This tendency to under-represent noise impacts also arises from the failure of the Navy to fully analyze the cost of mitigating the noise impacts which are projected.

21

NCOG-18 Tables 4.8-1, 5.2-16, 6.2-16, 7.2-16, and 8.2-16 of the Draft EIS quantitatively compare the number of people impacted by noise zones for 1978, 1997, and 1999 aircraft operations. These tables are also included in the Final EIS, but they have been modified. Corresponding figures have been added to clarify the comparison between 1978, 1997, and 1999 aircraft operations.

NCOG-19 Please see response to NCOG-18.

NCOG-20 Aircraft noise impacts are dependent upon several factors including the maximum noise levels, duration of the event, and the number of operations or overflights that occur. Therefore, the use of average sound energy metrics (Ldn, Ldnmr) to describe the environment is appropriate.

NCOG-21 Upon request, the Navy will work with local officials to conduct detailed engineering evaluations at those schools of particular concern. This assistance would include providing technical background information on such issues as specific Ldn values for schools and sound attenuation recommendations. The Navy recognizes that the costs to local school authorities of noise mitigation is a significant impact. However, because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy did not develop cost estimates for noise mitigation at schools and churches.

Specifically, whereas the DEIS indicates that 22 schools will experience significant noise impacts in the Oceana area and 4 schools in the Cherry Point area, no estimate is provided under any ARS for the cost of mitigating such noise impacts. The DEIS merely states that the Navy is willing, if requested, to conduct an engineering analysis to determine what mitigation measures might be appropriate. Presumably, there are engineering studies available which can offer at least a rough estimate of the likely cost of installing insulation and other sound-muffling devices in structures in the affected areas. The cost of mitigating these severe noise impacts should also be included for churches and other public facilities. These mitigation costs should be quantified in the final EIS and included in the cost of the each ARS.

22

Also, we urge the Navy to give full consideration to the human cost of imposing significant noise impacts on the populations in the three alternative locations. In particular, as recommended in Dr. Royster's comments, the Navy should do a more detailed analysis of the noise impacts of individual F/A-18 fly-overs in specific locations and not rely so heavily on averaging techniques.

23

Finally, the relative advantages from a noise perspective of Cherry Point, especially compared to Oceana, should be articulated better in the Final EIS. While some increase in noise levels will no doubt be experienced around Cherry Point with the arrival of F/A-18 squadrons, these impacts are within an acceptable range in view of the relatively small number of people affected. Compared to the other basing options, Cherry Point is fortunate to be buffered on three sides by either the Neuse River or the Croatan National Forest. Thus, Cherry Point offers an expansive natural buffer on virtually all sides of the base, with only small populated areas exposed to jet aircraft noise operations from the base. The Navy is urged to complete its analysis in the DEIS, eliminate any and all inconsistencies between the work done by the Wyle Laboratories and the presentation made in the DEIS, and include the full cost of mitigating noise impacts at the individual site receptor location.

24

NBMAIN304407.1

NCOG-22 Please see response to NCOG-21.

NCOG-23 The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

NCOG-24 The existing environment and potential environmental impacts are discussed for each location/ARS at a level of detail sufficient for decision makers to accurately assess the environmental advantages and disadvantages of each ARS.

November 23, 1997

Mr. J. Daniel Cecchini
Atlantic Division, Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

I was asked to review the following document with respect to the environmental issue of noise: Draft Environmental Impact Statement, Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station Cecil Field, Florida, to Other East Coast Installations.

Although the document exhibits several basic flaws in its analysis of the noise issue, two issues are clearly improperly addressed: outdoor speech communication, and use of the wrong metric to assess the potential impacts on the surrounding communities.

1 The first issue that I would like to address is that of speech communication outside of dwellings. I was somewhat amazed that the document did not address the impact that the planned additional F/A-18 airplanes will have on the ability of children to communicate while playing outdoors and the resulting additional potential safety hazard that will be created. Children playing outside the affected school buildings will not be able to communicate effectively or safely from less than 0.5 meters up to any greater distance for significant time periods. For the in-close site locations indicated in Figure 3-17 (Wyle Laboratories report of September, 1997) the corresponding time periods when communications will not be possible will be very significant. As a consequence, the additional operations by the F/A-18 fleet will create a significant additional outdoor safety hazard for the affected public school populations.

Again, I was surprised that this issue, communication needs outdoors at the surrounding public schools, was not addressed in the report. Indeed the report's focus seems to be based on the assumption that all of the affected populations will always be inside dwellings. This neglect of outside activities is a major flaw in the report's approach to the potential effects of moving additional F/A-18 planes to other facilities.

2 The second issue also deals with speech communication, but indoors. The report uses the L(dn), or related metrics, as its primary metric in assessing the impact that the additional planes will have on speech interference, sleep interference, etc. As you are aware, the L(dn) metric is a daily, or longer, energy average value using an A-frequency weighting filter. As a consequence it diminishes the impact of noise created by planes passing in the vicinity of schools, homes, businesses, etc.

NCOG(LR)-1 The EIS addresses the potential for speech interference (Section 4.8). In addition, Section 3.1.8 of the EIS indicates that speech interference can occur for individual noise events above 65 dB Ldn. Since outside noise levels cannot be attenuated, the potential for speech interference will be greater outdoors for children and adults. The EIS addresses safety in the region through an analysis of accident potential zones. These zones do not predict aircraft accidents but indicate the possible location of an accident should one occur.

NCOG(LR)-2 Section 3.1.8 of the EIS states that, at levels above 75 dB Ldn, possible noise impacts include intermittent speech interference and occasional sleep disturbance. The EIS also states that single event noise levels above 65 dB Ldn may result in speech interference. The use of A-weighted sound levels to assess speech interference is further documented in Section A of the accompanying noise report for the EIS (reference Wyle Labs, 1997). Sleep disturbance is based on the sound exposure level (SEL), which accounts for the duration of the noise event. The day-night average sound level (Ldn), which incorporates SELs, does not diminish the impact of aircraft noise on schools, residences, and businesses.

In addition, the use of the 65 dB L(dn) contour as the basis for making judgements is an attempt to minimize the impact of moving the fleet on the surrounding populations. Professionals and communities today recognize that for airplane noise the 55 dB contour is the reference of choice. Indeed, the courts awarded compensation to home owners around the Raleigh Durham Airport for homes located within the 55 dB L(dn) contour.

The 55 dB L(dn) contour should have been selected as the beginning impact level, especially when dealing with the potential impact of the additional airplanes on the educational process. Even with the selection and use of the 65 dB L(dn) contour, the increases in the average daily noise levels indicated in Table 3-11 of the Wyle report are simply astounding!

When a plane flies over a structure, the two basic questions that have to be addressed are: (a) How much does the noise energy created by the planes exceed the existing background noise? and (b) How much does the noise energy exceed the background levels as a function of frequency (or pitch)?

3 To address these issues, the Wyle report first assumes that a given level of background noise will exist (though many people do not run the air conditioner units at all times), then assumes that the structure will provide 20 dB of attenuation, and then uses the model's predicted L(dn) value. By using the A-frequency weighting metric, the report totally neglects a structure's frequency dependent attenuating characteristics. (Structures typically provide less attenuation in the lower frequencies, especially the windows and roof system.) The Wyle report does not even address the frequency content (spectrum) characteristics of the F/A-18 aircraft. In reality, the noise level inside school rooms, as well as other community structures, will be significantly higher over the frequency ranges of interest for significant time periods than is indicated in the Wyle report. The Wyle report should have used the ANSI S12.2-1995 standard (Criteria for Evaluating Room Noise) or similar parallel documents as one source of evaluating the effects that the aircraft will have on the students' learning process).

4 The Wyle report ignores the fact that childrens' voice levels are less powerful than adults, and that young female voice levels are typically less than their male counterparts.

5 The Wyle report totally ignores the fact that a significant portion of the children in school will exhibit either a permanent or temporary hearing disability at any instant in time. As a consequence, the impact of multiple F/A-18 fly overs will have an additional impact on children in this population and their ability to learn.

The effect of room noise on the educational process has become a significant concern in the professional community. Indeed, the Acoustical Society of America is presently co-sponsoring a series of seminars to start addressing this issue, and ANSI Accredited Standards Committee S12 has initiated a working group to set standards for classroom noise.

6 In addition to the above two main issues, the Wyle report exhibits several obvious technical and professional judgement errors. Examples include: (a) Referring to 60 dB in Figure A-1 as quiet. (b) Using a "highly annoyed" metric as part of Figure A-2 and the median

NCOG(LR)-3 The day-night average sound level (Ldn) is the metric used by all federal agencies, including the EPA, for assessing land use compatibility and reduction requirements for noise levels. Aircraft noise is measured in A-weighted decibels which accounts for how the human ear hears the broad spectrum of frequencies composing aircraft noise. Manufacturers of sound insulating products typically categorize their products in terms of A-weighted attenuating characteristics. According to the research cited in the EIS, effects on the learning process are linked to the A-weighted noise level not the frequency content of the noise. Thus, there is no "frequency range of interest." Furthermore, neither the spectrum characteristics of F/A-18 aircraft nor the need for ANSI S12.2 apply. It should be noted that the noise frequency range of all modeled aircraft types are accounted for in the calculation of airfield noise contours in the EIS. Noise contours were developed using the Department of Defense NOISEMAP program which relies on spectral data to develop A-weighted noise levels in the calculation of noise contours.

NCOG(LR)-4 At the same noise levels, communication would likely be more difficult for children than for adults.

NCOG(LR)-5 The EIS acknowledges that any projected realignment of F/A-18 squadrons to NAS Oceana would increase aircraft operations and aircraft noise levels. However, although operations and the average daily noise levels would significantly increase, noise levels would not result in permanent threshold of hearing shifts. Although temporary threshold of hearing shifts are possible, individual noise levels would not reach the threshold of pain (i.e., 120 dB). The EIS does not address the hearing abilities of the school-age population at any instant in time. However, federal workplace standards for protection from hearing loss allow a time-average noise level of 85 dB over a 16-hour period (please see Appendix H, Section H.3.1). Since it is unlikely that children will spend 16 hours per day outdoors, the potential for permanent hearing loss is remote.

(average?) central values shown in Figure A-5. (c) Using the presented format of Percent Sentence Intelligibility vs. dB(A) in Figure A-3 and giving the impression that the dB(A) values can be compared to L(dn) values. (d) Including Figure A-6 to suggest how sound is blocked instead of showing all of the actual real-world paths that are encountered in real-world buildings, especially schools, etc.

After having reviewed the content of the Wyle Laboratories report, I can only conclude that many of the real issues and problems that will result from relocating the F/A-18 fleet to the bases refcrenced in the report have yet to be properly addressed. Indeed, some of the more critical issues have simply been ignored.

Larry H. Royster, Ph.D.
Acoustical Consultant

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***** Communication Nodes *****

Larry Royster
4706 Connell Dr.
Raleigh, NC 27612
Phone 919-782-1624
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NCOG(LR)-6 Figure A-1 classifies sound levels into typical categories such as "Quiet", "Moderate", "Very Loud", and "Uncomfortable." Figure A-1 denotes 60 dB as being in the extreme upper range of "Quiet" sounds and the extreme lower range of "Moderate" sounds. Figures A-2 and A-5 are correct and are faithfully reproduced from the references. Figure A-3 refers to A-weighted noise levels. There is no discussion in Section A.2.4 comparing A-weighted noise levels to Ldn. Finally, the intent of Figure A-6 was not to show all sound transmission paths for all types of structures. Rather, as stated in section A.2.7, the figure illustrates sound transmission through a particular type of wall construction. Other transmission paths through other types of structures exist.

South Carolina

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1122 LADY STREET, 12TH FLOOR
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GEORGE M. DORN, JR.
DIRECTOR

December 2, 1997

Mr. Dan Cecchini
Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

Project Name: Draft Environmental Impact Statement (DEIS) for Realignment of F/A-18 Aircraft and Operational Functions From Naval Air Station (NAS) Field, Florida, to Other East Coast Installations.

Project Number: EIS-970904-004

Dear Mr. Cecchini,

The Office of State Budget, has conducted an intergovernmental review on the above referenced activity as provided by Presidential Executive Order 12372. All comments received as a result of the review are enclosed for your use.

The State Application Identifier number indicated above should be used in any future correspondence with this office. If you have any questions call me at (803) 734-0485.

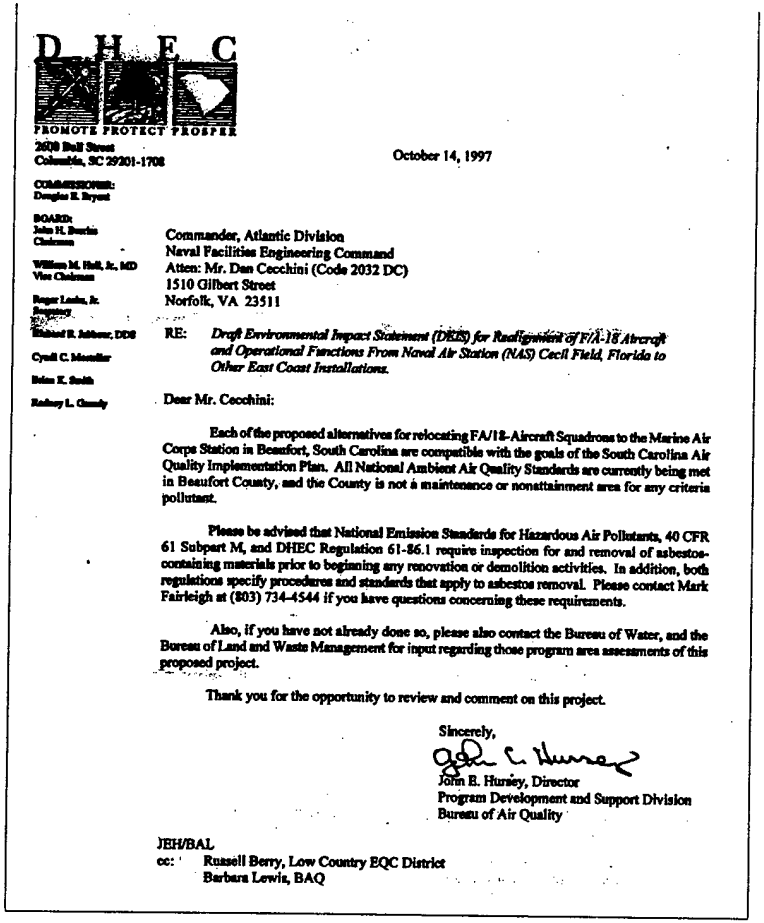
Sincerely,

Rodney P. Grizzle
Grants Services Coordinator

Fax (803) 734-0645

FEB 25 '98 11:17 8037340645 PAGE.02

Thank you for your comments; no response required.



D H E C

PROMOTE PROTECT PROSPER

2600 Bull Street
Columbia, SC 29201-1708

October 14, 1997

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Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

RE: *Draft Environmental Impact Statement (DEIS) for Realignment of F/A-18 Aircraft and Operational Functions From Naval Air Station (NAS) Cecil Field, Florida to Other East Coast Installations.*

Dear Mr. Cecchini:

Each of the proposed alternatives for relocating FA/18 Aircraft Squadrons to the Marine Air Corps Station in Beaufort, South Carolina are compatible with the goals of the South Carolina Air Quality Implementation Plan. All National Ambient Air Quality Standards are currently being met in Beaufort County, and the County is not a maintenance or nonattainment area for any criteria pollutant.

1 Please be advised that National Emission Standards for Hazardous Air Pollutants, 40 CFR 61 Subpart M, and DHEC Regulation 61-86.1 require inspection for and removal of asbestos-containing materials prior to beginning any renovation or demolition activities. In addition, both regulations specify procedures and standards that apply to asbestos removal. Please contact Mark Fairleigh at (803) 734-4544 if you have questions concerning these requirements.

2 Also, if you have not already done so, please also contact the Bureau of Water, and the Bureau of Land and Waste Management for input regarding those program area assessments of this proposed project.

Thank you for the opportunity to review and comment on this project.

Sincerely,

John E. Hursey, Director
Program Development and Support Division
Bureau of Air Quality

JEH/BAL
cc: Russell Berry, Low Country EQC District
Barbara Lewis, BAQ

SCDHEC-1 Thank you for your comments; no response required.

SCDHEC-2 Three copies of the DEIS were sent to Ms. Omegia Burgess at the South Carolina "clearinghouse" (The Office of State Budget, State Budget and Control Board). In a telephone conversation on November 21, 1997, Ms. Burgess stated that copies of the Executive Summary were distributed to the Bureau of Water and the Bureau of Land and Waste Management for review.

South Carolina Department of
Natural Resources

Paul A. Sandifer, Ph.D.
Director
John V. Miglarese
Deputy Director for
Marine Resources

November 25, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

REF: DEIS for Realignment of F/A-18 Aircraft and Operational Functions From Naval Air Station (NAS) Cecil Field, Florida to other East Coast Installations

Dear Sir:

Personnel with the South Carolina Department of Natural Resources have reviewed the above referenced project and offer the following comments.

The above referenced Draft Environmental Impact Statement considers several alternatives for realignment of F/A-18 aircraft and operational functions from NAS Cecil Field, Florida. One of these alternatives (ARS 4) involves the transfer of 5 F/A-18 Squadrons to MCAS Beaufort, South Carolina. To accommodate the proposed transfer, existing facilities at MCAS Beaufort would need to be renovated, including expansion of the aircraft parking apron, taxiway and Mobile Facilities Pad. It would also require the construction of a new 8,000' parallel runway.

Coastal South Carolina contains extensive areas of both freshwater and estuarine wetlands. The MCAS Beaufort site is surrounded by sensitive estuarine wetlands and as noted in the DEIS expansion of this facility would involve encroachment into these wetland areas. The total acreage of wetlands proposed for fill are significant, especially those associated with new runway construction. Our agency would be strongly opposed to the proposed wetland fill associated with this alternative, especially in estuarine wetlands. Significant areas of productive wetlands and their associated ecological functions would be permanently lost as a result of the proposed fill activities.

1

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SCDNR-1 If ARS 4 is selected for the proposed action, the final design plans for new construction at MCAS Beaufort will be developed to minimize impacts to wetlands and other sensitive ecological areas to the maximum extent compatible with operational requirements lost. As discussed in Section 7.1.11.3 of the EIS, lost wetland acreage will be compensated for through wetland restoration, enhancement, preservation, or creation. The wetland mitigation plan, including compensation for lost wetlands, will be developed in consultation with the U.S. Army Corps of Engineers and appropriate state agencies through the Section 404 permit process.

If ARS 2 is selected, there would be minimal construction required. No wetland areas would be impacted.

We ask that the above concerns be taken into consideration in the selection of a viable alternative for this project. Alternatives, such as ARS 4, which involve the filling of significant areas of productive wetlands in South Carolina should be discouraged.

Sincerely,

Robert E. Duncan
Environmental Programs Director

FROM OFFICE OF STATE BUDGET

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier
EIS-970904-004

Suspense Date
10/25/97

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S. C. DEPARTMENT OF ARCHIVES & HISTORY

Nancy Brock
South Carolina Department of Archives & History

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

Please review the attached information, mindful of the impact it may have on your agency's goals and objectives. Document the results of your review in the space provided. Return your response to us by the suspense date indicated above. Your comments will be reviewed and utilized in making the official state recommendation concerning the project. The recommendation will be forwarded to the cognizant federal agency.

Should you have no comment, please return the form signed and dated.

If you have any questions, call me at (803) 734-0494. Rodney Grizzle

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- [x] Project is consistent with our goals and objectives.
- [ ] Request a conference to discuss comments.
- [ ] Please discontinue sending projects with this CFDA# to our office for review.
- [ ] Comments on proposed Application is as follows:

Assignment of F/A-18 Aircraft

Signature: Nancy Brock Date: 10/3/97

Title: Review Compliance Programs Coordinator Phone: 734-8615

FEB 25 '98 11:18 8037340645 PAGE.04

B-3-67

Thank you for your comments; no response required.

FROM :OFFICE OF STATE BUDGET

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier EIS-970904-004
Suspense Date 10/25/97

George Bistany
South Carolina Department of Commerce

OCT 03 1997

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

Please review the attached information, mindful of the impact it may have on your agency's goals and objectives. Document the results of your review in the space provided. Return your response to us by the suspense date indicated above. Your comments will be reviewed and utilized in making the official state recommendation concerning the project. The recommendation will be forwarded to the cognizant federal agency.

Should you have no comment, please return the form signed and dated.

If you have any questions, call me at (803) 734-0494. Rodney Grizzle,

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- ☐ Project is consistent with our goals and objectives.
- ☐ Request a conference to discuss comments.
- ☐ Please discontinue sending projects with this CFDA# to our office for review.
- ☐ Comments on proposed Application is as follows:

Signature: George Bistany Date: 10-7-97

Title: Grants Manager Phone: 734-0665

FEB 25 '98 11:18 8037340645 PAGE.05

Thank you for your comments; no response required.

B-3-68

FROM OFFICE OF STATE BUDGET

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier EIS-970904-004
Suspense Date 10/25/97

Steve Davis
S.C. Department of Health and Enviromental Control

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

Please review the attached information, mindful of the impact it may have on your agency's goals and objectives. Document the results of your review in the space provided. Return your response to us by the suspense date indicated above. Your comments will be reviewed and utilized in making the official state recommendation concerning the project. The recommendation will be forwarded to the cognizant federal agency.

Should you have no comment, please return the form signed and dated.

If you have any questions, call me at (803) 734-0494. Rodney Grizzle

Budget & Control Board
OFFICE OF STATE BUDGET

- ☐ Project is consistent with our goals and objectives.
- ☐ Request a conference to discuss comments.
- ☐ Please discontinue sending projects with this CFDA# to our office for review.
- ☒ Comments on proposed Application is as follows:
  DOCUMENTS ARE BEING REVIEWED BY THE BUREAU OF AIR QUALITY

Signature: _____ Date: 10/6/97

Title: _____ Phone: _____

FEB 25 '98 11:18 8037340645 PAGE.06

Thank you for your comments; no response required.

FROM (OFFICE OF STATE BUDGET)

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier
EIS-970904-004

Suspense Date
10/25/97

Joel T. Cassidy
South Carolina Employment Security Commission

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Should you have no comment, please return the form signed and dated.

If you have any questions, call me at (803) 734-0494. Rodney Grizzle

RECEIVED
OCT 10
Budget
OFFICE OF STATE BUDGET

- [x] Project is consistent with our goals and objectives.
- [ ] Request a conference to discuss comments.
- [ ] Please discontinue sending projects with this CFDA# to our office for review.
- [ ] Comments on proposed Application is as follows:

Signature: Joel T. Cassidy Date: 10/6/97

Title: Executive Director Phone: 803-737-2617

FEB 25 '98 11:19 8037348645 PAGE.07

Thank you for your comments; no response required.

FROM (OFFICE OF STATE BUDGET)

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier
EIS-970904-004
Suspense Date
10/25/97

Emergency Preparedness Division
Office of the Adjutant General

Stan M. McKinney
Office of the Adjutant General

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

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If you have any questions, call me at (803) 734-0494. Rodney Grizzle

OCT 1 [illegible] 1997

Budget & Control Board
OFFICE OF STATE BUDGET

- [XX] Project is consistent with our goals and objectives.
- [ ] Request a conference to discuss comments.
- [ ] Please discontinue sending projects with this CFDA# to our office for review.
- [ ] Comments on proposed Application is as follows:

Signature: R C Osborne — Date: October 10, 1997
Ronald C. Osborne

Title: Chief, Response & Recovery — Phone: (803) 734-8020

FEB 25 '98 11:19 8037340645 PAGE.08

Thank you for your comments; no response required.

FROM :OFFICE OF STATE BUDGET

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier EIS-970904-004
Suspense Date 10/25/97

Beth McClure
S.C. Department of Parks, Recreation and Tourism

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

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If you have any questions, call me at (803) 734-0494. Rodney Grizzle

RECEIVED
OCT 13 1997
Budget & Control Board
OFFICE OF STATE BUDGET

- [x] Project is consistent with our goals and objectives.
- [ ] Request a conference to discuss comments.
- [ ] Please discontinue sending projects with this CFDA# to our office for review.
- [ ] Comments on proposed Application is as follows:

Signature: W. O. McMeekin Date: 10-6-97

Title: Asst. Dir. - RP&D Phone: 734-0176

FEB 25 '98 11:19 8037340645 PAGE.09

Thank you for your comments; no response required.

FROM (OFFICE OF STATE BUDGET)

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier
EIS-970904-004

Suspense Date
10/25/97

James B. Johnson, Jr.
South Carolina State Library

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

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If you have any questions, call me at (803) 734-0494. Rodney Grizzle

RECEIVED
OCT 07 1997
...trol Board
...OF STATE BUDGET

- ☐ Project is consistent with our goals and objectives.
- ☐ Request a conference to discuss comments.
- ☒ Please discontinue sending projects with this CFDA# to our office for review.
- ☐ Comments on proposed Application is as follows:

Signature: James B. Johnson Jr. Date: 10-6-97

Title: Director Phone: 734-8666

FEB 25 '98 11:19 8037340645 PAGE.10

Thank you for your comments; no response required.

Budget & Control Board: Office of State Budget
South Carolina Project Notification and Review System
1122 Lady Street, 12th floor
Columbia, SC 29201

State Application Identifier
EIS-970904-004

Suspense Date
10/25/97

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OCT 03 1997

L. Chriswell Bickley, Jr
Lowcountry Council of Governments

The Office of State Budget is authorized to operate the South Carolina Project Notification and Review System (SCPNRS). Through the system the appropriate state and local officials are given the opportunity to review, comment, and be involved in efforts to obtain and use federal assistance, and to assess the relationship of proposals to their plans and programs.

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Should you have no comment, please return the form signed and dated.

If you have any questions, call me at (803) 734-0494. Rodney Grizzle

RECEIVED
Budget & Control Board
OFFICE OF STATE BUDGET

- ☐ Project is consistent with our goals and objectives.
- ☐ Request a conference to discuss comments.
- ☐ Please discontinue sending projects with this CFDA# to our office for review.
- ☒ Comments on proposed Application is as follows:
  ATTACHED

Signature: L. Chriswell Bickley, Jr. Date: 11/3/97

Title: EXECUTIVE DIRECTOR Phone: 803-726-5536

FEB 25 '98 11:20 6037340645 PAGE.11

B-3-74

Thank you for your comments; no response required.

FROM : OFFICE OF STATE BUDGET

Lowcountry Council of Governments
P. O Box 98
Yemassee, SC 29945

S. C. Project Notification and
Review System

PROJECT NOTIFICATION REFERRAL

TO: MS. ELIZABETH GRACE
509 NORTH STREET
BEAUFORT, SC 29902

RECEIVED
OCT 14 1997
Lowcountry Council of Governments

APPLICATION IDENTIFIER
R15-970904-B04E
(Control Number)
10/16/97
(Response Date)

The attached project notification describing a contemplation for federal assistance is being referred to your office for review and comment. Please provide your office's comment in the space below and return by the above response date to this office.

L. Chriswell Bickley, Jr., Executive Director

☐ OFFICE HAS NO COMMENTS

☐ OFFICE REQUESTS CONFERENCE PRIOR TO MAKING COMMENTS

☑ OFFICE COMMENTS ON CONTEMPLATED APPLICATION:

A decision to realign Cecil Field F/A-18 Aircraft + Operational Functions to Beaufort MCAS would be a wise decision for the US Navy. Bft has the most protected and least impacted environs in the vicinity of the base. We are passing a strict AICUZ zoning designation for the flight paths. MCAS has the last land-air - sea training facilities in the nation. MCAS is the cho [illegible]

(Use reverse side or separate continuation sheets if necessary.)

Signature [signature] Date 10-8-97

Title Bft City Council Telephone

RETURN THIS SHEET ONLY

FEB 25 '98 11:20 8037340645 PAGE.12

Thank you for your comments; no response required.

FROM TOMTLE OF STATE BOARD

Lowcountry Council of Governments
P. O. Box 98
Yemassee, SC 29945

S. C. Project Notification and
Review System

PROJECT NOTIFICATION REFERRAL

TO: Mr. Emmett McCracken, Chairman
Beaufort County Council
P. O. Box 716
Bluffton, SC 29910

APPLICATION IDENTIFIER
EIS 970904.DOI4
(Control Number)
10/16/97
(Response Date)

The attached project notification describing a contemplation for federal assistance is being referred to your office for review and comment. Please provide your office's comments in the space below and return by the above response date to this office.

L. Chriswell Bickley, Jr., Executive Director

☐ OFFICE HAS NO COMMENTS

☐ OFFICE REQUESTS CONFERENCE PRIOR TO MAKING COMMENTS

☒ OFFICE COMMENTS ON CONTEMPLATED APPLICATION:

Beaufort County remains supportive of any alternatives that relocate assets to MCAS Beaufort.

(Use reverse side or separate continuation sheets if necessary.)

Signature [signature] Date 10 Oct 97

Title Beaufort County Telephone 757-2511

RETURN THIS SHEET ONLY

FEB 25 '98 11:20 9037340645 PAGE.13

Thank you for your comments; no response required.

Virginia

(MON) 16:37 DEPT. OF AVIATION TEL:804 236 3635 P. 002

COMMONWEALTH of VIRGINIA

KENNETH F. WIEGAND
Director

Department of Aviation
5702 Gulfstream Road
Richmond International Airport, Virginia 23250-2422

V/TDD - (804) 236-3624
FAX - (804) 236-3635

November 17, 1996

Mr. Dan Cecchini
Naval Facilities Engineering Command
1510 Gilbert St.
Norfolk, VA 23511

Re: F/A-18 Squadron Realignment
DEIS Review Comments

Dear Mr. Cecchini:

The Department of Aviation has reviewed the DRAFT Environmental Impact Statement (DEIS) for the F/A-18 squadrons being proposed to be realigned to the Oceana Naval Air Station.

Because ARS 1 is the stated preferred alternative, we assume that this action is the chosen alternative, and our review is set out to reflect this. Consequently, we have two areas of primary concern.

1 | The first involves the substantial increase in the amount of traffic for the Class C Airspace in the Hampton Roads region, and the numerous impacts that may result. This issue was flagged as being important in our response to comments for scoping in a September 27, 1996 letter, and we haven't noticed much attention to the issue in the report.

2 | Secondly, we have concerns pertaining to the utilization of MTR's, especially the very large activity jumps indicated for several specific routes. This raises questions about the greater possibility for conflicts with civilian aircraft, as well as the accordant increase in noise and citizen reaction that is inevitable.

We would ask that our comments be taken into consideration in the analysis being prepared in order to publish the FINAL. Thank you for the opportunity to comment, and please feel free to call should there be any questions that may arise.

Sincerely,

Keith F. McCrea, AICP
Senior Aviation Planner

enclosure

c: Ellie Irons, DEQ
FAA, ATC
VDOA

VADA-1 The NASMOD analysis modeled specific departure and arrival routes for NAS Oceana. These routes provide for the most direct route to and from training areas along the east coast. Based on the use of these routes, there will be no significant impact on the Class C airspace surrounding Norfolk International Airport. In addition, the Norfolk Air Traffic Control Tower and NAS Oceana Terminal Radar Approach Control (TRACON) have an existing letter of agreement that outlines procedures for controlling air traffic within the area.

VADA-2 Noise impacts on the MTRs are identified in the EIS. MTRs are published low-level routes and are identified in aeronautical charts. Other users of the national airspace system would be expected to contact the local flight service station to inquire about scheduled traffic on the MTRs. Although the possibility of conflict between military and civilian aircraft was identified, it was not significant enough to pursue further analysis. The current management practice of the Navy and Marine Corps is to ensure real-time joint use of airspace for both military and civilian users.

DRAFT Environmental Impact Statement

Review Comments of the

Virginia Department of Aviation

No.	Page	Comment
1.	N/A	We are curious why the DEIS was prepared in-house as opposed to utilizing at least some outside consultants, as this leaves the idea of impartiality of the analysis in question from a perceptual standpoint.
2.	4.1-4,5	The 118% increase of flight ops at Oceana, and 51% increase at Fentress is certainly significant. The mix of aircraft in the Hampton Roads Region is complex, and we would offer our concern that the proposed increase could pose itself as an airspace utilization safety issue. This proves to be a coordinating question on airspace utilization, and in that regard, we are interested if this aspect has been explored with the Norfolk Tower and TRACON?
3.	Section 4.8	Regarding the increase in traffic, we would note that the increase in affected properties from aircraft noise is sizeable, and would be asking for assurances that there is sufficient liaison activity planned with Virginia Beach and Chesapeake officials on this count. This is especially so for the noise impact on schools.
4.	Section 4.4	In the same vein, the report indicates a nearly 3,000 acre increase in the size of the future APZ for Oceana. Again, this fact mandates a close cooperative arrangement with local government.
5.	4.2-2	We have made note of the increase of 11% in the overall utilization of MTR's Does this statistic reflect both visual as well as all instrument routes (only one breakout of an individual IR segment is shown) to be used?
6.	4.2-2,5,6	VR 1753 is forecast to have a utilization increase of 68%. Similarly, VR 1759 indicates an increase of 88%. How is it that the report states "no significant changes in noise levels would occur along MTR's as a result of ASR 1", when there is such a substantial increase in utilization? Also, the metrics used to measure noise impacts are left blank in the columns - - - is this data shown elsewhere?
7.	Section 4	There are other charted MTR's in the Commonwealth that are not listed individually in the report. Does this mean that they would not be used by the additional aircraft being proposed for Oceana?
8.	Section 4	As is the case with number 5 above, does the omission of the Farmville MOA from the report indicate that none of the transferred aircraft will be using this MOA?

VADA-3 The EIS was prepared by Ecology and Environment, Inc., an environmental consulting firm specializing in the preparation of environmental impact statements. They are located in Buffalo, New York. The airspace analysis (Appendix C of the EIS) was prepared by ATAC, Inc., a firm specializing in airfield and airspace analyses. They are located in Sunnyvale, California. The noise analysis was prepared by Wyle Labs, Inc., a firm specializing in noise impact analysis. They are located in Arlington, Virginia.

VADA-4 The NASMOD analysis uses state-of-the-art modeling techniques and extensive input from air operations, air traffic control, and squadron personnel. NASMOD indicates that the training requirements associated with the proposed F/A-18 realignment can be accommodated using existing air traffic control procedures, routes, and capacity. Aircraft operating between NALF Fentress and NAS Oceana follow Visual Flight Rules (VFR) procedures.

The Navy will continue to act as liaison with the Norfolk Air Traffic Control Tower and NAS Oceana TRACON to ensure smooth, orderly traffic flow in the region.

VADA-5 The EIS acknowledges the potential noise impacts, especially for schools. The Navy will continue to assist local officials under the AICUZ program. Specifically, the City of Virginia Beach has requested that the Navy work with local officials to conduct detailed engineering evaluations at those schools of particular concern. At the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

VADA-6 As noted above, the Navy will continue to work with the City of Virginia Beach.

VADA-7 The projected increase in total operations on all MTRs shown on Table 4.2-1 includes the 11 visual routes and one instrument route potentially affected by the F/A-18 realignment.

VADA-8 No significant change in noise levels would occur along MTRs under ARS 1. Navy F/A-18 aircraft use higher average altitudes on the MTRs than other users. In addition, the A-6 aircraft has been decommissioned, and minimal changes in the number of sorties by other aircraft utilizing the MTRs are projected.

The noise metric used for MTRs is the onset-rate adjusted monthly day-night average sound level (Ldnmr), which is defined in Section 3.1.8 of the EIS. Table 4.2-4 has been amended to show the units (decibels, dB) for Ldnmr, which had been inadvertently omitted from the Draft EIS.

VADA-9 The EIS examined those MTRs that the Navy identified as primary F/A-18 training routes. Occasional use of other MTRs is possible.

VADA-10 While the Farmville MOA may be used for an occasional sortie, the majority of Navy air-to-air training would be conducted in the warning areas.

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources



Kathleen W. Lawrence
Director

REPLY TO:
Suffolk Regional Office
1548 Holland Road
Suffolk, Virginia 23434
Telephone (804) 925-2468
FAX (804) 925-2388

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street, Suite 206
Richmond, Virginia 23219-2094
Phone: (804) 786-2064 FAX: (804) 786-1798 TDD: (804) 786-2121

November 18, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, Virginia 23511

RE: Draft Environmental Impact Statement (DEIS)
Realignment of F/A-18 Aircraft to NAS Oceana

Dear Commander:

As stated in Section 4.6.3 of the referenced project DEIS, the proposal would be designed to meet the water quantity criteria of the Virginia Stormwater Management Act. We recommend that the final design at NAS Oceana also meet the water *quality* criteria of the proposed Virginia Stormwater Management Act which should be effective by early of 1998 well before the Final Environmental Impact Statement. The proposed stormwater quality criteria will combine the requirements of the three state agencies: The Department of Conservation and Recreation (DCR), the Department of Environmental Quality (DEQ) and the Chesapeake Bay Local Assistance Department (CBLAD). A copy of the proposed regulations are enclosed. 1

If you have any further questions or require additional information, please do not hesitate to contact me by phone at (757)925-2468 or by e-mail at pkd@dcr.state.va.us. Thank you for your attention.

Sincerely,

P.K. Das
Stormwater Management Engineer

PKD/wgm

Enclosure

cc: James Edmonds - DCR

An Agency of the Natural Resources Secretariat

VADCR-1 The design for stormwater management at NAS Oceana under the selected ARS will be developed in consultation with the Virginia Department of Environmental Quality and other appropriate state and local agencies. Stormwater management will be designed to meet all provisions of the Virginia Stormwater Management Act. Therefore, if the water quality criteria are in effect at the time of construction, the design will be in accordance with these critieria.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
http://www.deq.state.va.us

Thomas L. Hopkins
Director

(804) 698-4000
1-800-592-5482

December 2, 1997

Mr. J. Daniel Cecchini
Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

RE: Draft Environmental Impact Statement for the proposed Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida to NAS Oceana located in the City of Virginia Beach; DEQ-97-111F.

Dear Mr. Cecchini:

The Commonwealth of Virginia has completed its review of the Draft Environmental Impact Statement for the above referenced project. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies and planning district commission took part in this review:

Department of Environmental Quality
Department of Health
Department of Conservation and Recreation
Department of Agriculture and Consumer Services
Department of Transportation
Department of Aviation
Virginia Institute of Marine Sciences
Hampton Roads Planning District Commission.

In addition, the Department of Game and Inland Fisheries, Department of Historic Resources, Virginia Marine Resources Commission, and the City of Virginia Beach were invited to comment.

An Agency of the Natural Resources Secretariat

The Virginia Department of Environmental Quality attached and summarized the comments of Virginia state agencies and other agencies/organizations as listed in its cover letter. Responses are provided in the VADEQ summary letter only unless specifically noted.

The Navy proposes to transfer eleven F/A-18 fleet squadrons (132 aircraft), the Fleet Replacement Squadron (FRS) comprising of 48 F/A-18 aircraft, and operational functions from NAS Cecil Field (scheduled for closure in accordance with BRAC) to other east coast facilities. The preferred alternative realignment scenario (ARS) involves transferring all 180 F/A-18 aircraft and 4,200 positions to NAS Oceana. The other four ARSs discussed are: transfer of 156 F/A-18 to NAS Oceana and 24 F/A-18 to MCAS Beaufort in South Carolina; realignment of 144 F/A-18 aircraft to NAS Oceana and 36 aircraft to MCAS Cherry Point in North Carolina; and realignment of 120 aircraft to NAS Oceana and 60 aircraft to (i) Beaufort or (ii) to Cherry Point. Implementation of any of the 5 alternatives discussed in the DEIS would require construction of new facilities and renovation of existing structures at Oceana.

Environmental Impacts and Mitigation

1 *1. Water Quality.* Impacts to water quality should be minimal. However, potential adverse impact to water quality resulting from surface runoff must be minimized by using Best Management Practices. Precautions should be taken to prevent the entry of any contaminants into wetlands or state waterways. The implementation and maintenance of proper erosion and sediment control measures should minimize the impacts on water quality.

2 *2. Wetlands.* The DEIS (section 3.1.11.3) indicated that the proposed site for the parking apron expansion contains approximately 0.3 acres of wetlands based on USFWS National Wetlands Inventory Maps, interpretation of aerial photography, and field survey. Wetlands impacts may be subject to the requirements of Virginia Water Protection Permit as well as the U.S. Army Corps of Engineers permit issued pursuant to Section 404 of the Clean Water Act. The Navy should contact the Army Corps of Engineers for confirmation on the estimate of wetland impacts associated with the proposed expansion of the apron.

In general, the project must demonstrate adherence to existing wetlands policies and § 404 (b)(1) guidelines of the Clean Water Act. These guidelines as well as the Commonwealth's wetlands policies require avoidance of wetland impacts as the first step in the mitigation process. In instances where the impacts cannot be avoided, minimization of impacts must precede other options such as compensatory mitigation in the form of re-creation, restoration, enhancement or preservation of wetlands.

3 *3. Air Quality.* DEQ-Air Division concurs with the draft air conformity finding incorporated in the DEIS. We agree that the emissions projected from the conformity determinations are within the state implementation plan emission budgets. However, DEQ-Air Division has indicated that there are some areas of the conformity analysis which should be clarified.

Accordingly, the following clarification should be included in the Final EIS: (i) the differences in emission levels for nitrogen oxides and volatile organic compounds presented in

VADEQ-1 Any increase of water flow intensity and sediment load resulting from the increase of impervious surfaces will be offset through the incorporation of appropriate stormwater collection systems into the design of the new facilities. Any new construction under the jurisdiction of the existing (or modified) VPDES permit will require the implementation of Best Management Practices.

VADEQ-2 The proposed site for the parking apron expansion is located adjacent to the 0.3-acre (0.01-hectare) wetland. Potential construction impacts will be mitigated by implementing proper erosion and sediment control measures. Prior to construction of the parking apron expansion, the Navy will contact the U.S. Army Corps of Engineers (USACE) to receive concurrence on the estimate of wetland impacts as a result of this project. If necessary, the Navy will comply with the requirements of the Virginia Water Protection Permit as well as the USACE Section 404 permit.

VADEQ-3 The differences in NO_x and VOC emission levels between the Draft Air Conformity Determination Report (dated August 1997, Appendix E of the EIS) and the Preliminary Draft Air Conformity Determination Report (dated April 15, 1996) are due to the inclusion of updated and site-specific aircraft emission data (i.e., emission factors, engine test times, taxi and flight time in mode) in the EIS.

The fuel handling emissions analyses include refueling activity at engine testing and maintenance run-up locations.

Refueling emissions for ground support equipment (GSE) and construction equipment were not included in the conformity determination. There are approximately 485 GSE units to be reassigned; 42 are gasoline-powered and the remainder are diesel-powered. Construction equipment is also assumed to be primarily diesel-powered. Due to the low volatility of diesel fuel and the small percentage of GSE units powered by gasoline, refueling emissions were not determined to be significant.

the DEIS compared with the emission levels presented in the April 15, 1996 draft conformity determination; (ii) whether the JP5 Fuel Handling (evaporative emissions analyses) includes refueling activity for aircraft engine testing and maintenance run-ups operations; (iii) whether the refueling emissions (Stage 1 and Stage 2) for general service equipment and construction equipment were included in the conformity determination; and (iv) whether emissions from transporting and loading of aviation, gasoline, and diesel fuel destined for NAS Oceana/NALF Fentress occurring at other sites such as Yorktown Fuel Depot, Craney Island, Naval Station at Norfolk etc. were included in the conformity determination.

In addition, although no adverse impacts to air quality are anticipated, during construction of the project, fugitive dust must be kept to a minimum. This requires, but is not limited to, measures such as application of water to suppress dust, and washing down construction vehicles and paved roadways immediately adjacent to the construction site. Also, we encourage the Navy to commit to voluntary reduction of VOC and NOx emissions during ozone alert days. If you need clarification of these comments, please see detailed comments which are attached or contact Dona Huang at (804) 698-4405.

4 *4. Natural Heritage Resources.* According to the Draft DEIS and the information in the files of the Department of Conservation and Recreation's Division of Natural Heritage (DNH), natural heritage resources are documented on the base. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formation. As noted in the DEIS, in 1990 DCR documented a population of the southern twayblade at Oceana. Based on more recent reevaluation, this species has been removed from DCR's list of rare plants. In addition, the state rare dragonfly, the red-mantled glider (**Tramea onusta**) has been documented as occurring on the base. Also, the following areas notable for their contribution to Oceana's natural diversity were identified by DNH in the 1990 natural heritage inventory conducted at Oceana: Northwest Woods Special Interest Area (SIA), Sandpits SIA, Owl Creel SIA, and Old Woods SIA. However, due to scope of the construction projects and the distance to the resources, DNH does not anticipate that this proposal will have any adverse impacts on natural heritage resources identified at NAS Oceana. Also, the Department of Agriculture and Consumer Services' files do not indicate the presence of listed threatened or endangered plant and insect species under its jurisdiction within the project area.

5 *5. Historic Structures and Archaeological Resources.* According to the DEIS (section 4.13), this project will not affect historical structures or archaeological resources that are listed or eligible for listing in the National Register of Historic Places. In the event that archaeological resources are encountered during excavation, immediately contact the Department of Historic Resources, David Dutton at (804) 786-3143.

6 *6. Erosion and Sediment Control.* Non-point source impacts to waters from sediment and runoff from impervious surfaces such as roofs, parking lots, and roadways, could result from this project. Implementation of strict erosion and sediment control measures should

The indirect emissions resulting from loading fuels at other military facilities for transport to NAS Oceana/NALF Fentress were not included in the conformity determination. The JP-5 emission entry in the stationary source table includes both the loading of fuel into aircraft and delivery trucks and the JP-5 storage on base. The annual quantity of JP-5 throughput at NAS Oceana is 100 to 150 million gallons per year. The quantity of VOCs released from JP-5 handling is 1 to 2 tons per year. At a maximum, the loading of this fuel quantity at other military installations in the Hampton Roads area could be assumed to release an additional 1 to 2 tons of VOCs per year. A similar analysis is applicable to other fuel types used at NAS Oceana and NALF Fentress.

The Navy will mitigate any sources of fugitive dust due to construction activities and will continue to examine its operational procedures and use of materials or equipment emitting VOCs and NO_x, especially during ozone alert days. The Navy will examine limiting the routine, non-readiness use of equipment or materials emitting VOCs and NO_x during ozone alert days.

VADEQ-4 Section 3.1.12 has been updated to reflect the removal of the southern twayblade species from Virginia's list of rare plants.

VADEQ-5 The Department of Historic Resources will be contacted if archaeological resources are encountered during construction at NAS Oceana.

VADEQ-6 Any increase in non-point source runoff intensity and sediment load resulting from the increase of impervious surfaces will be offset through the incorporation of appropriate stormwater collection systems into the design of the new facilities. Any new construction under the jurisdiction of the existing (or modified) VPDES permit will require the implementation of Best Management Practices, including appropriate erosion control measures.

minimize non-point source pollution.

7

7. Solid and Hazardous Wastes and Hazardous Materials. All solid or hazardous wastes generated at the site during construction should be reduced at the source, re-used, or recycled. Hazardous waste must be minimized. The DEIS did not address the impacts from potential spills associated with the increased flow of fuel from underground or above-ground storage tanks as well as during transportation from Craney Island Depot to a contractor-owned fuel depot (Mercer's Landing). This should be addressed in the Final EIS. Also, due to the proposed increase in fuel use, NAS Oceana must upgrade their leak detection, spill prevention, and spill operations associated with fuel storage.

8

8. State Scenic Rivers. The Department of Conservation and Recreation has indicated that the proposed development will not affect any streams on the National Park Service Nationwide Inventory, Final List of Rivers, or existing or potential State Scenic Rivers. Nor will the project affect existing or potential State Scenic Byways.

9

9. Pesticides and Herbicides. The use of herbicides or pesticides for landscape maintenance should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used. We recommend that the use of pesticides containing volatile organic compounds as their active ingredient be avoided to the maximum extent practicable in order to protect air quality. Please contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

10

10. Other Matters: (i) **Regional and Local Plans.** Hampton Roads Planning District Commission indicated that this proposal is consistent with local and regional plans. HPDRC noted several sections in the DEIS pertaining to water resources, air quality, and public infrastructure which need to be updated in the Final EIS (see detailed comments which are attached). (ii) **Traffic Issues.** According to the DEIS, traffic conditions on some roadways in the vicinity of NAS Oceana would be significantly impacted. Specifically, a section of Oceana Boulevard from Bells Road to Princess Anne Road would be degraded from Level of Service E to F. However, according to the DEIS, several planned improvement projects, including expansion of Oceana Boulevard, would reduce traffic congestion. We recommend that road improvement projects be coordinated with Virginia Department of Transportation. Please contact Michael Hester at (804) 371-4871 for more information. (iii) **Aviation Issues.** The Department of Aviation indicated that its September 27, 1996 comments submitted to the Navy during the scoping phase of the project were not reflected in the DEIS. For this reason, DOAv reiterates its previous comments. The Department is concerned about potential adverse impacts to civilian aircraft and the community associated with (i) the proposed significant increase in traffic in the Class C Airspace of Hampton Roads region and (ii) the proposed 11% increase in Military Training Routes. Issues raised by DOAv should be addressed in the Final EIS. For clarification of these comments, contact Keith McCrea at (804) 236-3624. (iv) **Energy Conservation.** The new buildings should be planned and designed to comply

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VADEQ-7 Section 4.6.6 has been amended to include a discussion of potential spills associated with an increase in the amount of fuel stored or piped at NAS Oceana and transported off base. NAS Oceana will update its Spill Prevention, Control, and Countermeasure (SPCC) Plan to reflect any increase in volume or change in type of fuel stored.

VADEQ-8 Thank you for your comment; no response required.

VADEQ-9 No change in the use of pesticides or herbicides is anticipated under the proposed action.

VADEQ-10 Thank you for your comment; please see responses to the HRPDC comments.

VADEQ-11 The roadway improvements listed on Table 3.1-33 are independent of the proposed action. These improvements are part of the regional transportation system master plan (*City of Virginia Beach FY 1995/96-2000/01 Capital Improvement Program)* and are intended to alleviate existing traffic conditions. The EIS addresses the cumulative impacts on traffic conditions for ARS 1 in Sections 4.7 and 9.1.5 of the EIS.

VADEQ-12 Thank you for your comment; please see responses to the Virginia Department of Aviation.

with state and federal guidelines and industry standards for energy conservation and efficiency. For example, energy efficiency of the facility can be maximized by optimizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, and insulation);
- high efficiency heating, ventilation, air conditioning systems;
- high efficiency lighting systems;
- energy-efficient office and data processing equipment.

The Department of Mines, Minerals and Energy should be contacted (Eugene Rader at (804) 293-5121) for assistance in meeting this challenge.

13

Regulatory and Coordination Needs

1. Erosion and Sediment Control and Stormwater Management. This project must comply with Virginia's Erosion and Sediment Control Law/Regulations and the Stormwater Management Law and Regulations. All plans prepared in accordance with these legislation must comply with the guidelines set forth in Chapter VI of the Virginia Erosion and Sediment Control Handbook. If the Navy wishes technical review of either the erosion and sediment control plan or stormwater management plan for this project, contact the Department of Conservation and Recreation's Division of Soil and Water Conservation at (804) 371-7483.

14

2. Water Quality. The Navy should consult with the DEQ's Tidewater Regional Office at (757) 518-2000 concerning (i) the need for a Virginia Pollutant Discharge Elimination System stormwater construction permit if the total land disturbance associated with construction is five acres or more, (ii) modification of the existing VPDES stormwater permit; and (iii) the need for a Virginia Water Protection Permit for wetlands impacts.

15

3. Air Quality Regulations. Construction of the new facilities at NAS Oceana may be subject to regulation by the Department of Environmental Quality. The following sections of Virginia's Administrative Code (VAC) may be applicable: 9 VAC 5-50-80 and 90, governing abatement of visible emissions and fugitive dust emissions. For additional information, please contact DEQ's Tidewater Regional Office at (757) 518-2000.

16

4. Natural Heritage Resources. For updated natural heritage resource information, please contact the Department of Conservation and Recreation's Natural Heritage Program at (804) 786-7951 if this project is not implemented soon.

17

VADEQ-13 Thank you for your comment; no response required.

VADEQ-14 All construction activities at NAS Oceana associated with the realignment of the F/A-18 aircraft will comply with the guidelines in Chapter VI of the *Virginia Erosion and Sediment Control Handbook* and the applicable regulations of Virginia's Erosion and Sediment Control Act and Stormwater Management Act. The Navy will contact the Division of Soil and Water Conservation, as appropriate, for review of site-specific control measures.

VADEQ-15 Upon completion of the FEIS and issuance of a Record of Decision by the Office of the Secretary of the Navy, the Navy will contact appropriate permitting agencies concerning the need and/or applicability of permits for the chosen ARS.

VADEQ-16 The Navy is thoroughly reviewing the applicability of air quality regulations to new facilities and construction activities associated with each ARS. The Navy anticipates submitting a permit application for aircraft painting and corrosion control facilities.

VADEQ-17 The Department of Conservation and Recreation's Natural Heritage Program will be contacted for updated information if implementation of one of the ARSs is significantly delayed.

18

5. Solid Waste and Hazardous Substances. All solid waste, hazardous waste, and hazardous material must be managed in accordance with all applicable federal, state, and local environmental regulations. Excess soil must be properly characterized and disposed of in appropriate facilities. For more information, contact DEQ's Tidewater Regional Office.

19

6. Underground and Aboveground Storage Tank Regulations. The Navy must contact DEQ's Tidewater Regional Office concerning new installation or removal of underground or aboveground storage tanks. Also, any petroleum releases detected in areas of new construction must be reported to DEQ-TRO.

20

7. Federal Consistency Determination. Pursuant to the Coastal Zone Management Act of 1972, as amended, federal projects located within Virginia's designated coastal management area must be constructed and operated in a manner which is consistent with the Virginia Coastal Resources Management Program (VCRMP). Also, as stated on page 3.1-92 of the DEIS, the Coastal Zone Management Act Reauthorization Amendments of 1990 requires that ".. each federal agency activity within or outside the coastal zone that affects any land or water use or natural resources of the coastal zone shall be carried out in a manner which is consistent to maximum extent practicable with the enforceable policies of the approved state management programs." In Virginia, an activity is consistent with the VCRMP upon receipt of all applicable permits or approvals listed under the Enforceable Programs of the VCRMP (Attachment 1). Applicable approvals must be obtained prior to implementing the project. For more information, contact Ellie Irons at (804) 698-4325.

Thank you for the opportunity to review the Draft DEIS for this undertaking. We urge your review of the detailed comments of reviewing agencies which are attached. Please contact Ellie Irons at (804) 698-4325 for clarification of these comments or concerning coordination of the Final EIS for this proposal.

Sincerely,

Michael P. Murphy
Director Customer Service

Enclosures

VADEQ-18 The Navy will manage all solid waste, hazardous waste, and hazardous materials in accordance with federal, state, and local regulations.

VADEQ-19 The Navy will comply with regulations associated with any new installation or removal of underground or aboveground storage tanks. Any petroleum releases detected in areas of new construction will be reported to VDEQ-TRO.

VADEQ-20 Prior to construction, the Navy will obtain applicable permits or approvals, and therefore will be consistent with the VCRMP.

cc. Honorable Becky Norton Dunlop
Joseph P. Hassell, DEQ-OWRM
Ulysses Brown, DEQ-OTAW
Dona Huang, DEQ-ADA
Sheri Kattan, DEQ-TRO
John R. Davy, DCR
Raymond T. Fernald, DGIF
Perida Giles, VDACS
Keith McCrea, DOAv
Eugene Rader, DMME
David Dutton, DHR
John Simkins, VDOT
Robert Grabb, VMRC
Thomas A. Barnard, Jr., VIMS
Clay Bernick, City of Virginia Beach
Arthur L. Collins, Hampton Roads PDC.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

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Thomas L. Hopkins
Director

(804) 698-4000
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Enforceable Regulatory Programs comprising Virginia's Coastal Resources Management Program

a. Fisheries Management - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (Virginia Code §28.2-200 to §28.2-713) and the Department of Game and Inland Fisheries (Virginia Code §29.1-100 to §29.1-570).

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The MRC, DGIF, and VDACS share enforcement responsibilities (Virginia Code §3.1-249.59 to §3.1-249.62).

b. Subaqueous Lands Management - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality, Water Division. The program is administered by the Marine Resources Commission (Virginia Code §28.2-1200 to §28.2-1213).

c. Wetlands Management - The purpose of the wetlands management program is to preserve tidal wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation. This program is administered by the Marine Resources Commission (Virginia Code §62.1-1301 through §62.1-1320).

d. Dunes Management - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission (Virginia Code §62.1-1400 through §62.1-1420).

e. Non-point Source Pollution Control - Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation (Virginia Code §10.1-560 et.seq.).

f. Point Source Pollution Control - The point source program is administered by the State Water Control Board pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of:

(i) The National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the VPDES permit program.

(ii) Water Quality Certification pursuant to Section 401 of the Clean Water Act administered in Virginia through the Virginia Water Protection Permit which includes protection of wetlands --both tidal and non-tidal.

g. Shoreline Sanitation - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code §32.1-164 through §32.1-165).

h. Air Pollution Control - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code §10-1.1300).

If you cannot meet the deadline, please notify ELLIE IRONS at 804/698-4325 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

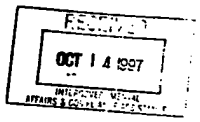
A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319



Ellie Irons
Environmental Program Planner

COMMENTS

The Navy should get a confirmation from the Corps of Engineers of their estimate of wetland impacts from the apron expansion (> 1/2 acre). Overall the realignment will have no great direct impact on the Virginia Water Pollution Permit program and probably not require any permits. Obviously there will be secondary impacts with the transfer of 4200 positions into the region.

(signed) Joseph A. Hassell (date) 9/30/97
(title) Env. Engineer Senior
(agency) DEQ - OPS

PROJECT # 97-111 F 2/97

B-3-92

RECEIVED
OCT 1 1997

ODA-215-97

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF AIR DATA ANALYSIS

MEMORANDUM

TO: Ellie Irons, Office of Environmental Impact Review

FROM: Dona Huang

SUBJECT: EIS on the Realignment of F/A-18 & Operational Functions from NAS Cecil Field, Fl. To Other East Coast Installations Including NAS Oceana, Virginia Beach, VA

DATE: October 31, 1997

Thank you for the opportunity to review the referenced subject. This office concurs with the draft air conformity finding incorporated in the EIS. The emissions projected from the conformity determination are well within the emission budgets. However, this office would like to make several comments regarding the draft conformity analysis.

1. The emissions estimated for the ARS1 scenario show a significant reduction in nitrogen oxide (NO_x) and an increase in volatile organic compound (VOC) emissions from the initial draft conformity determination (April 15, 1996). Although these emissions are within the state implementation plan (SIP) budgets, the changes in the emissions estimations between the two draft conformity versions warrant an explanation from the project proponent. The most noticeable differences were the aircraft flight and engine testing emissions (activity levels and emissions factors).

2. It is not clear if the JP5 Fuel Handling (evaporative emissions analyses) includes refueling activity for aircraft engine testing and maintenance run-ups operations.

3. It is not clear if the refueling emissions (Stage 1 and Stage 2) for general service equipment (GSE) and construction equipments were included in the conformity determination.

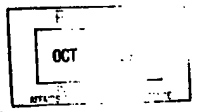
4. It is not clear if the emissions from transporting and loading of aviation, gasoline, and diesel fuel destined for NAS Oceana/NALF Fentress occurring outside of these installations (i.e., at the Yorktown Fuel Depot, Craney Island, Naval Station at Norfolk, etc.) were included in the conformity determination. Afterall, the frequency and quantity of fuel involved are anticipated to increase due to the realignment.

The preferred alternative demonstrates a positive conformity determination, but we would like to encourage the two affected facilities to commit to voluntary reduction in VOC and NO_x production during ozone alert days.

If you or the project sponsor has any questions regarding these comments, please call me at (804) 698-4405.

cc: Kirit Chaudhari, Director, Office of Air Data Analysis
Frank Daniel, Director, DEQ Tidewater Regional Office





COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

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Thomas L. Hopkins
Director

(804) 698-4000
1-800-592-5482

Division of Waste Operations - Office of Technical Assistance

MEMORANDUM

To: Ellis Irons
Environmental Program Planner

From: Ulysses B. Brown
Environmental Program Manager

Subject: Real Estate Inquiry concerning Cecil Field

RES 2409-1844

Date: October 17, 1997

The Office of Technical Assistance has reviewed the Environmental Review Request for Realignment of F/A Aircraft & Operational Functions from (NAS) Cecil Field to other East Coast Installations.

In response to your recent inquiry, we have undertaken a search of our computerized files as they might relate to the above referenced property site. Because these files are organized by either zip code or city/county, we provide the following information on the site in question within our ability to search available office resources. The following information is not a substitute for a site-specific environmental audit since these files only include information available to us and may not reflect the result of unreported conditions.

Upon searching our solid waste, hazardous waste, Superfund, and current investigations data files, we located no apparent hazardous waste problems or past incidents at the site.

Within the zip code area or closely adjacent areas of the site of interest are the following facilities for which the U. S. Environmental Protection Agency has notified this office as being handlers of hazardous wastes. Some of these listings were protective filings and in fact no hazardous waste was ever generated at that specific site. In addition many of these listings may reflect businesses which have ceased operation.

B-3-95

NO HAZARDOUS WASTE HANDLERS WERE LISTED IN THE ZIP CODE AREAS OF INTEREST

The following sites in the area of interest are in the U.S. EPA CERCLIS (Superfund) List:

USN CAMP PENDLETON	VA1170090012	VIRGINIA BEACH	23459

The following solid waste sites are in our records as being in the city or county of interest (Latitude & Longitude are included where available):

OCEANA NAVAL AIR STN		VIRGINIA BEAC		
LITTLE CREEK NAVAL AMPHIB		VIRGINIA BEAC		
OCEANA NAVAL AIR STN		VIRGINIA BEAC		
OCEANA NAVAL AIR STN		VIRGINIA BEAC		
CENTERVILLE TPK-MT TRASHMR	MT TRASHMORE II	VIRGINIA BEAC	N36-47-53	W76-12-01
LAKESIDE CONSTRUCTION LF	FENTON ST	VIRGINIA BEAC		
FEW INC DEBRIS LF	BAKER RD	VIRGINIA BEAC		
BAILLIO DEBRIS LF	OCEANNA BLVD	VIRGINIA BEAC		
VIRGINIA BEACH-MT TRSHMR I		VIRGINIA BEAC		
BRAITHWAITE DEBRIS		VIRGINIA BEAC		
BROOKS POLLOCK INERT LF		VIRGINIA BEAC		
GUNTER DEBRIS LF	SEABOARD RD	VIRGINIA BEAC		
WILLIAMS CORP DEBRIS LF	MILITARY HWY	VIRGINIA BEAC		
SEPSA-VA BEACH TRANS STN #	VA BCH BLVD	VIRGINIA BEAC		
VA BEACH LF #2-MT TRSHMR I	CENTERVILLE PKE	VIRGINIA BEAC		
VA BEACH DEBRIS LF-POTTERS		VIRGINIA BEAC		
APAC-VA DEBRIS LF	OCEANNA BLVD	VIRGINIA BEAC		
TARMAC-LONESTAR CO	OCEANNA BLVD	VIRGINIA BEAC		
AMER BIO-GAS RECOVERY	RT 671	VIRGINIA BEAC		
VIRGINIA BEACH (EMER. PERM		VIRGINIA BEAC		
SPSA-VA BEACH MT. TRASHMOR	MT. TRASHMORE I	VIRGINIA BEAC		
SEPSA-LANDSTOWN TRANS STAT	LANDSTOWN TS	VIRGINIA BEAC	36°40'00"	76°05'32"
NAB-LITTLE CREEK TRANSFER	LITTLE CREEK	VIRGINIA BEAC	36°54'30"	76°10'35"

The following are incidents in the area of interest in our computerized file:

NO INCIDENTS ARE LISTED FOR THE ZIP CODE AREA OF INTEREST:

The following are incidents which may be in the area of interest but are not indexed by zip code in our computerized file.

VA. BEACH SANDBOX INCIDENT	UNKNOWN	VIRGINIA BEACH
FIRE		VIRGINIA BEACH
OCIANA DAIRY CO.	1040 OCIANA BLV	VIRGINIA BEACH
TIM STREET	TIM STREET, CROSS RR, TRK	VIRGINIA BEACH
PRINCESS ANNE HIGH SCHOOL	BEHIND PRINCESS ANNE HIGH	VIRGINIA BEACH
MACDONALD ROAD SITE	3429 MACDONALD ROAD, VIRGI	VIRGINIA BEACH
RTR SIGN	544 CENTRAL DRIVE, SUITE 1	VIRGINIA BEACH
HOT SITE	3029 COBBLESTONE DRIVE, VI	VIRGINIA BEACH

B-3-96

WEDGEWOOD MOBILE HOME PARK	BONNERY ROAD, BEHIND COUNT	VIRGINIA BEACH
LYNNHAVEN COLONY	2945 BREEZY ROAD, VIRGINIA	VIRGINIA BEACH
SEAPORT SITE	100 S. PENNSYLVANIA AVE.,	VIRGINIA BEACH
OLD GUILLE STEEL	122 S. WITCHDUCK ROAD, VIR	VIRGINIA BEACH
A & P ARMS - LISHELLE	2664 LISHELLE PLACE, VIRGI	VIRGINIA BEACH
PRINCESS ANNE RECREATION C	1400 FERRELL PARKWAY, VIRG	VIRGINIA BEACH
NAS OCEANA SCRAP AREA	NAVAL AIR STATION OCEANA,	VIRGINIA BEACH
SHELL ROAD SITE	EASEMENT AT 5145 SHELL ROA	VIRGINIA BEACH
NAVAL BASE--DAM NECK	NAVY EXCHANGE, BEHIND GAS	VIRGINIA BEACH
BROWN & RICHTER PROPERTY	CORNER DUKE LANE AND VA BE	VIRGINIA BEACH
DOCTOR'S OFFICE	33 1/2 ARTIC AVENUE, VIRGI	VIRGINIA BEACH
NEW LAND DRIVE SITE	1245 NEW LAND DRIVE, VIRGI	VIRGINIA BEACH
PUNGO AIRFIELD	PRINCESS ANNE ROAD, VIRGIN	VIRGINIA BEACH
BOB MOVING SITE	VACANT LOT ADJ. TO 4798 DE	VIRGINIA BEACH
CHEM LAWN	1431 BAKER ROAD, VIRGINIA	VIRGINIA BEACH
C F MARINE DIESEL	5900 THURSTON AVENUE, VIRG	VIRGINIA BEACH
ABOCENE PEST CONTROL	412 DORSETTE AVENUE, VIRGI	VIRGINIA BEACH
BLACKSTONE TRAIL SITE	MAGIC HOLLOW SUBDIVISION,	VIRGINIA BEACH
FITNESS WAREHOUSE	4716 VIRGINIA BEACH BOULEV	VIRGINIA BEACH
VIRGINIA BEACH TRANSFER ST	BEHIND RESIDECE 2124 VA BE	VIRGINIA BEACH
ST. MARTIN COURT	END OF ST. MARTIN COURT, N	VIRGINIA BEACH
LITTLE SHORE DRIVE FLEA MA	4400 SHORE DRIVE, ACROSS F	VIRGINIA BEACH
B & D ELECTRIC SUPPLY	1569 DIAMOND SPRINGS ROAD,	VIRGINIA BEACH
VIRGINIA TRAILER AND TRUCK	516 SOUTH MILITARY HIGHWAY	VIRGINIA BEACH

We cannot be more specific on location because our files are not indexed to locate specific geographic points. This file search in no way replaces a thorough site-specific investigation performed by a qualified environmental consultant.

If you cannot meet the deadline, please notify ELLIE IRONS at 804/698-4325 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

SEP 0 1997

Ellie Irons
Environmental Program Planner

COMMENTS

Thanks for providing the opportunity to review this realignment action. We have no comments.

(signed) Durwood H Willis (date) 9/29/97

(title)

(agency) DEQ Federal Facilities Restoration & Superfund

PROJECT # 97-111 F

2/97

B-3-98

NOV 3 '97

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
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Becky Norton Dunlop
Secretary of Natural Resources

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Virginia Beach, Virginia 23462
Fax (757) 518-2103
http://www.deq.state.va.us

Thomas L. Hopkins
Director

Francis L. Daniel
Tidewater Regional Director
(757) 518-2000

MEMORANDUM

TO: Ellie Irons - Office of Environmental Impact Review

FROM: Sheri Kattan - Tidewater Regional Office

DATE: October 28, 1997

SUBJECT: Review of the Environmental Impact Statement titled "Realignment of F/A-18 Aircraft & Operational Functions from NAS Cecil Field, FL to Other East Coastal Installations including NAS Oceana, Va Beach, Project #97-111F.

The Tidewater Regional Office has finished its review of this Environmental Impact Statement and we are submitting the following comments. Thank you for the opportunity to participate in the review process.

WATER QUALITY: All construction projects should implement proper erosion control measures as outlined in "The Virginia Erosion and Sediment Control Handbook". Precautions should be taken to preclude the entry of any contaminants into wetlands and waters of the state. If wetlands impacts are anticipated, submittal of a Joint Permit Application may be required to determine whether issuance of a Virginia Water Protection Permit is required. On-site wetland delineations should be approved by the Army Corps of Engineers.

STORM WATER: Section 3.1.6.3 should include a statement regarding the need for individual stormwater construction permits for activities that will disturb more than 5 acres. New construction may also require modification of the existing VPDES stormwater permit.

GROUND WATER: No comments were solicited from our Ground Water Program as impacts to ground water are not anticipated.

UNDERGROUND STORAGE TANKS: In areas of new construction, any petroleum releases must be reported to the DEQ. Due to an increase in fuel use, Oceana needs to upgrade their leak detection, spill prevention and spill response operations.

ABOVEGROUND STORAGE TANKS: The report did not address the impact of the additional fuel on the aboveground storage tank system. What are the chances of an oil spill occurring with the increased flow of product through the system?. The report did not address the additional fuel that will be transported from the Craney Island Fuel Depot to a contractor-owned fuel depot (Mercer's Landing). What are the chances of an oil spill occurring as a result of the increased barge traffic?

WASTE: All solid and hazardous waste generated, including debris and demolition waste, must be managed in accordance with all applicable federal, state, and local environmental regulations. Excess soil must be properly characterized and disposed.

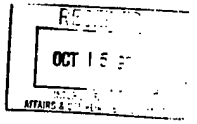
AIR: There are no comments concerning air quality impacts in relation to this project.

cc: RFJ --> File

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources





Kathleen W. Lawrence
Director

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street, Suite 326

TDD (804) 786-2121 Richmond, Virginia 23219-2010 (804) 786-2556 FAX: (804) 371-7899

MEMORANDUM

DATE: October 10, 1997

TO: Ellie Irons, Department of Environmental Quality

FROM: John R. Davy, Jr., Planning Bureau Manager

SUBJECT: DEQ#97-111F, Realignment of F/A-18 Aircraft & Operational Functions from (NAS) Cecil Field, FL To Other East Coast Installations Including NAS Oceana, Virginia Beach

Comments are provided herein on the above referenced project:

DIVISION OF NATURAL HERITAGE

The Department of Conservation and Recreation (DCR) has searched its Biological and Conservation Data System (BCD) for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information in our files, DCR completed a natural heritage inventory of the Naval Air Station (NAS) Oceana in 1990. As noted in the DEIS in section 3.1.12.3, this inventory documented a population of the southern twayblade (*Listeria australis*, G4/S3S4/NF/NS), which has since been removed from our list of rare plants due to a reevaluation of its status in the state. In addition, the state rare dragonfly, the red-mantled glider (*Tramea onusta*, G5/S1/NF/NS), has been documented as occurring on the base. This inventory work also identified several areas notable for their contribution to Oceana's natural diversity: Northwest Woods Special Interest Area (SIA), Sandpits SIA, Owl Creek SIA, and Old Woods SIA. DCR concurs with the conclusion of the DEIS that due to the scope of the construction projects, and the distance to these resources, adverse impacts to these natural heritage resources are unlikely.

New and updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

DIVISION OF SOIL AND WATER CONSERVATION

If any future project implementation disturbs over 10,000 square feet of a land disturbing activity an erosion and sediment control plan will be needed prior to any land disturbing activity on site. If the total land disturbance for the project exceeds one acre, a separate stormwater management plan will also be required. The project is proposed by a federal agency, therefore if an E&S plan is needed it must be developed according to the guidelines set forth by the Department of Conservation and Recreation, Division of Soil and Water Conservation. The federal agency is required to comply with the E&S Law/Regulations and SWM Law and Regulations. The Division's appropriate field office will assist the government in any plan review (if needed) and all plans must comply with the guidelines set forth in Chapter VI of the

Virginia Erosion and Sediment Control Handbook.

DIVISION OF PLANNING AND RECREATION RESOURCES

The proposed project is not anticipated to have any adverse impacts on existing or planned recreational facilities nor will it impact any streams on the National Park Service Nationwide Inventory, Final List of Rivers, potential Scenic Rivers or existing or potential State Scenic Byways.

Thank you for the opportunity to comment on this project.

/jeg

TO:

If you cannot meet the deadline, please notify ELLIE IRONS at 804/698-4321 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THEN FORM MUST BE SIGNED AND DATED.

Please return your comments to:

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX 804/698-4319

Ellie Irons
Environmental Program Planner

COMMENTS

We have reviewed the subject document from a marine environmental perspective & have no comments to make at present.

(signed) [signature] (date) 10/27/97

(title) Assistant Professor

(agency) VIMS

PROJECT # 97-111 F 2/97

J. Carlton Courter, III
Commissioner

COMMONWEALTH of VIRGINIA

Department of Agriculture and Consumer Services
PO Box 1163, Richmond, Virginia 23218
Phone: 804/786-3501 • Fax: 804/371-2945 • Hearing Impaired: 800/828-1120
http://www.state.va.us/~vdacs/vdacs.htm

OCT

October 27, 1997

Ms. Ellie Irons
Department of Environmental Quality
P.O. Box 10009
Richmond, VA 23240-0009

Re: Draft Environmental Impact Statement for Realignment of F/A-18 Aircraft & Operational Functions from (NAS) Cecil Field, FL to Other East Coast Installations including NAS Oceana, Va Beach

Dear Ms. Irons:

This will respond to your request for comments on the above referenced proposed project. We do not anticipate that this project will have any adverse impacts as it relates to this agency's responsibility for the protection of agricultural lands and listed endangered or threatened plant and insect species.

Thank you for the opportunity to comment.

Sincerely,

Perida Giles
Policy Analyst

cc: Roy E. Seward, Jr.
John Tate

-Equal Opportunity Employer-

B-3-104

If you cannot meet the deadline, please notify ELLIE IRONS at 804/698-4325 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

NOV 3.[illegible]

Ellie [illegible]
Environmental Program Planner

COMMENTS [illegible]

No adverse impact on this program

(signed) [signature] (date) 10/2[illegible]/97

(title) Asif K. Malik, P.E.
~~Chief of Technical Services~~
Division of Wastewater Engineering

(agency) ~~Virginia Department of Health~~

PROJECT # 97-111 F

2/97

If you cannot meet the deadline, please notify ELLIE IRONS at 804/698-4325 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

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Please return your comments to:

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

Ellie Irons
Environmental Program Planner

COMMENTS

It appears that this project will have no impacts to existing and proposed transportation facilities

(signed) John A. Dunkum (date) 10/10/97

(title) Environmental Program Analyst

(agency) VDOT

PROJECT # 97-111 F

2/97

B-3-106

RECEIVED
NOV 20 1997

COMMONWEALTH of VIRGINIA

KENNETH F. WIEGAND
Director

Department of Aviation
5702 Gulfstream Road
Richmond International Airport, Virginia 23250-2422

V/TDD - (804) 236-3624
FAX - (804) 236-3635

November 17, 1996

Mr. Dan Cecchini
Naval Facilities Engineering Command
1510 Gilbert St.
Norfolk, VA 23511

Re: F/A-18 Squadron Realignment
DEIS Review Comments

Dear Mr. Cecchini:

The Department of Aviation has reviewed the DRAFT Environmental Impact Statement (DEIS) for the F/A-18 squadrons being proposed to be realigned to the Oceana Naval Air Station.

Because ARS 1 is the stated preferred alternative, we assume that this action is the chosen alternative, and our review is set out to reflect this. Consequently, we have two areas of primary concern.

The first involves the substantial increase in the amount of traffic for the Class C Airspace in the Hampton Roads region, and the numerous impacts that may result. This issue was flagged as being important in our response to comments for scoping in a September 27, 1996 letter, and we haven't noticed much attention to the issue in the report.

Secondly, we have concerns pertaining to the utilization of MTR's, especially the very large activity jumps indicated for several specific routes. This raises questions about the greater possibility for conflicts with civilian aircraft, as well as the accordant increase in noise and citizen reaction that is inevitable.

We would ask that our comments be taken into consideration in the analysis being prepared in order to publish the FINAL. Thank you for the opportunity to comment, and please feel free to call should there be any questions that may arise.

Sincerely,

Keith F. McCrea, AICP
Senior Aviation Planner

enclosure

c: Ellie Irons, DEQ
FAA, ATC
VDOA

B-3-107

DRAFT Environmental Impact Statement

Review Comments of the

Virginia Department of Aviation

No.	Page	Comment
1.	N/A	We are curious why the DEIS was prepared in-house as opposed to utilizing at least some outside consultants, as this leaves the idea of impartiality of the analysis in question from a perceptual standpoint.
2.	4.1-4,5	The 118% increase of flight ops at Oceana, and 51% increase at Fentress is certainly significant. The mix of aircraft in the Hampton Roads Region is complex, and we would offer our concern that the proposed increase could pose itself as an airspace utilization safety issue. This proves to be a coordinating question on airspace utilization, and in that regard, we are interested if this aspect has been explored with the Norfolk Tower and TRACON?
3.	Section 4.8	Regarding the increase in traffic, we would note that the increase in affected properties from aircraft noise is sizeable, and would be asking for assurances that there is sufficient liaison activity planned with Virginia Beach and Chesapeake officials on this count. This is especially so for the noise impact on schools.
4.	Section 4.4	In the same vein, the report indicates a nearly 3,000 acre increase in the size of the future APZ for Oceana. Again, this fact mandates a close cooperative arrangement with local government.
5.	4.2-2	We have made note of the increase of 11% in the overall utilization of MTR's Does this statistic reflect both visual as well as all instrument routes (only one breakout of an individual IR segment is shown) to be used?
6.	4.2-2,5,6	VR 1753 is forecast to have a utilization increase of 68%. Similarly, VR 1759 indicates an increase of 88%. How is it that the report states "no significant changes in noise levels would occur along MTR's as a result of ASR 1", when there is such a substantial increase in utilization? Also, the metrics used to measure noise impacts are left blank in the columns - - - is this data shown elsewhere?
7.	Section 4	There are other charted MTR's in the Commonwealth that are not listed individually in the report. Does this mean that they would not be used by the additional aircraft being proposed for Oceana?
8.	Section 4	As is the case with number 5 above, does the omission of the Farmville MOA from the report indicate that none of the transferred aircraft will be using this MOA?

B.4 State Representatives

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

GLENN R. CROSHAW
TENTH FLOOR
ONE COLUMBUS CENTER
P.O. BOX 61898
VIRGINIA BEACH, VIRGINIA 23466
EIGHTY-FIRST DISTRICT

COMMITTEE ASSIGNMENTS:
PRIVILEGES AND ELECTIONS
GENERAL LAWS
APPROPRIATIONS
LABOR AND COMMERCE
NOMINATIONS AND CONFIRMATI

November 6, 1997

Commander Atlantic Division
Attn: J. Daniel Cecchini (Code 2032 DC)
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

RE: DEIS Realignment of F/A-18 Aircraft

Dear Mr. Cecchini:

My district includes the area south of Virginia Beach Boulevard in the eastern part of the city, and includes a large amount of the area impacted by the proposed build-up at NAS Oceana. I want to applaud the recommendation in the DEIS to have all 180 east coast F/A-18 aircraft come to Virginia Beach. The Oceana alternative is the best alternative for the sailors, for the defense of this nation, and most importantly for the taxpayers. It is the least costly alternative. It puts the sailors and their planes close to the ships on which they will embark. This will greatly reduce the amount of time that the sailors would otherwise have to be away from home as they prepare for and return from deployments.

The city, with the assistance of the Commonwealth, has also made great preparations to make sure that Oceana did become home to the F/A-18s. Virginia recognizes the importance of the military as the largest employer in the Commonwealth, and makes sure that the sailors receive the appropriate tax benefits for their service to the country. For instance, the General Assembly is giving additional tax breaks, on top of what has been customary for many years, to those involved in deployments such as Desert Storm. The General Assembly also provides money to localities for road improvements which are funding, in part, the improvements to First Colonial Road and Oceana Boulevard, London Bridge Road, and Great Neck Road. The Commonwealth will also be a partner in the Southeastern Parkway which will provide greatly needed interstate grade access to Oceana.

BI-10099.1/GRC:JWK
11/6/97

B-4-3

Thank you for your comments; no response required.

DEIS Realignment of F/A-18 Aircraft
November 6, 1997

As a resident of Virginia Beach, I appreciate the willingness shown by the Navy in conjunction with Congressman Pickett's efforts in the DEIS to work with the City representatives to reduce any perception that there will be a negative impact from the expansion of noise and accident potential zones. I have great faith that working together these perceived impacts can be minimized such that a significant positive impact will result from the relocation of these aircraft to Oceana.

Sincerely,

Glenn R. Croshaw

cc: Hon. Owen B. Pickett, Member, U.S. House of Representatives
Hon. Meyera E. Oberndorf, Mayor, City of Virginia Beach
Hon. W. D. Sessoms, Jr., Vice-Mayor, City of Virginia Beach
James K. Spore, City Manager, City of Virginia Beach
Hon. Kenneth W. Stolle, Member, Virginia Senate

B-4-4

B.5 Local Agencies

North Carolina

CITY OF HAVELOCK
Post Office Drawer 368
Havelock, N.C. 28532

November 21, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini
Code 2032 DC
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

Thank you for this opportunity to submit written comments concerning the Draft Environmental Impact Statement referencing the realignment of F/A - 18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida, to Other East Coast Installations. Specifically, I wish to mention strategies undertaken by the City of Havelock in response to the initial Base Realignment and Closure decision in 1993 and subsequent related activities which result in the City's preparedness to accommodate the relocations specified in Alternative Realignment Scenario 3 and Alternative Realignment Scenario 5 of the Draft Environmental Impact Statement pursuant to the Base Realignment and Closure decision of 1995. These measures undertaken to improve the quality of life for those living in the area and to further enhance the historical support offered Marine Corps Air Station - Cherry Point and the Air Station's Naval Aviation Depot by the City include community services activities, planning initiatives, infrastructure improvements and environmental efforts.

Regarding community services activities, the City and other governmental entities have made significant investments geared toward improving the quality of life of present and future residents of Havelock. These investments fall into two separate categories. The first category includes new and innovative efforts to provide facilities which support the mission of Marine Corps Air Station - Cherry Point and/or the citizenry at large. Both the proposed Institute of Aeronautical Technology and the proposed Tourist Center fall into this category. The state funded $5,000,000 Institute of Aeronautical Technology will be utilized to support the functions of Marine Corps Air Station - Cherry Point's Naval Aviation Depot by providing a long term source of trained professionals (See Appendix A). The State of North Carolina has invested $1,000,000 this year for planning and acquisition activities related to the project. An additional $4,000,000 of state revenue is anticipated for construction costs in Fiscal Year 1998-99.

1

Phone (919) 444-6402 printed on recycled paper Fax (919) 447-0126

[Appendices A through G, as referenced in this letter, are not attached, but are included in the Administrative Record.]

CH-1 Thank you for your comments; no response required.

The Craven County Room Occupancy Tax funded Havelock Tourist Center will provide meeting rooms and space for tourism related functions including military reunions, Naval Aviation Depot conference and training needs and related activities (see Appendix B). As mentioned funding is in place for this $1,000,000 facility. Construction of the Tourist Center should begin within the next year.

2 The second category of quality of life investments include the general government areas of Public Safety, Public Works and Parks and Recreation. Although some mention of these services is offered in sections 6.1.5.2 and 8.1.5.2, I believe it is worth communicating some of the Havelock specific initiatives which will improve the lives of those relocating to our City. In Public Safety, the City has implemented several innovative measures. These include community policing, the strategic placement of police substations, the placement of a school resource officer at Havelock High School, the addition of a juvenile officer and the recent increase in staffing of Fire/Rescue personnel to enhance emergency responsiveness. The investment in this latter effort included the hiring of additional personnel as well as the construction of a facility to house emergency responders.

In the area of Public works the City offers a wide range of services including maintenance, sanitation and transportation program activities. Newly constructed facilities to support the garage and maintenance facilities total $161,330. Most significant of these programs are transportation improvement activities. Activities in this area fall into the general categories of specific Havelock initiatives and regional efforts.

3 Concerning Havelock initiatives, the City has utilized $2,602,883.06 in Powell Bill (state shared) revenues for community transportation improvements since July of 1993. Regional efforts include participation in the State of North Carolina Department of Transportation's Transportation Improvement Program. Submissions offered in this latter effort are made through Havelock's participation in the Craven - Pamlico Transportation Committee. Although I am enclosing a copy of the submissions planned for this year (Appendix C), most noteworthy is the City's support of the North Carolina's plan to construct a bypass south of Havelock's current corporate limits.

4 Finally, regarding transportation, three projects appear worth mentioning after reviewing the Draft Environmental Impact Statement. In Table 6.1 - 5 "Projected Traffic Conditions on Roads in the Vicinity of MCAS - CP," Jackson Road to NC 101 (Fontana Blvd.) has been rated "C" under the "LOS" heading. This road has recently been overlaid

CH-2 All of the subjects mentioned are discussed in the EIS at a level of detail sufficient for decision makers to accurately assess impacts from each ARS.

CH-3 Section 3.3.7.4 includes a discussion of the proposed bypass.

CH-4 The projected level of service for a specific highway segment was determined based on overall highway characteristics. Expanded capacities at intersections and improved wearing surfaces are not integral to flow analysis on the planning level.

with new pavement and passing at intersections has been established. Therefore, a higher rating may be appropriate. I believe it is also important to convey that an access road allows traffic traveling from Marine Corps Air Station - CP direct access to Slocum Village Base Housing. Further, a recent project by the North Carolina Department of Transportation has resulted in the paving of NC 101 from the main gate of Marine Corps Air Station - Cherry Point to the Carteret County line and the location of a traffic signal and turning lanes allowing safer entrance to Marine Corps Air Station - Cherry Point's Hancock Village Housing Area.

Havelock is currently involved in several planning initiatives which should further prepare the City to meet the future needs of existing residents and those relocating to the community as a result of Realignment Alternative Scenario 3 or Realignment Alternative Scenario 5. The City is currently preparing to update the 1996 Land Use Plan (Appendix D). Please note that since 1993 the North Carolina Coastal Area Management Act Land Use Plan Updates have been developed based on the premise that several FA - 18 squadrons would be relocated to Marine Corps Air Station - Cherry Point. Planning and zoning efforts have been directed toward accommodating the increased population which would occur from the increased base population.

5

In addition to the planning initiatives disclosed elsewhere in this submission, Havelock is currently participating in a county-wide planning effort entitled Craven 2006 and regularly participates in civilian/military planning efforts such as those undertaken by the Civilian Military Community Council and the Conservation - Development Advisory Commission.

Through the development and enforcement of zoning restrictions and the interpretations of Havelock's Board of Adjustment, the City has consistently acted in the best interests of all parties with regard to issues of interest to Marine Corps Air Station - Cherry Point. Havelock's current zoning ordinance and the official zoning map include both Accident Potential Zone I and Accident Potential Zone II regulations and designations (respectively). Only two of the lots being planned for development encroach into Accident Potential Zone II (as shown on our zoning map - 1981 Air Installation Compatible Use Zones study). Further, the Planning Board has proposed for consideration by the Board of Commissioners that all undeveloped land in Accident Potential Zone I be required to obtain a Special Exception Use Permit for any use other than those allowed under the R20A zoning classification. This zoning designation would require a minimum residential lot size of 20,000 square foot. This proposal is to be included in Zoning Ordinance rewrite recommendations to the Board of Commissioners.

CH-5 Thank you for your comments; no response required.

Regarding infrastructure improvements, several measures were undertaken by the City of Havelock in response to the decisions made by the Base Realignment and Closure Commission in 1993 which enable the City to accommodate additional aircraft and the resultant increases in population. In preparing to meet anticipated needs Havelock has invested $5,800,000 in the upgrading of the Wastewater Treatment Plant. The primary reason this upgrade was undertaken at this time was to accommodate the increased activity at Marine Corps Air Station - Cherry Point anticipated by the Base Realignment and Closure decision of 1993. This construction, financed by the City with State assistance in the form of a revolving loan, is scheduled to be completed in December of 1997. As is noted in Sections 6.1.6.2 and 8.1.6.2 the City is prepared to handle the additional flows resulting from Alternative Realignment Scenario 3 or Alternative Realignment Scenario 5.

6

In addition to the flow accommodations described in the Draft Environmental Impact Statement, I believe it is worth mentioning that the City will be required to meet rather stringent effluent limits. Beginning in January of 1998, the City will be required to meet nitrogen limits of four milligrams per liter in the summer and eight milligrams per liter in the winter. Phosphorous limits will be .7 milligrams per liter in the summer and 1 milligram per liter in the winter. Ammonia nitrogen limits will be .5 milligrams per liter in the summer and 1 milligram per liter in the winter. CBOD limits will be 3 milligram per liter in the summer and 6 milligrams per liter in the winter. I urge you to compare these effluent limits with those being realized by Oceana.

The City has also expressed an interest in pursuing land application strategies in considering future effluent discharge demands. Further, the City is pursuing upgrading the classification of biosolids produced at the wastewater treatment plant to an "A" classification.

Other wastewater planning activities which may further improve and support City initiatives include efforts described in a recently completed report by the Craven County Wastewater Advisory Commission and a forthcoming report by a multi-county task force geared toward meeting long-term needs (Appendix E). I believe the City's initiatives coupled with the County and regional efforts are testimony to our community's preparedness for the immediate and long-term opportunities afforded by Alternative Realignment Scenarios 3 and 5. I am enclosing that portion of the City's Master Plan which references wastewater facilities in Appendix F.

The City is equally prepared to meet water supply needs. In both Alternative Realignment Scenario 3 and Alternative Realignment Scenario 5, the Department of the Navy states "the city would have adequate capacity to serve this new demand." This observation is further supported by the current construction of the groundwater well

CH-6 The proposed action will not significantly impact regional wastewater treatment capacities under ARS 1 or wastewater treatment capacity at MCAS Cherry Point under ARS 3 or 5.

referenced as a planning activity in sections 6.1.6.1 and 8.1.6.1 of the document. Further, the City has acquired enough property at the location of the new groundwater well to accommodate an additional well to meet any long-term needs. I am enclosing that portion of the City's Master Plan which references water facilities in Appendix G.

7

Regarding stormwater activities, although not specifically reviewed in sections 6.1.6.3 and 8.1.6.3, the City continually monitors and prepares to meet ongoing stormwater concerns. Aside from the effective reactive measures of the aforementioned Public Works Department personnel, Havelock is involved in the proactive measures included in subdivision review and the submission of feedback to those involved in the development of proposed state regulations geared toward non-point source discharge enforcement by municipalities. The City's commitment to stormwater management is further evidenced by the recent submission of a Hazard Mitigation Grant application. If funded, this grant may assist in meeting future development planning needs.

Finally; although all of the aforementioned issues relate directly or indirectly to environmental efforts, the City has taken specific steps to protect the environment for future generations. Industrial recruitment efforts are currently geared toward locating light industrial business to Havelock. Those industries recruited to date have had no adverse impact on the community from an environmental perspective. Likewise, Havelock's effort to remove all City underground storage tanks was completed in the last few months.

In closing; I respectfully submit that in addition to the favorable circumstances listed herein, Havelock offers additional benefits to prospective residents. Much of the reports included in sections 6.1.5.1 and 8.1.5.1 appear to indicate that no unfavorable impact will be realized by the community in meeting housing needs and that communities surrounding Marine Corps Air Station - Cherry Point will experience benefits from either Alternative Realignment Scenario 3 or Alternative Realignment Scenario 5. Although I agree this is accurate, I feel compelled to offer that Eastern North Carolina offers benefits to those families locating here that cannot be offered elsewhere. Aside from the obvious quality of life issues, certain other benefits await those who relocate to our community. For example, Havelock offers the lowest tax rate of any full service municipality in North Carolina with a population over 10,000. This is accomplished while the City simultaneously provides the unparalleled service previously described.

8

For all of these reasons, on behalf of the Board of Commissioners of the City of Havelock, I respectfully request the Department of the Navy to choose either Alternative Realignment Scenario 3 or Alternative Realignment Scenario 5.

CH-7 The proposed action will not significantly impact regional or on-base water supply under ARS 3 or ARS 5.

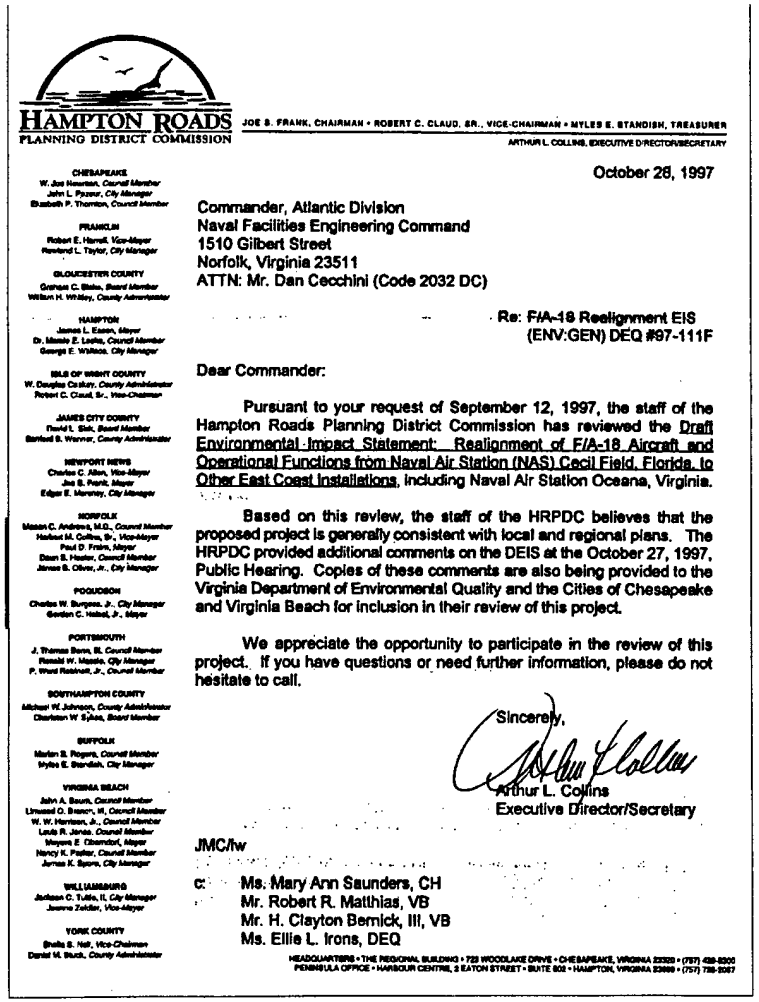
CH-8 Please see response to CH-2.

The City of Havelock stands ready, willing and able to accommodate transfers associated with these two preferred alternatives.

Sincerely,

Joseph R. Huffman
City Manager

Virginia



HAMPTON ROADS
PLANNING DISTRICT COMMISSION

JOE S. FRANK, CHAIRMAN • ROBERT C. CLAUD, SR., VICE-CHAIRMAN • MYLES E. STANDISH, TREASURER
ARTHUR L. COLLINS, EXECUTIVE DIRECTOR/SECRETARY

CHESAPEAKE
W. Joe Newton, Council Member
John L. Pysznar, City Manager
Elizabeth P. Thornton, Council Member

FRANKLIN
Robert E. Harrell, Vice-Mayor
Rowland L. Taylor, City Manager

GLOUCESTER COUNTY
Grahame C. Blake, Board Member
William H. Whitley, County Administrator

HAMPTON
James L. Eason, Mayor
Dr. Mamie E. Locke, Council Member
George E. Wallace, City Manager

ISLE OF WIGHT COUNTY
W. Douglas Caskey, County Administrator
Robert C. Claud, Sr., Vice-Chairman

JAMES CITY COUNTY
David L. Sisk, Board Member
Sanford B. Wanner, County Administrator

NEWPORT NEWS
Charles C. Allen, Vice-Mayor
Joe S. Frank, Mayor
Edgar E. Maroney, City Manager

NORFOLK
Mason C. Andrews, M.D., Council Member
Herbert M. Collins, Sr., Vice-Mayor
Paul D. Fraim, Mayor
Dean S. Haxter, Council Member
James B. Oliver, Jr., City Manager

POQUOSON
Charles W. Burgess, Jr., City Manager
Gordon C. Helsel, Jr., Mayor

PORTSMOUTH
J. Thomas Benn, III, Council Member
Ronald W. Massie, City Manager
P. Ward Robinett, Jr., Council Member

SOUTHAMPTON COUNTY
Michael W. Johnson, County Administrator
Charleston W. Sykes, Board Member

SUFFOLK
Marlon S. Rogers, Council Member
Myles E. Standish, City Manager

VIRGINIA BEACH
John A. Baum, Council Member
Linwood O. Branch, III, Council Member
W. W. Harrison, Jr., Council Member
Louis R. Jones, Council Member
Meyera E. Oberndorf, Mayor
Nancy K. Parker, Council Member
James K. Spore, City Manager

WILLIAMSBURG
Jackson C. Tuttle, II, City Manager
Jeanne Zeidler, Vice-Mayor

YORK COUNTY
Sheila S. Noll, Vice-Chairman
Daniel M. Stuck, County Administrator

October 28, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511
ATTN: Mr. Dan Cecchini (Code 2032 DC)

Re: F/A-18 Realignment EIS
(ENV:GEN) DEQ #97-111F

Dear Commander:

Pursuant to your request of September 12, 1997, the staff of the Hampton Roads Planning District Commission has reviewed the Draft Environmental Impact Statement: Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida, to Other East Coast Installations, including Naval Air Station Oceana, Virginia.

Based on this review, the staff of the HRPDC believes that the proposed project is generally consistent with local and regional plans. The HRPDC provided additional comments on the DEIS at the October 27, 1997, Public Hearing. Copies of these comments are also being provided to the Virginia Department of Environmental Quality and the Cities of Chesapeake and Virginia Beach for inclusion in their review of this project.

We appreciate the opportunity to participate in the review of this project. If you have questions or need further information, please do not hesitate to call.

Sincerely,

Arthur L. Collins
Executive Director/Secretary

JMC/lw

c: Ms. Mary Ann Saunders, CH
Mr. Robert R. Matthias, VB
Mr. H. Clayton Bernick, III, VB
Ms. Ellie L. Irons, DEQ

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1

HRPDC-1 Thank you for your comments; no response required.

COMMENTS OF THE STAFF OF THE HAMPTON ROADS PLANNING DISTRICT COMMISSION ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR REALIGNMENT OF F/A-18 AIRCRAFT AND OPERATIONAL FUNCTIONS FROM NAS CECIL FIELD, FLORIDA, TO OTHER EAST COAST INSTALLATIONS

General Comments

The HRPDC focused its review on DEIS sections dealing with air quality, water resources and public infrastructure, including water distribution and sewer systems. This review and all resulting comments assume selection of ARS-1 since this alternative involves the greatest amount of development at NAS Oceana. Other alternatives would have a lesser impact on the Hampton Roads region.

The DEIS appears to fairly characterize the current status of public infrastructure in Hampton Roads and its adequacy to serve proposed expansions under ARS-1, the Navy's preferred alternative.

2 DEIS descriptions of water supply adequacy should be updated to reflect the recent completion of the Lake Gaston Project, which negates water supply as a significant issue.

3 DEIS Sections 3.1.9, 4.9, 14.2 and Annex E need a thorough editing to update and correct misstatements pertaining to the current air quality designation status of the Hampton Roads Intrastate Air Quality Control Region. Additionally, the DEIS omits many pertinent facts regarding the history of ozone problems in Hampton Roads. The net effect of these misstatements and omissions is to overstate the severity of previous ozone noncompliance, understate the progress that has been accomplished and misrepresent the region's current "attainment" status. The following paragraphs provide a chronological narrative of the ozone situation in Hampton Roads:

> The Hampton Roads Intrastate Air Quality Control Region was designated an ozone marginal nonattainment area in November, 1991, based on NAAQS exceedances during 1990 and prior years. The region experienced no NAAQS exceedances during 1991, two in 1992 and three in 1993, resulting in an average number of 1.7 exceedances annually during the test periods 1991-93 and 1992-94. There have been no NAAQS exceedances since July, 1993. The Virginia Department of Environmental Quality (VDEQ) submitted to the EPA on August 27, 1997, the required maintenance plan (i.e., SIP revision) and Request for Redesignation of Hampton Roads as an attainment area. On March 12, 1997, the EPA published a direct final ruling to approve Virginia's maintenance plan and "redesignate the Hampton Roads marginal attainment area to attainment..." effective April 28, 1997, unless adverse or critical comments were received (FR Vol. 62, No. 48, 11337-11346). Following receipt of comments from two respondents in North Carolina, the EPA withdrew its March 12, 1997, direct final ruling and extended the public comment period to May 13, 1997 (FR Vol. 62, No. 82, 23139 and 23196). On June

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HRPDC-2 Sections 3.1.6.1 and 4.6.1 have been updated to reflect completion of the Lake Gaston Project.

HRPDC-3 At the time the DEIS was prepared, the redesignation request had not received final approval. Sections 3.1.9, 4.9, and 14.2 and Appendix E have been updated to reflect the redesignation from ozone non-attainment to attainment.

HRPDC-4 Thank you for your comments; no response required.

26, 1997, the EPA published its response to the North Carolina respondents and issued its final action approving the maintenance plan and redesignating Hampton Roads to "attainment" effective July 28, 1997 (FR Vol. 62, No. 123, 34408-34413). In its final action, the EPA noted that Hampton Roads had achieved the ozone standard for two consecutive 3-year periods, thereby presenting "an even stronger case" that the ozone standard had been met. The EPA further observed the positive steps taken in Hampton Roads to reduce ozone precursors including adoption of the Federal Motor Vehicle Control Program and reformulated gasoline.

4

It should be noted that the EPA does not, in its formal announcements, use the term "maintenance area" as an category of air quality compliance status. Our conversations with the EPA indicate that Hampton Roads is an attainment area subject to a maintenance plan rather than a "maintenance area," the somewhat misleading term used in several sections of the Draft EIS.

5

Page-Specific Comments

3.1-112 - 3.1-113 The DEIS appropriately indicates that historically, the City of Virginia Beach has been faced with an inadequate supply of potable water. This issue has been addressed through the construction of the Lake Gaston Project, which is currently undergoing testing and expected to be fully operational in early 1998. The expected level of future population and development growth, associated with this project, has long been considered in the growth projections and related planning for this project. Thus, adequate potable water is presently available to serve immediate water supply needs and will continue to be available in the future to serve long-term growth associated with this project.

6

3.1-113 - 3.1-114 The DEIS notes that wastewater collection, transmission and treatment service is available through the Hampton Roads Sanitation District and that adequate capacity and a high level of treatment are available at present and are expected to continue to be available to service not only new on-base activities but off-base development as well. These points are reiterated on pages 4.6-1 - 4.6-2.

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3.1-140 - 3.1-141 The discussion of air quality in Hampton Roads beginning with the last paragraph on page 3.1-140 and ending with the third paragraph on page 3.1-141 is misleading. The wording suggests that Hampton Roads is currently designated as both an ozone "marginal nonattainment area" and an ozone "maintenance area." "Maintenance" is not an EPA air quality

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HRPDC-5 The EIS has been modified to use the following air quality terms. "Maintenance area" will continue to be used in discussions pertaining to the regulatory requirements of ozone attainment areas that were previously nonattainment. The General Conformity Rule (40 CFR Part 93) uses the terminology "maintenance area" in its wording and definition list. The term attainment is used in discussions pertaining to compliance with the ozone National Ambient Air Quality Standards.

HRPDC-6 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies").

HRPDC-7 Thank you for your comment; no response required.

HRPDC-8 Please see responses to HRPDC-3 and HRPDC-5.

		designation category. Hampton Roads is a designated ozone attainment area subject to an ozone maintenance plan. This section should be redrafted to reflect the facts and chronological sequence of events contained above in our general comments on air quality.
8	3.1-142	The second paragraph in Section 3.1.9.2 incorrectly refers to Hampton Roads' "marginal ozone nonattainment designation" in the present tense and makes reference to an "ozone maintenance designation." As previously noted, "maintenance" is not an EPA designation category. Hampton Roads is a designated ozone attainment area subject to an ozone maintenance plan.
	3.1-143	The first sentence of the third paragraph implies that EPA approval of Virginia's redesignation request is pending. As previously noted, EPA approval was effective July 28, 1997.
9	3.1-148 - 3.1-150	The DEIS indicates that adverse impacts on regional water resources, both surface water and ground water, are not expected as a result of this project. To the extent that all construction and future operational activities comply with state and local requirements for erosion and sediment control and stormwater management, we concur that negative water quality impacts should not be expected as the result of project implementation. This conclusion is reinforced by the discussion on page 4.11-1
10	3.1-149	The North Landing River and Tributaries, including West Neck Creek, have been designated as scenic waterways by the City of Virginia Beach and as parts of the North Landing and Tributaries State Scenic River, pursuant to legislation enacted by the Virginia General Assembly.
	4.9-1	The first sentence of second paragraph in Section 4.9.1 incorrectly refers to the "Hampton Roads marginal ozone nonattainment area."
11	4.9-1	The sentence in the third paragraph in Section 4.9.2 reading "Virginia has petitioned for the Hampton Roads region to be redesignated as an ozone maintenance area" should be changed to "...redesignated as an ozone attainment area."
	14-2	The third paragraph incorrectly states that "NAS Oceana is located within an ozone nonattainment area."
	E-5	The last sentence of the first paragraph incorrectly states that "The site of this federal action is within a marginal ozone nonattainment area called the

HRPDC-9 Thank you for your comment; no response required.

HRPDC-10 The changes in designation for these water bodies have been noted and incorporated into the EIS. As discussed in Section 4.11.1 of the EIS, no significant impacts on these water bodies are anticipated under any of the ARSs.

HRPDC-11 Please see responses to HRPDC-3 and HRPDC-5.

	Hampton Roads Ozone Nonattainment Area in Virginia," and further states that "This nonattainment designation is current as of August 15, 1997." In fact, Hampton Roads was redesignated to attainment effective July 28, 1997.
E-6	In the last paragraph on this page, a sentence should be added noting that the maintenance plan being described was approved by the EPA effective July 28, 1997.
E-8	The last sentence on this page incorrectly states that Hampton Roads "...is currently designated as a marginal nonattainment area for ozone (VDEQ 1994)."
E-23	The last paragraph on this page begins with the incorrect statement that "NAS Oceana and NALF Fentress are located in the Hampton Roads Ozone Nonattainment area, which has a marginal designation."
E-24	The first paragraph includes the outdated statement that "The EPA has indicated its intent to approve the redesignation and SIP revision requests and is currently accepting public comment on their proposed approval." As noted earlier, EPA approval was announced on June 26, 1997, and became effective on July 28, 1997. The correct reference for final approval is *FR Vol. 62, No. 123, pp. 34408-34413, June 26, 1997.*
E-26	The last three sentences of the first paragraph contain outdated information indicating that the EPA has not approved the Virginia SIP revision submitted on August 27, 1996. As noted earlier, EPA approval was announced on June 26, 1997, and became effective on July 28, 1997. The correct reference for final approval is *FR Vol. 62, No. 123, pp. 34408-34413, June 26, 1997.*
E-39	The title line reads "Net Change in Emission of Nonattainment Pollutants," implying that the Hampton Roads area is still in ozone nonattainment status. This title should be changed to read "Net Change in Emission of Maintenance Pollutants," or words to that effect.
E-44	The following entry should be added to the Reference List: *United States Government Printing Office, Federal Register, June 26, 1997, Volume 62, Number 123, pp. 34408-34413.*

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HRPDC-12 This entry was added to Section 17, References.

City of Virginia Beach

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December 2, 1997

Commander, Atlantic Division
Attn: Mr. J. Daniel Cecchini (Code 2032 DC)
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

RE: Draft Environmental Impact Statement - Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station, Cecil Field, Florida to other East Coast Installations

Dear Mr. Cecchini:

Congratulations to you and the rest of your staff for the work that has gone into the Draft Environmental Impact Statement (DEIS) on the realignment of the F/A-18 aircraft to Oceana Naval Air Station.

The following are the city's comments on the DEIS. We have mainly commented on ARS-1 since that would have the greatest impact on Virginia Beach. Comments on traffic and other conditions in ARS-1 are also applicable to the other scenarios.

1 ➢ We believe that the more appropriate comparison on the off-station noise impacts shown on Chart 2.5-2 should be between the 1978 AICUZ map and the 1999 projected conditions. The 1978 AICUZ map is the map which the real estate community and others are familiar with, and is that which the city's Airport Zoning Ordinance is based. We believe that comparison with an artificial condition that existed in 1997 is not appropriate.

2 ➢ Page 3.1-75: Please note that the Comprehensive Plan for the City of Virginia Beach has just been revised and adopted on November 4, 1997. The Comprehensive Plan goes into great detail on the need to accommodate the

CVB-1 The projected noise contours/zones for all of the ARSs, were compared to both the current (i.e., 1997) noise contours/zones and the AICUZ. The dates of the latest AICUZ varied for NAS Oceana, MCAS Cherry Point, and MCAS Beaufort; therefore, current conditions were used for direct comparison.

CVB-2 Section 3.1.4.2 has been updated to reflect the November 4, 1997, revision of the comprehensive plan.

2 revised AICUZ map for Oceana in any land use decision. A copy of the adopted Plan is provided for your information and use.

3 ➢ Page 3.1-78: This is an additional comment on the need to use the 1978 AICUZ as a baseline for comparative analysis with each ARS. We restate our comment that the 1997 conditions provide an inappropriate comparison.

4 ➢ Page 3.1-89: Seatack Elementary and Linkhorn Elementary Schools are being relocated because they were in the 1978 APZ. The city feels that schools can be compatible within Noise Zone 3 if proper noise attenuation is provided. The document has several references to the fact we are relocating schools because they are in Noise Zone 3. The schools are being relocated because they are in the APZ. It should be noted there are a number of schools in other jurisdictions; for instance, Norfolk, that lie within an APZ. In fact, a school is under construction in the Cherry Point APZ.

5 ➢ Page 3.1-89: As mentioned earlier, the city has just readopted its revised Comprehensive Plan.

6 ➢ Page 3.1-97: The city's Comprehensive Plan projections for population indicate the city's population will be 520,000-540,000 by the year 2015. There are also more up-to-date population estimates available from the Hampton Roads Planning District Commission for Chesapeake.

7 ➢ Page 3.1-109: This section dealing with medical services seems to be extremely lacking. No reference is made to the large number of private medical facilities available through the TRICARE system or the Portsmouth Naval Hospital which is undergoing a major expansion.

8 ➢ Page 3.1-111: We suggest that the information on Impact Aid be updated to show the FY-97 dollar amounts actually received.

9 ➢ Page 3.1-112: Dealing with the regional water system, the stated capacity of the Norfolk water system of 104 million gallons per day (MGD) is the maximum rated combined capacity from Norfolk's two water treatment plants. This capacity should not be compared or contrasted to the average daily water demand as has been done in the DEIS. Maximum daily water demands which typically occur in the summer months are as much as 150% of average annual water demands. Norfolk is currently constructing a 30 MGD expansion of the Moore's Bridges Water Treatment Plant to handle the additional Lake Gaston Project water. That capacity will be available in the spring of 1998.

CVB-3 Please see response to CVB-1.

CVB-4 Section 3.1.4.2 has been corrected to state that the schools are being relocated outside of APZ 1.

CVB-5 Please see response to CVB-2.

CVB-6 The EIS analysis was prepared using the latest data available at the time of preparation. The information is sufficient for decision makers to accurately assess the impacts from each ARS.

CVB-7 Section 3.1.5.2 has been revised to include this information.

CVB-8 The EIS analysis was prepared using the latest data available at the time of preparation. The information is sufficient for decision makers to accurately assess the impacts from each ARS.

CVB-9 The average daily water demand for NAS Oceana has been provided to allow an evaluation of potential impacts resulting from each ARS. While not directly comparable to the stated capacity of the regional water system, it does allow for a general understanding of the NAS Oceana demand versus the regional demand. Section 3.1.6.1 has been

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The sentence which states that current water demand on the Norfolk water system is estimated to be 60-70 MGD is not consistent with data provided to Virginia Beach by Norfolk. For FY-96, the average annual raw water demand for the Norfolk system was 76 MGD, and the average annual treated water demand was 73 MGD. The raw and treated water maximum month demands for FY-96 were 87 and 82 MGD, respectively.

These demands are artificially low because Norfolk placed its major wholesale customers under water use restrictions in FY-92. In FY-91, the average annual raw water demand was 85 MGD, and the average annual treated water demand was 77 MGD. The raw and treated water maximum month demands for FY-91 were 94 and 87 MGD, respectively.

The reference to Virginia Beach's "average flow of approximately 32 MGD" should be properly characterized as an annual average demand of approximately 32 MGD.

revised to clarify that the demand is based on the average annual water demand.

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➢ *Page 3.1-113: The Lake Gaston Project is a 76-mile pipeline, not 85 miles long. The Lake Gaston Project is being undertaken by the cities of Virginia Beach and Chesapeake. Currently, Virginia Beach will receive 50 MGD from the project, and Chesapeake will receive 10 MGD. Isle of Wight and Suffolk might participate in the project for up to 1 MGD each. If they do, the water would come from Virginia Beach's 50 MGD share. If Isle of Wight does not participate, Suffolk may participate for up to 2 MGD. Neither Isle of Wight nor Suffolk has decided to participate as yet.*

The Lake Gaston Project will be fully operational as of November 7, 1997.

CVB-10 Section 3.1.6.1 has been revised to reflect completion of the Lake Gaston Project.

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➢ *Page 3.1-118, Existing traffic conditions, shown on Table 3.1-32. On page 3.1-120, the following corrections need to be made to the tables:*

- *Oceana Boulevard - Harpers Road to Flicker Way is two lanes.*
- *Oceana Boulevard - Flicker Way to General Booth is two lanes.*
- *Great Neck Road - Potters Road to Laskin Road had a 1990 vehicle volume of 18,000 cars.*
- *Virginia Beach Boulevard - Lynnhaven Parkway to Great Neck Road had a 1990 vehicle volume of 55,000.*

CVB-11 Tables 3.1-32 and 3.1-33 and Figure 3.1-20 have been revised to include this information.

On Page 3.1-121:

- *Virginia Beach Boulevard - London Bridge to Chapel Lake should probably be characterized as Great Neck Road to Chapel Lake. The 1992 volume on this road segment was 40,000 cars per day.*

- *Virginia Beach Boulevard - Chapel Lake to Fountain Drive is four lanes. It had a 1992 volume of 30,000 cars per day.*

- *Virginia Beach Boulevard - Foundation Drive to First Colonial Road is four lanes. It had a 1992 volume of 30,000 cars per day.*

- *Virginia Beach Boulevard - First Colonial Road to Oceana Boulevard is four lanes.*

- *Virginia Beach Boulevard - Shipps Lane to Birdneck Road had a 1992 volume of 19,000 cars per day.*

- *Virginia Beach-Norfolk Expressway - Lynnhaven Parkway to Great Neck Road had a 1992 volume of 100,000 cars per day.*

- *Virginia Beach-Norfolk Expressway - First Colonial Road to Birdneck has a 1992 volume of 38,000 cars per day.*

These changes also need to be reflected on the map on Page 3.1-123.

➢ *Page 3.1-125, Table 3.1-33 - Correct as follows:*

- *Oceana Boulevard - Virginia Beach Boulevard to General Booth (Boulevard). Construction dates at 9/97 through 9/98.*

- *London Bridge Road - International Parkway to Route 44: Four lane divided highway from International Parkway to Potter's Road, and a six lane divided from Potter's Road to Virginia Beach Boulevard. Construction dates are 11/99 to 11/01.*

- *London Bridge Road - Swamp Road to Dam Neck Road: Widen and do intersection improvements. Construction dates are 11/96 to 4/98. Under construction at this time:*

- *Potter's Road - London Bridge Road to First Colonial Road: No plans to widen this road at this time.*

B-5-21

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- *Birdneck Road - Southern Boulevard to General Booth Boulevard: Construction dates are 3/98 to 7/01.*
- *The new road to be named is Ferrell Parkway.*
- *The Courthouse Loop terminus is actually Judicial Boulevard and its improvement is a four lane divided highway on six lane right of way. Construction dates are 10/01 to 10/03.*
- *Ferrell Parkway - Upton Drive to Sandfiddler Road is not in the CIP. An engineering analysis is underway to determine the appropriate needs in the corridor.*

11

- *Holland Road - Dam Neck Road instead of Landstown Road to Ferrell Parkway. Construction dates are 7/03 to 7/05.*
- *Laskin Road - First Colonial Road to Birdneck Road: Construction dates are 10/00 to 10/03.*
- *Laskin Road - Great Neck Road to First Colonial Road is not in the CIP.*
- *Princess Anne/Ferrell Parkway from Dam Neck Road to Judicial Boulevard: Construction dates are 10/01 to 10/03.*
- *Southeastern Parkway and Greenbelt - Phase I from Route 44 to Dam Neck Road: Construct a four lane controlled access highway - 6/01 to 6/08.*
- *Add First Colonial Road - Virginia Beach Boulevard to Oceana Boulevard, and Oceana Boulevard from Harper's Road to General Booth Boulevard, a four lane divided arterial 7/99 to 4/01.*

The city has completed a number of road projects in the vicinity of Oceana over the past several years. These include the construction of Dam Neck Road, General Booth Boulevard, expansion to International Parkway, construction of Landstown Road and London Bridge Road Phase I, London Bridge Road Extended, Princess Anne Road Phase III, and Virginia Beach Boulevard Phase II at a cost of $102 million. We also have improvements planned to roads as displayed on page 3.1-125 for a total of $503.6 million.

12

➢ *Page 3.1-137: Are the decibel readings on Virginia Beach Middle School reversed in the chart? Should the LDN number be 58 as opposed to 57? Also, on note b, the Seatack and Linkhorn Elementary schools are being (re) located.*

CVB-12 The Ldn and Leq values stated in the table have been modified. The reason the Leq is higher than the Ldn for site S4 (Virginia Beach Middle School) is because the average number of school-day (7 a.m. to 4 p.m.) flight operations (of those operations which most affect S4) is higher than the corresponding annual average number of daily (24-hour) flight operations, and the time period over which noise is modeled for the school day (9 hours) is shorter than for Ldn (24 hours). The Leq value is 62 dB and the Ldn value is 58 dB. Therefore, the difference between Leq and Ldn becomes 4 dB.

13 ➢ *Page 3.1-140: Virginia Beach is in an Air Quality Attainment Area. The Planning District Commission has provided you with a very detailed response to this question.*

14 ➢ *Page 3.3-31: The civilian hospitals serving Cherry Point are mentioned. No mention is made of the equivalent civilian hospitals that service the Oceana Naval Air Station. Also, there is inadequate discussion of recreational facilities available at Oceana Naval Air Station compared to the write-up on the communities surrounding Cherry Point.*

15 ➢ *Page 3.3-49: There's a note that a new school was under construction at the departure end of Runway 32R. That school does not seem to be shown on the AICUZ maps.*

16 ➢ *Chapter 4 - General Comments. Our noise consultants, Mestre Greve Associates, and our AICUZ consultants, Hogan & Hartson, believe that the adverse noise impact of ARS 1 on the community surrounding NAS Oceana is overstated. If so, the justification for implementing ARS-1 would be even stronger then indicated in the DEIS. Our consultants believe the DEIS projections are overstated for the following reasons:*

1. The projections in the DEIS for F-18 operations at Oceana appear to be substantially overstated based on a comparison between projected F-18 operations at Oceana and actual F-18 operations at Cecil Field. For 1996, based on the operational data furnished to our consultants by the Navy, F-18 operations at Cecil Field totaled 114,564. Since that total included 33,385 FCLP's, non-FCLP F-18 operations [1]/ for 1996 totaled 81,179. The DEIS (at 4.1-3 to -4) shows nearly 122,000 non-FCLP F-18 operations, which is approximately 50% higher than actual operations at Cecil Field.

For 1995, the Navy provided data showing that actual F-18 operations at Cecil Field from September 1995 through December 1995 totaled 28,984, which included 7,031 FCLP's. Thus, non-FCLP operations by F-18's during that four-month period totaled 21,953, which would indicate an annual rate for non-FCLP operations of approximately 66,000. As noted above, the DEIS projects 122,000 non-FCLP F-18 operations per year for F-18's, which is approximately 85% higher than the actual operations rate for 1995 at Cecil Field.

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[1]/ Our consultants factored out FCLP operations in comparing the F-18 projections for Oceana with actual F-18 operations at Cecil Field because, according to the DEIS (at C-91), 97% of the FCLP operations will be performed at NALF Fentress with only 1,240 F-18 FCLP's per year at Oceana.

CVB-13 As indicated in the response to the HRPDC, the EIS has been updated to reflect the redesignation from ozone nonattainment to attainment.

CVB-14 Additional information on hospitals and recreational facilities has been added to Section 3.1.5.2.

CVB-15 The school has been added to the AICUZ-related figures for MCAS Cherry Point.

CVB-16 Projected F/A-18 operations under ARS 1 are not overstated with respect to historical data from NAS Cecil Field. The number of operations at NAS Cecil Field in 1995 and 1996 and projected operations for ARS 1 at NAS Oceana are not directly comparable because: 1) the number of squadrons at NAS Cecil Field during 1995 and 1996 differs from the number of squadrons at NAS Oceana under ARS 1 and 2) because flight hour funding and engine parts availability problems slowed flight operations at NAS Cecil Field in 1996. In 1995 and 1996, only 10 F/A-18 squadrons were operating at NAS Cecil Field, compared to 11 F/A-18 fleet squadrons in the projections for ARS 1 at NAS Oceana. NAS Cecil Field data for calendar year (CY) 1997 provide a more realistic comparison to the ARS 1 projections for NAS Oceana. Total 1997 aircraft operations at NAS Cecil Field were 207,210 (including OLF Whitehouse). These number of operations are substantially higher than in CY 1996. During 1997, many changes to the aircraft population occurred at NAS Cecil Field, including the start of flight operations for the 11th F/A-18 squadron, the reassignment of two Navy and Marine Corps F/A-18 reserve squadrons to NAS Atlanta, and the completion of the move of all S-3 squadrons to NAS Jacksonville. Flight operations for the Strike Fighter Advanced Readiness Program (SFARP) and Fleet Replacement Squadron (FRS) detachments associated with the two Navy and Marine Corps squadrons were not conducted at NAS Cecil Field, whereas NAS Oceana hosts SFARP exercises, carrier-based exercises, and FRS Strike and Fighter Weapons Training. These differences in operational use also contribute to the difference in the number of annual flight operations (both non-FCLP and FCLP). Taking into account aircraft reassignments for the F/A-18 reserve and S-3 squadrons and differences in the operational use of the base, the CY 1997 total F/A-18 flight operations at NAS Cecil Field are approximately 179,000. This compares very well with the ARS 1 projected F/A-18 (Fleet and FRS) operations of approximately 177,000.

16 *Thus, based on actual operations data for 1995 and 1996 [1]/ for the F-18 squadrons that would be transferred to Oceana under ARS 1, the DEIS projections appear to overestimate – or to overstate – F-18 operations by between 50% and 85%.*

17 *2. The projections in the DEIS for F-14A operations at Oceana also appear to be substantially overstated. The F-14A operational projections for Oceana are based on a projection that there will be 115 F-14A's based at Oceana in 1999. (DEIS at E-12.) This projection appears to be incorrect because the Navy's Budget Exhibit for F-14A's dated 24 July 1997 shows only 65 F-14A Mission and Training aircraft for 1999. Therefore, the F-14A basing projection appears to be overstated by approximately 77%, which would mean that the F-14A operational projections are overstated by an equivalent amount.*

18 *3. When the overestimates of F-18 and F-14A operations are taken into account, the noise contours for ARS 1 are approximately the same as the existing (1978) AICUZ boundaries for Oceana. To compensate for the apparent overstatement of F-18 operations, our noise consultants reduced the projected F-18 operations by 39%, which corresponds to the midpoint between the 33% correction necessary to compensate for a 50% overstatement (based on 1996 operations) and the 46% correction necessary to compensate for an 85% overstatement (based on the annual operations rate for 1995). To compensate for the apparent overstatement of F-14A operations, based on the incorrect projection that there would be 115 F-14A's rather than 65 F-14A's based at Oceana in 1999, our noise consultants reduced projected F-14A operations by 43%. With those two adjustments, the projected contours for ARS 1 for Oceana would be virtually identical to the existing AICUZ boundaries shown in Figure 3.1-14 of the DEIS.*

• • •

19 *Our AICUZ consultants also believe that at least two of the APZ's shown in the DEIS are no warranted. For example, the APZ 2 at the departure end of 5R does not appear to be justified because, with the adjustments to F-18 and F-14A operations described above, there would be fewer than 5,000 operations per year.*

20 *In addition, the APZ-2 on the left side at the arrival end of 5R also appears to be unwarranted. With the F-18 and F-14A adjustments discussed above, the runway*

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[1]/ The Navy was unable to provide any breakdown of F-18 operations at Cecil Field for 1997.

CVB-17 The NASMOD Study (Appendix C of the EIS) projected F-14 operations based on 11 F-14 fleet squadrons (seven Atlantic Fleet and four Pacific Fleet squadrons) and a 48-aircraft F-14 FRS. Table 2-6 provides the number of aircraft and aircrews per fleet squadron. For the DEIS, F-14 fleet squadrons were modeled with 18 aircrews per squadron. Subsequent to publication of the DEIS, the Navy reduced the F-14 inventory by 51 aircraft. The number of aircrews per squadron was also reduced to 15. Since the number of training sorties (operations) are driven by the number of aircrews per squadron, F-14 fleet operations are projected to decrease by approximately 17%. Projected F-14 FRS operations will remain unchanged; however, the number of FRS aircraft will be reduced to 35.

CVB-18 The noise contours presented in the DEIS are accurate based upon the projected level of F/A-18 and F-14 operations. Reductions in the F-14 inventory will result in a 17% decrease in operations and a less than 1 dB Ldn reduction in the baseline 1997 noise contours. Since the F/A-18 dominates the noise impacts in each ARS, the reduction in F-14 fleet operations will not have a significant impact on the overall noise exposure.

CVB-19 The APZs depicted in the DEIS are accurate based upon the projected level of flight operations on each flight track. However, the reduction in F-14 fleet operations will result in the elimination of the APZ on Track 3LD1 in ARS 1. No other APZ changes are warranted.

CVB-20 Please see response to CVB-19.

20 | *operations in this area are also below 5,000 operations per year.*

21 | *Our consultants also point out that the 5,000 operations per year criterion is far too low based on the data summarized in Table G-5 of the DEIS (at G-14) and on the accident rates for the aircraft which would be based at Oceana under ARS 1. As noted in the DEIS, the APZ concept is based on military aircraft accident studies covering the years 1968-1982 whose results are summarized in Tables G-2, G-3 and G-4. As those tables indicate, over 70% of all accidents shown occurred within 3,000 of a runway threshold. In contrast, the data for 1982-1997 which is summarized in Table G-5 shows only about 25% of the accidents shown occurred on takeoff or landing with the overwhelming majority occurring "In-flight."*

22 | *Even more importantly, according to data furnished to our consultants by the Naval Safety Center, the accident rates for military aircraft have declined dramatically since the APZ concept was developed. For example, in FY 1980, the accident rate for Navy aircraft was 5.64 per 100,000 hours. The comparable rate for Navy aircraft during FY 1997 was 1.38 – only 25% of the 1980 rate. The FY 1997 rates for Navy F-14's and F-18's are similar to the overall rate for the Navy: F-14's - 1.67; F-18's - 1.44. Therefore, based on accident rates alone, if 5,000 operations per year was an appropriate criterion based on 1968-1982 accident rates, then 20,000 operations per year would be a more appropriate rate based on current accident rates. This is particularly true here in view of the high proportion of F-18 operations in that, as noted in the DEIS (at 4.4-3), "accident data for the period from 1982 to 1997 indicates that the F/A-18 experiences fewer accidents than other fighter aircraft in the [Navy] inventory. (Emphasis added.)*

In any event, the APZ 2 zones identified above do not appear to be warranted even under the apparently outdated 5,000 operations per year criterion.

23 | ➢ *Page 4.4-6: The city once again states its desire that comparisons be made between the 1978 AICUZ and the 1999 projected conditions.*

24 | ➢ *Page 4.4-5: The DEIS needs to state that the AICUZ maps at Oceana Naval Air Station and Fentress will be redrawn regardless of the scenario chosen. This will be done because the revision of the criteria for AICUZ(s) was changed in 1979 after the latest AICUZ map was developed for Virginia Beach.*

25 | ➢ *Page 4.5-9: The city currently has 747 sworn police officer positions, of which 721 are filled. We also have 352 firefighter positions.*

26 | ➢ *Page 4.6-1: 90 gallons per day per person for a combined domestic industrial and commercial per capita water demand is correct based on current water consumption. However, the city uses a planning figure of 100 gallons per day per*

CVB-21 The Navy's APZ criterion of 5,000 annual operations per flight is used to define when an APZ is established (or removed). The criterion has no relationship to the percent of all accidents attributable to the takeoff or landing phase of flight. The criterion was based upon the Navy's comparison of the level of annual aircraft activity on a flight track that could be compatible with certain types of land use and restrictions considered by local governments in their comprehensive plans.

CVB-22 Accident rate data provided by the Naval Safety Center includes all accidents worldwide, including those occurring at sea. Moreover, the Navy's APZ criteria are not intended to predict aircraft accidents; rather they are intended to indicate the probable location of an accident should one occur.

CVB-23 Please see response to CVB-1.

CVB-24 Section 4.4.2 has been amended to include this information.

CVB-25 Section 4.5.2 has been amended to include this information.

CVB-26 Thank you for your comments; no response required.

26 | *person to account for three factors: (1) the water system is aging and we anticipate that our unaccounted for water will increase in the coming decades; (2) the city has resolved the water shortage and anticipates that its industrial and commercial demand will increase at a faster rate than its population; and (3) the city will soon institute a flushing program (heretofore has been prohibited due to the water shortage) to improve water quality in the distribution system in order to meet more stringent water quality requirements proposed by the Safe Drinking Water Act. We have addressed the water supply issue in earlier comments which negates the comments in the DEIS about an increase in water quality/quantity which would strain the system.*

27 | ➢ *Page 4.7-2 & 3: Information provided earlier on road projects around Oceana. Service level on the segments to be improved is planned to be C or better.*

28 | ➢ *Page 4.8-3: The chart showing the decrease in off-station area/population noise exposure needs to be better explained.*

29 | ➢ *Page 4.8-4: The city has retained a noise consulting firm to review the Navy's documentation and to assist the city in working with the Navy in a non-confrontational manner as the Navy has offered to "work with local officials to conduct detailed engineering evaluations of those schools of particular concern." We have already done a preliminary evaluation on Birdneck Elementary School and the results indicate that the school, as it now exists, has efficient noise attenuation to reduce the noise level to 45 decibels or lower for interior space.*

30 | ➢ *Page 4.8-11: The Navy stated at the public hearing in Chesapeake that a TACAN system had been removed from Fentress. The city is interested to know if the Navy plans to reintroduce that system or to require GPS equipment to be used to fly published flight patterns.*

➢ *Comments on the Appendix Volume:*

31 | *On page C-66 and a number of other pages, there's comment on the number of aircraft that are mission capable on a given day. We would be interested to know the average number of aircraft that would be flying on a given day at Oceana, taking into account deployments, maintenance requirements, etc.*

32 | *Page C-87: Because no priority is given to FCLPs at Cherry Point, is there a detriment to training?*

33 | *Page C-88: The perceived significant increase in scheduling difficulties need to be better explained.*

CVB-27 Section 4.7 has been amended with updated information, provided by HRPDC, on projected traffic and LOS. The projected LOSs incorporate planned roadway improvements.

CVB-28 Table 4.8-2 has been revised to clarify the decrease in area/population as a result of the change in flight patterns and runway utilization.

CVB-29 Section 4.8 has been amended to include this information.

CVB-30 The Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

CVB-31 As noted in Appendix C, projected aircraft operations are based on several factors: carrier workup cycles, squadron air wing assignments, squadron deployments/detachments, number of aircrews per squadron, the number of FRS classes and schedules, and the number of aircraft available per squadron considering maintenance requirements. The EIS projects aircraft operations for a one-year period during the workup cycles based on an analysis of each day during the year. The NASMOD modeling process is described in detail in Appendix C. The number of aircraft operating at NAS Oceana will vary daily during the year.

34 | *Page C-91: As mentioned earlier, has the possible reduction in the number of F-14 aircraft been incorporated into the flight pattern operations?*

35 | *Page C-99: The completion of desired pattern events at Oceana is significantly higher than those under the other ARSs. Does this translate into increased flights needing to be made under the other ARSs?*

Mr. Cecchini, again we would like to congratulate you and your co-workers on the work done on the DEIS. As mentioned previously, we did not repeat the comments that applied to Virginia Beach or Oceana for all the ARSs because of ARS-1 being the one of greatest impact to Virginia Beach. We assume that those comments will be added to the other ARSs as appropriate.

If we can provide you with any additional information, please call Bob Matthias at 427-4242.

Sincerely,



James K. Spore
City Manager

JKS/RRM/kma
Attachment

cc: Honorable Members of Council
Art Collins, HRPDC

CVB-32 This information is central to the assumptions used in the NASMOD modeling process. F/A-18 fleet squadrons do not receive priority for FCLP scheduling unless they are within 30 days of an extended deployment. Therefore, there is no "detriment to training".

CVB-33 Table 3-2 indicates the percent of missions that are adjusted (alternative training area selected or flight launch time adjusted by NASMOD's central scheduler due to a resource constraint such as area availability) and postponed. The greater the number of missions adjusted or postponed for an aircraft group, the greater the scheduling difficulties and the lower the scheduling efficiency. These scheduling statistics generally reflect the "busyness" in the system. These statistics are useful in understanding the impacts to other aircraft groups.

CVB-34 A discussion of the effects of the reduction of F-14 aircraft has been included in the EIS. For ARS 1, please note especially changes in the aircraft operations (Section 4.1), noise (Section 4.8), and air quality (Section 4.9) sections.

CVB-35 The number of pattern events (e.g., touch-and-go and ground control approach [GCA] box) represents the activities normally performed by aircraft returning from a mission based upon fuel availability and pattern congestion. Some aircraft returning to base desire to conduct pattern operations but are unable to access the patterns for several reasons. If an aircraft arrives at a time when five other aircraft are in the pattern or if Field Carrier Landing Practice (FCLP) operations are underway, it cannot enter the visual pattern and must proceed to the next action specified in its profile (e.g., perform a full-stop landing). Similarly, if an aircraft returns to base when the weather precludes Visual Flight Rules (VFR) pattern operations, it will either conduct an instrument approach to a full-stop landing or conduct practice instrument approaches if the weather permits. Even though non-FCLP missions are scheduled to avoid FCLP periods on the flight schedule, some aircraft return to the base for pattern work while other aircraft are active in the FCLP pattern or when the tower pattern is full. When this occurs, the desired pattern operations are considered to be "lost". However, failure to complete pattern events does not require additional sorties to be conducted. As shown on Table 3-1 of Appendix C, the number of sorties decreases when the number of aircraft stationed at NAS Oceana decreases.

B.6 Local Representatives

North Carolina

City of New Bern

T. A. BAYLISS, III
MAYOR

A Southern Surprise

PHONE: 636-4000 P.O. BOX 1129
New Bern, N. C. 28563-1129

November 24, 1997

Atlantic Division Naval Facilities
Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Attn: Mr. J. Daniel Cecchini

Dear Mr. Cecchini:

I would just like to restate the support of our community for the location of the Hornets here. Our people have a long standing great relationship with you military folks and welcome you with open arms. The success of any project depends on everyone "buying in" and you have us on your team.

Very truly yours,

Tom Bayliss

Striving for Excellence

B-6-5

Thank you for your comments; no response required.

Craven County

November 21, 1997

Atlantic Division
Naval Facilities Engineering Command
ATTN: J. Daniel Cecchini
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

The Craven County Board of Commissioners wishes to respond to the Draft Environmental Impact Statement, Realignment of F-A-18 Aircraft and Operational Functions from Air Station Cecil Field, Florida to Other East Coast Installations by registering its support for relocation of units to MCAS Cherry Point, North Carolina. Craven County has been preparing for this eventuality since Base Realignment and Closure '93, and is well equipped to accommodate the additional personnel.

Please do not hesitate to contact me if the need arises.

Sincerely,

Donald L. Phillips
Chairman
Craven County Board of Commissioners

DLP gmb

cc: Harold Blizzard, County Manager

B-6-6

Thank you for your comments; no response required.

DARE COUNTY AIRPORT AUTHORITY
DARE COUNTY REGIONAL AIRPORT
P.O. BOX 429
MANTEO, NORTH CAROLINA 27954
PHONE (919) 473-2600

November 17, 1997

Good evening. My name is Jay Wheless. I am a nearly life-long resident of Manteo and Chairman of the Dare County Airport Authority.

It is beyond question that the Dare County Regional Airport is experiencing growth in flight operations and commercial development, air and ground. The number of flight movements, the amount of fuel sold, the number of [illegible] the size, speed and complexity of the aircraft using our airport -- all [illegible] continuing rapid growth.

We have attempted to [illegible] ahead of the growth and, by and large, have succeeded. We lengthened our main [illegible] it will be widened within the six months. We have the Remote Communications [illegible] with Washington Center and we have installed a satellite-linked Automatic Weather Reporting system.

Interestingly, but certainly most importantly, our growth has come without compromising safety. That is until now. It is not my concern as to whom is crowding whom. Nevertheless, it is self-evident that your increase in training sorties will send through the gauntlet more high speed, low altitude aircraft. We too are becoming busier and faster.

1 The Dare County Airport Authority believes that it is possible to live together harmoniously and in relative safety by introducing, among others, two elements into the equation: (1) better real-time status communications between you and Washington Center which, in turn, communicates that status with our guests; and (2) one simple word, radar.

Our users must [illegible] to use our approaches when they are needed. It is frustrating enough not to be able to use the longest runway just because your folks are training and cannot give up a small slice of the [illegible]. Frustration builds to utter distraction when we cannot use that approach because [illegible] knows and cannot find out whether they are active or not. Communication makes [illegible] neighbors. In this instance, good neighbors are more safe neighbors.

An appropriately maintained and staffed [illegible] is warranted. We know the value of radar. If radar coverage were not a keystone to safety in today's airspace, it would not be at your air stations or at our larger airports. We must have it and soon.

As all pilots know, you must stay ahead of the airplane. Likewise, we must stay ahead of this increasingly busy airspace. To do otherwise would be shortsighted, further compromise safety and may ultimately cost lives. We must open air-to-ground communications, push for our radar and not settle for less than both.

Thank you for the opportunity to address this important issue. I am always available to discuss it with you.

LAND OF AVIATION'S BEGINNINGS

PRINTED ON RECYCLED PAPER

DCAA-1 The Navy is continuing to investigate the merits of a radar installation in eastern North Carolina. Although no decision has been reached, procedures have been established and direct telephone lines have been installed to ensure better communications for the Dare County area.

South Carolina

Dennis Ann Baer
Post Office Box 363
Beaufort, South Carolina 29901

19 November 1997

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Attn: Mr. Don Cecchini
Norfolk, Virginia 23511

Mr. Cecchini,

I am writing in support of the Marine Corps Air Station, Beaufort being the recipient of at least two F/A-18 Hornet squadrons from the Naval Air Station Cecil Field. As you well know, this was the recommendation from the 1995 Defense Base Closure and Realignment Commission and as such should be followed.

The military has always enjoyed a special relationship with the civilian population here in South Carolina and in Beaufort in particular. The majority of the people in this area recognize the importance of our military not only from an economic basis but as a shield to protect our way of life.

As an elected member of Beaufort's City Council, I can assure you that I will personally do everything within my abilities to support and defend the presence of the military here in Beaufort and the Lowcountry.

Sincerely,

Dennis Ann Baer
Councilwoman

Thank you for your comments; no response required.

FAX Cover Sheet

Date: 19 Nov 1997

To: Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Attn: Mr. Don Cecchini

FAX #: (757)322-4894

From: Dennis Carr
(703) 622-3623

Message:

No. of Pages Including Cover Sheet
1

Virginia

Melissa Ann Dowd
Attorney-at-Law
P. O. Box 309
Monterey, VA 24465

Tel. 540-468-2600 Fax 540-468-2602

November 19, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

RE: Comments on the Draft Environmental Impact Statement Issued Regarding the Realignment of F/A-18 Aircraft and Operational Functions from NASC Cecil Field, Florida

Dear Commander:

The Highland County, Virginia, Board of Supervisors asked that I write and register their concerns about the preferred alternative discussed in the DEIS of relocating over 180 aircraft to NAS Oceana.

As you may be aware, Highland County, Virginia, Pendleton County, West Virginia, and Pocahontas County, West Virginia, were the victims of an ill-conceived and poorly planned attempt by the United States Air Force last February to dramatically expand the Evers Military Operations Area. The Air Force violated NEPA, failed to inform the counties affected in a timely manner, and failed to consider the majority of the important impacts on our communities. Only one month after being challenged by these three counties, the Air Force withdrew its plan to expand the Evers MOA and decided to reassess their training needs. Consequently, we are especially sensitive to military plans to use our air space.

Highland County is the most rural county in the Commonwealth of Virginia. Agriculture is the primary occupation, and we support sheep farms, cattle farms, horse farms, an emu farm, and many poultry facilities. Known as "Virginia's Little Switzerland", we also rely heavily on tourism for economic survival. Any increase in low-flying aircraft over our community is of concern.

In our discussions with the Air Force in February, we were very quick to point out that we are not opposed to military

B-6-15

training flights over our skies. However, we do fully expect that the Air Force and the Navy respect our economic needs and balance those economic needs with the national defense needs for training.

1 We have two military training routes which cross Highland County, in addition to having a portion of the county in the Evers MOA. We note from the DEIS that the movement of all of the aircraft to NAS Oceana will only result in an increase of approximately 14 sorties over our skies. However, we note that there are no projections beyond 1999. We are concerned that the failure to make projections beyond approximately one year from now could result in a back door effort to significantly increase the air traffic in our skies without going through the required NEPA processes.

The DEIS does not consider any impact whatsoever of the expansion of NAS Oceana-originated flights over the majority of the Commonwealth of Virginia. The focus is clearly only on the immediate area of NAS Oceana. However, it is clear that these planes will be flying in our skies. The "startle effect" on poultry has long been documented and certainly has a detrimental effect on tourists who come to our community for peace and quiet. Once again, we appear to have been omitted from the calculations by the military. Once again, our economic well-being is ignored.

In conclusion, the Highland County Board of Supervisors is opposed to any back door increase in flights in our skies which may be made without the benefit of any NEPA process. The Board believes that projections beyond 1999 must be made before any final decision can be made regarding the realignment of aircraft.

Sincerely,

Melissa Ann Dowd
County Attorney

MAD/sfg

cc: Ronald T. Malcolm, Chairman
Robin Sullenberger, Supervisor
Jerry A. Rexrode, Supervisor
Gary R. Wilson, Pendleton County, WV
Dana Moyers, Pocahontas County, WV

MAD-1 The EIS addresses proposed operations for 1999. F/A-18 operational tempo and training requirements are expected to remain constant for the foreseeable future beyond 1999. Based on F/A-18 training requirements, significant utilization of the Evers MOA or low level MTRs is not expected. Under all ARSs, F/A-18 training operations would occur near NAS Oceana, in eastern North Carolina, or in offshore waters.

Congressman Robert W. Goodlatte
The Honorable John W. Warner
The Honorable Charles S. Robb
Delegate R. Creigh Deeds
Senator Emmett W. Hanger, Jr.
Grace P. Bukowski

d:\county\letters\navalcom.N19

B.7 Organizations/Associations

North Carolina

Craven County
NORTH CAROLINA

October 21, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini
(Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

Thank you for holding a public hearing concerning DEIS for Realignment of F/A-18 Aircraft and Operation Functions from NAS Cecil Field, Florida, to other East Coast Installations, and Draft CAA Conformity Determination, here in Havelock.

I am providing you a copy of my speech, and I again thank you for listening to our concerns.

Sincerely,

James T. Davis III

James T. Davis, III
Executive Director

THANK YOU, COMMANDER. GOOD EVENING, MY NAME IS JIM DAVIS. I'M THE EXECUTIVE DIRECTOR OF THE CRAVEN COUNTY ECONOMIC DEVELOPMENT COMMISSION, A NONPROFIT CORPORATION RESPONSIBLE FOR JOB CREATION AND TAX BASE EXPANSION IN CRAVEN COUNTY.

IN MY REMARKS THIS EVENING I WANT TO ADDRESS TWO ISSUES, BOTH OF WHICH RELATE TO THE IMPORTANCE OF MARINE CORPS AIR STATION CHERRY POINT TO THIS REGION. FIRST, I WILL DISCUSS THE ECONOMIC IMPORTANCE OF THE AIR STATION. SECOND, I WILL DISCUSS THE PUBLIC COMMITMENTS, FINANCIAL AND OTHERWISE, MADE TO IMPLEMENT THE RECOMMENDATIONS OF THE 1993 BASE REALIGNMENT AND CLOSURE COMMISSION.

UNLIKE THE URBAN HAMPTON ROADS/NORFOLK AREA, THE CHERRY POINT REGION IS DEFINED BY ITS SMALL CITIES AND PASTORAL CHARACTER. NOTWITHSTANDING THE

Craven County
NORTH CAROLINA

REDUCTIONS IN FORCE OF APPROXIMATELY 2,600 MARINE PERSONNEL AT CHERRY POINT SINCE 1992, THE TOTAL ECONOMIC IMPACT OF CHERRY POINT ON THE STATE OF NORTH CAROLINA IN THE MOST RECENT FISCAL YEAR WAS OVER $689 MILLION. OF THAT, 91 PERCENT, OR OVER $630 MILLION WAS SPENT IN THE QUAD-COUNTY AREA OF CARTERET, CRAVEN, JONES, AND PAMLICO COUNTIES.

THE ECONOMIC IMPACT OF CHERRY POINT DWARFS ANY OTHER EMPLOYER IN THIS REGION. THE TOTAL CHERRY POINT RELATED POPULATION IN THE FOUR COUNTIES IS OVER 51,000 PEOPLE, UNDERSCORING THE IMPORTANCE OF THE AIR STATION TO THIS REGION. THE ACTIVE DUTY MILITARY PERSONNEL AT CHERRY POINT, HOWEVER, ARE DOWN FROM 10,822 IN 1992 TO 8,258 IN 1997. DOWN FROM 13,000 IN 1987.

AS YOU HAVE HEARD FROM OTHER SPEAKERS, THERE IS BROADBASED COMMUNITY SUPPORT FOR CHERRY POINT.

THAT SUPPORT IS SHARED BY LOCAL GOVERNMENT LEADERS, MANY OF WHOM YOU'VE HEARD FROM THIS EVENING, BUSINESS PEOPLE, AND THE RESIDENTS OF ALL OF THE COMMUNITIES SURROUNDING CHERRY POINT WHO GREATLY APPRECIATE THE MARINE CORPS AND NAVY PERSONNEL STATIONED HERE.

UNLIKE THE RELATIONSHIP OF OCEANA TO THE HUGE HAMPTON ROADS/NORFOLK METROPOLITAN AREA, CHERRY POINT IS THE ECONOMIC HUB OF THIS REGION.

THE 1993 BRAC ORDERED THE RELOCATION OF APPROXIMATELY 200 F/A-18 HORNET AIRCRAFT FROM CECIL FIELD TO CHERRY POINT. THAT RECOMMENDATION WAS ADOPTED BY CONGRESS AND SIGNED INTO LAW BY THE PRESIDENT. BECAUSE OF THE AMOUNT OF PLANNING REQUIRED TO IMPLEMENT THE 1993 BRAC DECISION, LOCAL GOVERNMENTS AND CITIZENS BEGAN MAKING SIGNIFICANT

PREPARATIONS FOR THE ARRIVAL OF THE NEW NAVY AIRCRAFT AND RELATED PERSONNEL.

AS OTHER SPEAKERS HAVE DISCUSSED, THOSE PREPARATIONS INVOLVED THE EXPENDITURE OF MILLIONS OF DOLLARS OF PUBLIC AND PRIVATE FUNDS. IN CARTERET COUNTY, FOR EXAMPLE, VOTERS PASSED A $29 MILLION SCHOOL BOND REFERENDUM, THE BULK OF THE PROCEEDS OF WHICH WERE USED TO CONSTRUCT A NEW HIGH SCHOOL AND A NEW ELEMENTARY SCHOOL IN THE WESTERN END OF THE COUNTY AND CLOSE TO CRAVEN COUNTY.

REGIONAL MEDICAL FACILITIES AND UTILITY SYSTEMS WERE EXPANDED, AND THE REGIONAL AIRPORT AND HIGHWAY PROJECTS WERE ACCELERATED.

PRIOR TO THE BRAC ORDERED RELOCATION, CRAVEN COUNTY CONDUCTED A COUNTY-WIDE STRATEGIC PLANNING PROCESS AND OUT OF THAT CAME MANY RECOMMENDATIONS

RELATIVE TO THE ISSUE BEFORE US THIS EVENING. SPECIFICALLY THE RECOMMENDATION OF A MAJOR BRIDGE CONNECTING HIGHWAY'S 17 AND 70 WAS INCLUDED. TODAY THAT STRUCTURE IS IN THE PROCESS OF BEING CONSTRUCTED AND TO BE COMPLETED BY OCTOBER 1999 AT A COST OF $120 MILLION.

FOR CRAVEN COUNTY ALONE, FOR THE YEARS 1998-2000, THERE WILL BE OVER $70 MILLION ($70,049,000) SPENT ON DEPARTMENT OF TRANSPORTATION (DOT) RELATED PROJECTS. BY THE WAY, THAT IS $810 PER CAPITA. FOR THE SAME YEARS 1998-2000, THERE WILL BE OVER $112 MILLION ($112,556,000) SPENT ON DOT PROJECTS IN THE QUAD-COUNTY AREA. THIS ALONE SHOULD TELL YOU OUR GOVERNOR, JIM HUNT, OUR DOT BOARD AND LOCAL OFFICIALS ARE SERIOUS ABOUT GETTING READY FOR OUR JETS AND OUR NEW CITIZENS.

ALSO A NEW REGIONAL AIR FACILITY IS BEING BUILT HERE IN NEW BERN AT A TOTAL COST OF $16 MILLION TO BE COMPLETED IN APRIL 1999. TWENTY-FIVE PERCENT OF THE EXISTING PASSENGER TRAFFIC IS CHERRY POINT RELATED.

PRIVATE CITIZENS INVESTED MILLIONS OF DOLLARS IN LAND AND IMPROVEMENTS FOR HOUSING NEW RESIDENTS. OFF BASE HOUSING CERTAINLY SHOULD NOT BE A CONCERN; THERE ARE 1,600 APARTMENTS, TOWNHOUSES OR HOUSES LISTED IN THE REGION AS I SPEAK.LOCAL ECONOMIC DEVELOPMENT ORGANIZATIONS REDOUBLED THEIR EFFORTS TO RECRUIT BUSINESSES WHICH WOULD PROVIDE EMPLOYMENT FOR THE SPOUSES OF NAVY PERSONNEL. AND WE HAVE BEEN SUCCESSFUL IN THAT EFFORT.

THE CHERRY POINT REGION DID EVERYTHING REQUESTED BY THE DEPARTMENT OF DEFENSE TO IMPLEMENT THE 1993 BRAC DECISION. THE COMMUNITY ENTHUSIASTICALLY

EMBRACED THE EXPANSION ORDERED BY THE DEPARTMENT OF DEFENSE, AND THEY SUPPORTED THEIR ENTHUSIASM WITH ACTION. UNFORTUNATELY, AFTER YEARS OF PLANNING AND THE EXPENDITURE OF TENS OF MILLIONS OF DOLLARS, THE 1993 DECISION WAS REVERSED BY THE 1995 BRAC FOR REASONS THAT STILL HAVE NOT BEEN EXPLAINED TO THE CITIZENS OF NORTH CAROLINA AND THE CHERRY POINT REGION.

1

WE ARE PLEASED THAT THE DEPARTMENT OF THE NAVY HAS REOPENED THE DIALOGUE RELATING TO THE REALIGNMENT OF THE CECIL FIELD F/A-18S. ALL WE ASK IS THAT THE NAVY GIVE CHERRY POINT FAIR, UNBIASED CONSIDERATION.

CHERRY POINT AND THE SURROUNDING REGION HAVE AN EXCELLENT STORY TO TELL. OUR STATE, OUR LOCAL GOVERNMENTS. AND OUR CITIZENS HAVE BACKED UP THEIR

CCEDC-1 Section 2.6.2 of the EIS discusses the alternative of single-siting all F/A-18 aircraft at MCAS Cherry Point.

RHETORIC WITH COMMITMENT AND ACTION. WE HOPE THE NAVY WILL DO SIMILARLY.

ONCE AGAIN, THE CHERRY POINT REGION STANDS READY TO DO WHATEVER IS NECESSARY TO ACCOMMODATE THE CECIL FIELD ASSETS.

THANK YOU VERY MUCH.

ACTIVE DUTY MILITARY PERSONNEL: 10,822 IN 1992

8,258 IN 1997

REDUCTION OF ACTIVE DUTY MILITARY PERSONNEL AT CHERRY POINT SINCE 1992: 2,564

TOTAL NORTH CAROLINA IMPACT: $689,656,200

PERCENT SPENT IN QUAD-COUNTY ON MILITARY SALARIES: $272,557,900

MILITARY ACTIVE DUTY POPULATION:

CARTERET COUNTY:	621
CRAVEN COUNTY:	7,324
JONES COUNTY:	4
PAMLICO COUNTY:	3

TOTAL MILITARY RELATED POPULATION:

CARTERET COUNTY:	12,971
CRAVEN COUNTY:	36,306
JONES COUNTY:	949
PAMLICO COUNTY:	1,211

POPULATION IN QUAD-COUNTIES:

CARTERET COUNTY:	59,100
CRAVEN COUNTY:	86,400
JONES COUNTY:	9,800
PAMLICO COUNTY:	12,400

[Comments provided by Frank Sheffield of Ward & Smith]

Peyton Frank Sheffield Ward & Smith 2/27/98

COMMENTS ON DEIS
BRAC REALIGNMENT OF F/A-18 HORNET AIRCRAFT

AIR ANALYSIS

1| • **Conformity Analysis uses 1993 baseline**
  - representative of current conditions?
  - consistent with other components of the DEIS?

2| • **Mobile source emissions associated with the transfer of personnel from NAS Cecil Field**
  - Emissions of 584 TPY not included in Conformity Analysis
  - Has Navy verified that these emissions are accounted for in Virginia Maintenance Plan?
  - Discrepancy between population growth estimates (and hence VMT) in DEIS and Virginia Ozone Maintenance Plan

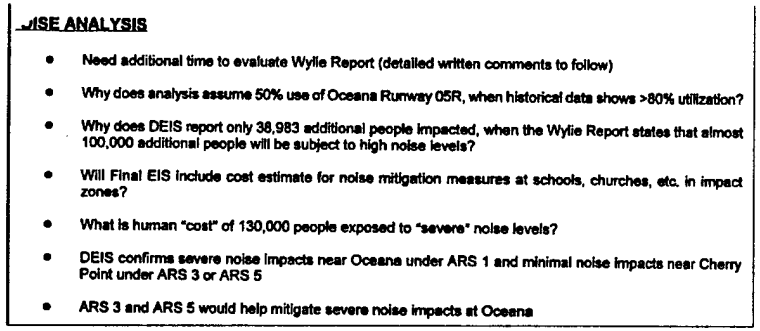
3| • **Virginia's NOx budget is very tight**
  - 800 ton allowance for NOx does not include any mobile source emissions associated with transferring personnel (584 TPY a "budget buster"?)
  - Is Navy confident that Virginia can meet its maintenance budget if all Oceana-related emissions included?

4| • **Conformity Analysis does not consider implications of new ozone and fine particle standards**
  - NOx is precursor to both ozone and fine particles
  - Will increased NOx emissions (800 TPY plus 584 TPY of off-base mobile source emissions) contribute to violations of new standards?

WS-1 The 1993 baseline is the correct baseline year to use for the conformity analysis. As stated in the EIS and conformity report (Appendix E), VDEQ chose 1993 as the baseline year for use in its ozone maintenance plan emission budget. It is a logically and technically sound air quality analysis procedure for the conformity analysis to also use 1993 NAS Oceana emissions. This allows direct comparison of the change from 1993 to 1999 due to each ARS, the same procedure VDEQ uses to evaluate the ability of its maintenance plan to maintain the ozone standard. The General Conformity Rule requires a demonstration of compliance with, in this case, Virginia's SIP. The ozone maintenance plan and mobile source emission budget for Hampton Roads recently added to Virginia's SIP defines NAS Oceana's emission and growth allotment. The Navy demonstrates compliance with the emission and growth allotment in the approved SIP and therefore demonstrates conformity.

WS-2 Mobile emissions caused by the personnel and dependents relocated from NAS Cecil Field to the Hampton Roads area are accommodated in Virginia's mobile emissions budget for Hampton Roads by the loss of military personnel and dependents leaving the Hampton Roads area due to downsizing and force restructuring. The reference for this conclusion has been added to the EIS and conformity analysis (Appendix E).

WS-3 Please see response to WS-2.



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WS-4 The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementations Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. SIP revisions, if any, addressing the new standards are not expected until after 1999. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard. There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with ARS 1 are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

WS-5 The close of the public comment period on the Draft EIS was extended from November 18, 1997, to December 2, 1997, due to public request.

WS-6 The noise analysis included historical runway utilization averages when modeling aircraft noise contours. Runway 5/23 left/right is a dual runway. The separate designations indicate the different directions in which aircraft arrive and depart. Runway 05 is used approximately 50% of the time; Runway 23 is used approximately 34% of the time.

WS-7 Tables 4.8.1, 5.2-16, 6.2-15, 7.2-15, and 8.2-15 of the Draft EIS quantitatively compare the number of people impacted by noise zones for 1978, 1997, and 1999 aircraft operations. The tables are also included in the Final EIS, but they have been modified. Corresponding figures have been added to clarify the comparison between 1978, 1997, and 1999 aircraft operations.

WS-8 The EIS states that, upon request, the Navy will work with local officials to conduct detailed engineering evaluations at those schools of particular concern. This assistance would include providing technical background information on such issues as specific Ldn values for schools

and sound attenuation recommendations. However, because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy did not develop cost estimates for noise mitigation at schools and churches.

WS-9 Approximately 50,440 people would be included within the projected 75 dB or greater Ldn noise zone if ARS 1 were to be implemented. The 75 dB or greater Ldn noise zone is an area of "severe" noise impact. Approximately 75,123 people would be included in the 65 to 75 dB Ldn noise zone which is considered an area of "moderate" noise impact.

Neuse River Foundation, Inc.
• Serving the river and all its tributaries •

P.O. Box 15451
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919•637•7972

November 10, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

I am writing on behalf of the Neuse River Foundation, Inc., to express serious concern over the possibility that the Navy will locate additional F-18 aircraft at the Marine Corps Air Station Cherry Point under a proposed realignment plan.

The EIS which has recently been released and discussed at public hearings in our area is seriously flawed in the following particulars:

1 The EIS fails to adequately address the pollution problems affecting the Neuse River.

2 The EIS fails to fully demonstrate the extent to which any additional aircraft will add to the River's pollution problems.

3 The EIS fails to adequately address the secondary pollution impacts which will accompany the reassignment of personnel.

4 The EIS contains other omissions such as the location of the heavily used Minnesott-Cherry Point Ferry crossing and the Children's Camps Sea Gull, Seafarer and Don Lee, all of which are in the flight pattern. These camps and the ferry are used by many thousands of children and adults each year.

5 The EIS fails to properly address the impacts to water quality from aircraft fuel which is jettisoned over the open waters of the Neuse River.

6 The EIS fails to adequately address the impacts associated with the ordnance being discharged in the Neuse River from aircraft and the fact that such ordnance is being discharged to the Neuse River in violation of the NPDES provisions of the federal Clean Water Act.

[Ms. Harrison also submitted a copy of testimony given before the U.S. House of Representatives. It has been included in the Administrative Record.]

NRF-1 The Navy acknowledges that there are multiple pollution problems affecting the Neuse River, including discharges from industries and sewage treatment plants, urban stormwater runoff, and excessive nutrient inputs resulting from the rapid growth of agribusiness and factory farms in the river's watershed. However, it is beyond the scope of the EIS to thoroughly address these problems. The EIS assesses the potential impacts resulting from the relocation and use of a limited number of F/A-18 aircraft within a confined portion of the Neuse River watershed.

NRF-2 The extent to which additional aircraft transferred to MCAS Cherry Point would affect water quality in the Neuse River is addressed in Sections 6.1.1 and 8.1.11. Water quality impacts would generally be associated with an increase in stormwater runoff, which would be controlled through on-station stormwater management facilities, and as prescribed in the station's stormwater pollution prevention plan. The projected increase in air traffic would have minimal, if any, impact on the water quality of the Neuse River. Water quality studies conducted in "high use" military aircraft areas indicate that these overflights have no measurable impact on water quality. For example, as discussed in Section 3.1.3.1, water quality in the vicinity of the BT-9 target range is not significantly different from reference locations.

NRF-3 Indirect impacts on water quality from the realignment of military and civilian personnel associated with the F/A-18 squadrons could occur with the projected increase in wastewater discharge. This wastewater discharges through the station's sanitary sewage treatment plant (SSTP), which discharges into the Neuse River. As discussed in Sections 6.1.6.2 and 8.1.6.2, MCAS Cherry Point has adequate capacity to handle the additional wastewater flows under both ARS 3 and ARS 5 without modification to its existing NCNPDES permit. Potential indirect effects from the realignment of personnel, such as the impacts of urbanization on the Neuse River, are speculative and unquantifiable.

The Neuse River is the most important economic resource in our area. Unfortunately, it is well past its assimilative capacity for nutrients and many other pollutants. So stressed is the River that in 1991 over one billion fish died in a toxic pfiesteria outbreak. Again in 1995, over ten million fish perished from the same cause. Cherry Point is in the heart of the fish fill zone. These matters have been well publicized. Over the past five years the River's problems, including human health concerns, have been addressed locally, nationally and internationally in over five hundred news stories. Attached for your consideration is a video tape containing a limited number of these accounts. Also attached is a copy of the testimony recently given by Rick Dove, Neuse Riverkeeper, to the U.S House of Representatives, Committee on Resources, Sub-Committee on Fisheries Conservation, Wildlife and Oceans. These materials, which are all self explaining, provide some insight into the problems affecting the Neuse River and the people who inhabit the area near Cherry Point.

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On December 31, 1996 the Neuse River Foundation filed suit against the Environmental Protection Agency (EPA) in Federal District Court alleging the EPA's failure to enforce its non-discretionary duty of requiring North Carolina to restore the degraded waters of the Neuse River. This suit, which will be litigated over the next two years, may adversely impact any plan to station additional aircraft and personnel at Cherry Point.

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The Neuse River Foundation is not opposed to additional aircraft eventually being assigned to Cherry Point. However, no such aircraft can properly be assigned until the deficiencies, as noted above, are fully addressed and corrected. In time, after the Neuse River is restored to a state of good health, it may be feasible to locate additional aircraft at Cherry Point. However, as a priority, we must *FIRST, FIX THE RIVER!*

9

Sincerely,

Mary Ann Harrison

Mary Ann Harrison
President, Neuse River Foundation

NRF-4 The locations of Camps Sea Gull, Seafarer, and Don Lee and the Cherry Branch to Minnesott Ferry route have been added to Figure 3.1-7 and are described in Section 3.1.3. Under ARS 3, the camp would be outside of the 65 to 75 dB Ldn noise zone. Under ARS 5, the 65 to 75 dB Ldn noise zone would increase and would include Camps Sea Gull and Don Lee and the northern end of the ferry route.

NRF-5 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this design minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

NRF-6 Existing water quality in Pamlico Sound is discussed in Section 3.1.3 of the EIS. Water quality studies indicate that ordnance use has not significantly impacted water quality near BT-9 and BT-11. Potential impacts to water quality near the mouth of the Neuse River near BT-9 and BT-11 as a result of the increase in bombing practice are discussed in Sections 4.3, 5.2.3, 6.2.3, 7.2.3, and 8.2.3. The projected increase in practice bombing would have a negligible effect on water quality. The Navy is currently engaged in discussions with appropriate representatives from the State of North Carolina concerning water-based bombing targets in eastern North Carolina. The Navy's Clean Water Act responsibilities are a topic to be addressed in the context of these discussions.

NRF-7 Thank you for your comments; no response required.

NRF-8 Thank you for your comment; no response required.

NRF-9 Thank you for your comment; no response required.

CP&L

Carolina Power & Light Company
P. O. Box 12363
New Bern, NC 28561

November 25, 1997

Commander, Atlantic Division
Naval Facilities, Engineering Command
Attn: Mr. Dan Cecchini (code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

1 I am writing concerning the transfer of 180 aircraft from NAS Cecil Field. The community in the MCAS Cherry Point area is strongly supporting the transfer of a portion of these aircraft to North Carolina. Our community has prepared for the transfer of these aircraft. If we do not receive at least some of them, the economic impact to the community will be significant.

2 The way I understand the DEIS, significant adverse impacts would occur at NAS Oceana with a transfer of all aircraft to Virginia. To help mitigate these impacts, I urge the Navy to consider directing five squadrons to MCAS Cherry Point.

Our community supports scenario ARS 5 and we ask that you strongly consider this in your decision-making process.

Sincerely,

Craig P. Norfolk
Manager - Community Relations

CPN/cjw

CPL-1 Consistent with the National Environmental Policy Act, the EIS assesses the potential direct, indirect, and cumulative impacts of the proposed action. To assess the impacts of not implementing the proposed action at a particular location is highly speculative and beyond the scope of the EIS.

CPL-2 Thank you for your comment; no response required

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November 28, 1997

MEMORANDUM

TO: J. Dan Cecchini

FROM: I. Clark Wright, Jr. ICW/sms

COPY: File

RE: Analysis of Cecil Field Redirect DEIS

This memo documents our initial analysis of whether the Cecil Field Redirect Draft EIS (DEIS) covering relocation of the Cecil Field F/A-18 assets complies with relevant provisions of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321, et seq. and associated Council on Environmental Quality (CEQ) implementing regulations, 40 CFR Parts 1500-1508. As a result of our analysis, we have reached three basic conclusions: (1) the alternatives analysis contained in the DEIS fundamentally is flawed; (2) the cumulative impacts analysis in the DEIS of both positive and negative impacts in and over North Carolina materially is deficient; and (3) the discussion of mitigation measures in the DEIS materially is incomplete.

I. **Fundamentally Flawed Alternatives Analysis:**

The alternatives analysis contained in an Environmental Impact Statement (EIS) is the heart of the NEPA EIS process. 40 CFR §1502.14. The scope of alternatives that must be considered is defined by reference to the stated purpose and need for the federal action under consideration as governed by the so-called "rule of reason." NRDC v. Morton, 458 F.2d 827 (D.C. Cir. 1972); Vermont Yankee Nuclear Power Corp. v. NRDC, 435 U.S. 519, 55 L. Ed. 2d 460, 98 S. Ct. 1197 (1978); 48 Fed. Reg. 34263, et seq. (1983), and Simmons v. Army Department, 45 ERC 1306 (7th Cir. 1997) (see letter

B-7-22

from F. Sheffield to D. Shepherd dated November 6, 1997). These and other cases confirm that, at a minimum, the Navy must consider all reasonably feasible alternatives that accomplish the basic purposes and needs associated with the proposed federal action.

In the case of the DEIS, purpose and need directly is defined by the language of the 1995 BRAC Commission's decision requiring, pursuant to specific federal law, relocation of all of Cecil Field F/A-18 assets to other appropriate receiving air stations. This language effectively eliminates the traditional "no action" alternative required by 40 CFR §1502.14(d) as a reasonable alternative. However, unlike many other BRAC Commission decisions, the 1995 BRAC Commission decision does not specify receiving installation(s) to receive the Cecil Field F/A-18s. Instead, the Commission's decision directs the Navy to relocate these assets to other naval air stations, or other Navy and Marine Corps air stations *"with the necessary capacity and support infrastructure."* As stated by the Navy in the DEIS at page ES-3, all alternative realignment scenarios (ARS) *"had to be operationally and functionally acceptable . . . (and) consistent with the BRAC recommendation to utilize excess capacity and infrastructure at potential receiving* stations" (parenthetical added).

Based upon additional operational considerations specified by the Navy, preference is given in the DEIS to location of all of the Cecil Field F/A-18 assets at one receiving station. Without accepting or rejecting the validity of this assumption, the DEIS immediately appears suspect by only examining one single-site ARS, and by including NAS Oceana in all five ARSs. The fundamental flaw in the Navy's initial alternatives screening process becomes even more apparent in light of the Navy's admission in the DEIS that MCAS Cherry Point and MCAS Beaufort also meet all fundamental siting criteria and thus are both reasonable and feasible receiving sites for the Cecil Field F/A-18 squadrons. Additionally, as to Cherry Point, only two years prior to the 1995 BRAC Commission decision, the 1993 BRAC Commission had determined that Cherry Point was an appropriate receiving facility for all of Cecil Field F/A-18 assets (and thus necessarily a "reasonable" and "feasible" receiving site for all of the Cecil Field F/A-18 assets).

The Navy's briefly stated justification for avoiding a detailed alternatives analysis in the DEIS of MCAS Cherry Point and MCAS Beaufort as "reasonable and feasible" single siting locations is based on higher construction costs and a purported less efficient use of overall existing excess east coast air station capacity.

1

B-7-23

WS(CW1)-1 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Sections 2.5 and 2.6 of the EIS. Table 2.5-1 presents a comparative summary of the ARSs.

2

However, the very purpose of NEPA and the CEQ regulations that define the EIS process is to prevent federal agencies from making significant commitments of federal resources based solely on narrowly defined cost issues or agency mission goals. The DEIS itself highlights flaws in the Navy's alternatives screening process by documenting that both Cherry Point and Beaufort each could accommodate all of the Cecil Field F/A-18 assets with significantly lower overall negative environmental impacts and significantly greater relative **positive** socioeconomic impacts.

3

In the face of these facts, documented in the DEIS itself, NEPA mandates that the Navy revise and reissue a second DEIS that properly provides the final decision maker and the public with a critical analysis of all potential impacts - positive and negative - associated with single siting of the Cecil Field F/A-18 assets at MCAS Cherry Point and MCAS Beaufort.[1] Only then will the public and the final decision maker have available the information needed to make a reasoned decision that balances issues of cost and capacity utilization along with negative environmental impacts, negative and positive socioeconomic impacts, cumulative impacts (see Section II below), and potential mitigation measures (see Section III).

4

As presently drafted, the Cecil Field Redirect DEIS is not an honest document. Nowhere in it is the final decision maker or the public given the chance to weigh significant environmental concerns against, operational, cost and capacity utilization concerns and choose between reasonable alternatives that, for example, allow for protection of the environment to be considered on an equal footing with cost and capacity concerns. It is clear that MCAS Cherry Point represents the most attractive siting facility in terms of minimizing negative environmental impacts and maximizing relative positive socioeconomic impacts. It equally is clear that the 1993 BRAC Commission determined, after a thorough review, that siting all of the Cecil Field F/A-18 assets at Cherry Point was reasonable, feasible and desirable. In the face of these facts, it patently is unreasonable [see 40 CFR §1502.14(a)] to exclude a detailed alternatives analysis of single siting all of the Cecil

[1]There may be other reasonable and feasible alternatives, such as siting the F/A-18 assets at Cherry Point and Beaufort only, or relocation of Beaufort's Marine Corps F/A-18 assets to Cherry Point in conjunction with siting some or all of the Cecil Field F/A-18 assets at MCAS Beaufort.

WS(CW1)-2 Relocation of all 11 F/A-18 fleet squadrons and the FRS to MCAS Cherry Point was considered but eliminated from further analysis because that alternative would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible. Therefore, the Navy did not conduct a detailed analysis of socioeconomic and environmental impacts of the relocation of all 11 F/A-18 fleet squadrons and the FRS to MCAS Cherry Point in this EIS. Please see response to WS(CW1)-1.

WS(CW1)-3 As discussed in Sections 2.6.2 and 2.6.3 of the EIS, single-siting all F/A-18 aircraft to MCAS Cherry Point or MCAS Beaufort is not consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible. Please see response to WS(CW1)-1.

Further, the EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, moving aircraft from MCAS Beaufort to MCAS Cherry Point is beyond the scope of this analysis.

WS(CW1)-4 Each ARS is evaluated in terms of meeting operational criteria and in terms of the environmental impacts associated with that ARS. A summary of operational criteria and environmental impacts for each ARS is included in Table 2.5-1. The Navy strongly believes that all feasible and reasonable alternatives have been evaluated in the EIS.

Field F/A-18 assets at MCAS Cherry Point merely because the Navy thinks that this alternative would require additional, short-term construction costs. The Navy's DEIS must be rewritten to comply with NEPA's mandate on the scope of reasonable and feasible alternatives and there is nothing in the 1995 BRAC Commission's final decision that allows the Navy to avoid this clear mandate.[7]

II. Deficiencies in Cumulative Impacts Analysis:

In 1991-92, the State of North Carolina sued the Federal Aviation Administration because of concerns over the cumulative impact of multiple existing and proposed Department of Defense training activities taking place in and over the eastern part of the State. See, State of North Carolina v. Federal Aviation Administration, 957 F.2d 1125 (4th Cir. 1992). While the State's petition to overturn FAA approval of the Navy's request for airspace designation was denied, the Fourth Circuit's opinion in this case strongly affirmed the State's interpretation, backed up by direct support from CEQ, of NEPA's cumulative impact analysis requirements. The Fourth Circuit's denial of North Carolina's petition in this case expressly was based upon representations made by the Navy that a NEPA cumulative impacts analysis was being conducted in connection with yet another airspace designation request involving the Core/Cherry MOAs. Ironically, that analysis remains inadequate and incomplete to this day, thus representing a significant baseline inadequacy for the present Cecil Field Redirect DEIS.

The DEIS is woefully inadequate in its analysis of the existing and potential adverse, cumulative impacts associated with existing and proposed military airspace activities in and over eastern North Carolina. Under the CEQ regulations, both direct and indirect impacts associated with the proposed action must be analyzed [see 40 CFR §§1502.16 and 1508.8], and the DEIS must disclose and analyze the cumulative impacts of the proposed action in conjunction with all other past, present and reasonably foreseeable future actions, regardless of what agency undertakes those other actions [see 40 CFR §1508.7].

[7]In fact, it is clear from a review of the BRAC Commission proceedings record (portions of which are being submitted for the administrative record here) that the 1995 BRAC Commission rejected the Navy's plea to specify only NAS Oceana as a receiving site.

B-7-25

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WS(CW1)-5 The proposed realignment of F/A-18 squadrons will not require the establishment of new training areas. Current airspace and training areas have sufficient capacity to meet all current and reasonably foreseeable training requirements, as demonstrated in the NASMOD analysis. The Cherry I and Core MOAs were not modeled because the Navy F/A-18 aircraft would not require these new training areas.

WS(CW1)-6 Consistent with the National Environmental Policy Act, the EIS assesses the potential direct, indirect, and cumulative impacts of the proposed action.

For decades, North Carolina's citizens willingly have accepted the unavoidable negative impacts associated with military training activities both because of a strong sense of duty to country and because the brave men and women of the Nation's armed forces who were participating in such exercises by and large were living in the State's communities, thereby providing vital, positive social and economic benefits. However, as uniformly stated by every elected representative in the State over the past several years, North Carolina's citizens are less likely to accept the additional negative impacts associated with use by the Cecil Field F/A-18 assets of North Carolina facilities such as the Dare County Bombing Range, the Mid-Atlantic Electronic Warfare Range, the BT-9 and BT-11 targets, etc. if all of these assets (and therefore all of the related **positive** socioeconomic impacts) are located elsewhere.

7

In the context of the requirements of NEPA, the DEIS must be rewritten and recirculated to more honestly disclose the fact that significant, adverse impacts (direct, indirect, cumulative and otherwise) will occur in and over North Carolina regardless of where the Cecil Field F/A-18 assets are based. More importantly, the DEIS must be rewritten to more honestly disclose the obvious disconnect between positive and negative environmental impacts that would occur if the Cecil Field F/A-18 assets are located at NAS Oceana, yet spend a significant portion of their training time in and over eastern North Carolina. The final decision maker and the public must be honestly informed as to the very real consequences of such a decision in terms of relative social and economic impacts, both positive and negative. As stated at 40 CFR §1508.14, where an EIS otherwise is required, it must discuss and disclose **all** interrelated social and economic effects.

III. Deficiencies in Discussion of Mitigation Measures:

8

Mitigation includes avoidance and minimization of impacts, rectifying unavoidable or prior impacts, reducing impacts over time, and compensating for unavoidable impacts. See 40 CFR §1508.20. The DEIS must contain an appropriate level of detail in addressing mitigation issues. See 40 CFR §§1502.14(f), 1502.16(e-h), and 1505.2(c). As indicated in Section II above, the DEIS as written does not disclose the full range of potential adverse negative impacts on North Carolina, nor the relative loss of potential positive socioeconomic impacts if the Cecil Field F/A-18 assets are located in another state.

WS(CW1)-7 The EIS addresses training of F/A-18 aircraft in eastern North Carolina for all of the alternatives. Because training in eastern North Carolina is necessary under each of the alternatives, impacts related to the aircraft training in eastern North Carolina are discussed in Sections 4, 5, 6, 7, and 8 of the EIS. Because of the excess capacity at NAS Oceana, relocation of some aircraft and associated personnel to NAS Oceana is proposed under each of the five alternatives. Economic impacts associated with the relocation are similarly discussed in Sections 4, 5, 6, 7, and 8 of the EIS. The EIS does not fail to disclose these impacts. These factors will be considered by the Office of the Secretary of the Navy prior to making a final decision on the proposed action.

WS(CW1)-8 All of the relevant socioeconomic and environmental impacts are discussed in the EIS at a level of detail sufficient for decision makers to accurately assess the impacts of each ARS. To assess the impacts of not implementing the proposed action at a particular location is highly speculative and beyond the scope of the EIS.

9 For purposes of mitigation, these failures are exacerbated by the additional, related failure of the DEIS to comply with the mandates contained in the CEQ regulations cited immediately above. Nowhere in the DEIS is it acknowledged that co-location of the Cecil Field F/A-18 assets with their training ranges (i.e., in eastern North Carolina) would serve as a positive form of compensatory mitigation by offsetting unavoidable negative impacts with positive socioeconomic impacts. This is a critical failing in light of the obvious benefits to all concerned associated with such co-location of negative and positive impacts.

10 The DEIS fails to disclose the relative importance of potential positive and negative impacts in light of the surrounding human environment. For example, the transfer of the Cecil Field personnel to Cherry Point would result in a significant increase in total economic benefits to the greater Havelock area and surrounding counties while the same transfer of personnel into the greater Hampton Roads metropolitan area would have a much less significant positive economic impact relative to the existing population and economic base. This omission deprives the final decision maker and the public of material information relevant to the issue of compensatory mitigation as well as the overall balancing of cost, capacity, and environmental issues.

11 The DEIS also fails to disclose the significant, voluntary mitigation actions taken by State and local governments, as well as private citizens in North Carolina. As documented in a number of administrative record submittals, after the 1993 BRAC Commission decision was announced, literally hundreds of millions of dollars in road, water, sewer, development, and community support projects were committed in anticipation of the location of the Cecil Field F/A-18 assets at MCAS Cherry Point. Many of these projects now are complete and most of the others are well under way. Relative to local population and economic bases, these commitments represent a huge outpouring of public and private support, which the Navy apparently has chosen to minimize and/or ignore.

WS(CW1)-9 The positive economic impacts associated with the realignment of F/A-18 aircraft to MCAS Cherry Point under ARS 3 and ARS 5 are discussed in Sections 6.1 and 8.1 of the EIS, respectively. These sections also provide a detailed discussion of the unavoidable negative impacts on the communities surrounding NAS Oceana and MCAS Cherry Point, including an increase in noise contours and APZs. For ease of comparison, both the positive and negative impacts of each alternative are summarized in Table 2.5-1 of the EIS. These factors will be considered by the Office of the Secretary of the Navy prior to making a final decision on the proposed action.

WS(CW1)-10 Please see response to WS(CW1)-9.

WS(CW1)-11 Improvements to the local community are reflected in the description of the existing environment around MCAS Cherry Point. Please see Section 3.3 of the EIS.

WARD AND SMITH, P.A.
ATTORNEYS AT LAW

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December 1, 1997

MEMORANDUM

TO: J. Dan Cecchini

FROM: Frank H. Sheffield, Jr. FHS

RE: Comments on Draft EIS re Cecil Field A/A-18 Redirect

Following are some additional comments on the Cecil Field Redirect DEIS for your consideration.

1 ES-1 The stated goal -- to maximize the use existing capacity at installations along the Atlantic Seaboard -- is limited and narrow. It seems much more appropriate to include other relevant factors including recent investments in infrastructure, readiness issues, complications arising from force concentrations, projected lifespan of facilities, the possibility of increased mortality/morbidity associated with increased levels of operations in densely populated areas, local support, etc. Obviously, the inclusion of these other factors would compel an expansion of the decision matrix and lead to potentially radically different alternative realignment scenarios.

2 ES-4 It is equally unclear why the screening criteria for the draft environmental impact statement does not include civilian and environmental impacts.

3 ES-5 The draft environmental impact statement includes no discussion of the opportunity cost of not fully utilizing other bases' capacity. In any discussion of costs and benefits, there needs to be a full examination of the opportunity costs of the non-preferred options, otherwise, the exercise is flawed.

4 ES-6 The second sentence on page ES-6 of the draft environmental impact statement makes it clear that the Navy *ab initio* adopted single siting as the most important goal of this exercise. This is in direct conflict with the stated goal of maximizing the utility of facilities along the Atlantic coast,

WS(FHS1)-1 As stated in Section 1.1, the overall goal of the BRAC Commission was to "optimize use of existing infrastructure, thereby reducing additional investment and ensuring that taxpayers dollars are spent in the most efficient way possible." The BRAC 95 goal and supporting background data was used by the Navy to develop criteria and a framework for the development of alternatives. The EIS undertakes a multistage screening process to arrive at alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria (please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). Please see Section 2 of the EIS for a complete discussion of alternatives.

WS(FHS1)-2 Each ARS is evaluated in terms of meeting operational criteria and in terms of the environmental (and socioeconomic) impacts associated with that ARS. A summary of operational criteria and environmental impacts for each ARS is included in Table 2.5-1.

WS(FHS1)-3 Only three bases on the east coast of the United States have the excess capacity and operational capability to accommodate F/A-18 aircraft: NAS Oceana, MCAS Cherry Point, and MCAS Beaufort. Section 2.2.6 of the EIS describes each base and discusses excess capacity. Sections 4, 5, 6, 7, and 8 provide detailed analyses of the socioeconomic and environmental impacts in the vicinities of these three bases for each ARS. The public and the Navy's decision makers have sufficient information to accurately assess the impacts from each ARS and compare the relative advantages and disadvantages of each ARS. To assess the impacts of not implementing the proposed action at a

4 and is, at a minimum, a violation of the spirit of the environmental impact statement process.

ES-12 It is noteworthy that the Navy recognizes in their own draft environmental impact statement that their preferred option would result in the "greatest level of environmental impacts" to the surrounding community and ecosystem.

ES-12 The Navy is under an affirmative obligation in the draft environmental impact statement to assess and indicate, to the extent possible:

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- the cost of the environmental impacts;
- the costs of noise attenuation;
- the cost of new and modified infrastructure to localities;
- the costs associated with increased traffic and congestion, including lost time;
- costs associated with decreased property values (including tax consequences thereof);
- costs associated with increased morbidity brought on by increased indoor air pollution which will result from schools needing to keep their windows closed for noise attenuation purposes; and
- the costs associated with increased mortality/morbidity which might arise as a result of increased operations in a densely populated area.

By not including those costs, the Navy has introduced a terminal flaw into the cost projections and operational criteria which undergird the selection of the preferred alternative. In short, the draft environmental impact statement is defective on its face.

6 ES-12 The draft EIS does not address increased air emissions due to increased population, nor does it address increased air emissions due to increased automobile traffic and congestion.

7 ES-13 The draft EIS relies on a maintenance plan developed by the Hampton Roads Air Quality Commission and submitted to US EPA by Virginia DEQ in assessing the impact of the Navy's preferred alternative on air quality in the region. That maintenance plan was developed to meet the requirements of National Ambient Air Quality Standards (NAAQS) for ozone which are no longer in place. The draft EIS is silent with respect to the impact of the Navy's preferred alternative on Hampton

particular location is highly speculative and beyond the scope of the EIS.

WS(FHS1)-4 The Navy considered both the BRAC 95 Commission goal of using existing capacity and the Navy's operational requirements in developing the five ARSs. Under ARSs 2 through 5, excess capacity is used at NAS Oceana and MCAS Cherry Point or NAS Oceana and MCAS Beaufort. ARS 1 best meets the Navy's operational requirements and is the preferred alternative. The preferred alternative is to single-site all F/A-18s at one installation. From operations, training, logistics support, and life-cycle cost perspectives, single-siting all F/A-18 aircraft is preferred to siting aircraft in multiple locations. While dual-siting of F/A-18 aircraft under ARSs 2 through 5 is reasonable, single-siting replicates to the greatest extent practicable the operational and logistical characteristics currently experienced with all Atlantic Fleet F/A-18 fleet and FRS aircraft stationed at NAS Cecil Field. The CEQ regulations specify that a preferred alternative be identified in the EIS.

WS(FHS1)-5 The EIS discusses the effects of the proposed action on noise levels, infrastructure and utilities, transportation, and land use at a level of detail sufficient for decision makers to accurately assess the impacts from each ARS. Because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy did not develop cost estimates for mitigation of these impacts. Where applicable, the Navy includes costs for mitigation of impacts associated with each ARS (i.e., wetland mitigation).

WS(FHS1)-6 In developing the maintenance plan and accompanying redesignation request, Virginia included growth factors for population and vehicular traffic increases. EPA has since approved the redesignation request.

7 Roads ability to achieve attainment with the recently promulgated NAAQS for both ozone and particulate matter. This needs to be addressed.

8 ES-14 The draft EIS fails to address health problems (and attendant costs) related to increased exposure to noise.

9 ES-14 The draft EIS fails to address and examine the increased risk (and attendant likelihood of enhanced mortality/morbidity) associated with increased operations in a densely populated area.

10 ES-15 It is unclear from the draft EIS whether and to what extent the Navy took into account increasing population growth in the Virginia Beach area when considering the extent of the impacts from noise.

11 ES-15 It is unclear whether and to what extent the Navy considered the increased costs associated with additional traffic and congestion, including increased number of accidents, lost time, and increased risk of mortality/morbidity associated with more automobile traffic.

12 2.2.3 The Navy correctly notes that the 1995 BRAC commission recommended that NAS Cecil Field assets be transferred to those stations with the "necessary capacity and support infrastructure". This quote, and the record of the Commission in general, leads one to conclude that the Commission envisioned a greater dispersion of the Cecil Field assets than the Navy has indicated in the draft EIS it prefers.

Additionally, the Navy also notes, clearly contrary to its preferred alternative, that "Second, the Navy concluded that scenarios that require development of new capacity would not be considered reasonable should usable capacity exist elsewhere that supports the Navy's operational needs." We agree -- in accordance with the wishes of the Commission and the dictates of common sense, the Navy should use all existing capacity first, and then build more if needed. However, the Navy's insistence on single siting elsewhere in the draft EIS flies in the face of this most sensible approach. Indeed, single siting, especially at Oceana, is almost directly converse to this approach.

13 2.3.3 The draft EIS fails to examine and list the avoided cost of having all the F/A 18s at a single location. This is a serious defect.

2.4-14 The draft EIS fails to list the annualized cost of the facilities contemplated. Moreover, it is silent with respect to the lifetimes of various facilities, which is especially crucial when considering the costs of single siting. For

WS(FHS1)-7 The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementations Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. SIP revisions, if any, addressing the new standards are not expected until after 1999. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard. There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with ARS 1 are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

WS(FHS1)-8 Sections 3.1.8 and 4.8 and Appendix H of the EIS present the potential health effects associated with aircraft noise.

WS(FHS1)-9 The EIS addresses aircraft safety through an analysis of APZs in the vicinity of each airfield. Appendix G of the EIS presents a background discussion on the APZ concept.

WS(FHS1)-10 The EIS uses the 1990 population census data throughout the document for consistency in comparisons both between the existing environment and the environment under the proposed action and between alternatives. The 1978 AICUZ has been recognized by the cities of Virginia Beach and Chesapeake in their comprehensive plans and local zoning ordinances. It is representative of NAS Oceana operations for purposes of long-range planning and is therefore used as a baseline for comparative analyses with each ARS.

WS(FHS1)-11 Under all ARSs, the regional population in Hampton Roads would increase with the greatest impact being under ARS 1 (approximately 2%.) The Navy recognizes there may be a corresponding increase in traffic incidents, although population increases are only one of many factors (i.e., intersection configurations, roadway lighting and markings, etc.) that determine the number and frequency of traffic incidents.

example, are there any facilities at Oceana which are nearing the end of their useful life and will need substantial renovation or replacement? Without an accurate assessment of such possibilities, the cost data included in the draft EIS is, at best, suspect.

14 2.5-7 The draft EIS fails to address or include the multiplier effect in various areas with respect to economic growth or demographics arising from the various relocation scenarios.

15 2.5-8 The draft EIS fails to address (or even mention) the effect of the Lake Gaston situation on Virginia Beach. It appears that the Navy is unaware that new raw drinking water supply from Lake Gaston will initially spur growth (probably across Virginia Beach's "Green Line"), but that the flow may be disrupted after 2000 by legal action associated with the relicensing of the hydropower dams which formed the lake. This is an important and complicated problem directly related to Virginia Beach's ability to absorb additional population. It is unconscionable that the Navy does not address this issue in a substantive way.

16 2.5-11 The draft EIS fails to address or even mention the effect that increased operations in the Virginia Beach area will have on the biota in Back Bay National Wildlife Refuge and neighboring False Cape State Park, which are both home to numerous endangered species, as well as being important stops on migratory pathways of numerous birds. This omission is a clear sign that the draft EIS is fatally flawed and should be redone.

17 2.5-12 The draft EIS notes that under the Navy's preferred alternative, "Hazardous waste generation would increase by an estimated 41% over wastes generated in 1995 at Oceana." It is unclear whether this increase is provided for in Oceana's RCRA permit.

18 3.1-74 It is unclear from the draft EIS whether the Navy took account the likely changes in zoning and local planning that is likely to occur in Virginia Beach over the next few years and population pressures alter the current zoning plan.

19 3.1-114 It is unclear from the draft EIS whether the VPDES permit Oceana currently holds for stormwater is a general permit, and, if so, whether it will be affected by an increase in operations.

20 3.1-115 The draft EIS fails to account for the likely environmental impacts arising from the handling of more fuel at Oceana. Such impacts might include increased spills, increased accidents, potential tank ruptures and collapses, etc.

WS(FHS1)-12 As discussed in Section 2, realignment scenarios must maximize excess capacity in a manner that supports the Navy's operational needs. Section 2 outlines these operational needs and explains the Navy's screening process, which considered both capacity and operational needs. Some alternatives were considered but rejected as unreasonable. The Navy notes that some construction will be necessary regardless of which alternative is chosen.

WS(FHS1)-13 Costs associated with each of the ARSs are discussed in Section 2 of the EIS. One-time construction and renovation costs, as well as 30-year life cycle costs, are provided for each alternative. A comparative cost summary is provided in Table 2.3-1.

WS(FHS1)-14 The Regional Input-Output Multiplier System II (RIMS II), which was developed by the U.S. Department of Commerce, was used to estimate the direct and indirect or "multiplier" effects of each ARS on the local economy.

WS(FHS1)-15 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies"). The outcome of potential legal action in 2000 is impossible to predict and is not reasonably foreseeable.

WS(FHS1)-16 The FAA recommends a 2,000-foot restriction for aircraft flying over national wildlife refuges. Given that a self-imposed Navy restriction requires Navy and Marine Corps aircraft to maintain an altitude of 3,000 feet over these areas, the fish and wildlife resources in the vicinity of Back Bay National Wildlife Refuge or False Cape State Park (which are adjacent to one another) would not be impacted under any of the ARSs.

21 | 3.1-147 The draft EIS notes that, "The net increase (of emissions under the Navy's preferred alternative) is within the growth allotment contained in the VDEQ maintenance plan for NAS Oceana." It is unclear when that increment was requested from VDEQ by Navy.

22 | 3.1-162 It is unclear from the draft EIS whether Oceana has experienced any violations of the terms of its RCRA permit.

23 | 3.1-163 The draft EIS fails to take into account the costs required to be spent to remediate contaminated groundwater at Oceana when developing overall cost estimates.

24 | The draft EIS fails to address or explain how Oceana NAS is going to be incorporated into the Phase II stormwater activities of Virginia Beach. This is a critical environmental issue and its omission is unacceptable.

25 | 3.1-138 The draft EIS used AAD (annual average) to derive noise impacts in Virginia Beach. At the same time, the draft EIS used ABD (a truer measure) to derive noise impacts in Beaufort. The draft EIS should use both methodologies both places, so a more accurate picture of noise impacts can be developed.

26 | 4.4-4 The draft EIS fails to address the costs associated with problems which will arise for people trying to obtain FHA, VA, or HUD guaranteed loans for houses in areas with noise problems and/or clear zones. These costs need to be addressed. Similarly, environmental justice concerns are also implicated in this issue and need to be addressed.

27 | 4.7-1 The draft EIS notes that, "HRPDC 2015 segment projections assume completion of planned roadway improvements." This assumes that the transportation conformity plans of Hampton Roads remain unchanged. With new NAAQS in place, that assumption is tenuous at best, and fatally flawed at worst.

28 | 4.9-2 The draft EIS is unclear with respect to whether the contemplated AIMD maintenance facility at Oceana would be a major source under the provisions of the Clean Air Act of 1990. The draft EIS is equally unclear where the Navy plans to obtain the needed offsets for the AIMD maintenance facility.

29 | 4.9-3 Again, the draft EIS fails to recognize that there is a new NAAQS for particulate matter. Therefore, any tables or analysis done on the basis of PM10 are no longer operative and need to be redone.

30 | 4.14-1 The draft EIS is unclear with respect to what options would be explored should the in-situ treatment at 2B/2C at Oceana is not successful.

WS(FHS1)-17 The projected increases can be accommodated within the terms of NAS Oceana's existing RCRA Part B permit.

WS(FHS1)-18 The EIS includes a review of the Virginia Beach Comprehensive Plan, which presents the city's plans for growth, and its policies and objectives. Past population growth and the projected trends are presented in Tables 3.1-22 and 3.1-23. As shown, the population has grown significantly, and this trend is expected to continue. Although the realignment would contribute to the population growth, the population increase under ARS 1 represents only a 2% increase over the total 1990 census population of Virginia Beach. Therefore, the projected increase in personnel under ARS 1 would not significantly impact comprehensive planning and zoning in Virginia Beach.

WS(FHS1)-19 As discussed in Section 3.1.11, NAS Oceana currently operates under VPDES Permit No. VA0005266. This permit covers all discharges from the base to regulated waterways. The Navy monitors the outfall quality, and VDEQ reviews the data. The existing permit would need to be amended for the construction phase of the project because more than 5 acres of ground would be disturbed.

WS(FHS1)-20 Section 4.6.6 has been amended to include a discussion of potential spills associated with an increase in the amount of fuel stored or piped at NAS Oceana and transported off base. NAS Oceana will update its Spill Prevention, Control, and Countermeasure (SPCC) Plan to reflect any increase in volume or change in type of fuels stored.

WS(FHS1)-21 The Navy, in its BRAC and environmental planning activities, anticipated that NAS Oceana would be one of several candidate east coast installations to receive the squadrons or a portion of the squadrons. The Navy understood the ozone non-attainment issue that existed prior to June 26, 1997, as well as VDEQ's requirements to develop a maintenance plan and mobile emissions budget to maintain the ozone air quality standard after redesignation to attainment. Therefore, the Navy (along with other major sources in Hampton Roads) participated in the development of the maintenance plan and emission forecasts by supplying

information to VDEQ upon request. NAS Oceana's allotment resulted from other major sources in Hampton Roads accepting caps on their emissions.

WS(FHS1)-22 NAS Oceana's last inspection was on December 18, 1996. Three minor violations were reported, and all were corrected. The next inspection is scheduled for 1998.

WS(FHS1)-23 The remediation of groundwater at NAS Oceana is an ongoing activity. It will occur regardless of any construction activity associated with the ARSs. Therefore, costs for hazardous waste site remediation at NAS Oceana, MCAS Cherry Point, or MCAS Beaufort have not been included for any of the ARSs.

WS(FHS1)-24 NAS Oceana and Virginia Beach operate under separate VPDES permits for stormwater management. NAS Oceana will comply with its VPDES permit and will not impact or be impacted by stormwater management activities off station.

WS(FHS1)-25 The projected tempo of activity at NAS Oceana under any of the proposed ARSs would be significantly different than the tempo of activity at MCAS Beaufort. The different tempos of activity require different noise analysis methodologies. Because NAS Oceana would likely be operating seven days a week, noise exposure is most accurately predicted by averaging flight operations over the entire year (365 days). MCAS Beaufort would operate with a tempo of high activity (i.e., the level of operations each day are equal to or greater than 50% of the annual average day) for 215 days. With the addition of up to five F/A-18 squadrons in ARS 4, the number of days of high activity at MCAS Beaufort would increase to 260.

WS(FHS1)-26 The Navy recognizes that the possible inability to obtain federally guaranteed mortgage loans in noise zones 2 and 3 and/or clear zones is a significant impact. Because the Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of

32| 4.6-3/5.1-31 The draft EIS is unclear as to whether the cost of stormwater control is embedded in construction cost estimates.

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funds, the Navy did not develop cost estimates for the loss of or provision for these mortgage loans. As stated in Section 10 of the EIS, the proposed realignment does not disproportionately affect minority or low-income neighborhoods surrounding NAS Oceana, although some low-income or minority residents may be affected by their inability to obtain federally guaranteed mortgage loans.

WS(FHS1)-27 The roadway improvements listed on Table 3.1-33 are independent of the proposed action. These improvements are part of the regional transportation system master plan (*City of Virginia Beach FY 1995/96-2000/01 Capital Improvement Program)* and are intended to alleviate existing traffic conditions. Some of the improvement projects have been completed.

The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementation Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. HRPDC and VDEQ will determine the need to revise the HRPDC Transportation Conformity Analysis once the SIP is revised to incorporate compliance methods for the new standards.

WS(FHS1)-28 The AIMD maintenance facility would be a minor source. The Navy will submit a permit application to construct and operate a minor source. Offsets to permit this source are not required. Section 4.9.3 has been amended to clarify the permit status of the AIMD facility.

WS(FHS1)-29 Please see response to WS(FHS1)-7.

WS(FHS1)-30 In accordance with the RCRA 3008h consent order, the Navy will consult with USEPA, the Virginia regulatory agencies, and the Restoration Advisory Board (RAB) prior to altering any approved remedial action plan.

WS(FHS1)-31 The cost of stormwater management measures is included in the total construction costs for each ARS.

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December 1, 1997

To: Mr. J. Daniel Cecchini
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From: Major Douglas E. Lindeman,
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RE: Comments on the Draft Environmental Impact Statement for the Relocation of F/A-18 Aircraft from NAS Cecil Field

Please state your agreement or disagreement with the following issues and comments. If disputed, please explain the factual or logical faults contained in the comment provided for each answer.

1. ISSUE: Has the goal of Navy and Marine Corps air squadron interoperability been met in ARS 1?

COMMENT: The draft environmental impact statement refers to the desire of the U.S. Navy for single siting of all squadrons to support the training of Navy pilots. This disregards the objective of working with Marine Corps aviation assets. An inference that may be drawn is that the benefits of interoperability with Marine Corps aviation components is less important than the interoperability benefits between U.S. Navy aviation assets. The National Defense Panel chartered by Congress has recently recommended that the Armed Services share some bases as a way of economizing.

2. ISSUE: Rule 1 of the 1995 BRAC configuration model required, in part, that introduction of aircraft

WS(DEL)-1 Consistent with the 1995 BRAC Commission recommendation to realign F/A-18 aircraft to air stations with sufficient capacity, this EIS employed a capacity analysis that eliminated from consideration any installations with less than two modules of existing hangar capacity. Requiring at least two modules of existing hangar capacity furthered one of the basic operational considerations discussed in Section 2.1 of the EIS, specifically, carrier air wing unit integrity. Carrier air wings typically contain two or three Navy F/A-18 squadrons; thus, one squadron could not be stationed alone. Additionally, Marine Corps F/A-18 squadrons are assigned to four of the Navy's ten operational air wings sometime during their training cycle in preparation for that air wing's next deployment.

Post-deployment, air wing squadrons primarily focus on unit level training. Marine squadrons return to Marine Corps control and the pursuit of Marine training objectives. Navy squadrons remain under air wing control where their training objectives are greatly enhanced by collocation. It is therefore operationally advantageous for Navy squadrons in the same air wing to be based together.

Advanced integrated training of a carrier air wing's individual squadrons as a larger, cohesive warfighting unit is normally accomplished by training detachments to NAS Fallon and at-sea exercises. It is here that all aircraft types in the air wing come together to form the warfighting team that will deploy aboard ship.

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types new to a base was not to be allowed. Was this rule disregarded and if so, was it ever supportable?

COMMENT: The rule was either disregarded or removed as ARS 2 and ARS 4 are present in the environmental impact statement consideration statements. The rule cannot be supported if Oceana is projected as a single site over Beaufort. Oceana, at the time of the BRAC 95 consideration, qualified only by virtue of supporting one reserve F/A-18 squadron while Beaufort supported two F/A-18 air groups. Additionally, the DEIS provides ARS 3 and 5 which would send F-18s to Marine Corps Air Station Cherry Point, a station presently without F-18s.

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3. ISSUE: Were relocation costs at Marine Corps Air Station inflated in the area of family housing units?

COMMENT: The study does not adequately consider the amount of off-base housing constructed or planned as a result of the BRAC 93 decision (and before the BRAC 95 ARS alterations), nor does it consider the further growth of housing that would occur in this relatively low cost, undeveloped region should a final decision assign new squadrons to the Marine Corps Air Station.

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4. ISSUE: Will a large majority of air-to-air and air-to-ground training occur in North Carolina areas?

COMMENT: The principal air-to-ground training sites are located in North Carolina with two of the three sites located in close proximity to Marine Corps Air Station Cherry Point. Most air-to-air training ranges are located off the North Carolina Outer Banks.

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5. ISSUE: Can any cost benefit analysis support the concept of locating aircraft squadrons at bases farther from their training areas in terms of fuel costs, other flight costs and crew training costs?

COMMENT: Although other forms of justification may be cited for basing aircraft at airfields farther from the training areas than at airfields nearer to those

WS(DEL)-2 The BRAC 1995 Commission took into account many factors before arriving at their final recommendations. It is not known if the 1995 BRAC configuration model considered whether F/A-18 aircraft were currently stationed at a particular base prior to making their final recommendation. The BRAC 1995 Commission recommendation and supporting background data does not mention this prohibition.

WS(DEL)-3 Housing availability in the vicinity of MCAS Cherry Point is discussed in Section 3.3.5 of the EIS. Based on the 1990 census, sufficient off-station housing is available to support families relocated under the proposed realignment for ARS 3 or ARS 5. The Navy does not plan to construct new family housing at MCAS Cherry Point under ARS 3 or ARS 5. The family housing costs included in the life-cycle cost analyses for ARS 3 and ARS 5 are the costs associated with housing allowances. Under DoD policy, housing allowances are provided to military personnel living off station.

WS(DEL)-4 The three principal air-to-ground training ranges for NAS Oceana and MCAS Cherry Point are located in North Carolina. Department of Navy "scored" Tactical Aircrew Combat Training Systems (TACTS) ranges for air-to-air training are located offshore of North Carolina: offshore of MCAS Beaufort; and northwest of NAS Key West. In addition to these areas, relocated F/A-18 aircraft would continue to utilize other Special Use Airspace for "un-scored" air combat manuever and instrument training flights.

WS(DEL)-5 Life-cycle costs associated with travel between either NAS Oceana or MCAS Cherry Point and the ranges in eastern North Carolina are similar. As long as the distance to a range is 100 nautical miles (NM) or less, all programmed training could be accomplished without any changes to the framework of existing syllabi. After the training syllabi is completed, aircrews will use any remaining time to conduct additional training (i.e., extra repetitions) at the range, or additional practice landings upon return to home base. Excess fuel also provides some added safety margin in the form of fuel reserve should deteriorating or poor weather conditions be encountered upon return.

training areas, such reasons must clearly outweigh the increased training costs and decreased training benefits in both the short and long term viewpoint.

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6. ISSUE: Is the proximity of the air station to that of the naval station an issue in the home base assignment of aircraft squadrons?

COMMENT: If this were an issue, the recent relocation of F-14 aircraft to a single site at Naval Air Station Oceana despite sourcing responsibilities to the Pacific fleets could not be justified. In any event, the operational, logistical and financial impacts of home basing at either Naval Station Oceana or Marine Corps Air Station Cherry Point would be virtually identical.

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7. ISSUE: Do the Virginia Beach area planning documents support a claim of an adequate water supply for that area for the next 20 years?

COMMENT: In 1994, the Corps of Engineers concluded that the area is very vulnerable to drought and, without an additional water supply, the area faces water problems of extreme proportions. The January 1995 FERC indicates that Virginia Beach officials have indicated that the additional water provided by "the Lake Gaston Project will not eliminate the need for Virginia Beach or Chesapeake to restrict water use". This latter statement was either a tactically used half-truth used to justify the pipeline during project development or the statement continues to be valid to this day.

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8. ISSUE: The cities of Virginia Beach and Chesapeake are required to cease water withdrawal from Lake Gaston at North Carolina's request during times of drought for periods lasting up to nine months. The City of Virginia Beach has indicated that such droughts will occur in ten to fifteen year intervals. The cities can continue to draw Lake Gaston water only if they can prove all other sources have been maximized and mandatory water restrictions have been put into place without resolving the problem. Assuming the two cities have plans for implementing such water restrictions, does the DEIS take these

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Therefore, the elapsed flight time per sortie, and the consequent costs of fuel, parts and maintenance due to airframe wear and tear, will vary insignificantly between the five ARSs.

WS(DEL)-6 One criteria considered during the initial screening process for F/A-18 realignment was the proximity of the air station to aircraft carrier homeports. Because of this criteria, only east coast Navy and Marine Corps bases were considered as potential F/A-18 receiving installations. The Pacific Fleet F-14s stationed at NAS Oceana are expected to be removed from the Navy's active inventory as early as 2008. The concurrent homeporting of the Pacific and Atlantic Fleet F-14s is temporary and, therefore, acceptable.

WS(DEL)-7 Section 4.6.1 estimates the potential impact of ARS 1 on the regional water supply based on the projected increase in population and using average consumption rates that were provided by the local water authorities. In 1997, the capacity of the regional water supply was restricted. However, with the completion of the Lake Gaston Project, the regional water supply would not be significantly impacted by the projected population increase under ARS 1.

WS(DEL)-8 The Navy has an agreement with the cities of Norfolk and Suffolk allowing water withdrawal from wells during drought conditions.

plans into consideration in determining the impacts squadrons to be relocated to NAS Oceana?

8 COMMENT: The DEIS makes no mention of the fact that water problems can continue to exist under certain circumstances despite the additional water supplies from Lake Gaston. The DEIS does not consider the impact of such water problems and the restrictive controls necessary should droughts occur in the Roanoke basin.

9. ISSUE: Are aircraft approach routes at Marine Corps Air Station Cherry Point safer than those at Naval Air Station Oceana in terms of risk to the numbers of lives and the amount of property located underneath these routes?

9 COMMENT: The approaches to Marine Corps Air Station Cherry Point are over water, forested areas and areas of low population density and thus present much less risk in terms of potential number of lost lives and property destroyed than do the approaches to Naval Air Station Oceana which occur over dense urban areas.

10. ISSUE: In terms of numbers of people affected, will the relocation of 180 F-18 aircraft to the Oceana area disrupt the lives of more citizens in the area surrounding that airfield than would a relocation of those aircraft to Marine Corps Air Station Cherry Point affect the people living near that airfield?

10 COMMENT: The extremely disproportionate population levels within three miles of each air station indicate that many more people would have a noticeable disruption of their lives in the Virginia Beach, Virginia area than in the Havelock, North Carolina area.

11. ISSUE: As a follow up to Issue 9, would a reduction of aircraft from 180 to 120 at Naval Air Station Oceana area with reassignment of 60 aircraft to the Marine Corps Air Station Cherry Point area still provide the most benefit to the local area citizens

WS(DEL)-9 Land uses in the vicinity of NAS Oceana are more developed than land uses in the vicinity of MCAS Cherry Point. Table 4.4-1 presents land use within projected APZs for NAS Oceana under ARS 1, and Tables 6.1-2 and 8.1-2 present land use within projected APZs for MCAS Cherry Point under ARS 3 and ARS 5, respectively.

WS(DEL)-10 Noise impacts in the vicinity of NAS Oceana under ARS 1 would affect more people than noise impacts in the vicinity of MCAS Cherry Point under ARS 3 or ARS 5. This is the result of the differences in number of aircraft and the fact that NAS Oceana is located in an urban area while MCAS Cherry Point is located in a rural area.

of the two localities regardless of locale in terms of noise reduction or increase?

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COMMENT: Again the disproportionately high numbers of people in the Virginia Beach area that would benefit from any reduction of noise impact outweighs the much lower number of people that would be adversely affected from an increased number of flights in the Havelock, North Carolina area.

12. ISSUE: Naval Air Station Oceana and Marine Corps Air Stations Cherry Point and Beaufort are mobilization sites. Does the draft environmental impact statement discuss the direct environmental impacts or the indirect impacts due to construction and increases in operational and training activities that would result at those air stations should reserve units be activated?

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COMMENT: Mobilization of reserve units cannot be predicted, but plans for their mobilization must be developed for their arrival and the impacts that arrival will have at those air stations. This topic is not discussed in the DEIS for any of the air stations.

13. ISSUE: Military airfields throughout the country have been closed in recent years due, in part, to the various pressures caused by increasing urbanization surrounding those bases. It is possible that urbanization can create or increase such pressures considered in this draft environmental impact statement. Has an analysis been made for each of these airfields identifying such pressures and identifying the potential limitations those pressures could cause on each of these airfields and their activities in the next twenty years?

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COMMENT: Although not an easy task to develop, such an analysis should be done prior to an increase in airfield loading with the attendant infrastructure costs and environmental impacts that would result from the additional aircraft assigned to that an airfield.

14. ISSUE: The December 1991 addition of the Community Relations Plan for Naval Air Station Oceana, Virginia Beach, Virginia prepared by the Naval

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WS(DEL)-11 Table 4.8-1 provides an estimate of the number of people who would be impacted by noise zones 2 and 3 in the vicinity of NAS Oceana under ARS 1. Tables 5.1-8 and 8.1-.8 provide an estimate of the number of people who would be impacted by noise zones 2 and 3 in the vicinity of MCAS Cherry Point under ARS 3 and ARS 5, respectively. Each ARS is evaluated in terms of meeting operational criteria and in terms of the environmental impacts associated with that ARS. Table 2.5-1 summarizes operational criteria and environmental impacts for each ARS.

WS(DEL)-12 Reserve units do not mobilize at NAS Oceana, MCAS Cherry Point, or MCAS Beaufort. Therefore, the EIS does not address any potential cumulative effects associated with the mobilization of reserve units.

WS(DEL)-13 Such an analysis has not been made and is beyond the scope of this EIS.

14

Facilities Engineering Command noted local area citizens concerns regarding the release of jet fuel underneath the flight approaches to the Naval Air Station Oceana and Naval Auxiliary Landing Field Fentress. Have the potential problems noted in that document been analyzed to determine if fuel releases or other forms of discharge are occurring, and, if so, what the forms and extent of damages are that may be occurring? In view of the increase in alleged fuel releases or other discharges that could result from the addition of 180 additional aircraft and their projected flight activities, has the impact of an increase in such releases been studied?

COMMENT: The draft environmental impact statement does not indicate whether a fuel release problem for Naval Air Station Oceana and Auxiliary Landing Field Fentress does exist or it's extent if such existence is identified. The draft environmental impact statement certainly does not compare the potential magnification of such a problem that would occur at any of the three airfields that are under consideration in the environmental impact statement.

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15. ISSUE: The BRAC '93 Commission assigned approximately 204 aircraft to MCAS Cherry Point. The BRAC '95 Commission reassigned the 180 F/A-18 aircraft to NAS Oceana and the remaining aircraft types to bases not located in the mid-Atlantic coastal area. The BRAC '93 Commission determined that the 204 aircraft could be assigned to MCAS Cherry Point without the need for building an additional runway. The DEIS produced as a result of the '95 BRAC reassignment of aircraft requires as additional runway be built at MCAS Cherry Point for as few as 60 aircraft in ARS-5. Does the DEIS or any other document explain the apparent disparity in runway requirements?

COMMENT: No obvious explanation for the differing requirements is apparent.

Douglas E. Lindeman

WS(DEL)-14 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

WS(DEL)-15 The BRAC 1993 Commission assumed that an OLF would be constructed; the BRAC 1995 Commission did not assume that an OLF would be constructed and, therefore, a parallel runway would need to be constructed under ARS 5.

TABLE OF CONTENTS
COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT
REALIGNMENT OF F/A-18 AIRCRAFT AND
OPERATIONAL FUNCTIONS FROM NAVAL AIR STATION
CECIL FIELD, FLORIDA, TO OTHER EAST COAST INSTALLATIONS

Section A: BRAC-95 Materials

Binder I

A. Brac 1995 Regional Hearing, May 4, 1995

1. Briefing
2. Installation Photographs
3. Final Selection Criteria
4. Mission Requirements
5. Land, Facilities and Air Space
6. Mobilization & Total Force Requirements
7. Cost and Manpower
8. Return on Investment
9. Economic Impact
10. Communities' Infrastructure
11. Environmental Impact
12. Supporting Document

Binder II

A. Department of Defense Base Closure and Realignment Report Dated March 1995

B. Naval Air Station Oceana Master Jet Base Structure and Evaluation Committee Report

C. DEHNR Letter Regarding Environmental Assessment/Finding of No Significant Impact Dated May 6, 1996

D. Defense Base Closure and Realignment Commission Meeting, May 4, 1995 Held in Baltimore, Maryland

E. Portion of Air Force Hearing Conducted March 6, 1994

1. NADEP

2. Cherry Point

3. Oceana

4. Oceana Cobra

[This Table of Contents lists reference material provided by Ward and Smith, P.A., in addition to the preceding comments. The reference material is included in the Administrative Record.]

F. Report of the Special Subcommittee on Defense Base Closure, Senate Finance Committee, December 2 and 3, 1993

G. Hampton Roads Military Impact Study

H. Letter to the Honorable Alan J. Dickson from Owen Pickett Member of Congress, Dated June 16, 1995

I. United States Senate Letter to Honorable Alan J. Dickson from Senator Lauch Faircloth Dated June 13, 1995

J. Speaking Order for Elected Representatives and Other Public Organization Officials at the EIS Scoping Meeting Held in Havelock, North Carolina on September 10, 1996

K. Public Scoping Meeting Regarding the Environmental Impact Statement for Realignment of F/A-18 Aircraft Dated September 10, 1996

L. Comments to Preliminary Draft Environmental Impact Statement

Section B: Costs, Capacity and Capability

M. Study of Military Economical Impact on North Carolina Prepared by the Governor's Advisory Commission on Military Affairs Dated April 1995

N. Final Draft of Family Housing Market Analysis for Marine Corps Air Station Cherry Point, North Carolina Prepared by Department of the Navy Atlantic Division Naval Facilities Engineering Command Dated May 1994

O. Havelock, North Carolina Apartment Market Analysis Prepared by John Wall and Associates Dated February 17, 1995

Binder III

A. Letter to the Honorable Carol M. Browner from Senator Lauch Faircloth Dated June 12, 1996

B. Letter to the Honorable William Peary from Senator Lauch Faircloth Dated June 12, 1996

C. Letter to the Honorable Carol M. Browner from Senator Lauch Faircloth Dated November 26, 1996

D. Letter to the Honorable Carol M. Browner from Lauch Faircloth Dated April 11, 1997

E. Letter to the Honorable Louise D. Cashell from Representative Eva Clayton Dated March 13, 1995

F. Letter to Mr. Joe Huffman from Representative Eva Clayton Dated April 3, 1995

Section C: Environment-Air

G. Draft Summary of the Federal Advisory Committee Act Science and Technical Support Workgroup Meeting Dated July 8, 1996

H. State of Virginia Request for Redesignation of Hampton Roads Ozone Nonattainment Area Dated August 27, 1996

I. EPA Documents Provided in Response to Information Requests Submitted by Allies in Defense of Cherry Point Dated April 16, 1997

1. EPA Technical Support Document dated February 5, 1997, Sections 1 and 2
2. Section 3, Area/Non-road Mobile Source Emission Inventories
3. Section 4, On-Road Mobile Source Emission Inventories
4. State of Virginia Environmental Quality Office Data Analysis
5. State of Virginia letter to EPA dated February 15, 1995
6. Hampton Roads letter to EPA dated February 16, 1995
7. County of York letter to EPA dated February 16, 1995

Section D: Environment-Water

J. Portions of the Final Administrative Record Regarding Naval Air Station Oceana Prepared by the Naval Facilities Engineering Command Under the ANTDIV Clean Program

1. Chapter 4 Site Investigations
2. Chapter 4, Nature and Extent of Contamination
3. Letters Regarding Contamination at Naval Air Station Oceana

4. Draft RCRA Work Plan Addendum for Corrective Measures Study at Sites 1, 2b, and 2c Prepared for the Atlantic Division Naval Facilities Engineering Command
5. Related News Articles Community Relations Plan Naval Air Station Oceana Dated December 1991

K. Community Relations Plan, Naval Air Station Oceana, Virginia Beach, Virginia dated December 1991.

Binder IV.

A. Lake Gaston Water Supply Project

1. Questions from Citizens' Water Conservation Awareness Committee
2. DEHNR Letter Dated December 29, 1995
3. DEHNR Letter Dated September 7, 1994
4. DEHNR Letter Dated December 21, 1993

B. Substantive Comments of the City of Virginia Beach Regarding FERC DEIS for the Virginia Beach Water Supply Project Dated March 13, 1995

1. Substantive Comments
2. Newspaper Articles
3. Letter, City of Virginia Beach "Review of Water Supplies Demand Alternatives" Dated March 10, 1995
4. James River Drought Preparedness Study Prepared by Corps of Engineers Dated July 1994
5. Comprehensive Plan, Isle of Wright County, Virginia Dated July 1993
6. 2005 General Plan, City of Norfolk, Dated April 19, 1989
7. Comprehensive Plan, Southhampton County, Virginia Adopted August 1989
8. State of Virginia letter to Virginia Beach Virginia dated January 31, 1995

C. State of Virginia Discharge Permit to Naval Air Station Oceana Dated February 14, 1995

D. Lake Gaston Water Project Materials

1. Press Release RRBH Challenges Gaston Settlement as Unconstitutional
2. Summary of Clean Air Act Conformity Concern
3. Ward and Smith, P.A. Letter to EPA Regarding Conformity Requirements Dated June 6, 1995
4. Senator Lauch Faircloth Letter to EPA Dated June 8, 1995

5. Senator Lauch Faircloth Letter to the Honorable Alan Dixon Dated June 20, 1995
6. Letter to the Honorable Alan Dixon from Representative Owen Pickett Dated June 16, 1995
7. EPA Letter to Senator Lauch Faircloth Dated June 20, 1995
8. Environmental Assessment; Emergency Acquisition of Potable Water for Tidewater Naval Activities Dated December 1980
9. Amended Complaint to Overturn Settlement Agreement, State of North Carolina v. Harold Brown, et al.

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December 4, 1997

Mr. J. Daniel Cecchini
Atlantic Division, Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Re: **Comments in behalf of the Eastern Center for Regional Development on Draft Environmental Impact Statement -- Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida, to other East Coast Installations**

Dear Mr. Cecchini:

As Vice President for Governmental Relations of the Eastern North Carolina Center for Regional Development, I have been authorized and directed by our Executive Committee to communicate with Government officials regarding the military bombing targets in North Carolina. This letter is submitted as a comment on the Draft Environmental Impact Statement.

1 The US Navy and Marine Corps are actively bombing several targets areas in our coastal sounds. The State has the ownership and control of these areas, except to the extent that it voluntarily agrees for them to be bombed. The Executive Committee of the Eastern Center for Regional Development is advised that the State has entered into currently effective agreements with respect to only two of these bombing target areas. The terms of these two existing agreements are being violated by the military.

2 The bombing of these targets and the use of air space by aircraft in the vicinity of these targets severely impinges on the rights of North Carolina citizens and adversely affects real estate values and the development of our coastal areas for commercial and recreational purposes. The 3 bombing and low-level flight activities adversely affect waterfowl populations, especially diving ducks whose populations have severely declined in the areas affected.

4 The bombing ranges have necessitated the establishment of flight-restricted areas over vast areas of Eastern North Carolina and its coastal waters with a resulting adverse effect on private

WCSR-1 The Navy is currently engaged in discussions with appropriate representatives from the State of North Carolina concerning water-based bombing targets in eastern North Carolina. The Navy's real estate responsibilities are a topic to be addressed in the context of these discussions.

WCSR-2 Existing training operations have coexisted with commercial and recreational activities in the region, and the proposed F/A-18 realignment would increase the number of operations by only two to three sorties per day over all training routes. Therefore, the proposed increase in training operations in eastern North Carolina under the proposed action is not expected to significantly impact commercial and recreational development in the region.

Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

WCSR-3 The coastal sounds and bays of North Carolina are important wintering grounds for waterfowl migrating along the Atlantic Flyway. Several waterfowl species may be present during the winter months. However, breeding does not occur at the BT-9 Range or in any other open water area of the sound. The majority of the wintering waterfowl breed in areas located farther north. Field studies and controlled laboratory studies by Fleming et al. (1996) did not find any physiological effects on adult birds due to noise levels at BT-11 (noise levels are higher at BT-11 than BT-9). Adult birds rapidly acclimated to high noise such that no response was elicited by low-level overflights. Furthermore, review of 30 years of waterfowl counts on the Atlantic Flyway indicate that waterfowl populations at BT-11 were heathier than those in other areas of coastal North Carolina or the Atlantic Flyway as a whole. This indicates that aircraft activity is not a dominant factor in the decline of waterfowl in the flyway and that increases in activity would not adversely affect wintering waterfowl.

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and commercial air traffic. For example, Manteo Airport is hindered in obtaining flight service because of the restrictions on the use of air space by civil aircraft. Likewise, boat traffic and fishing are prohibited for several miles around the target areas.

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During World War II, there was little protest to the use of these targets by propeller-driven aircraft, but jet age aircraft have become far more noisy, and the excessive noise levels extend over a far greater area. In addition, the military claims the right to fly at surface level, not only over the targets, but also over many thousands of acres of privately owned land in the vicinity of the targets. Neither the U.S. Navy nor the Marine Corp. has made or offered any payment for this use of the airspace in violation of nominal FAA minimum attitude requirements.

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The seriousness of the problem is intensified by the increasing population of our State and the increasing use of its coastal waters and adjoining privately owned lands for purposes which are inconsistent with low-level military combat activities. Meanwhile, the Navy and Marine Corps are planning to move an additional 200 aircraft from Florida to Virginia Beach. These aircraft can be expected to add to the pressure on these North Carolina targets, as there are none in Virginia. The plan is for Virginia to receive the benefits for the payroll associated with these 200 aircraft while North Carolina receives the bombs, the noise the depletion of wildlife and the suppression of property tax values and a loss of local revenue collections.

In behalf of the Executive Committee of the Eastern Center for Regional Development, it is my responsibility to ask the Navy and Marine Corps to work out reasonable agreements with the State of North Carolina that will move all bombing targets well away from privately owned shorelines; require military aircraft to observe FAA minimum altitude requirements over all land areas where neither the land nor the air rights are paid for; and, finally, to encourage the Navy and the Marine Corps to utilize open ocean or desert for all low-level dogfight practice and for as much bombing practice as possible.

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Thank you for your consideration of these comments.

Yours sincerely,

WOMBLE CARLYLE SANDRIDGE & RICE
A Professional Limited Liability Company

E. Lawrence Davis, III

ELDIII:ks

WCSR-4

The proposed realignment of the F/A-18 aircraft will not require the establishment of any new Special Use Airspace (SUA). The current airspace management practices of the Navy and Marine Corps ensure real-time joint use of airspace by both military and civilian users. Increased activity in existing SUA will not significantly impact private and commercial aircraft activities.

Water resources and water use of the areas surrounding BT-9 and BT-11 are discussed in Sections 3.1.3.1 and 3.1.3.2, respectively, of the EIS. Recreational and commercial fishing, two of the most important water uses in Pamlico Sound, are discussed in detail in Section 3.1.3.1. The USACE, Wilmington District, designated a surface prohibited area with a 3-mile radius centered on the target at BT-9. They also designated a surface prohibited area with a 1.8-mile radius centered on a BT-11 target in Rattan Bay. In addition, there are three surface restricted areas of 0.5-mile radius each. No boating is permitted in the surface prohibited areas; activity is permitted in the restricted areas only during hours the range is not in use (primarily at night). Increased activity at the range will not affect the surface prohibited and restricted areas; therefore, no impact on water use would occur.

WCSR-5

Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude over congested areas and at least 500 feet over rural areas (except during takeoffs and landings). FAA regulations provide for the establishment of Special Use Airspace and exempt that airspace from the requirement. Portions of the Pamlico Sound and eastern Pamlico County are restricted by the FAA down to surface level to allow for military aircraft training within Restricted Area R-5306A, which includes BT-9 and BT-11. Military aircraft are authorized to operate within the confines of this restricted area. Low level operations are scheduled and do occur over land and water within R-5306A, BT-9, and BT-11. A procedure is in effect at MCAS Cherry Point to investigate complaints and determine whether military aircraft exceeded the limits of the Special Use Airspace.

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December 4, 1997

Mr. J. Daniel Cecchini
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1510 Gilbert Street
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Re: **Comments in behalf of James E. Johnson, Jr., on Draft Environmental Impact Statement -- Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida, to other East Coast Installations**

Dear Mr. Cecchini:

Our client, Mr. James E. Johnson, Jr., owner of approximately 8,500 acres of shoreline property adjacent to BT-9 (Brant Island Shoal), is concerned that the proposed realignment would cause a 41% increase in the utilization of this particular bombing target. The bombing of this particular target begins as early as 8 a.m. and continues as late as 11 p.m. and is a constant source of disruption of his right to the quiet enjoyment of his land and to the waterfowl population which drew him to the area. It is in his behalf that we make these comments on the Draft Environmental Impact Statement -- Realignment of F/A-18 Aircraft and Operational Functions from Naval Air Station (NAS) Cecil Field, Florida, to other East Coast Installations (the "EIS").

In Section 3.1.3.1, the Draft Environmental Impact Statement contains a number of material inaccuracies and omissions of significant information relating to environmental impact. They are as follows:

1. It is stated at page 3.1-29 of the EIS that the range is an entirely marine environment located approximately three miles off shore of Goose Creek Island. The target itself is located approximately three miles off shore and the prohibited area for boating has a radius of three miles, which includes a small section of shore line as shown on the 1997 North Carolina Coastal Boating Guide, a portion of which is attached as Exhibit A. The restricted area for aircraft is far more extensive and includes approximately 1,000 square miles, most of which is water, but much of which is land. The Navy and Marine Corps claim and utilize the right to fly down to surface level over practically all of this area. Attached as Exhibit B are portions of a 1994 N.C. Aeronautical Chart

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WCSR-6

The water-based bombing targets in eastern North Carolina are essential training resources for Navy and Marine Corps aircraft and will not be moved to deep water. Established training requirements dictate the identification, prosecution, and attack of water-based bombing targets such as surface vessels as a major objective of the Navy's operational mission. The Navy currently uses deep-water ranges to the maximum extent possible, consistent with established readiness requirements. This deep-water training, however, does not negate the need for the low level training provided by water-based bombing targets such as BT-9. This training is unique in that it occurs near the shoreline and includes low-altitude aerial maneuvers needed to evade simulated enemy threats or to deliver bombs and strafing fire to selected targets. The ability of military pilots to do this whenever and wherever called upon requires consistent and continuous training activities at the water-based bombing targets in eastern North Carolina.

The Navy strictly prohibits air combat maneuvering ("dog fighting") below 5,000 feet above ground level (AGL). Tactical flight involving turns of up to 180 degrees is allowed from 5,000 AGL down to the surface.

WCSR-7

Please see response to WCSR-4.

BT-9 consists of the bombing target itself and the prohibited areas established by the USACE, Wilmington District, around the target. The range lies in a marine environment. The Special Use Airspace that aviators employ to use BT-9 is identified as Restricted Area R-5306A and lies over marine and terrestrial environments.

which shows restricted areas and which contains a table showing no minimum altitude requirement in Restricted Area R-5306A. Mr. Johnson has requested that bombing runs be made from directions which will keep the aircraft over open water, but military sources have responded that bombing runs will be made from any direction and that the aircraft will continue to utilize the right to fly down to surface level over the lands in the area. All areas surrounding BT-9 in which flight activity occurs below 3,000 feet should be classified as part of the range. This range is clearly not an entirely marine environment.

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2. It is stated that BT-9 is an unmanned submerged ship hull target for conventional weapons delivery. We are informed that two additional hulls have been moved into the area for placement on BT-9 in breach of the terms of the Special Use Agreement with the State of North Carolina for the use of its property. We are also informed that several towers have been erected in the surrounding waters for military purposes without agreement by the State to such use of its property. A copy of the Special Use Agreement, dated July 25, 1967, is attached as Exhibit C.

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3. The information on page 3.1-29 with regard to the number and types of bombs dropped on the target is from a 1991 source and dates from 1990. While perhaps accurate at the time, this information may not reflect the frequency and intensity of bombing taking place in 1997.

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4. It is stated on page 3.1-31 that the nearest occupied structure is seven miles from the range in Hobucken. Our client, James Johnson, has two residences, which are frequently occupied, within two miles of the prohibited area. Aircraft come across Mr. Johnson's property at near treetop level and seem to take the roofs off his houses with a roar and shock which shakes the ground. It is stated in Table 5.2-18 at page 5.2-54 that an F/A-18 generates 108 decibels of noise at 1,000 feet and in Table 4.8-4 on page 4.8-8 that hearing loss may begin to occur at 75 decibels or above. The "24 hour Ldn" value has little relevance as the range is closed for at least nine hours (11 p.m. to 8 a.m.) during each 24 hour period. We suggest that sound data be included for a required minimum altitude over land of 3,000 feet to protect people's hearing and houses.

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5. It is stated on page 3.1-40 that aircraft operating in BT-9 remain above 3,000 feet AGL unless performing a practice bombing or strafing operation. We are advised that the area is also used for dogfight practice and helicopter operations, which involve flight down to ground surface level but do not involve bombing or strafing operations and are in addition to the bombing and strafing operations.

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6. In September, 1994, a US Navy F-14A Tomcat from Ocean Naval Air Station crashed and burned at BT-9 on the land which Mr. Johnson owns and within a mile of his two houses. The crash started a fire which burned 35 acres before it was controlled. We are informed that two aircraft have crashed at BT-11 in the past year. These facts and attendant risks to people and property should be considered.

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WCSR-8 The Navy is currently engaged in discussions with appropriate representatives from the State of North Carolina concerning water-based bombing target agreements in eastern North Carolina. The Navy's real estate responsibilities are a topic to be addressed in the context of these discussions.

WCSR-9 Section 3.1.3 has been updated to reflect ordnance use in 1996.

WCSR-10 The Navy recognizes that two structures owned by Mr. Johnson are within 2 miles of the BT-9 boundary. The noise level of 108 dB for the F/A-18 at 1,000 feet altitude is the maximum noise level for a single F/A-18 aircraft overflight. The projected 1999 average noise level, in terms of Ldnmr, within the BT-9 range is 62 dB; it is less than 50 dB outside the range (exclusive of BT-11). This level is significantly lower than the 75 dB Ldn value at which hearing loss may begin to occur. As stated in Appendix H of the EIS, single-event sound levels of 130 dB or more can excite structural resonance. Expected single-event noise levels on and in the vicinity of the range will not approach 130 dB. Finally, Department of Navy guidelines require aircraft to operate at or above 3,000 feet above ground level when flying over noise-sensitive land uses except when operating in Special Use Airspace. The range is within the restricted area, and aircraft are in compliance with Navy guidelines.

WCSR-11 The Navy strictly prohibits air combat maneuvering ("dog fighting") below 5,000 feet above ground level (AGL). Tactical flight involving turns of up to 180 degrees is allowed from 5,000 feet AGL down to the surface. Section 3.1.3 has been amended to reflect these operations.

WCSR-12 There is no known method of predicting where aircraft accidents may occur away from the airfield. The F/A-18 is one of the safest aircraft ever to enter Naval service.

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7. The adverse effect on waterfowl in the vicinity of BT-9 has been omitted. For an outline of adverse effects, see my enclosed letter of September 29, 1997, and enclosures (Exhibit D).

14

8. The BT-9 area is prime habitat for endangered turtles. The State of North Carolina is taking strong steps to protect these turtles at a high cost to its citizens, particularly commercial fishermen. For example, Mr. Hubert Potter, PO Box 15, Hobucken, NC 28537, a commercial fisherman, advises that he has incurred approximately $5,000 in fines, cost of replacing confiscated nets and related travel costs within the part few years because of minor violations such as having turtle excluders that were one inch too small. He says that turtle excluders cost him and other fishermen about 15% of their catch. It is not consistent to have these same turtles exposed to explosive bombs with no consideration of restrictions on military operations in order to protect them. Mr. Potter is also concerned that low flying aircraft are doing structural damage to his house at Hobucken.

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9. Because BT-9 is a very productive fishing area, fishing boats go inside the restricted area. In 1974, a fisherman was killed at BT-9. A number of other civilians have been under fire but not injured according to an article appearing on page 4B in *The News and Observer*, Sunday, June 9, 1991. The sharp increase in recreational boating in the Pamlico River, the -Neuse River, and the adjoining part of the Pamlico Sound near BT-9 means that the danger to human life will increase until BT-9 is moved or closed.

16

10. The EIS does not include any alternative locations for bombing. BT-9 is adjacent to a privately owned shoreline and brings people water fowl and fish and marine animals into jeopardy. There are other open ocean or Pamlico Sound areas which do not involve privately owned property or equivalent danger to people and wildlife. If additional bombing pressure is to be added, alternative locations for bombing targets should be considered. The moving of BT-9 will require an Environmental Impact Statement. It is suggested that one or more alternate locations for BT-9 be included and evaluated in the current EIS because of the adverse environmental impact of bombing at BT-9 and the lack of legal right to continue at that location.

In addition, we offer the following general comments regarding deficiencies in the EIS:

17

1. The description of the affected environment in Chapter 3 describes the lands in proximity to BT-9 as primarily marshlands to the west of the range on Goose Creek Island, and state that "activities in these areas primarily include resource based recreational uses such as hunting and fishing." Further, it states that "the nearest occupied structure is seven miles from the range in Hobucken." This description significantly understates the impacts of target usage on these areas by implying that the area is uninhabited and used only for transient activities. The reverse is the correct

WCSR-13 Please see response to WCSR-3.

WCSR-14 Although endangered sea turtles have been identified in Pamlico Sound (see Section 3.1.3.1 of the ESI), the likelihood of one being affected by bombing at BT-9 is remote. The Navy F/A-18 aircraft transferred from NAS Cecil Field will use only inert ordnance at BT-9; therefore, no concussion impacts from explosives will occur as a result of the proposed action. Only a direct hit with a practice bomb would affect a sea turtle. (However, Marine Corps F/A-18 aircraft and other range users will continue to employ high explosive ordnance.) The area potentially affected by bombing at BT-9 represents a very small portion of suitable turtle habitat in Pamlico Sound, and the projected increase in range use is approximately two sorties per day. Therefore, the likelihood of a turtle being harmed by the bombing activities as a result of the proposed action is extremely remote.

WCSR-15 BT-9's prohibited area is identified by piling with signs posted on the perimeter of the three statute mile prohibited area. In addition, the target area is protected by two surveillance cameras mounted on towers and monitored by Range Operation and Control personnel. Finally, standard procedure requires the pilot to visually verify that the range is clear prior to deploying ordnance. Intrusions documented via daily range sweeps, pilots sweeping the range prior to their mission, or surveillance cameras are reported via the chain of command. There were 27 incidents of intrusion reported in the last two years; no military aircraft-related injuries were reported.

WCSR-16 Please see response to WCSR-6.

WCSR-17 The description of land use in the vicinity of BT-9 (Section 3.1.3.1 of the EIS) does not say that Goose Creek Island is uninhabited or that all activities are transient. The EIS provides a description of the character of the area, which is largely rural with small towns and a sparse population. Several towns, including Hobucken and Bayboro, are mentioned. According to the Navy's AICUZ Program Procedures and Guidelines, fishing and outdoor recreational activities are compatible with high noise levels. ARS 1 would result in an increase of less than two sorties per day

17 situation – habited areas are much closer to the target than acknowledged, and the noise and related impacts render the area unavailable or unsuited for the activities to which they are dedicated. Hunting and recreation are severely degraded, if not entirely precluded, by low-level flights of jets and helicopters using the target. The EIS fails even to acknowledge, much less provide any sort of appropriate analysis of these detrimental environmental impacts. As a result, the EIS is seriously deficient.

18 2. The EIS blandly states at page 3.1-38 that "the recreational fisheries of Pamlico Sound are also a significant source of income for the region and the state," with accompanying statistics on usage and income derived. However, the EIS provides no evaluation whatsoever of the detrimental impacts of target usage at BT-9 or other areas in the Pamlico Sound area. As a result, the EIS provides no basis for a judgment on an extremely significant component of the environmental effects of the proposed actions under evaluation.

19 3. The EIS at 3.1-39 indicates that the National Marine Fisheries Service indicated that several threatened or endangered species occur in North Carolina, including the green sea turtle, Kemp's ridley sea turtle, and the larger head sea turtle, and that each "were identified as commonly occurring in Pamlico Sound." Following the same approach discussed in the previous paragraph, the EIS provides no evaluation or information on the environmental impacts of target area usage on any of these species. Once again, the EIS provides no basis for a judgment on an extremely significant component on the environmental effects of the proposed actions and is thereby seriously deficient.

20 4. Noise levels are analyzed at 3.1-125 to 140. However these analyses are based on what are described as average noise levels and not peak projections. In this respect, the EIS is completely deficient, as the most significant impacts from noise are from peak and not average levels. This is especially true for an area such as Pamlico Sound and its neighboring land areas which are highly dependent on hunting, fishing, and other recreational activities as significant income and revenue sources. The EIS utterly fails to include or consider these factors.

21 5. At page 4.3-1, the EIS indicates that projected aircraft operations at BT-9 would increase significantly, by 41% from 1997 levels as a result of ARS-1. It states that this is primarily the result of projected operations using F-14 and F/A-18 aircraft. It then goes on to state that "land use impacts resulting from increased noise levels at BT-9 would be minimal." This conclusion is based on the statement that noise levels at BT-9 would increase only from 60 to 62 dB, an increase of 2 dB over existing levels. Further the EIS states that "because a 2 dB increase in noise would generally not be perceptible to individuals under any airspace, no significant impacts to human population would occur at BT-9. Typically a 3 dB change is detectible to humans (citing a USEPA study). The EIS then goes on to state that "further, the range is removed from development, and that "no major communities are located within ten to fifteen miles of the range", as well as the statement that "no permanent residence is located within seven miles." These statements are without

(on average) and an increase in noise from 60 to 62 dB Ldnmr at the target range. Noise will be considerably higher at the target than at Goose Creek Island. These increases are not expected to affect recreation-based activities at terrestrial areas close to the range.

WCSR-18 There will be no change to existing fishing access restrictions in BT-9 under any of the ARSs. The BT-9 Target Range has been in continued use for more than 55 years and is authorized for explosives to the maximum equivalent of 100 lbs. TNT. There are no documented or reported cases of adverse impacts resulting from high explosive concussion for any aquatic resource at BT-9. Although Marine Corps F/A-18 aircraft and other range users will continue to employ high explosive ordnance, Navy F/A-18 aircraft transferred from NAS Cecil Field will use only inert ordnance at BT-9. Therefore, none of the ARSs would cause concussion impacts at the site.

WCSR-19 Please see response to WCSR-14.

WCSR-20 The impact of aircraft noise depends on the maximum noise level, the duration of the noise event, and the number of overflights. The Ldnmr metric accurately reflects the combined effect of these quantities. Appendix H and Section 3.1.8 of the EIS present a discussion of the basis and interpretation of the day-night average sound level. Section 3.1.8 was amended to further explain the Ldnmr concept.

WCSR-21 The 38% increase in range operations would create only a 2 dB increase in the Ldnmr because the F-14 and F-18 aircraft would spend 65% and 95% of their time, respectively, at altitudes of 3,000 feet AGL or above. The Navy recognizes that two structures owned by Mr. Johnson are within 2 miles of the BT-9 boundary. Section 4.3.1 has been amended to clarify land use impacts in the vicinity of BT-9.

21

reasonable foundation in that utilization of the range will be increased by 41% and the increase in utilization will be caused by aircraft that generate more noise than the present aircraft. As stated elsewhere, there are houses within two miles of the prohibited area and within the range as properly defined.

22

6. The EIS states that "noise levels in these surrounding areas would be significantly lower than in the range itself. In turn, no significant secondary impacts such as impacts to structures as a result of vibrations associated with aircraft noise, would occur as a result of ARS-1 because noise levels in the range and developed areas near the range would be below acceptable noise levels for residential land uses (i.e., 65 dB)." It has been noted that the F/A-18 generates as much as 108 dB at 1,000 feet and that aircraft would be permitted to fly over residences at ground level.

23

7. In evaluation impacts of noise, our review indicates that the EIS is completely inadequate as shown by the comments filed by the State of North Carolina, dated November 23, 1997, by Acoustical Consultant Larry H. Royster. As Mr. Royster points out, the noise analyses confuses and switches back and forth between two differing measurement systems -- dB(A) values and L(dn) – implying that the numbers from each can be directly compared. As Mr. Royster points out, this is certainly not correct. Beyond that, this appear to be an attempt to reduce the apparent impacts by using lower numerical values that understate the undoubted noise increases that will occur under all scenarios. In addition to understating the impacts, the noise analyses are internally inconsistent in stating at one several points that 2 to 3 dB increases are insignificant, while conceding elsewhere that increases of these magnitudes would result in doubling of noise levels due to the logarithmic basis for noise measurement. By no stretch of the imagination can a doubling of noise levels to human or wildlife be judged to be insignificant. Moreover, this understating of the "real world" impacts is compounded the fact that even these flawed analyses are based on average and not peak noise level, the latter being much more important in terms of environmental impacts.

24

8. The EIS concedes, at page 4.3-9 that "there may be a potential for aircraft mishaps in the vicinity of BT-9, resulting in the release of fuel and/or hydraulic fluids that have the potential to adversely affect aquatic resources in Pamlico Sound." The EIS then goes on to state that the impact then on many factors and could be controlled through rescue and spill response procedures, but provide no information or evaluation of the likely environmental impacts of such mishaps. Once again, the EIS fails to provide even a cursory evaluation of the impacts of the proposed action.

Conclusions

25

As clearly demonstrated above, the EIS are flawed and incomplete is major respects, and does not provide either the information or adequate evaluation of the environmental impacts of the proposed actions that is required by the National Environmental Policy Act and its implementing regulations, guidance, and case law. As such, the EIS must be substantially revamped, the information and evaluations supplemented and revamped before the Department can adequately

RAW2376 10.01

WCSR-22 The 108 dB noise level is the noise level for a single F/A-18 overflight. The reference to acceptable noise levels for residential land use (i.e., 65 dB) is based on federal land use compatibility guidelines. If the guidelines are applied to the range environment, the calculated noise levels are assumed to be compatible with residential development, although individual overflights may result in increased annoyance.

WCSR-23 An increase of 2 to 3 dB is barely perceptible to the human ear. While a 3 dB increase represents a doubling of sound energy, a 10 dB increase is perceived as being twice as loud. Please see Appendix H of the EIS for additional information. The impacts of aircraft noise are dependent upon several factors including maximum noise levels, duration of the aircraft event, and the number of aircraft events. Therefore, the use of average sound energy metrics to describe the noise environment is appropriate. The Navy does not concur with Dr. Royster's comments (please see responses to NCOG(LR)).

WCSR-24 The EIS acknowledges that there is a potential for aircraft mishaps and that the release of fuel and hydraulic fluids may adversely affect aquatic resources in Pamlico Sound. However, it is impossible to predict what specific impacts may occur from any particular aircraft mishap. Impacts would depend on the severity of the mishap, weather conditions, location of the impacts, amount of fuel and/or hydraulics released, etc. It is anticipated that any impacts would be temporary in nature and that established spill response procedures would help minimize those impacts.

25

gauge the options before it with respect to relocation of the aircraft. Most importantly, the impacts on the adjoining areas of targets, especially BT-9, must be considered and appropriate steps taken to eliminate the unacceptable impacts demonstrated by the EIS.

Thank you for your consideration of these comments.

Very truly yours,

E. Lawrence Davis III

E. Lawrence Davis, III

ELD:aah
Enclosures

cc: Mr. James E. Johnson, Jr.
Mr. Hubert Potter

R#023761001

WCSR-25

The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The EIS provides sufficient information for the Office of the Secretary of the Navy to make an informed decision regarding the various alternatives evaluated. Table 2.5-1 of the EIS provides a comparative summary of the five alternatives.

South Carolina

Greater Beaufort Chamber of Commerce

November 17, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Gentlemen:

1 The community of Beaufort has been under the impression for the past four and half years that we would receive at least two F/A -18 fleet squadrons from NAS Cecil Field. The 1993 BRAC commission directed that NAS Cecil Field be closed and all the aircraft as well as the military be transferred to NAS Oceana, MCAS Beaufort, and MCAS Cherry Point. We would like to have these squadrons relocated to MCAS Beaufort.

The Beaufort Community and the military have an excellent relationship. We work well together on many programs and projects which jointly affect the military and civilian residents. The military adds much to the quality of life in our area. They support many community non profit agencies by supporting and attending their various events. Individually the marines and sailors volunteer their time and energies to community projects.

We feel that we will be able to support the needs of the two F/A -18 fleet squadrons. The business community encourages the Office of the Secretary of the Navy to choose realignment scenario Number 2. We like and respect our military and would welcome more.

The vast majority of the residents are not bothered or complain about the sound of the jets. In fact it is with a sense of pride that the words, "It is the sound of freedom" is said when Jets fly over them.

Sincerely,

Jean Lebro

Jean Lebro
Executive Vice President

1006 Bay Street • P.O. Box 910 • Beaufort, SC 29901-0910 • (803) 524-3163

GBCC-1 Under ARSs 2 and 4, the 11 F/A-18 fleet squadrons and FRS would be divided between NAS Oceana and MCAS Beaufort.

North Street Aquarium

BEAUFORT, SOUTH CAROLINA

DEDICATED TO THE EDUCATION AND ENJOYMENT OF THE RESIDENTS OF AND VISITORS TO THE BEAUFORT AREA

DEC. 2, 1997

COMMANDER, ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
ATTN: MR. DAN CECCHINI (CODE 2032 DC)
1510 GILBERT STREET
NORFOLK, VIRGINIA 23511

DEAR MR. CECCHINI

MY COMPLIMENTS ON A THOROUGH AND WELL PRESENTED DEIS. AS A NATURALIST AND CURATOR OF AN ESTUARINE PUBLIC AQUARIUM I AM ACUTELY AWARE OF THE IMPACT THE ONGOING GROWTH IN HUMAN POPULATION NUMBERS IS HAVING ON LOCAL NON-HUMAN ENVIRONS.

I HAVE STUDIED ALL THE ARS OPTIONS WITH PARTICULAR ATTENTION TO NUMBERS TWO AND FOUR. WHILE NUMBER TWO WOULD HAVE LESS OF A DIRECT AND OBVIOUS IMPACT ON THE NATURAL ENVIRONMENT THAN WOULD NUMBER FOUR, IT WOULD STILL HANG NEGATIVE ENVIRONMENTAL CONSEQUENCES NOT ADDRESSED BY THE DEIS.

I SPEND A GOOD DEAL OF TIME IN THE FIELD AND OFTEN COME IN CONTACT WITH MILITARY PERSONNEL ON RECREATIONAL OUTINGS. THEY ARE NOT ALWAYS PLEASENT ENCOUNTERS. I HAVE FOUND MYSELF ON OCCASION TRYING TO EXPLAIN CALMLY AND WITH RESPECT HOW CERTAIN ACTIVITIES IN CERTAIN AREAS OF THE ESTUARY CAUSE UNNECESSARY DAMAGE TO THE SYSTEM AS A WHOLE OR TO SOME SPECIES IN PARTICULAR. I AM ALL TOO OFTEN SIMPLY IGNORED OR REBUFFED.

WHILE THE NUMBER OF PERSONNEL BROUGHT TO THE AREA BY EITHER ARS NUMBER TWO OR FOUR MAY BE CONSIDERED "INSIGNIFICANT" WHEN COMPARED POPULATION GROWTH IN GENERAL, THOSE PERSONNEL ARE PRONE TO HAVE AN IMPACT ON THE ENVIRONMENT DISPROPORTIONATE TO THEIR NUMBER.

GENERALLY SPEAKING, FROM THE STANDPOINT OF COST EFFECTIVENESS AND IMPACT ON THE ENVIRONMENT THE CHOISE OF THE MOST SUITABLE ARS WOULD APPEAR TO BE A NO-BRAINER. I URGE ARS NUMBER ONE BE ADOPTED.

RESPECTFULLY
Robt Bender
ROBERT BENDER, CURATOR
NORTH STREET PUBLIC AQUARIUM
BEAUFORT, SC 29902
(803)524-1559

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B-7-58

Thank you for your comments; no response required.

WACHOVIA

Wachovia Bank, N.A.
Trust & Investment Management
Post Office Box 700
Charleston, South Carolina 29402

November 25, 1997

Mr. Duncan Holaday
Deputy Assistant Secretary of the Navy
Navy Pentagon
Room 4A686
Washington, DC 20350-1000

RE: Projected AICUZ Noise Contours-MCAS Beaufort, SC

Dear Mr. Holaday:

I am in charge of managing real estate held in trusts and estates for the Coastal Market of Wachovia Bank, N.A. We own, in two trusts, a 25% interest in approximately one thousand contiguous acres located within the above referenced area. As Trustee we have a fiduciary responsibility to our Trust Beneficiaries.

Any factor which would have a deleterious effect on the value of a trust account would be of concern to us and we would endeavor to mitigate or neutralize any such factor. The projected increased restrictive area associated with the proposed F-18 squadron addition to the Beaufort Marine Corps Air Station from Cecil Field, Jacksonville is such a factor. This is the narrow perspective of a bank trust real estate officer as pertains to this situation.

As a member of a community (Charleston) which has recently had a substantial reduction in military presence, I know firsthand the uncertainties and hardships caused by such a reduction. I am also a patriotic American and a redistribution of military resources, which although may have a negative economic impact on my community but is good for our great nation, must be supported.

1 It is my understanding that the Navy hierarchy believes that a move to NAS Oceania is most desirable for a variety of reasons. I have been informed, however, that because of political pressure, some squadrons may be assigned to Beaufort MCAS.

B-7-59

MSH-1 Although ARS 1 is the preferred alternative, the Office of the Secretary of the Navy will issue a final decision upon review of the EIS.

For the reasons discussed above, as a professional representing my clients' best interest and as an American cognizant of the big picture militarily, I oppose moving F-18's to Beaufort for political reasons. I entreat you to stand by your convictions and do the right thing for America in this case. Thank you for your time.

Sincerely,

Mark S. Hurlbutt
Vice President

MSH:gdc

cc: The Honorable Strom Thurmond
Russell Senate Office Building
Washington, DC 20510-4011

The Honorable Ernest F. Hollings
Russell Senate Office Building
Washington, DC 20510-4011

The Honorable Floyd Spence
2405 Rayburn House Office Building
Washington, DC 20515

✓Commander, Atlantic Division
Naval Facilities Engineering Command
ATTN: Mr. Dan Cecchini (Code 2033 DC)
1510 Gilbert Street
Norfolk, VA 23511

[Mr. Hurlbutt submitted a duplicate letter to Mr. Duncan Holaday, Deputy Assistant Secretary of the Navy, which is included in the Administrative Record but is not reproduced herein.]

Virginia

October 14, 1997

Commander, Atlantic Div.
Naval Facilities Engineering Command,
1510 Gilbert St., Norfolk, Va. 23511

Dear Mr. Cecchini,

The Virginia Beach Garden Club, founder and charter member of the Council of Garden Clubs of Virginia Beach, member of the Garden Club of Virginia, and of the Garden Club of America, opposes the projected placing of Cavalier Park - Bay Colony in Zone II (65-75 Ldn).

Our members live within this area, we are gardeners spending most of our time in the outdoors, we enjoy the beach with our families. We walk and many of us play tennis, are golfers, fish, and sail.

We have terraces, porches, gazebos, and pools. We enjoy sleeping at night with our windows open, and we have screens so that fresh air can flow through our homes. Many of us have properties on Crystal Lake and Linkhorn Bay, and all of us enjoy the year round outdoor living that our cherished homes, so close to the Atlantic Ocean, provide.

Our area has never been in an AICUZ disclosure zone and we do not wish to carry on our lives in such a zone now.

Sincerely,

Betty Sundin

Betty M. Sundin, President
Virginia Beach Garden Club

C.C.

Ms. Carol M. Browner, Adm. E.P.A.
Hon. Owen B. Pickett
Hon. John Warner
Hon. Charles S. Robb
Hon. Meyera E. Oberndorf

Thank you for your comments; no response required.

B-7-63

Prudential

Prudential/Decker Realty
701 Greenbrier Parkway, Chesapeake VA 23320
Tel 757 549-2000 Fax 757 549-2400

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Va. 23511

Ref: Cecil Field Relocation to Oceana
Attn: Mr. Dan Cecchini

Dear Mr. Cecchini,

As a lifetime resident of the Tidewater area and an active Realtor since 1991, I have a vested interest in the development of Tidewater and the military influence on the community.

Having been exposed to many military families over the years, both professionally and personally, I continually hear positive comments about the overall military "user friendly" atmosphere of the area. This is especially evident when real estate buyers call me from other areas and tell me that their Realtor has never helped someone obtain a VA loan to buy a home. Rarely do I go into a grocery store or major retail outlet without seeing some sign of military influence, whether it be the Soundings publication or a discount offered on purchases to someone with a military I.D. card. These may be little benefits in the big scheme of things but considering the open arms and welcoming attitude that the people of Tidewater consistently display to military families the result is that most often military families who relocate to Tidewater, end up retiring here because they feel at home.

It is with this in mind that I support the Cecil Field Relocation to NAS Oceana. This move not only benefits those military members who relocate here but it also benefits the community as a whole. This relocation effort has my support.

Sincerely,
Denise Sutton
Denise Sutton, Realtor
Prudential Decker Realty
Chesapeake, Va.

Thank you for your comments; no response required.

TIDEWATER ASSOCIATION OF REALTORS®

Your Business Partner

October 21, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Commander:

1 The Tidewater Association of REALTORS® (TAR) strongly supports the relocation of all 11 F/A-18 squadrons and the Fleet Replacement Squadrons (FRS) from NAS Cecil Field to NAS Oceana. The military's presence in Hampton Roads has and is a very positive force promoting the economic vitality of this region. The total community benefits from the military makes for a more stable economy. Conversely, the military personnel benefit tremendously enjoying the excellent quality of life that is present in Hampton Roads.

Quality of Life

The City of Virginia Beach is well positioned as a city with a superlative quality of life. This is a major factor that separates Virginia Beach from other potential locations for the relocating squadrons. The Hampton Roads region is culturally diverse and offers many recreational amenities for personal enjoyment. Parks, beaches, shopping, museums, amusement parks, community programs, professional sport franchises, and musical events are just some of the many recreational opportunities Hampton Roads citizens can enjoy. Hampton Roads area is conveniently located to Carolina beaches, historic Williamsburg, the nation's Capitol and beautiful Blue Ridge Mountains, all within a few hours drive.

The region's public educational systems are considered excellent. Opportunities to obtain higher educational degrees are boundless. Child-care, medical assistance, and city services are considered top-notch. The Hampton Roads region is a growing area offering almost everything to all people! The quality of life in Hampton Roads is second to none!

Infrastructure

Can Virginia Beach and the Hampton Roads area handle the increase? Unquestionably, TAR believes this region can handle the increase! Should the 11 squadrons relocate to Oceana, the total buildup will be little less than in 1990. Essentially, we're not talking about a large

TAR-1 Thank you for your comments; no response required.

increase placing a strain on our public infrastructure, we are mainly talking about a return of what we lost in the early 1990s!

NAS Oceana has the appropriate infrastructure, such as runways, hangers, support buildings, and equipment already in place. In addition, it is our understanding, that the military is constructing additional quarters to house more personnel and airplanes. Also, the City of Virginia Beach has appropriated millions of dollars in expanding the roadways around Oceana to make for easier access in and around the base. The Hampton Roads region is a superb location over all other proposed bases because we have the necessary infrastructure already in place to handle the increase of military personnel!

Economic Vitality

In our opinion, relocating all 11 F/A-18 squadrons will be positive for our economy. The increase in military personnel will increase the area's tax base enhancing public services and promoting larger capital projects. Local businesses stand to gain from increased purchases of goods and services. The local labor pool will increase due to the military contributing a well-trained technical labor force many of who will retire here. Larger, technical companies view this as a plus when considering relocating to the Hampton Roads region. In addition, the number of jobs generated by government contractors and manufacturers will help reduce unemployment and enhance the economic vitality of our region.

Real Estate Market

The Hampton Roads housing market is a progressively strong and stable market providing many opportunities for people of all salaries to live in quality housing throughout the region. With the current housing stock and new construction available, the Hampton Roads region is able to house the military personnel seeking private sector housing. The market can and will sustain the potential increase!

2 It is our understanding that the AICUZ (Air Installation Compatible Use Zones) will be re-delineated as a result of this relocation. This may effect some properties, however, we do not expect a reduction in property values as result there of. TAR demonstrated its support for NAS Oceana and the establishment of the AICUZ ordinance in 1994 and stands here today supporting the change in zones provided it does not cause any unnecessary intrusion on private property rights or causes any undue hardship on the local real estate industry.

3 It is the REALTORS® role, and requirement by city code, to disclose to potential buyers if the property is in a noise and/or accident zone. The REALTOR® plays an important role in the real estate process by helping potential buyers better understand what they are buying and helping sellers better understand the marketability and value of their home. Because of the REALTORS® critical role in the buying and selling process, they must rely on the most current and up-to-date information to distribute to clients. The Association makes every effort possible to keep our members up-to-date on the latest disclosure changes. TAR asks that the City of Virginia Beach and NAS Oceana work closely with the

B-7-66

TAR-2 Once a final decision is reached on the realignment of F/A-18 aircraft, the Navy will update the Air Installations Compatible Use Zones (AICUZ) plan.

TAR-3 NAS Oceana has an ongoing program to brief realtors (upon request) on base realignment and closure (BRAC) and AICUZ-related issues. The Navy will continue to keep the TAR and local municipalities informed of any potential changes to the AICUZ plan.

3

Association, informing us of any changes to the AICUZ ordinance; so we may inform our members of a change in disclosure consistent with the city ordinance and in a timely manner.

In conclusion, the Tidewater Association of REALTORS® supports NAS Oceana, Congressman Owen Pickett, and the City of Virginia Beach in their efforts to relocate the 11 F/A-18 squadrons and FRS to NAS Oceana. Because of our already established infrastructure, the Hampton Roads area is the best choice for relocating the 11 F/A-18 squadrons and FRS. For all these reasons, TAR enthusiastically welcomes F/A-18 squadrons and will work together assisting the military in a smooth transition to Virginia Beach. TAR and its Relocation Council commits to support this move and work towards helping to find temporary lodging, adequate rentals and affordable housing. Thank you for the opportunity to solicit comments.

Sincerely,

Joann Belote

Joann Belote
TAR President

cc: The Honorable Members of Virginia Beach City Council
The Honorable Members of Chesapeake City Council
The Honorable Owen B. Pickett
Capt. Stephen E. Benson, NAS Oceana
Capt. D.J. Santapaola, NAS Oceana
Mr. James Spore, City of Virginia Beach
Mr. Robert Matthias, City of Virginia Beach
Ret. Capt. J.B. Dadson, USN

talk to...
WOMBLE REALTY

October 27, 1997

To Whom It May Concern:

Subject: Moving all 11 F/A-18 squadrons to NAS Oceana

I definitely support the move of all 11 F/A-18 squadrons to NAS Oceana, Virginia Beach, Va. from NAS Cecil Field for the following reasons.

1. Cost - The cost is less to have the squadrons at NAS Oceans because - All units deploy from Norfolk or California. It would be a substantial savings for the Navy as it would eliminate transporting of units from Cherry Point to Tidewater for deployment. They would already be in Tidewater.

2. The large Military facilities are already in place such as Oceana, Little Creek Amphibious Base, Norfolk Naval Air, Portsmouth Naval Base; with the commissary and medical facilities i.e. the new Portsmouth Naval Hospital already in place.

3. Tidewater has many years of experience and expertise in dealing with the Military situations including unexpected deployment and extended deployment. TIDEWATER takes care of its military families for example; over 35,000 Retired Military families have elected to make Tidewater their home, and that says it all about our area.

4. Schools - Statistics show our public schools are of the highest quality; not to mention the opportunity for advanced education; such as Virginia Wesleyan College, Norfolk State University, Old Dominion University, College of William and Mary, Hampton University, Tidewater Community College, and numerous technical schools ... all within 20 - 40 minutes of central Tidewater.

I know the Military personnel transferring in will benefit in many ways by being in the Tidewater area; and we as a highly populated military community will also benefit from having the additional military personnel as welcome new member of our communities.

Thank you for taking the time to listen.

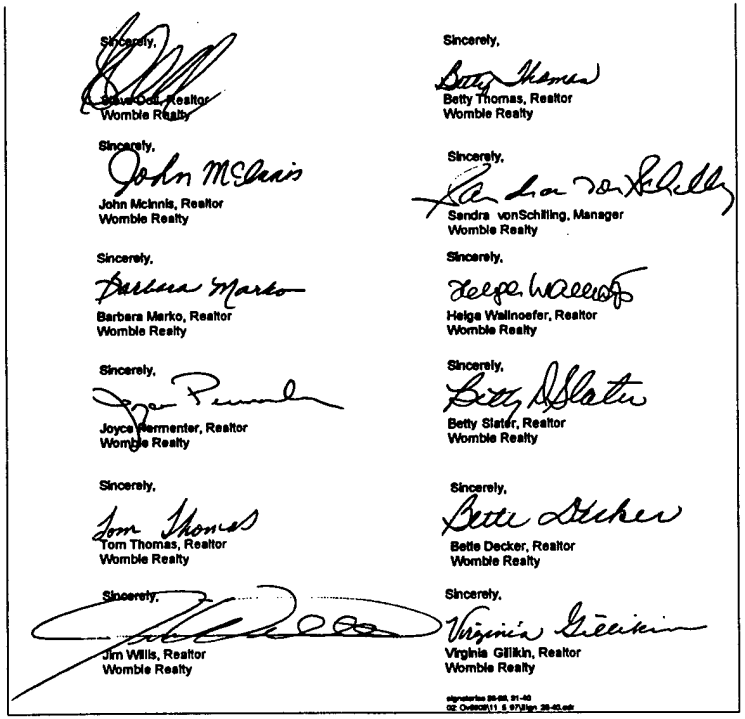
Sincerely,
Gisela Tepe

Gisela Tepe, Realtor
Womble Realty

P.S.: As a 'retired' military spouse, I would have preferred Tidewater as a duty station for my husband, because employment, education, recreation and military support facilities are more available, particularly important

Exclusive Agent Representing The Seller. All information contained herein is believed to be accurate, but is not warranted and is intended solely as a guide to prospective purchasers to enable them to decide whether to inquire further about the property. Prospective purchasers may not rely on this information, but should satisfy themselves by inspection or otherwise, as to the correctness of this information.

Thank you for your comments; no response required.



Sincerely,

Betty Thomas, Realtor
Womble Realty

Sincerely,

John McInnis, Realtor
Womble Realty

Sincerely,

Sandra vonSchilling, Manager
Womble Realty

Sincerely,

Barbara Marko, Realtor
Womble Realty

Sincerely,

Helga Wallnoefer, Realtor
Womble Realty

Sincerely,

Joyce Fermenter, Realtor
Womble Realty

Sincerely,

Betty Slater, Realtor
Womble Realty

Sincerely,

Tom Thomas, Realtor
Womble Realty

Sincerely,

Bette Decker, Realtor
Womble Realty

Sincerely,

Jim Wills, Realtor
Womble Realty

Sincerely,

Virginia Gillikin, Realtor
Womble Realty

[The preceding letter was also submitted by the following individuals and representatives of Womble Realty.]

Sincerely,

Dale E. Viot

Dale Viot, Realtor
Womble Realty

Sincerely,

Sheila Woods

Sheila Woods, Realtor
Womble Realty

Sincerely,

Marshall Bynum

Sincerely,

Mary Flynn

Mary FLYNN

Sincerely,

Sharon L. Wade

REALTOR

SHARON L. WADE

Sincerely,

Johnnie Grymes

JOHNNIE GRYMES, REALTOR

Sincerely,

Ophelia Brown

Ophelia Brown

Sincerely,

Lynn Hunt

LYNN HUNT

Sincerely,

John Angotti

John Angotti

Sincerely,

Sue Baker

Sincerely,

Alan L Buttkow

Alan L Buttkow

Sincerely,

Robin C. Coble

ROBIN C. COBLE

signatories 52-63
02: Ov8903\11 7 97\Sign 52-63.cdr

B-7-70

Sincerely,

Doug Lukes

Sincerely,

Bill Holtz
Bill Holtz
LCOR, USAbwy (Ret.)

Sincerely,

Samuel E Luke
SAM LUKE

Sincerely,

Carolyn Anderson

Sincerely,

Lorraine Engle

Sincerely,

Sincerely,

C H Moore

Sincerely,

Bill Holtz
Bill Holtz
LCOR, USAbwy (Ret.)

Sincerely,

Samuel E Luke
SAM LUKE

Sincerely,

Carolyn Anderson

Sincerely,

Lorraine Engle

Sincerely,

Ellen Drames, Realtor
Womble Realty

signatories 84-75
02:Ov8903\11_7_97\Sign_84-75.cdr

Sincerely,

Manny Ramos, Realtor
Womble Realty

Sincerely,

Debbie Orr, Realtor
Womble Realty

Sincerely,

Andrew Smith, Realtor
Womble Realty

Sincerely,

John Harper, Realtor
Womble Realty

Sincerely,

Wayne Miller, Realtor
Womble Realty

Sincerely,

Gordon Stibbards, Realtor
Womble Realty

Sincerely,

Tricia Surber, Realtor
Womble Realty

Sincerely,

Chris Black, Realtor
Womble Realty

Sincerely,

Betty Johnson, Realtor
Womble Realty

WM Bill

signatories 76-84
G2: Ov8903\11_7_97\Sign_76-84.cdr

Dear Mr. Cecchini,

Please accept the enclosed final version of my letter commenting on the DEIS for relocation of F/A - 18's. I submitted a draft version at the public meeting on October 27 and have made some changes since then. Thank you for your assistance. We all appreciated the opportunity to comment on the Navy's proposal.

Sheri Imel

Citizens' Coalition of Virginia Beach

Sheri L. Imel - President
1057 Blue Spring Lane
Virginia Beach, VA 23452

October 30, 1997

Mr. J. Daniel Cecchini
Atlantic Division, Naval Facilities
Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

I am Sheri Imel, president of the Citizens' Coalition of Virginia Beach (CCVB). I have reviewed the Navy's Draft Environmental Impact Statement (DEIS) for Realignment of F/A-18 Aircraft and Operational Functions from NAS Cecil Field, Florida, to Other East Coast Installations on behalf of the CCVB and of all Virginia Beach residents who will be adversely affected by the Navy's proposed actions. Overall, I was quite disturbed by the magnitude of potential adverse impacts that the Navy's preferred alternative will have on local residents, particularly in terms of noise and aircraft potential zones. Approximately 50,000, or 10% of the residents of Virginia Beach and Chesapeake will have to bear the brunt of adverse impacts for the other 90% of the population who will receive direct and indirect benefits from the proposal. The Navy, of course, will benefit the most out of the proposal. This is blatantly unfair. The City of Virginia Beach has fully embraced the Navy's proposal without regard to human health and safety. The CCVB seeks to represent and protect Virginia Beach residents who are basically being sacrificed for the benefit of everyone else. 1

Let's take a good look at the "benefits" to be derived as a result of the Navy's proposed activities. It's true that the Navy provides higher paying jobs, but exactly how many jobs are we talking about? Right now, Oceana employees about 1300 civilians. Only 100 additional civilian jobs will be transferred, most of which will be encumbered. 1400 employees translates into 0.3% of the population of Virginia Beach. The Navy employs only three tenths of one percent of the population of Virginia Beach. How many temporary and permanent jobs will be created both directly and indirectly as a result of the Navy's proposal? The DEIS seems to imply that a significant number of jobs will be made available, but how many does that mean? What types of jobs will be created? Minimum wage service industry jobs? Professional jobs? Conversely, how many military dependents will require employment? How will their needs impact local employment opportunities? 2

[A "draft" version of this letter, dated October 24, 1997, has been omitted, being replaced by the "final" version herein, dated October 30, 1997.]

CCVB-1 As stated in Section 4.8 of the EIS, approximately 38,385 additional people will be exposed to noise zones 2 and 3 under ARS 1 compared to the existing AICUZ. Noise levels are typically greater closer to the airfield. The flight patterns surrounding NAS Oceana provide the safest training for pilots while minimizing the effects on the human population.

CCVB-2 A discussion of additional military and civilian employment at NAS Oceana under all ARSs is presented in the EIS. The discussion includes estimates of total numbers of jobs, total increases in payroll, and total numbers of dependents resulting both directly and indirectly in the region surrounding NAS Oceana.

Under the Navy's preferred alternative, approximately 12,000 more people will relocate to Hampton Roads. The Navy estimates that approximately 7500 of those persons will live in Virginia Beach. This will result in a 1.7% increase in the population. No one could argue that this is a significant number. Yet the Navy's draft Environmental Impact Statement (DEIS) says that the influx of Navy personnel will have a positive impact on the economy, estimating that its proposal will inject an additional $226 million into the regional economy from payroll expenditures. How does this compare to the negative impacts? Many of these impacts, such as increased noise, are intangible and cannot be assigned a monetary figure. Roads will be more congested, schools will become more overcrowded, and the city's water supply will be taxed even further. Now the city will have to use our taxpayers' money to improve roads. Schools, which are already busting at the seams, will have to accommodate 2000 more children. The city can barely keep up with new school construction under current conditions. The DEIS should provide estimates on the amount of taxpayers' money that will have to be spent by the City of Virginia Beach to accommodate the Navy's proposal. How will that figure compare to the estimated $226 million? How does this figure relate to the potential stress that local residents will experience? Lastly, I think it is foolish to assume that the Lake Gaston water system will be on line by December 1997 as anticipated, simply because the State of North Carolina is trying to block the City of Virginia Beach from doing so. North Carolina has been successful in the past, and could very well do it again. The DEIS indicates that the city water supply will be sufficient for the needs of incoming Navy personnel once the Lake Gaston water system is on line. What is the Navy and City of Virginia Beach plan to do if the Lake Gaston system is not operational by 1999? Current Virginia Beach residents are already restricted in their water usage. Greater restrictions would be unfair. The DEIS should address any contingencies.

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One of the most serious negative impacts that the Navy's proposal will have is increased noise. The DEIS estimates that over 38000 additional residents will be exposed to high noise levels as compared to 1978 levels. The real fact of the matter is that current levels of noise exposure and numbers of residents exposed to aircraft noise is lower than 1978 figures. This means that the true number of residents who will be exposed to high aircraft noise as compared with current conditions is in excess of 130,000. Twenty year old data are no longer relevant. What is relevant are 1997 data. The DEIS does point out the difference between 1978 and 1997 conditions but downplays the true significance that future noise impacts will have for those of us who cannot remember or who have not been around during peak operations that existed until 1991. This proposal will have a deleterious effect on the quality of life. Not only will noise levels increase, but the amount of time that the residents will be exposed to high noise will double because the number of flights will double. How do these deleterious effects on the quality of life and on human health compare to the potential economic benefits?

5

CCVB-3 The EIS assesses the impacts of the proposed realignment on all identified areas of the environment potentially impacted by the proposed action, including the local economy, existing noise levels, schools, traffic, and water supply. Based on the review of existing documentation and interviews with federal, state, and local officials, the EIS concludes that the increase in personnel under all ARSs would not significantly impact the capacities of the schools or the availability of water supply. The increase in traffic will not significantly degrade existing levels of service, except on two major roadways. The Virginia Department of Transportation and the City of Virginia Beach have road improvements planned to address the existing low levels of service on the roadways around NAS Oceana. The Navy has no indication that local tax rates will increase as a result of the proposed action; the influx of personnel will contribute to the tax base through sales and property taxes. As stated in the EIS, the impacts to the existing noise levels will be significant; they are further discussed in Section 4.8 of the EIS. The intent of the EIS is to present all potential negative and positive impacts of a proposed action so that they can be evaluated by the decision maker before issuing a final decision.

CCVB-4 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies").

CCVB-5 The Draft EIS quantitatively compares the number of people impacted by noise zones for 1978, 1997, and 1999 aircraft operations in Tables 4.8-1, 5.2-16, 6.2-16, 7.2-16, and 8.2-16. The tables are also included in the Final EIS, but they have been modified. Figures have been added to the Final EIS to clarify the comparison between 1978, 1997, and 1999 aircraft operations.

The EIS estimates under ARS 1 that 38,385 people will experience an increase in noise relative to 1978 (Table 4.8-1) while 11,665 people will experience a decrease in noise relative to 1978 levels (Table 4.8-2). Thus, the net population exposed to increased noise is 26,720 residents. Data from 1978 are considered relevant because they are representative of the historical noise levels impacting the area surrounding NAS Oceana and NALF Fentress. In recent years (i.e., 1997) the noise levels have been much lower than historically because of the lower number of aircraft based at NAS Oceana and lower number of operations compared to historical levels. Please see Table 2.5-1 of the EIS for a comparative summary of all ARSs.

October 30, 1997

6 The DEIS states that Oceana NAS will be equipped with a structure to attenuate noise from ground operations and will continue to operate its community liaison office to respond to noise complaints as mitigation for noise impacts. This is all well and good, but when my son can't play outside because noise levels exceed 120 dB, then how are these "mitigation" proposals going to help? Residents can complain all they want, but those complaints are pushed aside when operational requirements result in excessive noise that is deemed unavoidable. In addition to quality of life issues, how will property values be affected? The DEIS should include a comparison of property values in and out of designated noise zones. If the Navy truly wants to be a "good neighbor" then it must be willing to investigate other ways of mitigating noise impacts for those of us who are trying to make a home in Virginia Beach. How is the Navy going to help us to reduce the noise in our homes and neighborhoods? The DEIS recommends closing the windows, turning on the air conditioner, and turning up the volume on the TV. Is the Navy going to pay for higher electric bills? Is the Navy going to give residents money to install noise attenuating windows? The DEIS states that the Navy may provide funds to reduce noise in schools. What will happen when the children play outside in the school yard? By the way, those children will be living in noise zones as well. Is the Navy trying to imply that the noise is different at home? Or does the Navy conclude that the children are out of luck at home?

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10 By far, the most devastating impacts are those that will result from the designation of new "accident potential zones" (APZ). The Navy explains that the new AICUZ designations were developed as a result of new standards, not necessarily because the actual risks will increase . Those standards were developed based on updated data to increase the safety of residents located near airports. Therefore the new AICUZ designations reflect a new understanding of operational risks. Is the Navy trying to imply that we should ignore the new designations because they're not relevant? These designations serve as a guideline for the community and as a red flag for residents. The DEIS explains in one section that APZs are not areas where there is greater potential for accidents, but if accidents are going to occur, they will probably occur within APZs. What's the difference? The DEIS then refers to a study relating APZs to accident probabilities. The Navy seems to be contradicting itself here. I, and other members of the CCVB, will be living in APZ 3. According to the referenced study, there is a 3% chance of accidents occurring in this area This may be a small number, but when an accident is going to happen, its going to happen regardless of its probability of occurring. This is unacceptable. If we knew that our houses would be located in an APZ, we would NOT have purchased them.

11 What was the likelihood of all the recent military aircraft accidents, particularly in such a short period of time? I'd bet that the probability of those events was much lower than the lowest probability quoted for the APZs. Did statistics help residents whose homes were destroyed in Maryland as a result of a military aircraft? The

The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

CCVB-6 Outside noise cannot be mitigated. Outside noise levels will vary, and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration.

CCVB-7 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

CCVB-8 As required by the AICUZ Program, the Navy will continue to review its operation procedures at NAS Oceana in order to mitigate noise impacts whenever practicable.

CCVB-9 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required, which the Navy does not plan to pursue.

CCVB-10 The EIS provides representative noise levels for various aircraft and missions. Outside noise levels will have an impact on speech intelligibility, and periodic interference is likely. The Navy focused its noise impact analysis efforts on schools, since schools are the principle learning environment.

CCVB-11 The Navy's APZ criteria were established in 1979 and updated in 1988. APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

12 numbers don't matter. What matters is that the Navy is now telling us that we are at greater risk. What's going to happen to property values in the APZs? The DEIS
13 has not addressed this issue. Is there going to be a difference in property values? Where are the statistics? The DEIS must include this information. Who is going to buy our homes now? When we purchased our homes, we could not anticipate that we would be living in APZs. Now we find that the Navy is putting us at risk. Those of use who are living in proposed APZs will be far more severely impacted by the Navy's proposal than anyone else. How will the Navy assist us in making our lives
14 safe? The Navy states in the DEIS that residential areas, commercial areas, and schools are NOT compatible with accident potential zones or high noise zones. Just because the City of Virginia Beach has elected to ignore the Navy and has accepted the updated AICUZ designations, that doesn't mean that we have to be sacrificed for the greater good.

15 The CCVB proposes that the Navy purchase properties from residents who do not want to live with the adverse risk that APZs would pose. This option would increase safety for both residents and aircraft operators who must avoid crashing in residential areas. Navy internal guidance permits the outright purchase of properties located in APZ 1 (crash zones) and certainly does NOT prohibit the purchase of homes in APZs 2 and 3. Of course, there are residents who will not opt for Navy purchase , but there may be risks that those residents will be willing to take. Optionally, the Navy could assist residents in finding buyers for their homes. Through coordination with the Navy's housing office, personnel who are relocated to Oceana could purchase homes from residents who would like to move out of APZs. Navy personnel are more likely to accept the risks that living in an APZ pose. They are also more likely to accept the noise levels. Many of the homes are located just minutes away from Oceana, which make them much more desirable. The City of Virginia Beach has decided to relocate schools that will be in APZs. Is it okay to provide a safe environment for children at school, but not at home?

16 The CCVB has concluded that in order to comply with the spirit and intent of the National Environmental Policy Act, the Navy must provide the following information in the final EIS:

- a cost/benefit analysis of potential economic benefits versus negative economic impacts such as funding needed for road and school improvements, loss of quality of life, reduction of property values, and the impacts of loud noise (particularly for children);
- an analysis of the impacts that would occur if the Lake Gaston water system is not on line as anticipated;
- a comparison of property values between houses located in and out of noise zones and between houses located in and out of potential APZs;

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 is one of the safest aircrafts in the history of naval aviation.

CCVB-12 The F/A-18 is one of the safest aircraft ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

CCVB-13 Please see response to CCVB-7.

CCVB-14 Sections 4.4.2 and 4.8, respectively, list mitigation efforts undertaken by the Navy to minimize APZ and noise impacts on sensitive receptors within the areas of additional APZs or high potential noise levels.

CCVB-15 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

16

- additional analyses on reasonable mitigation efforts for noise impacts and APZ designations in coordination with the City of Virginia Beach; and,
- clarification of the Navy's rationale for establishing new AICUZ designations.

The Citizens' Coalition of Virginia Beach looks forward to working with the Navy to come up with viable solutions. We know that the Navy is trying to balance with needs of the service against economic realities and political decisions while trying to be "good neighbor." However, if the Navy is truly concerned about being a "good neighbor", then we would expect that cooperation is the next order of business.

Thank you for the opportunity to comment. The CCVB looks forward to your reply.

Sincerely,

Sheri L. Imel

Copy: CINCLANTFLT
The Virginia Pilot
Mayor Meyera Oberndorf
Honorable Owen Pickett
EPA Regions III and IV
Honorable Kenneth W. Stolle

CCVB-16 Many of the costs, including those associated with noise impacts and most environmental effects, are difficult to quantify in economic terms. The EIS discusses construction cost information, environmental effects, and economic benefits to provide decision makers with necessary information. A cost/benefit analysis is outside the scope of the EIS analysis. The Lake Gaston Project, property values, noise mitigation, and the new AICUZ designations are covered in considerable detail either in the EIS or in the responses to comments above (i.e., Appendix I).

Prudential

Prudential/Decker Realty
701 Greenbrier Parkway, Chesapeake VA 23320
Tel 757 549-2000 Fax 757 549-2400

November 7, 1997

RE: Relocation of NAS Cecil Field
to NAS Oceana

To whom it may concern,

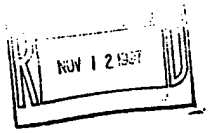
As a Realtor who works in the Hampton Roads area, I support the above relocation to our area.

I believe that the Hampton Roads area is a superb location over all other bases because of our excellent quality of life, stable economy, already established infrastructure and growing housing stock offering affordable, quality housing to people of all income levels.

Please call me at my office in Chesapeake, 549-2000 with any further questions.

Sincerely,

Realtor



An independently owned and operated member of The Prudential Real Estate Affiliates, Inc.

B-7-79

Thank you for your comments; no further response required.

Sincerely,

Realtor

Sincerely,

Realtor

Sincerely,

Realtor

Sincerely,

Realtor

Sincerely,

Realtor

Sincerely,

Realtor

[The preceding letter also was submitted by the following individuals and representatives of Prudential/Decker Realty.]

LONG & FOSTER
REAL ESTATE, INC.

OCEAN FRONT OFFICE
206 Laskin Road
Virginia Beach, Virginia 23451-3017
OFFICE: (757) 428-4600
FAX: (757) 491-6184

EXECUTIVE OFFICES
11351 Random Hills Road
Fairfax, Virginia 22030-8082
(703) 359-1500

Commander, Atlantic Division
Naval Facilities Engineering Command
ATTN; Mr. Dan Cecchini (CODE 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511
November 12,1997

Dear Commander,

I am a REALTOR with Long & Foster and a member of the Tidewater Association of REALTORS. I am writing to you today to voice my SUPPORT for moving all 11 F/A-18 air squadrons and RFS from NAS Cecil Field to NAS Oceana.

Because of our excellent quality of life, already established infrastructure, strong and healthy economy, and our superior location, I feel that Hampton Roads is well positioned as the only location for all 11 F/A-18 air squadrons and the RFS.

The Hampton Roads housing market is progressively strong and very stable. As a REALTOR, I believe that the current housing market can and will sustain the increase in military personnel. Hampton Roads has an excellent supply of affordable, quality housing for people of all income levels. It is my role as a REALTOR, and a requirement by Virginia Beach City Code, to disclose to potential buyers if the property is in a noise and/or accident zone. Because of our role, it is important that the Navy and City of Virginia Beach make every effort possible to provide us with appropriate maps in a timely fashion.

In conclusion, I strongly support relocation all 11F/A-18 air squadrons and the RFS to NAS Oceana. The real estate community is committed to assisting in this relocation and we welcome the military personnel. Hampton Roads is the best alternative relocation site. Thank you for the opportunity to submit comments.

Sincerely,

D.P. Widmayer.

DON WIDMAYER

Residential Sales • Commercial Sales & Leasing • Prosperity Mortgage Company
Auction Sales • Land Sales • New Home and Condominium Sales
Long & Foster Insurance Agency, Inc. • Commercial Property Management
Residential Property Management • Mid-States Title Insurance Agency, Inc.

Member: PHH Real Estate Network

1

1

LFR-1 Once a final decision is reached on the realignment of F/A-18 aircraft, the Navy will update the Air Installations Compatible Use Zones (AICUZ) plan. NAS Oceana has an ongoing program to brief realtors (upon request) on base realignment and closure (BRAC) and AICUZ-related issues. The Navy will continue to keep the Tidewater Association of Realtors and local municipalities informed of any potential changes to the AICUZ plan.

LONG & FOSTER REAL ESTATE, INC.

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Virginia Beach, Virginia 23451-3017
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EXECUTIVE OFFICES
11301 Random Hills Road
Fairfax, Virginia 22030-6082
(703) 359-1600

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (CODE 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511
November 12,1997

Dear Commander,

I have been a REALTOR for thirty years and represents Long & Foster. I am also a member of the Tidewater Association of REALTORS. I am writing to you today to voice my SUPPORT for moving all 11 F/A-18 air squadrons and RFS from NAS Cecil Field to NAS Oceana.

I feel that Hampton Roads is well positioned as the only location for all 11 F/A-18 air squadrons and the RFS. We have the best quality of life and have already established infrastructure, and a very strong economy.

Having been a resident in Hampton Roads for fifteen years and a REALTOR for 30 years coming from Kentucky. I can speak about how strong our housing market is and how stable the market is. We have an excellent supply of affordable, and quality housing for people if renting or buying.

We have met with Fred Pierson who is over the noise and or accident zone for the Navy . We are aware of this and as REALTORS and homeowners consider it to be the "Sound of Freedom".

In conclusion, I support having all 11 of the F/A-18 air squadrons and the RFS to come to NAS Oceana. I can promise you that the real estate community will do whatever is needed to welcome the military to Hampton Roads.

Sincerely,

BETTY PERKINS, BROKER

Residential Sales • Commercial Sales & Leasing • Prosperity Mortgage Company
Auction Sales • Land Sales • New Home and Condominium Sales
Long & Foster Insurance Agency, Inc. • Commercial Property Management
Residential Property Management • Mid-States Title Insurance Agency, Inc.

Member PHH Real Estate Network

B-7-82

Thank you for your comments; no response required.

William E. Wood
and Associates
REALTORS

MILITARY TEAM

November 13, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Attn: Mr. Dan Cecchini (code 2032DC)

Dear Sir:

On behalf of the **William E. Wood and Associates Military Team** we would like to extend a warm welcome to the F/A 18 Squadrons due to relocate to Hampton Roads. We recently participated in the Oceana Air Show and were impressed with the capabilities of the F/A 18's.

We believe that Hampton Roads has a great deal to offer and look forward to welcoming the military families to our community. The addition of these families will be a financial and cultural improvement for our area. The attached list is a small sampling of William E. Wood and Associates Sales Associates who readily endorse the relocation of these squadrons.

Welcome to Hampton Roads.

Sincerely,

Lili Cox

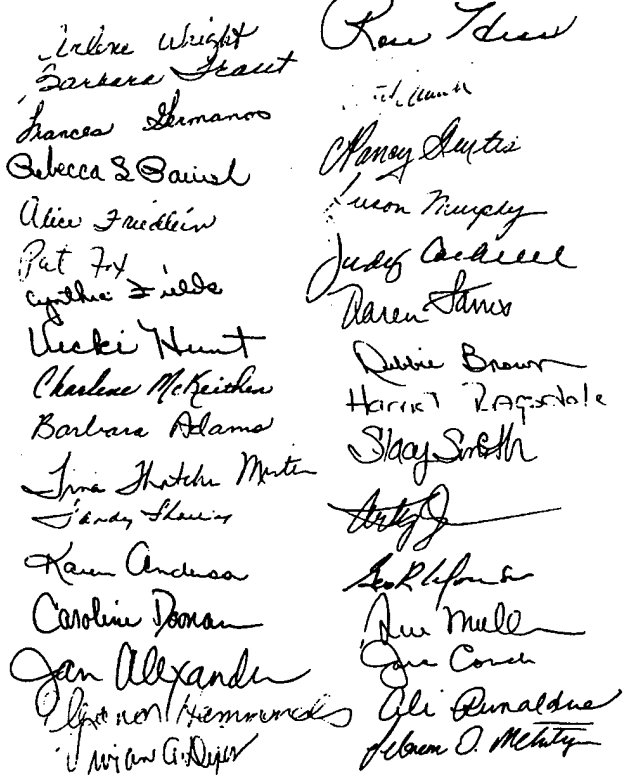
Lili E. Cox,
Chairperson
William E. Wood & Associates Military Team

800 Newtown Road, Virginia Beach, Virginia 23462 • (757) 499-1964 • Toll Free (800) 543-1971

B-7-83

Thank you for your comments; no response required.

IF YOU SUPPORT THE RELOCATING OF SQUADRONS FROM CECIL FIELD TO NAS OCEANA BASE INDICATE BY YOUR SIGNATURE BELOW.....



CAFFERTY
Commercial Real Estate Services

8341-B Greensboro Drive McLean, Virginia 22102
Telephone 703-448-0121 Facsimile 703-448-0524

November 24, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attention: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Via: Facsimile (757) 322-4894 & U.S. Mail

Re: F/A-18 Relocation - Cecil Field, Florida

Dear Mr. Checchini

I have followed with interest the public hearings and commentary relative to the potential relocation of 180 F/A-18's from Cecil Field, Florida. As a former resident of the Tidewater area and with family residing on the Outer Banks of North Carolina, I am well familiar with the alleged environmental and noise impacts. I believe these should be carefully balanced with the extraordinary positive economic impact the full relocation of all 180 aircraft would have on the Tidewater Region including Northeastern North Carolina. The self-serving interests of the environmentalists and residents who made well-informed decisions on locating in the Virginia Beach area should be weighed against the long-term impacts on the other communities in the Tidewater and Northeastern North Carolina that will be substantially benefitted from the numerous economic merits of this project.

My firm has ownership interests in a number of commercial properties in the Tidewater area that would be directly benefitted by the relocation. Accordingly, I render my full support to the hopeful relocation of all 180 aircraft to Oceana.

Sincerely,

CAFFERTY COMMERCIAL REAL ESTATE SERVICES

Thomas D. Cafferty, CRE, SIOR
President

TDC/djs

Thank you for your comments; no response required.

talk to...
WOMBLE REALTY

November 17, 1997

To Whom It May Concern:

Subject: Moving all 11 F/A-18 Squadrons to NAS Oceana

I definitely support he move of all F/A-18 squadrons to NAS Oceana from NAS Cecil Field for the following reasons:

1. Cost-The cost is significantly less to have all F/A-18 at Oceana
   A. Cost of enlarging Oceana versus enlarging Cherry Point
   B. Cost of transporting troops for deployment
   C. Savings realized because families would not have to move as often because of other career opportunities in this area.

2. Auxiliary facilities are already in place
   A. Commissaries
   B. Exchanges
   C. Naval hospital and dispensaries

3. Schools
   A. Quality education for the children
   B. Educational opportunities for the members and their spouses at one of the many places of higher education in the area

4. Quality of Life for the Military Families
   A. Shopping to fit anyone's needs
   B. Great restaurants
   C. Friendly people - many of them retired from the military themselves

My husband is a retired aviator and my son flies the F/A-18. That noise people are talking about is the "sound of freedom". I'd rather have our airplanes flying over than another nations. Bring them all!

Sincerely,

Joan Christie

Joan Christie

B-7-86

Thank you for your comments; no response required.

LONG & FOSTER
REAL ESTATE, INC.

OCEAN FRONT OFFICE
205 Laskin Road
Virginia Beach, Virginia 23451-3017
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Commander, Atlantic Division
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ATTN; Mr. Dan Cecchini (CODE 2032 DC)
1510 Gilbert Street
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November 12,1997

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I am a REALTOR with Long & Foster and a member of the Tidewater Association of REALTORS. I am writing to you today to voice my SUPPORT for moving all 11 F/A-18 air squadrons and RFS from NAS Cecil Field to NAS Oceana.

Because of our excellent quality of life, already established infrastructure, strong and healthy economy, and our superior location, I feel that Hampton Roads is well positioned as the only location for all 11 F/A-18 air squadrons and the RFS.

The Hampton Roads housing market is progressively strong and very stable. As a REALTOR, I believe that the current housing market can and will sustain the increase in military personnel. Hampton Roads has an excellent supply of affordable, quality housing for people of all income levels. It is my role as a REALTOR, and a requirement by Virginia Beach City Code, to disclose to potential buyers if the property is in a noise and/or accident zone. Because of our role, it is important that the Navy and City of Virginia Beach make every effort possible to provide us with appropriate maps in a timely fashion.

In conclusion, I strongly support relocation all 11F/A-18 air squadrons and the RFS to NAS Oceana. The real estate community is committed to assisting in this relocation and we welcome the military personnel. Hampton Roads is the best alternative relocation site. Thank you for the opportunity to submit comments.

Sincerely,

DON LAMB

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Residential Property Management • Mid-States Title Insurance Agency, Inc.

Member: FHH Real Estate Network®

Thank you for your comment; no response required.

B-7-87

Sincerely,

Liz Carlson,CRS,GRI
Broker Associate

Sincerely,

JANET MCCARRAHER

Sincerely,

MARK PAWLEY

Sincerely,

JAN HAWORTH

Sincerely,

CHRISTINA HAAG

Sincerely,

JOHN WEST

Sincerely,

Barbara Digges, REALTOR®

Sincerely,

EDITH WATSON

Sincerely,

NITA MEECE

Sincerely,

ALAN BROSS

Sincerely,

ROSE SIMONS

Sincerely,

JOHN HALL

Sincerely,

SHIRLEY DARNAUER

Sincerely,

LIS WOODS

Sincerely,

LAURA BARANEK

Sincerely,

Anne "Tina" Pierson

Sincerely,

MICHELE SLOWEY

Sincerely,

CAROL SIMONS

Sincerely,

WANDA VASS

Sincerely,

CAROL WEBB

Sincerely,

PEGGY WOODARD

Sincerely,

JANET GREEN

Sincerely,

ANNE KILAND

Sincerely,

BETH CORRALES

Sincerely,

Sincerely,

GENIA MCNEELY

Sincerely,

JOHN BAKER

Sincerely,

CAROL ANNE KENT

As the spouse of a military retiree I feel that this Hampton Road area has alot to offer a military transferee!

B.8 Concerned Citizens

North Carolina

J. M. & Claire K. Roberts
360 Neuse Winds Drive
Oriental, NC 28571

tel:919/249-1760 fax:919/249-3923
e-mail: claire@abaco.coastalnet.com
Nov. 7, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Att: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

fax: 757/322-4894

Dear Mr. Cecchini:

1 I would like to voice my objections to any additional aircraft transferring to MCAS, Cherry Point, NC from any locations. In fact, I would like to see a reduction to zero of tree-top high, knife edge vertical flights over our residential neighborhood. As I understand standing orders regarding flights, none should be under 1,000 feet, especially at nearly twenty miles from the field. I am seriously concerned that disregard of regulations may have been the cause of the recent rash of accidents invloving military aircraft. Will this stop when civilians are needlessly killed?

The cost of such accidents is another concern. As I understand, training a jet fighter pilot comes with a several million dollar price tag, not to mention several million for each plane and the dollars required to fly it. These are taxpayer dollars ... my money up in flames!

2 In addition to safety concerns, I am also afraid for the environment. Cherry Point MCAS has never had a "good neighbor" reputation on the Neuse River. What will the proposed increase in personnel do to an already over used waste water system? What are future plans to eliminate discharge into the Neuse? Many questions have been raised about noise and air pollution. We have too much of both already. I would be quite pleased to see

3 mothballing of Cherry Point, Brant Island Shoal, Piney Island and Rattan Bay. We would sleep more peacefully without the bombing activity shaking our house like an earthquake.

Sincerely,

J. M. Roberts
(hard copy follows by USPS)

JMR-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Marine Corps at a minimum adheres to these altitudes. Additionally, the Marine Corps has raised the minimum flight altitude at MCAS Cherry Point to 600 feet for pattern operations. Low level flights (i.e., under 600 feet) are not permitted at MCAS Cherry Point unless the aircraft is landing or taking off.

JMR-2 Indirect impacts on water quality from the realignment of military and civilian personnel associated with the F/A-18 squadrons could occur with the projected increase in wastewater discharge. This wastewater discharges through the station's sanitary sewage treatment plant (SSTP), which discharges into the Neuse River. As discussed in Sections 6.1.6.2 and 8.1.6.2, MCAS Cherry Point has adequate capacity to handle the additional wastewater flows under both ARS 3 and ARS 5 without modification to its existing NCPDES permit.

JMR-3 Thank you for your comment; no response required.

2032DC
Need to change
our mailing list

229 Dataw Drive
Dataw Island, SC, 29920 * (803) 838-5650

October 1, 1997

Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
ATTN: Charles W. Walker, P.E.
Head Environmental Planning Branch
1510 Gilbert Street
Norfolk, VA 23511-2699

Dear Mr. Walker:

Thank you for providing me with the DEIS for Realignment of F/A-18 Aircraft and Operational Functions from NAS Cecil Field, Florida to Other East Coast Installations and Draft Clean Air Act Conformity Determination. Please be advised that I am no longer serving on the Beaufort County Military Enhancement Committee. Accordingly, I have conveyed the compiled information you mailed to me on to Colonel Richard Stearns, USMC, Retired who has taken my place on the Beaufort County Military Enhancement Committee. Colonel Stearns is a past commander of the Marine Corps Air Station, Beaufort and is well qualified to utilize the information you have sent should there be another round of base realignment and closure, which there probably will be. I suggest that should you have further mailings with respect to these matters you send them directly to Colonel Stearns. His address is:

Colonel Richard D. Stearns
USMC, Retired
73 Wade Hampton Drive
Beaufort, SC 29902

Thank you for keeping the Beaufort Military Enhancement Committee wall informed with regard to these important matters.

Sincerely,

John Ballantyne

John Ballantyne
LTG, U.S. Army Retired

1

JB-1 Thank you for your comments; no response required.

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Sir,

A local newspaper advertisement requested inputs concerning F/A 18 relocation and provided us with points of contact. The advertisement stated that comments were desired prior to November 18, 1997. This is my response to the request.

Eastern North Carolina (which encompasses Craven County (including MCAS Cherry Point) Carteret County and Pamlico County) used to be a rural, pristine area. Our biggest industry was MCAS Cherry Point (including the local NADEP). Other than the military, most of our income was from farms and forest land.

In the last 10 years or so, our population and associated homes/business's have exploded, due to the large number retirees relocating to this area. This has resulted in many environmental problems. Look at our well-publicized river pollution (i.e. pfsteria) problem.

1 Now, due to political pressure, folks are trying to get the Navy to change it's mind and relocate the F-18's at Cherry Point. Who want's these F-18's at Cherry Point? In talking to many friends, neighbors and former co-workers (I recently retired), it appears that the only folks who want them here are politicians, real estate dealers, and housing developers. The vast majority of people I contacted DO NOT want the F-18's here.

2 If the F-18's came, property values around the base would probably skyrocket, noise pollution would increase, water quality would decrease, and sewage/septic problems may possibly become unmanageable.

I hope that before you folks decide the F-18 issue, you will consider the desires of the average citizen in eastern North Carolina.

Sincerely

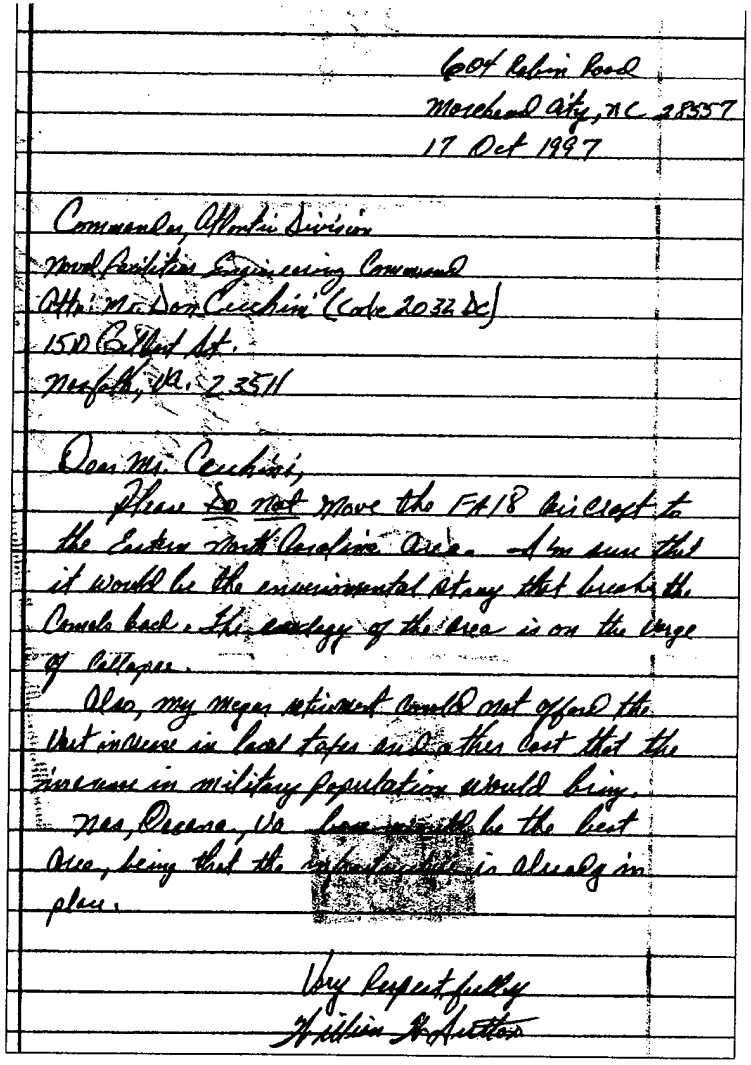
Paul R. Plagge

215 E. Palmer Drive
New Bern, NC 28560-9434

B-8-7

PRP-1 Thank you for your comments; no response required.

PRP-2 Impacts on housing, noise, water quality, and wastewater treatment capacities in the vicinity of MCAS Cherry Point are addressed in Sections 6.1.5, 6.1.8, 6.1.11 and 6.1.6, respectively for ARS 3, and Sections 8.1.5, 8.1.8, 8.1.11 and 8.1.6, respectively for ARS 5. Noise levels in the region would significantly increase, and the EIS discusses the mitigation measures to minimize/prevent adverse noise impacts. No significant impacts are anticipated under either ARS 3 and ARS 5 on the housing market, water quality or wastewater treatment capacities. Sufficient housing is available in the community to support the proposed increase in personnel that would not be living in military housing. Management of point and nonpoint stormwater discharges would be accomplished through the continued implementation of the station's Stormwater Pollution Prevention Plan and NCPDES permit for stormwater discharges. The increase in on-station wastewater discharges would be managed in compliance with the station's NCPDES discharge permit. Local wastewater treatment systems have sufficient capacity to handle the projected increase in personnel.



604 Cabin Road
Morehead City, NC 28557
17 Oct 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Ms. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, VA. 23511

Dear Ms. Cecchini,

Please Do not move the FA18 Aircraft to the Eastern North Carolina Area. I'm sure that it would be the environmental story that breaks the Camels back. The ecology of the area is on the verge of collapse.

Also, my wages at present would not afford the cost increase in local taxes and other cost that the increase in military population would bring.

Yes, Oceana, Va Beach would be the best area, being that the infrastructure is already in place.

Very Respectfully
William R. Sutton

1

2

WHS-1 Thank you for your comments; no response required.

WHS-2 Socioeconomic impacts in the vicinity of MCAS Cherry Point under ARS 3 and ARS 5 are discussed in Sections 6.1.5.1 and 8.1.5.1, respectively. As discussed in the EIS, taxes are not expected to increase in the vicinity of MCAS Cherry Point as a result of ARS 3 or ARS 5.

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Box 563
Oriental, NC 28571

Joe & Elizabeth Harris
(919) 249-1004

Commander, Atlantic Division
Naval Facilities Engineering
1510 Gilbert Street
Norfolk, Va. 23511

Attention: Dan Cecchini

Dear Sir:

1 We strongly oppose the relocation of the F/A-18 Hornet jets to Cherry Point, N.C. and anywhere else for that matter. If the Air stations are to be closed down then why not disband the squadrons ?

2 Our defense budget is too high now and disbanding these squadrons would certainly reduce it. We certainly do not want another Pearl Harbor, but who is going to attack us? Would the elimination of these squadrons cause us to be weaker or more vulnerable to attack? We don't think so! We understand that Cherry Point does not even have the facilities to house the F/A-18s. Why then spend more taxpayers money if other facilities are available?

3 Sir, there are many unanswered questions and we feel that it would have a negative impact on our environment. Our Neuse River is a disgrace and to add another 10,000 people would only help make a bad situation worse.

We hope you have the forsight to see in our favor. Thank You for your time and patience.

Sincerely yours,

Elizabeth + Joseph Harris

Elizabeth & Joseph Harris

A service charge of 1½% per month

EJH-1 The EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Retirement of the F/A-18 aircraft is counter to the directives of the 1995 BRAC Commission, and is therefore, outside of the scope of the EIS.

EJH-2 MCAS Cherry Point has excess hangar capacity to accommodate three squadrons of F/A-18 aircraft. Some new construction is required under each of the ARSs in order to meet all the operational requirements of the realignment. Please see Sections 2.1 and 2.2 of the EIS for a discussion of the operational requirements of the realignment.

EJH-3 Indirect impacts on water quality from the realignment of military and civilian personnel associated with the F/A-18 squadrons could occur with the projected increase in wastewater discharge. This wastewater discharges through the station's sanitary sewage treatment plant (SSTP), which discharges into the Neuse River. As discussed in Sections 6.1.6.2 and 8.1.6.2, MCAS Cherry Point has adequate capacity to handle the additional wastewater flows under both ARS 3 and ARS 5 without modification to its existing NCPDES permit. Potential indirect effects from the realignment of personnel, such as the impacts of urbanization on the Neuse River, are speculative and unquantifiable.

October 23, 1997
Mr. & Mrs. Lewis B. Adler
7230 Hwy 70 E
New Bern NC 28560

To: Mr. Dan Cecchini
Naval Facilities Engineering;

Dear Sir,

This letter is in regard to the Naval Squadrons from Cecil Field and where they should go.

My husband is retired Air Force and needless to say we both love planes, but we have been living in a close proximity to Cherry Point for over 20 years and have seen this area grow greatly. The town of Havelock, however, has not grown along with the population. There are no shopping places, except for furniture stores, car lots and fast food places. As someone once said, there is nowhere to buy a spool of thread.

I don't want to see the jets come here, this place is a disaster waiting to happen. The politicians of Havelock have permitted building to proliferate at the end of runways, in take-off patterns and even permitted a school and housing development to be built where a plane crashed once, causing a change in take-off direction. This is just one incident, there

1

2

LGA-1 Thank you for your comments; no response required.

LGA-2 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

This area surrounding Cherry Point is wetlands and most everything that has been built and is being built now has to be filled in. I'm sure some one can keep building and filling in land, but soon there will be no more wetlands.

3

Also there's the problem of water and sewage facilities. These services have not kept pace with the growth of this area, we still do not have sewage facilities here on the main highway between New Bern and Havelock.

4

Seems to us, my husband and myself, it would be best to keep the planes at Cecil Field, but if they must be moved, we would rather see them go somewhere else. I guess it's that old "not in my back yard" but they are literally in our back yard.

Thank you for letting me share my thoughts and opinions with you.

Sincerely

Mr. Lewis D. Allred

MSgt. Ret. Lewis D Allred

LGA-3 No wetlands would be impacted at MCAS Cherry Point under ARS 3. Wetlands at MCAS Cherry Point impacted by ARS 5 are discussed in Section 8.1.11.3 of the EIS. If ARS 5 is selected for the proposed action, the final design plans for new construction at MCAS Cherry Point will be developed to minimize impacts to wetlands and other sensitive ecological areas to the maximum extent compatible with operational requirements. Wetland acreage that will be lost will be compensated through wetland restoration, enhancement, preservation, or creation, as discussed in Section 8.1.11.3 of the EIS. The wetland mitigation plan, including compensation for lost wetlands, will be developed in consultation with the USACE and North Carolina Division of Coastal Management through the Section 404 permit process.

LGA-4 Sections 6.1.6.1 and 8.1.6.1 of the EIS address the potential impacts to water availability under ARS 3 and ARS 5, respectively; Sections 6.1.6.1 and 8.1.6.2 address the potential impacts to wastewater treatment capacity. Local water supply and wastewater treatment systems have sufficient capacity to handle the projected increase in personnel.

Donald H. Ogren
3620 Brown Creek Road
Merritt NC 28556

October 29, 1997

Commander, Atlantic Division
Naval Facilities Engineering
Attn: Dan Cecchini
1510 Gilbert Street
Norfolk, VA 23511

Re: Draft Environmental Impact Statement for moving squadrons of Navy F/A-18 Hornets to Cherry Point Marine Corps Air Station

I am writing to voice the strong opposition of my wife and myself to relocating any squadrons of Navy F/A-18 Hornets to the Cherry Point Marine Corps Air Station.

1 The proponents of this move argue that the planes from Cherry Point fly over largely uninhabited areas, so that noise pollution is no problem. This is not true. Perhaps proponents have just not observed how many people have recently built homes in beautiful Pamlico County which lies north of Cherry Point. In this area it often seems as though planes from Cherry Point are already about to fly down our chimneys.

2 The Neuse River, which runs along side of Cherry Point, is already in woeful condition due to agricultural runoff, inadequate sewage treatment and periodic accidents at hog farm lagoons and municipal sewage plants. The exhausts from these planes would greatly increase air pollution and fallout would undoubtedly find its way to our endangered river.

It is impossible to add an operation of this size to our area without a major negative environmental impact.

Sincerely,

Donald H. Ogren

DHO-1 The Navy recognizes that noise levels in the area would significantly increase under ARS 3 or ARS 5. The projected increase in land area and population within noise zones 2 and 3 is shown in Table 6.1-7 for ARS 3, and Table 8.1-7 for ARS 5. Although the population in the four-county area around MCAS Cherry Point has grown since the 1990 census, the 1990 census data is used throughout the EIS for consistency in comparisons both between the existing environment and the environment under the proposed action and between alternatives.

DHO-2 Aircraft engine emissions due to flight operations are not a source requiring permitting from NCDEHNR. Significant changes in aircraft emissions due to squadron changes are evaluated through the NEPA process and reviewed by NCDEHNR for impacts to the surrounding area.

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini,

1 MCAS Cherry Point North Carolina, has the facilities and space to accommodate any number of F/A-18 DEIS Aircraft that you need to re-locate and station there from Cecil Field, Florida.

Your consideration to use and station MCAS Cherry Point, North Carolina, for relocation of F/A-18 DEIS Aircraft will surely be appreciated.

Sincerely,
Edward L. Piver (Edward L. Piver)
P.O. Box 647
Beaufort, N.C. 28516-0647
October 28, 1997

ELP-1 MCAS Cherry Point has excess hangar capacity to accommodate three squadrons of F/A-18 aircraft. Some new construction is required under each of the ARSs in order to meet all the operational requirements of the realignment. Please see Sections 2.1 and 2.2 of the EIS for a discussion of the operational requirements of the realignment.

November 3, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

I am a resident of Oriental, Pamlico County and as such, have some objections, mainly noise and pollution, to the proposed realignment of F/A-18 aircraft and operational functions to MCAS Cherry Point. I made some of these points at the public hearing in Bayboro, on October 22, 1997.

1 I can find nothing positive in the EIS for Pamlico County. In Figures 3.3-3 and 3.3-4 it notes that there are no active military personnel living in Pamlico County, that 2.7% of the civilian population of the County work at the base comprising 1.2% of the total military and civilian workforce. Further it is noted that if the realignment, either of ARS 3 with 36 aircraft or ARS 5 with 60 aircraft, takes place, Pamlico's population might increase by 20 with 10 military households relocating but that there would be no change in local tax collection. Some Pamlico County residents have expressed the opinion that if we're going to be impacted by more noise and pollution by the use of the F/A-18s use of AI 9 and BT 11 in all cases, we ought to get some financial benefit from having the planes based at Cherry Point. The EIS shows no benefit to Pamlico County at all. However, not bringing the planes to Cherry Point would eliminate the overflights, noise and pollution that they will bring in addition to the aircraft now assigned to MCAS-Cherry Point.

2 There are omissions in the EIS. In Figure 3.1-7 the Bayboro, Alliance, Grantsboro and north side of NC 304 is blank as far as population, land use, buildings, etc. with the caveat that the data is not available. The Merritt and Florence area shows a great deal more developed area than Oriental, Arapahoe or Minnesott, the latter of which appears as marsh and forest. However, Table 10-5 shows that 4,842 people living in census tract 9502, encompassing Townships 2 and 5, can expect change in noise levels. If the information on page 6.1-5 concerning restrictions on VA, FHA, or HUD mortgage

3 policies for housing within noise contours of 75 dB Ldn or greater or within clear zones or within noise contours of 65 to 75 dB Ldn are applicable to these townships, it would severely impact a fast growing area of Pamlico County's home construction.

4 Other omissions are the location of the Minnesott-Cherry Branch ferry crossing (the second most utilized ferry in North Carolina's system); Camps Sea Gull and Don Lee which are directly in the landing path, and Camp Seafarer, located directly across from the Base are also not mentioned. Overflights impact over ten thousand people who use these camps each year and since they are outdoor recreation camps, there is no way to insulate them from the noise. These camps do affect Pamlico County's economy considerably.

GBE1-1 Thank you for your comments; no response required.

GBE1-2 Land use/cover was obtained from the North Carolina Center for Geographic Information and Analysis. The information is obtained from LandSat 5 satellite images. Contributors to these data include Earth Observation Satellite Corporation and North Carolina State University. The data were reviewed in November 1996 and represent the most up-to-date data available. Areas identified as not available could be the result of cloud cover or morning fog that occurred when the area was photographed.

GBE1-3 HUD, FHA, and VA mortgage policy generally prohibits the guarantee of loans for new homes located within the 75 dB Ldn or greater noise zone. These same loans are discretionary for new homes within the 65 to 75 dB Ldn noise zone. Figure 8.1-1 in the EIS shows the projected increase in noise zones for ARS 5. There are no areas of Pamlico County within the 75 dB Ldn or greater noise zone. Only a very small portion of Minnesott would be within the projected 65 to 75 dB Ldn noise zone. In this portion of Minnesott, HUD, FHA, and VA mortgage loan availability would be discretionary but would not limit the overall growth of Pamlico County.

None of Pamlico County would be within the 65 to 75 dB Ldn or 75 or greater dB Ldn noise zones under ARS 3, nor would Pamlico County be within the clear zone under ARS 3 or ARS 5.

GBE1-4 The locations of Camps Sea Gull, Seafarer, and Don Lee and the Cherry Branch to Minnesott Ferry route have been added to Figure 3.1-7 and are described in Section 3.1.3. Under ARS 3, the camps would be outside of the 65 to 75 dB Ldn noise zone. Under ARS 5, the 65 to 75 dB Ldn noise zone would increase and would include Camps Sea Gull and Don Lee and the northern end of the ferry route.

5

No outlying field for Cherry Point is identified and the use of Brant Island as a jettisoning area is not mentioned. Brant Island is noted, not only for the emissions and ordnance deposited, but also with the F/A-18 squadrons' 24% more useage there will be an increase in noise level. The statement: "this range is removed from any development, therefore there would be no significant noise impact" is a statement that has been argued for some 30 years, verbally and in correspondence to MCAS Cherry Point, from Pamlico County citizens.

6
7

It is projected that with ARS 3 the 65-75 dB Ldn, which I understand is the average of all flights in a 24 hour period, will reach to within ½ a mile of Minnesott and Camps Seagull and Don Lee, and ARS 5 will extend inland over and beyond this area. The projected flights for 1999 are 130,310 daytime (from 0700 to 2200) and 6,929 nighttime (2200 to 0700) an increase with ARS 3 of 23,064 additional takeoffs, landings and touch and goes. Under ARS 5, there would be an additional 11,624 added to that. The proposed new runway will increase the Pamlico County overflights more than any other area.

8

Which brings up a most troubling problem. I am well aware of Cherry Point's actions in cleaning up the air station's land and ground water. However, the amount of air emissions at BT 9, BT 11 and by aircraft airborne and stationary within the MCAS is very troubling. Contrary to the EIS, the whole Neuse River estuarine system is not rated SB. It is SA from Minnesott to Pamlico Sound. We who live on the Neuse, and the State of North Carolina which has authorized millions of dollars to clean up and protect the river, are concerned about the ammonia emissions from waste lagoons and the NOx emissions from cars and far away cities and factories impacting the river, but I personally had no idea of the tonnage from Cherry Point's operations, stated at present as annual figures of:

aircraft:	256 tons VOC	Stationary:	30 tons VOC
	280 tons NOx		198 tons NOx
	966 tons CO		64 tons CO
	37 tons SO2		450 tons SO2
	128 tons PM 10		19 tons PM 10

9

Two attorneys who spoke at the October 22 public hearing made considerable reference to the air pollution totals at Oceana and its surrounding area not having additional capacity for the increased pollution from the F/A-18s. In checking with an official of North Carolina's Division of Air Quality, I am told that contrary to the lawyers' statements that "the area around Cherry Point can handle additional pollution", there is no documented evidence for this statement since the area of Havelock, New Bern, etc. has not been monitored nor the present pollution quantified.

10

At BT 9 and 11 the VOC, NOx, SO2 and PM 10 are estimated at less than one ton each but CO exceeds one ton. By how much? It appears that F/A-18s produce more of these pollutants than other aircraft using the ranges. I sincerely believe we do not need an increase in pollutants over the Neuse River from the F/A-18s and the next

GBE1-5 MCAS Cherry Point has an ALF: Marine Corps Auxiliary Landing Field (MCALF) Bogue. The runway at MCALF Bogue is only 4,010 feet (1,215 meters) and was specifically designed to simulate a Marine Corps expeditionary airfield. MCALF Bogue is thus unsuitable for the level and type of operations, specifically FCLPs, associated with Navy F/A-18 squadrons.

Please see Section 3.1.3 for a discussion of the types and use of ordnance found at the Brant Island Shoal (BT-9) target range.

Section 4.3.3 of the EIS has been amended to state that no significant land use impacts will occur under ARS 1 because noise levels will increase 1 dB Ldn or less for all the military training routes.

GBE1-6 Please see response to GBE1-4.

GBE1-7 Thank you for your comments; no response required.

GBE1-8 Emissions of air pollutants from MCAS Cherry Point's stationary sources, which include jet engine test facilities, are regulated through permits issued by NCDEHNR or, at a minimum, reviewed by NCDEHNR for significance on an individual basis. These reviews evaluate the impact of these emissions on the surrounding area. Aircraft engine emissions due to flight operations are not a source requiring permitting from NCDEHNR. Significant changes in aircraft emissions due to squadron changes are evaluated through the NEPA process and reviewed by NCDEHNR for impacts to the surrounding area. The classification of the Neuse River has been amended in Section 3.3.11.1 of the EIS.

GBE1-9 NCDEHNR does not routinely monitor air quality around MCAS Cherry Point because of the relatively low concentration of major air pollution sources and their professional judgement that ambient air quality standards are not threatened by these air pollution sources.

10 generation of F/A-18 EFs which are slated to replace them. With the prevailing southwest winds, the emissions from present aircraft, both airborne and stationary at the Base, are more than enough without adding F/A-18 EFs which are stated to produce 55% more NOx emission than even the F/A-18s.

11 In closing, I note that increases in military air space are proposed: the Core MOA "to enable realistic tactical ingresses to R-5306A from the ocean by permitting AV-8, F-14, F/A-18, and other military aircraft conducting strike, close-air-support, and other air-to ground missions to operate at speeds in excess of 250 knots at altitudes below 10,000 feet MSL"; the Cherry 1 MOA which "will significantly increase the overland training area..." (much of which land is in Pamlico County; a new Phelps MOA to tie in Stumpy Point and the Dare Range; new special use airspace to the 47,000 acre Greater Sandy Run area near Camp LeJeune as well as an East Coast Shallow Water Training Range in Onslow Bay. I trust that these will all be addressed separately and not be incorporated as part of the realignment plan.

Just as MCAS Cherry Point has grown, so has Pamlico County as a residential, recreational, and retirement area. Farming and fishing are still major industries and jet skiis and truck and boat generators are the loudest noise producers. The "startle effect" is great at any time of day or night and the addition of F/A-18s to the area will not add to our county's environment or quality of life.

Sincerely,

Grace B. Evans

Grace B. Evans

P.O. Box 355
Oriental, N.C. 28571

cc: Pamlico County Board of Commissioners
Camp Sea Gull
Camp Don Lee
Rick Dove, Neuse River Keeper

GBE1-10 The calculation of aircraft emissions at BT-9 and BT-11 factors in the number of operations below 3,000 feet and the emission characteristics of each aircraft. As shown in Table 4.3-3 (ARS 1), helicopters would produce 1.0337 tons of CO per year compared to F/A-18s, which would produce 0.0272 tons of CO per year. Table 4.3-5 (ARS 1) shows that AV-8 aircraft and helicopters emit more than 90% of the CO, while F/A-18s account for only 3% of the total.

GBE1-11 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

GBE1-12 Cumulative impacts of the Core, Cherry 1, and Phelps MOAs; the Greater Sandy Run Area restricted airspace; and the East Coast Shallow Water training area are discussed in Section 9.1.1 of the EIS. Establishment of these military training areas is independent of the BRAC-mandated F/A-18 realignment.

317 Neuse Winds Drive
Oriental,N.C.28571-1932
November 6,1997

Commander,Atlantic Division
Naval Facilities Engineering Command
Attn:Mr.Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk,Virginia 23511

Dear Mr.Cecchini:

I am writing you to state my opposition to the assignment of any additional military aircraft being re-assigned from NAS Cecil Field,Florida to the MCAS Cherry Point,North Carolina station.

My concerns are twofold, the safety of coastline residents, and the noise and air pollution additional military aircraft would bring to our area.

Let me address the safety concerns that we,and our neighbors have. We live approximately five miles Northeast of Oriental, North Carolina and approximately 19.5 nautical miles from the Cherry Point MCAS. While most of the aircraft flying overhead in their approach to Cherry Point MAAS maintain the 1,000 foot altitude, there are several pilots that have flown over our home at well less than 500 feet,causing safety and noise concerns.Our feeling is that it has been demonstrated that there is an obvious lack-of-control by Cherry Point MCAS Command now, so I can only imagine what problems will be caused by additional planes being added to the Cherry Point base.With the 19-plus miles distance from our home to the base,no one can adequately explain to me why aircraft our flying 500 feet,or less,above us. With the miltary's recent safety record of over 13 crashes and several subsequent stand downs,I think the safety concern is valid.Perhaps the technological sophistication of military aircraft has outpaced the skill-level of the pilots flying them. 1

Another concern regarding safety is the bombing activity at the Rattan Bay bombing range. While we have had several of these incidents,the most recent occurred on October 30,1997 at 3:20 p.m.,when there were eight very strong bomb concussions.Obviously, someone missed the intended target by a wide margin! Normally, we can see the activity at Rattan Bay,but, do not hear the bombs.Calls to the Commander at Cherry Point were made regarding this incident,but none of the calls were returned by Cherry Point...again an example that the current number of planes are not controlled adequately, what would additional planes bring? 2

These are my concerns regarding bringing additional aircraft to Cherry Point MCAS.

Yours very truly,
James W. Morris

B-8-17

JWM-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Marine Corps at a minimum adheres to these altitudes. Additionally, the Marine Corps has raised the minimum flight altitude at MCAS Cherry Point to 600 feet for pattern operations. Low level flights (i.e., under 600 feet) are not permitted at MCAS Cherry Point unless the aircraft is landing or taking off.

JWM-2 Rattan Bay is part of the BT-11 target range complex. Live bombing of BT-11 has not occurred for many decades, and the targets are restricted to inert ordnance. The Navy F/A-18 aircraft transferred from NAS Cecil Field will use only inert ordnance; therefore, no concussion impacts from explosives will occur as a result of the proposed action.

CAX SPLICING TEL No.7578877245 Nov 17.97 10:10 No.002 P.01

FAX (757) 322-4894

NOVEMBER 17, 1997

COMMANDER ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
ATTN: MR. DAN CECCHINI
(CODE 2032 DC) 1510 GILBERT ST
NORFOLK, VA 23511

SUBJECT: RELOCATION OF AIRCRAFT FROM CECIL FIELD NAVAL AIR STATION, FLORIDA TO CHERRY POINT, N.C.

I am a resident of Minnesott Beach, N.C. and my home is in the flight path of one of the runways into Cherry Point. Noise on weekdays is already horrible. More aircraft means more noise, pollution to the already fragile Neuse River, and air pollution. Pamlico County is a peaceful and natural county and that attracts retirees and the residents who fish the waters for a living. I plan to retire in 1999 and then will be at home 24 hours a day. The increased noise will be a nuisance.

1

2 Why not move the jets to a desert base with all the environmental impacts?

Sincerely,
CLAYTON B. WESTON
283 COUNTRY CLUB RD

CBW-1 The proposed realignment of F/A-18 aircraft under ARS 3 or ARS 5 will increase noise levels, air emissions, and point and nonpoint discharges to the Neuse River. The increase in noise levels will be significant. The projected increase in land area and population within noise zones 2 and 3 is shown in Table 6.1-7 for ARS 3 and Table 8.1-7 for ARS 5. The net change in emissions for ARS 3 or ARS 5 is not considered significant and will not affect the attainment status of the Southern Coastal Plain air quality control region. Point and nonpoint discharges to the Neuse River will be controlled as specified under the station's existing Stormwater Pollution Prevention Plan and NCPDES permit for stormwater discharges. The increase in on-station wastewater discharges would be managed in compliance with the station's NCPDES discharge permit.

CBW-2 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

4785 Highway 24
Newport, N.C. 28570
Nov 26, 1997

Facilities Engineering Command
Atlantic Division
Mr. Dan Cecchini
Code 2032 DC
1510 Gilbert St.
Norfolk,Va. 23511

Dear Sir:

We are writing to strongly protest any additional military aircraft utilization of military airspace in Carteret County. For twenty years we have lived under the flight path of Bogue Marine Corps Auxiliary landing field. Low level, repetitive landings and take offs that simulate aircraft carrier approaches are simply not compatible with any decent quality of life, human or animal.

Due to increased flights of various jet aircraft with needs for day light and nighttime training, we are personally aware of neighbors within several miles of this "small base" suffering greatly with physical and psychological problems. A military airfield with its' many associated pollutants is not acceptable in this coastal wetlands area, particularly on the banks of waters designed as waters of Outstanding Resources by the state. These waters are mandated our highest efforts of preservation. 1

We were told in initial public hearings for environmental impact that Bogue Airfield would not qualify for use by Navy aircraft due to its limited runway length which could not be extended because of its' land-locked location. Even if this is factually true, we fear that increased Navy Aircraft in this area will force greater use of this small field by Marine Corps aircraft such as the Harrier and this will greatly affect the peoples, animals and overall environment of Bogue Sound. Has this side affect of placing additional Navy aircraft in NC been evaluated? 2

We have written our comments to share our beliefs that our coastal esturarine wetlands cannot tolerate any additional by military machinery and personnel.

Sincerely yours,

Mr. Paul Dunn, JR.

PD-1 Thank you for your comments; no response required.

PD-2 The number of operations at MCALF Bogue under ARS 3 or ARS 5 would increase less than 3% above the existing (1997) number of operations. This projected increase in operations would not significantly impact the existing environment in the vicinity of MCALF Bogue.

Nov 29th 1997

Commander;

Sir, thank you for extending the deadline now I know I must comment.

Location: the only real solution is Cherry Point N.C. close up the NADEP and move in the squadrons.

1. The economy will not be effected here.
2. The highest paid NADEP out of the 3 remaining would be a savings
3. The noise because of this area would not be a problem, here.

Sir, I've been here 3 years now a civilian from NADEP Alameda. The workload has declined to nothing, the helicopters are 30 years old, and this place is inefficient. Why not move the civilian workforce to the real NADEPS Jacksonville or San Diego where the work is and get these people back to work.

Thank you.

Douglas Winder

Thank you for your comments; no response required.

Capt. Harold J. Hart Jr. USN (Ret)
Mrs. Angela R. Hart

218 Drake Landing, Neuse Harbour,
New Bern, NC 28560
(919) 638-6262

The solution to polution is

Dilouticon

1 Map Charts are inconsistant regarding dates and info -

Replace = High Altitude Intelligence Photos - and IR charts -

2 Current Relibility is going down DUE age and personnel

Equipment Relibility is going way up

3 "I" Level Maintenance will go away in next 10 years -

4 Disbursing aircraft at different sites is strategically more SECURE than single siting.

5 APZ for Occidental is grossly UNDERSTATED

B-8-21

HJH-1 The best available data were used in a consistent manner to analyze impacts.

HJH-2 Thank you for your comments; no response required.

HJH-3 Thank you for your comments; no response required.

HJH-4 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

HJH-5 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

South Carolina

2032DC
Need to change
our mailing list

229 Dataw Drive
Dataw Island, SC, 29920 * (803) 838-5650

October 1, 1997

Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
ATTN: Charles W. Walker, P.E.
Head Environmental Planning Branch
1510 Gilbert Street
Norfolk, VA 23511-2699

Dear Mr. Walker:

Thank you for providing me with the DEIS for Realignment of F/A-18 Aircraft and Operational Functions from NAS Cecil Field, Florida to Other East Coast Installations and Draft Clean Air Act Conformity Determination. Please be advised that I am no longer serving on the Beaufort County Military Enhancement Committee. Accordingly, I have conveyed the compiled information you mailed to me on to Colonel Richard Stearns, USMC, Retired who has taken my place on the Beaufort County Military Enhancement Committee. Colonel Stearns is a past commander of the Marine Corps Air Station, Beaufort and is well qualified to utilize the information you have sent should there be another round of base realignment and closure, which there probably will be. I suggest that should you have further mailings with respect to these matters you send them directly to Colonel Stearns. His address is:

Colonel Richard D. Stearns
USMC, Retired
73 Wade Hampton Drive
Beaufort, SC 29902

Thank you for keeping the Beaufort Military Enhancement Committee well informed with regard to these important matters.

Sincerely,

John Ballantyne

John Ballantyne
LTG, U.S. Army Retired

B-8-25

1

JB-1 The Distribution List for the EIS has been amended to include this information.

November 10, 1997
290 Distant Island
Beaufort, S.C. 29902

The Honorable Strom Thurmond
SR-217
Washington, D.C. 20510

Dear Senator Thurmond;

This letter is in regard to the reassignment of squadrons from the closure of NAS, Cecil Fiels, Jacksonville, Florida to MCAS Beaufort, South Carolina. I am strongly opposed to the expansion of MCAS, Beaufort for the reasons given below.

1 Beaufort is now in the process of drawing up a Comprehensive Plan to control growth in Beaufort County. Bringing more squadrons into the area is completely contrary to the objectives of the plan. The economic growth in Beaufort County is aimed toward retirees, tourism, and the film industry- not the military revenue.

2 In fact, almost all residents of Beaufort believe that the communities economic base is currently too heavily weighted towards the military input. In addition, more squadrons will increase noise pollution which is already too severe.

I am very much in favor of a strong military and I applaud our military for all they have done for us. However, MCAS Beaufort is now secure following the "Save our Bases" movement, so we do not need any more military expansion. We don't need poor quality growth, low budget housing or trailers, more demands on our schools, police force and highways. Above all we don't need the noise pollution from F/A-18s that would assault our town.

Beaufort is the gem of the Low Country. Please help us preserve it and maintain our quality of life.

Sincerely yours,
Margaret S Peyton

cc: Congressman Floyd Spence

cc: Mr. Dan Cecchini (Naval Facility Engineering Command)

MSP-1 Sections 5.1.5 and 5.1.4 address the socioeconomic and land use impacts, respectively, for Beaufort County under ARS 2; Sections 7.1.5 and 7.1.4 address the impacts under ARS 4. The aircraft realignment under ARS 2 or ARS 4 is expected to have a positive, long-term impact on the economy of Beaufort County due to the influx of personnel, tax revenues, and business; the realignment is not expected to preclude other economic growth. Under the existing AICUZ Program, for example, aircraft operations and tourism have coexisted in Beaufort County.

MSP-2 Thank you for your comments; no response required.

[Ms. Peyton submitted a duplicate copy of this letter to Mr. Duncan Holaday, Deputy Assistant Secretary of the Navy on November 15, 1997. The duplicate letter is contained in the Administrative Record, and is not reproduced herein.]

PERRY CLEAR FARMS
W. D. WALSH, JR.
~~BOX 150, ROUTE 1~~ 29 W.D. WALSH LANE
BURTON, SOUTH CAROLINA ~~29909~~ 29906

November 1, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

I am opposed to the realignment of F/A 18 Aircraft and Operational functions from NAS Cecil Field, Florida, to MCAS, Beaufort for the following reasons:

1 1. Beaufort is a beautiful and historical city surrounded by water, attracting many visitors and people looking for retirement homes. The noise from the airplanes already here is very disturbing and disruptive. We do not need additional aircraft providing more noise and more accident potential. It is already BAD!

2 2. Affordable housing for the military families in the Beaufort area is very limited - especially for military in the lower income range. It is not fair to military families to send them to an area that does not provide adequate housing accomondations to meet their needs. Bringing in more military will only make this problem worse.

3 3. According to the information I've received, it will cost more to bring the F/A 18 operations from Cecil Field to Beaufort than to transfer them to other bases. We, the taxpayers are paying the bill, and I think the government should be more responsible with our funds - disregarding political influence and looking out for the general public's interest.

I own a lot of property behind the Air Station in the Grays Hill area and would like very much to have the Air Station closed completely, and certainly not have more squadrons brought in. A number of years ago when my father

WDW1-1 Thank you for your comments; no response required.

WDW1-2 The EIS states that the relocation of personnel to MCAS Beaufort under ARS 2 and ARS 4 would have a minor impact on the local housing market. Under ARS 2, in which two squadrons and 500 personnel would be transferred to MCAS Beaufort, sufficient housing is available in the community to meet the needs of the personnel that would not be living in on-base housing. Under ARS 4, in which five squadrons and 1,300 personnel would be transferred to MCAS Beaufort, the Navy proposes to construct two bachelor enlisted quarters (BEQs) and 240 units of family housing to support the increase in military personnel.

WDW1-3 The comparative capital and life-cycle costs of the five alternatives are discussed in Section 2 of the EIS. ARSs 4 and 5, which split the F/A-18 aircraft between NAS Oceana and either MCAS Beaufort or MCAS Cherry Point, have the highest capital and life-cycle costs. ARSs 2 and 3, which utilize the excess capacity at either MCAS Beaufort or MCAS Cherry Point and transfer the remaining squadrons to NAS Oceana, have lower capital and life-cycle costs than either ARS 4 or ARS 5. Single-siting all the F/A-18 aircraft at NAS Oceana has the lowest capital and life-cycle costs.

PERRY CLEAR FARMS
W. D. WALSH, JR.
BOX 150, ROUTE 1
BURTON, SOUTH CAROLINA 29902

owned the land, the Government condemmed 100 acres to expand the runways and give the airplanes more vacant land over which to fly. Several years ago, the Government once again condemmed 57 acres of my land for military purposes. To get a fair market price for the land I had to take the Government to Court. I won the case.

My home is in this area and at times the noise is deafening - in fact, I am now wearing a hearing aid. The planes continue to fly over my home even though so many acres have been taken for flight patterns. In addition, the Government is now trying to restrict the use of privately owned land surrounding the Air Station. This can only result in devaluation of our land. If the Government wants to restrict the use of land around the Air Station, I'm sure they will have many court battles to fight, and if condemnation is the result, paying land owners fair market value is going to be costly - with taxpayers picking up the bill once again. 4

I hope the Committee will do the responsible thing and move MCAS Beaufort to a more suitable location, and send the squadrons from Cecil Field elsewhere. 5

Sincerely,

William D. Walsh

William D. Walsh, Jr.

B-8-28

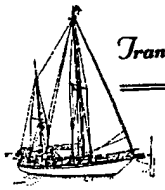
WDW1-4 Because the Navy does not have any regulatory authority outside the airfield, the AICUZ Program was designed to foster compatible land use development around military airfields through local land use planning and zoning authorities. The projected increase in APZs and noise zones under ARS 2 and ARS 4 would likely result in an expansion of Beaufort County's Airport Overlay District (AOD), which imposes development restrictions on certain land uses.

Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

WDW1-5 Thank you for your comments; no response required.

[Mr. Walsh submitted a duplicate copy of this letter to Mr. Duncan Holaday, Deputy Assistant Secretary of the Navy on December 1, 1997. The duplicate letter is contained in the Administrative Record, and is not reproduced herein.]



Tranquility Voyagers

26 west River Drive
Beaufort SC 29902
6 November 1997

Commander Atlantic Division (Code 2032DE)
Naval Facilities Engineering Command
1510 Gilbert St
Norfolk Va 23511

Re: F/A 18 Realignment

Sirs:

This letter is to express our opposition to basing Navy F/A 18 squadrons from Cecil Field at Beaufort, S.C. MCAS.

MCAS Beaufort has already nearly doubled its aircraft loading in the 1990s, creating unacceptable noise levels and further pressure on one of the fastest growing counties in the south.

Enclosed is a copy of a letter to the Editor I wrote to the Beaufort Gazette outlining our opposition. This letter produced an unexpected number of calls, all strongly opposed to adding any new squadrons at MCAS Beaufort.

There is a very active "Military Enhancement Committee" operating in the Beaufort area to encourage further MCAS Beaufort growth. This Chamber of Commerce and real estate developer/contractor led group likes to imply there is no opposition to base expansion locally. This letter is to advise you that we strongly oppose both the arrival of any new fighter jet squadrons and the MEC campaign to attract them.

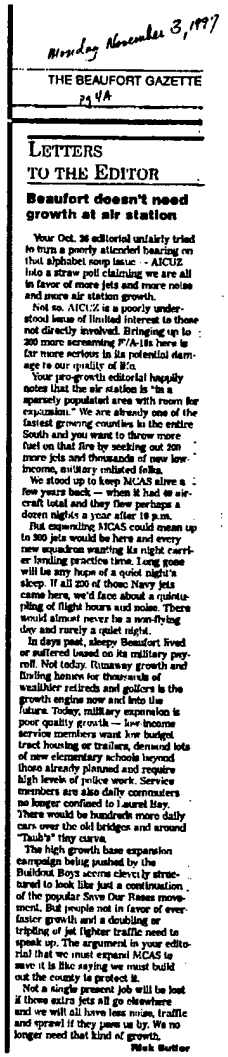
Sincerely,

Rick Butler

Carol A Butler

B-8-29

Thank you for your comments; no response required.



Monday November 3, 1997

THE BEAUFORT GAZETTE

2A 4A

LETTERS TO THE EDITOR

Beaufort doesn't need growth at air station

Your Oct. 26 editorial unfairly tried to turn a poorly attended hearing on that alphabet soup issue -- AICUZ -- into a straw poll claiming we are all in favor of more jets and more noise and more air station growth.

Not so. AICUZ is a poorly understood issue of limited interest to those not directly involved. Bringing up to 200 more screaming F/A-18s here is far more serious in its potential damage to our quality of life.

Your pro-growth editorial happily notes that the air station is "in a sparsely populated area with room for expansion." We are already one of the fastest growing counties in the entire South and you want to throw more fuel on that fire by seeking out 200 more jets and thousands of new low-income, military-related folks.

We stood up to keep MCAS alive a few years back -- when it had 60 aircraft total and they flew perhaps a dozen nights a year after 10 p.m.

But expanding MCAS could mean up to 300 jets would be here and every new squadron wanting its night carrier landing practice time. Long gone will be any hope of a quiet night's sleep. If all 200 of those Navy jets came here, we'd face about a quintupling of flight hours and noise. There would almost never be a non-flying day and rarely a quiet night.

In days past, sleepy Beaufort lived or suffered based on its military payroll. Not today. Runaway growth and finding homes for thousands of wealthier retirees and golfers is the growth engine now and into the future. Today, military expansion is poor quality growth -- low income service members want low budget tract housing or trailers, demand lots of new elementary schools beyond those already planned and require high levels of police work. Service members are also daily commuters no longer confined to Laurel Bay. There would be hundreds more daily cars over the old bridges and around "Taub's" tiny curve.

The high growth base expansion campaign being pushed by the Buildout Boys seems clever by structured to look like just a continuation of the popular Save Our Bases movement. But people not in favor of ever-faster growth and a doubling or tripling of jet fighter traffic need to speak up. The argument in your editorial that we must expand MCAS to save it is like saying we must build out the county to protect it.

Not a single present job will be lost if these extra jets all go elsewhere and we will all have less noise, traffic and sprawl if they pass us by. We no longer need that kind of growth.

Rick Sutter

1

B-8-30

RB-1 As noted in Section 2.3 of the EIS, the maximum number of aircraft transferred to MCAS Beaufort would be 60 under ARS 4. Operations and noise impacts at MCAS Beaufort under ARS 4 are discussed in Sections 7.1.1 and 7.1.8, respectively.

November 10, 1997

Commissioner, Atlantic Division
Naval Facilities Engineering Command
attn: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert St.
Norfolk, VA. 23511

Dear Commissioner:

1 I understand you are accepting public comment regarding the addition of as many as 200 or so more jet fighter planes to the Beaufort area here in South Carolina.

I and many others find the noise pollution overwhelming and most annoying. Recent "maneuvers" with Hunter Army Air Base in Savannah completely interrupted normal life for those of us unfortunate to be living below the action.

The addition you are considering will likely bring much more public complaint about noise and add to the developing ill-will toward the military in our area.

2 Maybe you could find a less populated area than the fastest growing county in South Carolina to locate your jets.

Thank you for listening.

Sincerely,
Deborah Holden
P.O. Box 167
Beaufort, S.C. 29901

DH1-1 As noted in Section 2.3 of the EIS, the maximum number of aircraft transferred to MCAS Beaufort would be 60 under ARS 4.

DH1-2 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Five alternatives have been evaluated under which aircraft would be transferred to NAS Oceana, MCAS Cherry Point, and/or MCAS Beaufort.

Seabrook, South Carolina 29940

Commander, Atlantic Division
Naval Facilities Engineering Command

Attn: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Sir,

Subject: F/A-18 DEIS

The purpose of this letter is to offer my comments which are opposed to the realignment of any FA-18 Aircraft from NAS Cecil Field, Florida to MCAS Beaufort.

My opposition is based on the following information which has been reported at various times in our local newspaper the Beaufort Gazette:

- Beaufort County is one of the fastest growing counties in the State and may in fact be the fastest growing county;
- There is a shortage of affordable housing;
- Northern Beaufort County is growing as a retirement destination with many upscale subdivisions underway and others in the planning stage;
- There is an overburdened infrastructure and a shortage of funds to correct the problems. Additional taxes such as an increase in sales taxes are being considered forbadly needed projects such as a new Broad River bridge and widening Highway 170 to four lanes;
- More planes will result in an increase in the AICUZ. This will apparently result in new ordinances for all property in the expanded area which will have an adverse affect on property values. This is very unfair for property owners who bought homes, lots, and land based on the present AICUZ.

1

2

B-8-32

GTL-1 The proposed realignment of F/A-18 aircraft and associated personnel to MCAS Beaufort under ARS 2 or ARS 4 would increase the population of Beaufort County by less than 2%. The projected increase in personnel would not have a significant impact on local housing, land use planning, infrastructure and utilities, or transportation. Under ARS 4, the Navy proposes to construct two bachelor enlisted quarters (BEQs) and 240 units of family housing to support the increase in military personnel.

GTL-2 Because the Navy does not have any regulatory authority outside the airfield, the AICUZ Program was designed to foster compatible land use development around military airfields through local land use planning and zoning authorities. The projected increase in APZs and noise zones under ARS 2 and ARS 4 would likely result in an expansion of Beaufort County's Airport Overlay District (AOD), which imposes development restrictions on certain land uses.

Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

Beaufort County is experiencing rapid growth with all of the ensuing problems brought about by too much growth in a short time period. Beaufort does not need additional growth generated by more squadrons moving to MCAS Beaufort.

The Beaufort Gazette has also reported that the Navy prefers to move all of the planes to NAS Oceana. I assume that the Navy's preference is based on operational and cost efficiencies as well as simply good management practices.

Therefore, as a citizen and tax payer, I encourage you to move all of the planes to Oceana which will create operational benefits for the Navy and cost savings which will benefit us all.

Very truly yours,

George T. Laney, Jr.

[Mr. Laney submitted a duplicate copy of this letter with a brief cover letter to Mr. Duncan Holaday, Deputy Assistant Secretary of the Navy on November 17, 1997. Those letters are contained in the Administrative Record and are not reproduced herein.]

OFFICE OF THE
PRESIDENT

Technical College of the Lowcountry
P.O. Box 1288
921 Ribaut Road
Beaufort, S.C. 29901-1288
(803) 525-8317

November 18, 1997

Mr. Dan Cecchini
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

I would like to express my support for the transfer of Navy F/A-18 squadrons to Marine Corps Air Station Beaufort, South Carolina.

As president of the Technical College of the Lowcountry and as a member of the executive board of the Greater Beaufort Chamber of Commerce, I encourage you to carry through with the 1995 BRACC findings which identified two squadrons to be transferred to MCAS Beaufort from Naval Air Station Cecil Field, Florida.

As I understand, MCAS Beaufort has been prepared to receive Cecil Field squadrons ever since the possibility first surfaced in the 1993 BRACC. Now, with 1995's BRACC reinforcing its status as a host base for additional squadrons, MCAS Beaufort continues to stand ready to receive these squadrons.

I request you follow through with the intent of the 1993 and 1995 BRACCs and transfer the appropriate number of squadrons to Beaufort's Air Station.

Sincerely,

Anne S. McNutt
President

ASM/nlb

Thank you for your comments; no response required.

RICHARD F. HUNT

201 Pleasant Point Drive
Beaufort, SC 29902
(803) 524-4868

November 19, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Sir:

Regarding evaluation of realignment of F/A-18 aircraft and operational functions from NAS Cecil Field, Florida, please accept my appreciation for providing me with a copy of the Draft Environmental Impact Statement.

In regard to the EIS and as a resident of Beaufort, SC unable to attend the recent public hearing on the matter I write to offer the following:

1 | 1. Clearly, in a political environment favoring further reduction of military bases, the cost of base realignment modifications is critical. Based upon the EIS it is clear that units from Cecil Field would best be consolidated at Oceana. I urge adoption of that option.

2 | 2. Relocation of some units to Beaufort MCAS would negatively impact much of northern Beaufort County principally through noise, safety considerations and the reduction of property valuation. The County is currently seeking to further encumber neighboring MCAS property owners with building construction noise-damping requirements. The cost thereof will be borne by residents already financially impacted by the MCAS.

Under the pending building requirements a hurricane would require more reconstruction cost per dwelling or higher insurance premiums for reconstruction. Either way, the burden is upon local property owners.

3 | 3. Beaufort residents have, for the most part, learned to live with existing air traffic. Increasing MCAS squadrons will certainly generate more negative reactions from the rapidly rising snowbird population.

In short, Oceana is a better option for additional aircraft than is Beaufort MCAS.

Sincerely,

RFH-1 Thank you for your comment; no response required.

RFH-2 The realignment proposed under ARS 2 or ARS 4 would increase the noise contours and APZs in the vicinity of MCAS Beaufort, as discussed in Sections 5.1.8 and 5.1.4 (ARS 2) ,and Sections 7.1.8 and 7.1.4 (ARS 4). Because the Navy does not have any regulatory authority outside the airfield, the AICUZ Program was designed to foster compatible land use development around military airfields through local land use planning and zoning authorities. The projected increase in APZs and noise zones under ARS 2 and ARS 4 would likely result in an expansion of Beaufort County's Airport Overlay District (AOD), which imposes development restrictions on certain land uses.

Property values may also be affected. However, property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

RFH-3 Thank you for your comment; no response required.

Nov. 17, 1997

To whom it may concern:

I have been a Beaufort resident since 1986 and have always appreciated the military. I approve the transfer of 2 more F/A-18 squadrons from NAS Cecil Field to Beaufort. I support this joint venture and feel both the resident and military will benefit from this arrangement.

Sincerely,

Elizabeth G. Freiburger

B-8-36

Thank you for your comments; no response required.

A New Waterfront Hometown on the Broad River

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511
Attn: Mr. Dan Cecchinni (Code 2032DC)

Dear Sir,

We are currently developing a project approximately 3.5 miles west off the end of runway 523. Our design concept is based on the design principals of small towns through out the region. The project includes 350 apartments, 650 single-family homes, 100,000 square feet of commercial facilities, two church sites and a daycare facility. Prior to starting the project, we met with officers at MCAS Beaufort to discuss the flight pattern and the effect it would have on the people living in the area. We left the meeting with an understanding that we would not be significantly impacted by the air traffic over the site. We were also informed at that meeting that there was a slight chance that two additional Navy squadrons may also be relocated to the area.

To date, we have sold 35 homes and lots and are in the process of negotiating a contact for a small Inn and some apartments. In the past few months we have spent great deal of time on the site and there appears to be a considerable increase in the amount of traffic from the previous year. We spoke with the officers at the air station and understood that all the squadrons were on base and that typically some squadrons would be on deployment. The experience of having the increased traffic has made us aware of the impact that additional squadrons will have on the area. We have a very good relationship with the officers at MCAS Beaufort and they have been very straightforward about providing any information that we have requested. However, we feel that the current military traffic is bothersome enough without the increased traffic and safety issues that two additional squadrons will bring. The area impacted by the noise will increase and the quality of life of all Beaufort residents will be impacted. Last week there was a public hearing regarding the adoption of an AICUZ overlay. Several communities met this topic with a great deal of opposition. The hearing lasted three hours and resulted in a tabling and rethinking by County Council of the impact on property rights that this ordinance would create.

We write this letter to express our concerns to the Navy of the potential problems that may occur should additional squadrons be brought to the area. We, as the Habersham Land Company and the property owners of Habersham want to go on record as opposing any increase in the number of squadrons deployed to the area. Thank you for your consideration in this matter.

Sincerely,

Robert Turner, Stephen Davis

Telephone: 803.846.1000 • Facsimile: 803.846.1114 • E mail: Homes@HabershamSC.com
Sales Office: 1013B Paris Avenue, Port Royal, SC 29935 • Mailing Address: Post Office Box 365, Beaufort, SC 29901

B-8-37

Thank you for your comments; no response required.

November 17, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Att: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk,Virginia 23511

Dear Sir:

I attended your meeting October 20, 1997 and was quite concerned that so few attended. I have a friend that is acquainted with a member of the Beaufort County Council. They planned their meeting to be the same day and time as your AICUZ meeting after the date and time of your meeting was announced. These people were told the county council meeting was more important and they would accomplish more by attending their meeting. This is typical of the devious means they use to achieve their ends.

The editorial page of the Beaufort Gazette dated October 26, 1997 mentioned that few people attended the AICUZ meeting and that it was a good sign. I am sure whoever wrote the article was aware of the council meeting. I would also like to mention that these same people were intentionally kept from the AICUZ meeting. So much for that!

1 Your map showing the various sound levels has to be wrong. I live 7 miles beyond the area the additional noise levels would be, in the event that additional planes are stationed at MCAS Beaufort. Someone on the Couty Coucil must have designed the map! Even without the additional planes, on several occasions I have had to go into town to make buseness calls. I cannot hear somebody talking to me while in the house with the windows closed due to the horrendous nerve-racking noise these planes make. The landing lights light up my living room as late as 11PM: on several occasions, it has sounded like these planes have taken the roof off the house. This happens quite frequently. I am sure they do not maintain the proper hight or abide by the decibel levels they are required by law. (There should be no exceptions for the government or anyone else.)

2 This county is one of the fastest-growing areas in the United States and one of the wealthiest counties in South Carolina. Many of the road systems are inadequate at this point in time to handle the volume of traffic and it does not look like this will be rectified for years to come. In addition to the vast influx of people moving into the area, ther are also thousands of tourists that visit throughout the year. There is also a critical shortage of labor at this point. Naturally, there are people who want the base to stay open and would want the additional planes if it will put an extra penney in their pocket, even if this will "sink the ship". These same people give no thouhgt to the congestion and confusion it will cause in the future, nor the money spent on upgrading the base, only to be forced to close in the very near future due to this same grwoth. City and Council are in a coninuous quandry over what to do now with the growth problems--please do not confuse them any more than they already are! (Gentlemen, if you doubt my word, subscribe to the Beaufort Gazette for two or three mohths and you will see what I mean.)

B-8-38

TJS-1 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Marine Corps at a minimum adheres to these altitudes. Additionally, the Marine Corps has raised the minimum flight altitude at MCAS Beaufort to 600 feet for pattern operations. Low level flights (i.e., under 600 feet) are not permitted at MCAS Beaufort unless the aircraft is landing or taking off.

TJS-2 Thank you for your comments; no response required.

I am sure there are other areas that need the advantages afforded by the Air Station: we do not. We have outgrown them. Please do not make us pursue this matter any further.

Respectfully,

Thomas J. Scott
Veteran, World War II

Martha R. Kimball
1813 Narcissus Lane
Port Royal, SC 29935

November 20, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

I am writing to you as a civilian citizen of Beaufort County, South Carolina and would like to address the issue of the relocation of the two F/A-18 fleet squadrons from NAS Cecil Field to MCAS Beaufort. I understand that this was the realignment scenario #2 suggested by the 1993 BRAC commission. I would like to have these squadrons relocated here to MCAS, Beaufort.

My belief is that the military and the civilian community in Beaufort work very well together and enjoy a very special, close relationship. I believe that both civilian and military have a direct benefit each other in this community and that we are very supportive of one another in both the business community and the military community as well. My family owns a home here in the Town of Port Royal and have lived here in harmony with the military for the past fourteen years. I feel that the Beaufort community can support the needs of the two F/A-18 squadrons and my family and I welcome them to our community with open arms!

I am,

Very truly yours,

Martha R. Kimball

Martha R. Kimball

mrk/navy.ltr

Thank you for your comments; no response required.

November 25, 1997

C. H. Von Harten, Jr.
130 Dolphin Point Drive
Cat Island
Beaufort SC 29902

Mr. Dan Cecchini
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk VA 23511

SUBJECT: INCREASING MILITARY SQUADRONS AT MCAS BEAUFORT, SC

Beaufort, South Carolina is blessed with a beautiful but, fragile environment. Our citizens have enjoyed the bounty, beauty and serenity of our waters and woods for centuries.

Tourists and affluent retirees flock to this area in ever-increasing numbers. Managing growth is one of our biggest problems.

We value the strong and friendly relationship with the military organizations in our area. We are patriotic to the marrow of our bones.

Our economic development efforts discourage industries that pollute and noise is pollution. The aircraft now stationed at MCAS Beaufort already provide all the noise we can tolerate.

I feel I speak for a silent majority when I suggest that additional squadrons be located elsewhere.

Sincerely,

C. H. Von Harten, Jr.

cc: Earnest Hollings, U.S. Senator
Strom Thurmond, U.S. Senator
Floyd Spence, Congressman-2nd District
Beaufort Gazette

Thank you for your comments; no response required.

December 1, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Att'n. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, Virginia 23511

Dear Sir:

I am writing to you as a concerned citizen of Beaufort County. One of the best ways to express my concerns is to contact those persons that represent us in the County, in this instance regarding the possibility of additional F/A-18 squadrons being transferred to MCAS-Beaufort.

This matter greatly concerns me, as well as others. The noise with the present air craft is such that when they fly over our home, we cannot hear the person(s) we are talking with. Some of the planes fly so low at times that we can see the pilots! The sound rattles and jars the ground. My family and myself believe it would be devastating to allow more aircraft to the Beaufort Air Station.

1 Is there any chance that the flight route could be changed, for those present squadrons in the area, so it would not be directly over our homes here at Seabrook Point? Again, the notion of additional squadrons being added is devastating. The County, environmental, and people impact would be long term. It hardly seems worth it, when the additional F/A-18 squadrons could be sent elsewhere more amenable, less destructive.

Thank you for taking this letter into serious consideration, along with any other letters you receive.

Sincerely,

Perry O'Quinn and family

P. O. Box 269
Seabrook Point, S.C. 29940

B-8-42

POQ-1 This EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, revisions to existing flight patterns are outside of the scope of this analysis.

29th November, 1997

Capt. & Mrs. Arthur Crimmins
38 Whale Branch Drive
P. O. Box 228
Seabrook Point, S.C. 29940

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Re.: F/A-18 DEIS

Dear Mr. Cecchini:

We appreciate, and are proud of, our aircraft and operational functions at MCAS Beaufort, S.C. However, enough is enough. There are already too many jet squadrons here; even two added squadrons would be a complete nightmare. Their flight pattern is not conducive to either the environment or residential quality homes.

1 -- The jets fly directly over Seabrook Point, creating too much noise. With a slight alteration in course, they could fly over the Whale Branch River, avoiding the land. This would help to eliminate some (although minor) noise.

-- Noise, again. Adding even one or two more F/A-18 squadrons would make it intolerable. Would YOU like it if it sounded as though three to six jets were going through YOUR home on regular intervals? In spite of homes' being as sound-proofed as feasible.

-- This is an exclusive residential area, well planned and environmentally beneficial. DON'T DESTROY IT; PROTECT IT.

2 -- Residue from the jets' low proximity gathers on roof tops and in gardens. For example, roses especially do not respond to such human carelessness and thoughtlessness. Other species are less able to "articulate" complaint.

3 -- To the elderly and/or ill, it is an added mental/emotional disturbance, having such horrendous s o u n d descend upon them, which in turn inhibits healing and a sense of well-being.

4 -- Wild life. Apparently there is a tolerance level for being bombarded by Sound Waves. Wild life cringe, run for cover; birds fly into the protection of shrubs...when the jets pass close overhead. What would additional jets do!

5 Finally, this vicinity is becoming over-developed as the County attempts to cope with ever-increasing retirees moving here. Additional squadrons would create an added burden. There are other, better, choices than MCAS-Beaufort. It is suggested that you give serious consideration to moving the closing stations' F/A-18s to other air stations as their new home.

Respectfully and sincerely yours,

Capt Arthur W. Crimmins - Peggy Crimmins

Capt. Arthur & Mrs. Peggy Crimmins

APC-1 This EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, revisions to existing flight patterns are outside of the scope of this analysis.

APC-2 There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this design minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

APC-3 Hospitals and nursing facilities are not generally considered compatible with noise levels in zones 2 and 3 (please see Appendix D).

APC-4 As discussed in Section 4.3.2 of the EIS, studies done on raptors, waterfowl, and other birds show that while direct aircraft overflights may disturb a small percentage of birds, there is no definitive correlation between aircraft overflights and reproductive success. The projected increase in aircraft operations is not expected to significantly impact wildlife populations.

APC-5 Thank you for your comment; no response required.

[Mr. McLeod submitted this letter, along with a copy of the report "A Residential Market Study for Seabrook in Beaufort County, South Carolina" and development plans. Only the letter is reproduced herein. Attachments are included in the Administrative Record file.]

[Mr. McLeod submitted this letter, in a slightly abbreviated version, to Mr. Duncan Holaday, Deputy Assistant Secretary of the Navy on November 29, 1997. The abbreviated version is contained in the Administrative Record, and is not reproduced herein.]

W. H. McLEOD & SON
ESTABLISHED 1884
P.O. BOX 300 SEABROOK, S.C. 29940
(803) 846-8563

Nov. 3, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2033DC)
1510 Gilbert St.
Norfolk, VA 23511

Re: MCAS—Beaufort, S.C.

Dear Mr. Cecchini:

I was one of the three who made comments at the public hearing for the Draft Enviromental Impact Study in Beaufort, S.C.

Due to another public hearing being held by Beaufort County at the same time and my being at both, I might not have made my position clear.

I am opposed to the transfer of any squadrons from Jacksonville to MCAS Beaufort for the following reasons:

My family owns approximately 1,000 acres of land in the approach zone of your northwest runway. This property was farmed from 1884 until 1984. At that time it was not economically feasible to continue our farming operation. Actually, it had not been for quite a few years prior to 1984. Being the optimistic farmers, we continued farming and adding to our debt load. Having what we have always considered to be very valuable property in Beaufort County, we started a subdivision to help pay our debts and also put other property on the market. The jewel in our basket was the 1,000 acre +/- tract at Seabrook.

In 1990 we employed Edward Pinckney and Assc. of Hilton Head Island, a highly respected Land Planner, to plan a development for our 1,000 acres +/- at Seabrook. At that time the family had hoped to develop the land ourselves. Not having the funds for such a project because of existing farming debt, we elected to offer this very desirable property for sale. Being that we value this piece of property very highly, we have it priced accordingly. We have had some interest and one offer on the property.

Now, in attempting to persuade the Navy to bring either 2 or 5 squadrons to MCAS Beaufort, Beaufort County in it's new Comprehensive Plan has labeled our property as a Military Planning Area. This property is also in your proposed AICUZ expansion zone as an Approach Zone.

1

2

These two designations destroy the value of this property on which the members of the McLeod family have thought was their "Crown Jewel". Not being able to use our land for farming, our livelihood depends on being able to use our land or sell it for it's best possible use.

If the proposed County and Navy designations are put on our property, I will consider it a taking and condemnation.

Please send these planes to Oceana where it appears that facilities are more available. Beaufort cannot provide affordable housing for the military personnel assigned here now. Beaufort County has become a retirement and tourist destination and I do not believe that the expansion of MCAS is compatible with these industries.

I am enclosing with this letter copies of our proposed development plans and the feasibility study that supports the plans.

The sign at the entrance to MCAS Beaufort says that "THE NOICE YOU HEAR IS THE SOUND OF FREEDOM". Please do not let the NOICE we hear be the "SOUND OF TAKING AND CONDEMNATION".

Thanking you for taking these comments onto consideration, I am

Yours very truly,

Claude E. McLeod, Jr.

Claude E. McLeod, Jr.
P.O. Box 22
Seabrook, S.C. 29940

cc: Senator Strom Thurmond
Senator Ernest Hollings
Congressman Floyd Spence
Congressman Mark Sanford
Congressman Robert Inglis

CEM1-1 Within each noise zone and APZ, various land uses are compatible with aircraft operations. Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

CEM1-2 Thank you for your comment; no response required.

12-22-97 : 11:11 : 716 684 0844:# 2/16

Ed:
Talk to Hay
see cindy to
reply email.

November 7, 1997

Mr. Duncan Holaday
Deputy Assistant Secretary of the Navy
Navy Pentagon
Room 4A686
Washington, D.C. 20350-1000

Dear Mr. Holaday:

Having grown-up and lived in Beaufort County South Carolina for over 20 years, I am writing to you about the proposed redeployment of F-18 squadrons from Cecil Field in Jacksonville Fla. I have read several newspaper articles stating that the Navy would like to move all of the squadrons to N.A.S. Oceana and that doing so would also be the most efficient option as well.

I have also read that there is political pressure to have a few of the squadrons "split off" and moved to the Beaufort Marine Corps Air Station in Beaufort S.C. The way I feel (and what I hear from everyone in the Beaufort area) is let the Navy do its job . As a U.S. citizen I have left, along with 260 million of my peers, the defense of our country up to the brave professionals which make up all ranks of the armed services. In war after war, defense operation after defense operation, the U.S. armed services have proven themselves to be the strongest force on the face of the earth. Furthermore, this has been the undisputed fact for over 75 years. Why then, must politicians dare to put their hand into a system which has protected our shores and democracy throughout the world for over 200 years?

If our Navy feels that the F-18's should be at Oceana over Beaufort S.C., who are local or national politicians to interfere with this decision? I am even more disturbed to think that it will cost me and my fellow taxpayers over $30,000,000.00 to do otherwise. In this age of billion dollar takeovers and multi-trillion dollar budgets, $30 million sounds like peanuts. What has happened to our elected government if 30 million is tossed around as if it is insignificant? If $30 million is an unbelievable fortune that most people (American taxpayers) can't even dream of having, why then should it be peanuts to their government made of the people and elected by the people?

My point is to thank you for being part of a Navy which simply wishes to do its job and in a manor which is most efficient to the taxpayers who pay for it. For over 20 years I have listened to the sound of freedom in Beaufort and expect to continue to do so. However, I hope you will resist any political pressure which would lead to forcing me, and tens of thousands of other Beaufort County residents who don't want to see new squadrons come to the Air Station, to listen the sound of freedom being overwhelmed by the roar of politics.

Sincerely,

John Sanford
American Taxpayer

cc: Congressman Floyd Spence
Senator Strom Thurmond
Senator Ernest Hollings

97W1230804/99

Thank you for your comments; no response required.

12-22-97 : 11:13 ; - 716 684 0844:# 6/18

8½ x 11

11/18/97

Dear Mr Holoday

I live in Beaufort South Carolina right near the Marine Air Station. We do not need any additional squadrons attached to the Air Station. At present, the area is about all we can stand. If you ever stop by you will know what I am talking about.

I could write alot more about the problem but I am sure you have heard that many more people to protest that I am trying to make.

Very Sincere

Yours

Beaufort
29906

Concern at 761-

9711030884998

Thank you for your comments; no response required.

Virginia

Oct. 19, '97

Dear Sir:

Mrs. W. L. Gilliam • 1208 York Lane • Virginia Beach, Va. 23451

I oppose the Navy's proposed relocation of 11 squadrons to Oceana Air Base. - The increased population, noise and air pollution will be intolerable -

Sincerely -

Anne C. Gilliam

1

ACG-1 Impacts under ARS 1 on the regional population, noise levels, and air quality are addressed in Sections 4.5.1, 4.8 and 4.9 of the EIS, respectively. Population, noise levels, and air emissions all would increase under ARS 1; however, the increase in population and air emissions would not significantly impact the existing environment. Noise levels in the region would significantly increase. The EIS discusses the mitigation measures to minimize/prevent adverse noise impacts.

10/27/97

I am here speaking on behalf of myself and what I believe is a majority of the citizens and taxpayers of VA. Beach. We do not want the transfer of Aircraft and personnel to Oceana NAS to take place. If you decide, in spite of our strong, sound objections, ~~then we wish~~ to transfer the Aircraft and personnel here anyway, then we wish for you to do so in the absolute smallest possible amounts. There are several very good reasons that the majority of us do not wish for this Aircraft transfer to our area to take place. We do not want the various forms of pollution that will be severly increased, such as Noise, Air, soil and water. The Noise factor is probably the most obvious of the pollutant levels that will increase. Those thousands of us who live in and around the noisy flight areas around Oceana must live daily (and nightly) with the constant onslaught of these powerful jet engines. When company comes to our homes and experience this terrible Noise, they invariably exclaim "my God, does this happen very often??". All the homeowners can do is hang our

1

B-8-52

MW-1 Impacts on noise, air quality, soils, and water resources under all ARSs are addressed in the EIS. Noise levels in the region would significantly increase, and the EIS discusses the mitigation measures to minimize/prevent adverse noise impacts. Air emissions will also increase; the increase would not significantly impact the air quality attainment status of the region. The impact on soils in the areas of new construction will be minor and primarily due to short-term construction activities. Adverse impacts will be avoided by employing standard soil erosion and sedimentation control techniques. Surface water quality will be affected in the short-term by sedimentation from construction activities; the station's VPDES permit will be amended to ensure proper control of the sedimentation. Surface water quality will be affected in the long-term by increased stormwater runoff, which will be controlled by additional stormwater collection systems.

head and reply, "I'm afraid it goes on all the time."

Besides the critically important issue of increased pollution, we also object to the planned expansion because of having our roads clogged with additional traffic. Our traffic in this area already greatly exceeds the capacity of our roadway system, and plans to improve them will probably not support the added congestion from the Oceana expansion to the level of congestion that now exists.

Another point of objection concerns schools. Ours are already filled to capacity and beyond. The increase of school aged children created by the proposed Oceana expansion, two to three thousand, will necessitate building additional schools, creating an unreasonable and unwanted burden on taxpayers who already feel that school spending is out of control. In addition, the taxpayers must shoulder the burden of moving schools from potential crash zones while double talking politicians tell homeowners in these same areas that the FA 18 Hornet is "so safe that the likelihood of a crash is almost nonexistant." If they are so safe, why are we paying

2

3

4

MW-2 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions (i.e., moderate traffic levels and acceptable levels of service), specific congested areas, and planned road improvements. Impacts on transportation under ARS 1 are addressed in Section 4.7 of the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

MW-3 Projected impacts on taxes/revenues and school capacity under all ARSs are addressed in the EIS. The ongoing Virginia Beach school expansion program should accommodate the additional school-age children. The resulting increase in total school expenditures would be at least partially offset by increased student aid and the additional local taxes paid by the new residents. Overall, the EIS states, in Section 4.5.1, "*Virginia Beach and the other communities in the region would not experience any significant negative fiscal impacts from the proposed realignment under ARS 1.*"

MW-4 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 aircraft is one of the safest in the history of naval aviation.

5

Astronomical Amounts of money to move these schools?? In addition to building And relocating schools, we must spend untold tens of millions of dollars to soundproof our schools. That one item speaks volumes About the Noise factor Associated with the Oceana jets. About the only positive thing that can be said About moving more jets to Oceana is the Additional money that will come Along with them. That money is the reason you will hear from our City Council And the people that they really represent, which is a group of business people with dollar sign in their eyes, ready to fill their pockets with the money from the Oceana jets. The rest of us citizens, who outnumber these people A thousand to one, must live with your decision every day of our lives. Please send your jets, your personnel And your money somewhere else. THANK

MW-5 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

you for the opportunity to express my views on this very important matter.

Submitted by:

Michael Walker
3405 Champlain La.
Va. Beach, Va. 23452

Our neighborhood is one that has been designated a "noise" zone outside of Oceana Naval Air Station, near Lynnhaven Mall. Anyone who has ever spent a few minutes walking from their car into the Mall has some idea of the noise level in our community. We are subjected to this noise throughout the day and often until very late at night. It is impossible to plan an outdoor activity, because we have been unable to determine what the flight schedule is. Sometimes a few hours pass between flights, usually flights go right over our house, and sometimes there is one plane right after another, so low that we can see the pilots. It is noisy beyond description. And the oily film from jet exhaust coats our cars and windows. Our home is 30+ years old, as are most in our neighborhood. I would guess that many homeowners bought around here at 1965 noise levels. We bought our home knowing that this was a designated noise zone.

1

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We would never have considered purchasing a house in a crash zone. Rezoning this entire area around Oceana as a possible crash zone, will affect nearly one fifth of the population of Virginia Beach. I, for one, really resent someone else determining that my life, and the lives of many other families are expendable, by approving additional air traffic in this area.

3

The city is considering relocating several schools because of the increased noise and danger. Will the city be willing (at no cost to us) to relocate those of us in the crash zone? What about our rights to live in a safe environment? Virginia Beach does not have a large selection of affordable houses for those who might choose to move away from this area, rather than live in danger.

4

Last month we fought to keep a go-go bar from moving into our neighborhood. This month our neighborhood faces a much more serious problem.

A suggested solution is for us to buy thicker windows and add more insulation. Tell me, how is that going to stop an incoming jet?? Further, does this mean that we are all expected to stay indoors all day, every day all year 'round? And spend our time praying that the heavy increase in jet traffic won't result in a crash into one of our homes? How many other communities would tolerate that?? When can we have a say about what is being planned for our neighborhoods? Now? Election time?

5

I have always supported Owen Pickett and our city planners. But, there must be some other acceptable solution. Mr. Matthias (no relation to me) suggests that additional noise won't be a problem. Perhaps he would like to spend a few days in one of our homes and hear for himself.

Let Cherry Point take these additional jets. Our city planners ought to be able to attract some other businesses to bolster Virginia Beach's economy.

Judith Matthias, 3021 Old Towne Lane, Virginia Beach, VA 23452
Virginia Beach (757) 468-5880
September 16, 1997

B-8-56

JM-1 Thank you for your comments; no response required.

JM-2 Primary aircraft air pollutant emissions (exhaust) include: volatile organic compounds (VOCs), nitrous oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO_2), and particulate matter (PM_{10}). Please see Section 3.1.9.3 for a more detailed discussion of jet aircraft exhaust. There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this design minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

JM-3 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 aircraft is one of the safest in the history of naval aviation.

JM-4 The Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach.

JM-5 The recommended sound attenuation methods identified in the EIS are suggestions for reducing noise levels in residential properties. Please see response to JM-3.

Mr. & Mrs. David A. Lyon
1212 Cedar Point Drive
Virginia Beach, Virginia 23451
(757) 491-1112

10-28-97

Mr. Dan Cecchini
Naval Facilities Engineering Command
(Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Re: Proposed Jet noise increase...

Dear Mr. Cecchini:

This letter is to **formally object** to the proposal to Re station 120 to180 F/A-18 jets at Oceana Naval Air Station. My wife and I believe it is not advisable for the following reasons:

1. **There are other options** which avoid the negative impacts (safety and noise) on the heavily built up area around Oceana with managable negative mission impacts.

2. The continuation of the trend for ever greater jet traffic over Virginia Beach is **absolutely incompatible with the documented long term goal** of emphasis on tourism for the city. The long term residents will move as the noise and safety concerns increase thus significantly decreasing the quality of life in the tourist area.

3. The increased noise impact will **decrease property values resulting in law suits against the Navy and / or the city.**

4. **The study is incorrect in its noise level projections.** Db levels far in excess of those projected have already been documented at our home from existing flight patterns.

5. Unnecessary concentration of aircraft in one area seems **tactically unwise.**

Very Respectfully,

David A. Lyon

Janice J. Lyon

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DAL-1 The City of Virginia Beach Comprehensive Plan recognizes both tourism and the military presence as important to the future economic development of Virginia Beach. The Comprehensive Plan describes land use policies and objectives that involve both tourism and military activities. One policy is to attain a strong and diverse profile of businesses to advance the economic development objectives of the City. Specifically, an objective is to promote and preserve tourism. A second policy is to recognize the importance of the federal presence to the future economic development of Virginia Beach.

As discussed in Section 3.1.5.1, tourism is an important industry in the south Hampton Roads area. In 1994, approximately $236 million was spent on hotel/motel/tourist court and campsite lodging in the regional economy with 60% of this total generated in Virginia Beach.

There are nine major military installations in south Hampton Roads with four bases in Virginia Beach. Payroll and procurement expenditures by DOD in Virginia Beach was $1.1 billion in 1990 and $1.2 billion in 1992. In 1995, total payroll and procurement expenditures at NAS Oceana declined to $250 million. Construction expenditures were approximately $30 million.

The proposed realignment of F/A-18 aircraft to NAS Oceana is not expected to significantly impact tourism in the region. Under the existing AICUZ Program, aircraft operations and tourism have coexisted in the Hampton Roads area.

DAL-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, the Navy cannot quantify whether the increase in noise will affect property values.

DAL-3 There are many ways to express the sound levels produced by aircraft. Among these are maximum or average maximum levels, as well as the day-night average sound level used in EIS. The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

DAL-4 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

Gary L. Wasson

2203 Carolina Road
Chesapeake, Virginia, 23322-1464

Phone (757) 855-0037
Fax (757) 853-3046
Home Phone: (757) 421-9323
Email glwasson@erols.com

October 27, 1997

Mr. J. Dan Cecchini (Code 2632DC)
Commander, Atlantic Division, Naval Facilities Engineering Command
1510 Gilbert Street, Norfolk, Virginia, 23511

Dear Mr. Cecchini,

It has come to my attention that there is a plan to alter the existing noise level from 1 to 2 in the area surrounding Carolina Road to support the flight pattern for new elite Navy fighter aircraft. ***This is unacceptable for the following reasons:***

1 | 1. When these houses were built the area Naval Commander assured the citizens that the area around Carolina Road was not in the flight pattern. ***This has proven itself over the past few years to be completely false.*** Not only are Naval aircraft flying directly over the area but when ***complaints*** are registered concerning the excessive noise they ***are ignored and sometimes the situation even gets worse.***

2 | 2. Homes were purchased in this area for quiet and solitude. That has been constantly disrupted by low flying Naval aircraft. If the noise level changes from 1 to 2 this will worsen the condition.

3 | 3. Finally, to be quite honest, ***I do not want to see my property value decreased*** because of poor judgment and lack of consideration.

For the above reasons I ***strongly oppose*** this change and plan on attending the meeting scheduled for 28 October.

GLW-1 Residences on Carolina Road are under the Ground Control Approach (GCA) box pattern used on approach to NAS Oceana. While this pattern will not change, the Navy has initiated measures to reduce noise impacts near NALF Fentress. The Navy is installing a permanent TACAN (navigational device) at the airfield to provide a reference point for aircraft transiting to NALF Fentress from NAS Oceana and provide aviators aid in FCLP pattern control at NALF Fentress. Operational Commanders at NAS Oceana will continue to emphasize to air crews the importance of maintaining proper patterns and noise abatement procedures.

GLW-2 Thank you for your comments; no response required.

GLW-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

Tom Trebi
2509 Sandusky Ave.
Va.Beach, VA
23456-8011

10-27-97

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn.: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, VA 23511
FAX (757) 322-4894

To whom it may concern:

I have the utmost reservations against moving ANY more aircraft onto NAS Oceana.

1 I have lived in Va. Beach since 1981 and have had the distinct displeasure of being subjected to incredible flight noise and near-misses along with my neighbors and colleagues.
How much more of a further degradation in our quality of life are we supposed to endure?
There seems to be no limit as to what the elected leadership of Va. Beach is willing to sacrifice for a few jobs on the base. Which shows their priorities, as we don't have a operating dependable municipal water supply to support what is here now, so how can we add several thousand more users?

2 It is in itself ludicrous to continue to operate an air-base, no less a training facility, smack in the middle of Virginias largest city and a supposed resort at that.

Has everybody forgotten the various crashes of Navy jets right here in town? Remember the A-6 skidding across Oceana Blvd. in flames killing civilians or the jet barely clearing some beachfront hotels before crashing into the Atlantic while the pilots parachuted onto Atlantic and Pacific Ave.s? More recently a jet in flames luckily wiping out on NAS Oceana.

3 We have had many visitors commenting on the acrobatics performed by the Navy fliers in what in motor vehicles would buy you a ticket for "careless and reckless". If they have such high-performance jets and are so capable, why do they need to fly low and strafe neighborhoods? They are their own worst enemy by displaying such a "Don't give a damn'" attitude.

Since the Navy continually demonstrates itself irresponsible, I will never support any enlargement of operations.

TT-1 According to the City of Virginia Beach, the Lake Gaston Project is fully operational as of November 7, 1997 (see letter from the City of Virginia Beach dated December 2, 1997, under Appendix I, Part B, "Local Agencies").

TT-2 The F/A-18 is one of the safest aircraft ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

TT-3 With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

On november ,1940 THE U.S.Government purchased
The original 328.95 acres for the purpose of construc-
Tion of a small air field.....the airplanes used them
Made a little more noise than a large lawn mower;
Today the tailhookers flying at 1000 feet would sound
Like shouting in ear, 100 dbl noise factor.

Today Oceana has some 6000 ft. , the City of Virginia
Beach is the largest city in Virginia, (61% Navy,39%
Others,stimated by mr,Warner of NRW) or some
425.000 Inhabitants.

Va.Bch. has 5 of the top ten residential Real Estates
In the country, this is because the Navy do not encou-
Rage long stay in the region,there is a lack of mea-
Ningfull employment, the best you find is flipping
Burgers or filling tacos. No one with some ambition
Leaving the Navy would plan to stay in here, the per-
Sonal income is 10% bellow the rest of the state. There
Is no quality education centers at this time,but we have
A substantial ammount of Pawn shops, typical of mili-
Tary communities. In resume our economy is a mess!

This is a beautifull City that deserves to grow economi-
Cally,deserves a Proffetional Team and all the amenities
Of a progressive modern City.

Sherry Point N.C. is eager to have those F-18 HORNETS
Why not let them have them, originally BRACC 95, had
Chosen Cherry Point; that is in the U.S. isn't it, there
Facility has 16000 acres of real estate, no population is
Encroaching the Point, and consolidation with the U.S.
Marine corp, makes sense.
G.Jimenez, Virginia Beach, 10/20/97 .

Thank you for your comments; no response required.

1222 N. Bay Shore Dr.
Va. Beach, 23451
Oct. 14, 1997

Mr. Dan Cecchini
1510 Gilbert Street
Norfolk, Va. 23511

Dear Mr. Cecchini:

Re: Realignment of F/A-18 Aircraft.

We live in Bay Shore and the aircraft activity is fairly tolerable. There are times when I am sure the jets are crashing into our house. It is frightening.

We like to garden and spend most of our time outside. An increase of 180 F/A-18 would make outside activities unpleasant. It makes us sad to think the quality of our life would change and perhaps make a move from the area necessary.

We hope with all our hearts and soul there will not be an increase of aircraft to this area.

Most sincerely,
Joyce Klingensmith
(Mrs. Bruce Klingensmith

Thank you for your comments; no response required.

Statement of Capt. P. F. Hollandsworth, USN (Ret) Concerning the Move of the F/A-18's from NAS Cecil to NAS Oceana.

The increase in jet noise seems to be the major concern of those people who are expressing apprehension for the move of the F/A-18's from NAS Cecil Field, FL to NAS Oceana. Following this concern is the anxiety created by the new APZ (Accident Potential Zone) or as the news media like to sensationalize it by calling it "Crash Zone." I shall address each of these in turn.

First, the new noise zones. The assumptions used were that all the aircraft stationed and to be stationed at NAS Oceana would all be on base at one time, i.e., worse case. In my 41 year association with NAS Oceana, I have never seen that happen. For the foreseeable future, there will always be two squadrons of F-14's deployed, one east and one west. There will be at least two F-14 squadron's operating from their assigned carrier preparing to relieve the deployed carriers (one east, one west), while one other squadron will be on a weapons detachment to Fallon, NV or to Porto Rico. So of the 11 fleet F-14 squadrons five will be gone from NAS Oceana at any given time.

F/A-18 squadrons will be similarly deployed. However, there are three F/A-18 squadrons in each air wing which deploy together, so that there will be three squadrons deployed to the Mediterranean, three in work up, and three deployed on weapons dets. (NAS Oceana does not provide F/A-18 squadron to the west coast as it does F-14's.) This will vary because the Marine Corps provides one squadron to a Navy carrier air wing once every-other year. Therefore, generally, there will be eight out of 11 F/A-18 fleet squadrons out of town.

Using the above schedule, there will be 13 of 22 fleet squadron deployed. The above deployments will overlap so at any given time there may be fewer or greater number of squadrons at Oceana but there will also be other mediating circumstances (replacement squadron dets and squadron standing down after deployments) that will keep the sortie rate to no greater than that generated by the normal count of nine fleet squadrons. As a matter of fact the nine fleet squadrons can be conjectured to be "worse case" for numbers of sortie flying out of Oceana.

Secondly the new noise zones (AICUZ or Air Installation Compatibility Use Zone) using comparative data from sorties flown out of Oceana in 1993 to those expected sorties flying out of Oceana in 1999-2000 ,i.e., Oceana's nadir to apogee. Had the data of 1990 been used as a comparison year, there would have been little or no different in noise level projections.

Thirdly if all 11 squadrons and the RAG comes to Oceana, there will still be one less aircraft squadrons stationed here than there was in '91-92. The noise will increase from what people have become accustom because the decommissioning of all A-6 squadrons and half of the F-14 squadrons during the period from 1993 through 1996. This reduced flight operations from a high of about 250,000 to a low of about 112,000, a 45% drop. The situation will be ascorbate because of the short time frame in which all of the F/A-18 squadron will move to Oceana, 12 squadrons moving here in roughly a 12 month period.

The up roar about the Accident Potential Zones (APZ's) should not

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PFH-1 Air wing deployment and training cycles are considered in the Naval Aviation Simulation Model (NASMOD) used to estimate the projected increase in operations associated with the realignment of F/A-18 aircraft. Please see Appendix C of the EIS.

PFH-2 Thank you for your comments; no response required.

PFH-3 Thank you for your comments; no response required.

be a cause for panic. The coming of the F/A-18's did not cause changes to the flight paths in and out of Oceana nor to the APZ. What did change were the rules the Navy used to draw up APZ's. It amounts to measuring with a micrometer (the play ground at the Seatack school is in the APZ, while the school building is not) and then executing with a meat ax. Historical data shows that more accidents occur during the landing/take-off phase of flight than any other one phase. From this data it is obviously the closer you are to the end of a run way the more apt you are to have an aircraft park in your back yard. However, it should be pointed out that most crashing aircraft have been deserted by their flight crew and it must decide on its own where to terminate the flight, which means that predicting a crash site for an aircraft is a highly speculative.

accidents are happening in all phases of flight for land based Based Aviation (F-14's and F/A-18's), flights from and to the aircraft carrier are still the phase of flight that has the highest accident potential. But after this flight phase there is no clear second place that an accident might occur. This not to say there will never be a crash in the Oceana flight pattern, but it does say that, statistically, such an occurrence will be rare.

In summary, the noise generated by the 180 additional F/A-18's will be no more than what was here in the late 1980,s to the early 1990's and that the chances of a crash in the APZ's, because of a greatly improved safety record, are less than they have ever been.

Paul F. Hollandsworth

4

PFH-4 Thank you for your comments; no response required.

October 23, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
Norfolk, VA 23511
Facsimile: (757) 322-4894

Dear Mr. Cecchini,

I am responding to an advertisement in today's Virginian Pilot Newspaper. The ad requested that I sent my comments about the relocation of the F/A 18 Deis to Oceana Naval Air Station.

I appreciate the opportunity to voice my opinion about this matter. I am a resident of the Ocean Lakes Community, which is a stones throw between the Dam Neck Naval Base and Oceana Naval Air Station. I am also a Navy wife.

My husband and I bought and moved into our new home on April 1, 1997. We felt blessed to have found a beautiful water front home in a quiet neighborhood that was within our price range. We love our house!

1 Within two months of moving into our home, I believe Oceana changed some or all of their flight paths. Suddenly, there were jets flying over our house routinely. Many times, it is two and three jets at a time. This goes on 24 hour a day, seven days a week. I am not sure where these jets are headed at 10pm, 11pm or 2, 3 and 5am, but I can tell you it makes for a very difficult nights sleep. Why can't the Navy have normal business hours for flight take-off and landing practices? During nicer weather, when we open our windows for some fresh air, it is like a war zone. I had a ringside seat from my front porch and bedroom window for the recent Oceana Air Show! When my dog is outside, she hits the ground in fear looking up at the sky each time a jet flies overhead.

2 Now the Navy wants to send 180 more jets to Oceana. My daughter goes to a school that is in a danger zone on Dam Neck Road. Real Estate adjusters are telling our community that our homes will decrease in value as well. Not even a year in our new home, and we are facing a financial loss on our $125,000 investment.

3 If the Navy has eager takers in a rural area of Cherry Point, NC, why does Virginia Beach have to be the recipients of all those jets? We already have to sit with the remote in hand to adjust the television volume when the existing jets fly over our home.

Please reconsider this relocation. I realize that Virginia Beach is looking at the financial benefits of the added military families, but as a resident, I believe there should be more to this decision that financial gain for the city. It seems as though the "Almighty Dollar" and not the welfare of community citizens is the deciding factor in decisions such as these.

I know I speak for many of the residents living near and around Oceana Naval Air Station, as well as those who live within the Oceana flight paths. Tell Washington to come spend a few days in our community to hear what daily life and sleep is like!

Sincerely,

Joanna Benka

JB2-1 Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

JB2-2 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JB2-3 The alternative realignment scenarios (ARSs) considered in the EIS and the process used to develop these ARSs are described in Section 2 of the EIS.

Commander,Atlantic Division
Naval Facilities Engineering Command
Attn: Dan Cecchini(Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

October 23, 1997

Dear Sir,

I am writing to state my objections to the recommendation in the DEIS that 180 F/A-18 Hornets be transferred to Oceana.

The noise of the jets presently at the Air Station is already too great even to those whose homes are as far away as mine is. I live two blocks from the Ocean near the Cavalier on the Hill. Many times sleep and conversation are impossible when planes are practicing takeoffs and landings at the Oceane Naval Air Station. I can personally testify to the annoyance this causes as stated in H-3.4 in the EIS, "Speech interference - disruption of radio, TV,telephone, and conversation gives rise to frustration and irritation." And in H-3.5, it is stated that sleep interference effects would be "less with air-conditioning on and windows closed." On page 9.1-14 of the DEIS it is stated that the F/A-18 is significantly noisier than the F-14 and that even if new Hornets eventually replaced the present ones, the new would still be louder than the F-14. The additional noise of F/A-18 Hornets in any form would in essence make the home where my husband and I live, unliveable and we feel it is unjust that we should be required to bear the expense of altering this house which has been here since 1952, in order to sound-proof it and lock ourselves inside. On page 8.2-41 it is stated that the additional acres of noise created by the transfer of the Hornets will be 16,476 total and will affect 27,930 additional citizens. This is for noise levels of 65-75 dB. Of these citizens, 12,549 would be subjected to levels of greater than 75dB. I do not believe that these citizens will accept without complaint a situation they have never experienced before and which has so many adverse effects.

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It is alarming to read that 22 schools will have to be altered in order to make them safe and viable for learning. In H-3.4 of the report, I read that the quality of speech in the classroom is important and that excessive noise can cause fatigue and vocal strain. How can Virginia Beach be considered the best place to transfer these jets when the cost and quality of education will be so jeopardized?

Virginia Beach's quality of life will suffer if the F/A-18 Hornets are transferred here. This is a city by the sea with many natural assets and resources. It has two National Wildlife Refuges and two State Parks in close proximity. Jet planes and recreational activities are not compatible. The new Aicuz zone stretches from well south of Rudee Inlet as far north as 57th Street. This zone includes the entire prime tourist area of the city. All that makes for pleasant living will be

B-8-66

BN-1 The selection of a preferred alternative involves the consideration of many factors, including environmental, operational, and economic factors. Section 2 of the EIS describes the process used to evaluate the various ARSs.

sacrificed if noisy planes condemn the city's residents and its summer tourists to shut themselves inside away from the environment which they enjoy.

2 I suggest that the Navy reconsider its recommendation. Certainly the fact that the Cherry Point Air Station has 11,600 acres of available land to Oceana's 5,650 should carry some weight since the more powerful Hornets need longer runways for operations. The citizens of Havelock raised no objections to the jets, in fact, asked for them in the hearing held there on October 21st. Oceana is a built-up urban area and safety precautions should dictate that nothing of a hazardous nature be added to the environment. It seems eminently logical to send these jets to Cherry Point Marine Corps Air Station.

Sincerely,

Betsy Nugent

Betsy Nugent
300 Cavalier Drive
Virginia Beach, VA 23451

copy to:
Carol M. Browner, Administrator
Environmental Protection Agency
Washington, DC 20460

B-8-67

BN-2 A comparative summary of reasonable alternatives is provided in Table 2.5-1 of the EIS. The Office of the Secretary of the Navy will make an informed decision on the proposed realignment considering environmental impacts of each ARS as well as the Navy's operation criteria.

[Ms. Nugent submitted a letter during the public hearing in Virginia Beach that is similar, but slightly abbreviated from this version.]

B-8-68

facsimile
TRANSMITTAL

To: Mr. Dan Cecchini

Of: Code 2032DC

Fax: 757-322-4894

Phone: Same

Pages: 1, including this cover sheet.

Date: October 22, 1997

Dear Mr. Cecchini:

Please record among your comments the fact that my wife, Kathleen Ann Duignan, and I are both in favor of relocating the F/A-18 squadrons from Cecil Field to NAS OCEANA.

We are both former active-duty Coast Guard judge advocates with significant experience in the environmental arena. My wife is still a drilling reservist. Although we both grew up in the Northeast, Virginia Beach is the place that we call home. Even if we eventually relocate, we will still maintain ownership of our home in Virginia Beach.

Although some in the local community are concerned about noise levels, this realignment would result in NAS OCEANA having approximately as many squadrons as it did during the 1980's. It is not the problem that it is portrayed as being. Rather, it is really simply a return to the status quo. From an economic standpoint, this would be a tremendous boon to the local economy.

By contrast, neither Havelock or Beaufort have the infrastructure needed to house, supply or employ these military members and their dependents. Thus, it is in the best interests of all concerned to relocate these squadrons to NAS OCEANA.

Thank you for your consideration of these comments.

Sincerely,

John B. Gately

From the desk of...

JOHN BRENDON GATELY
Attorney and Counselor at Law
2332 Croix Drive
Virginia Beach, Virginia 23451-1362
(757) 481-0772
fax: 481-9629
e-mail: jbgesq@aol.com

Thank you for your comments; no response required.

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

1 | After comparing the economic impact to the environmental impact the realignment of Navy aircraft and operational functions from NAS Cecil Field, Florida, to NAS Oceana, Virginia Beach, Virginia would have on this area, I think I speak for the average citizen when I say we all would like to preserve our quality of life in this fine city. Granted, the economic impact would be a boon for the construction industry and for the area's economy, as well as the creation of over 1000 private sector jobs. BUT AT WHAT COST? Additional jets would put nearly 39,000 area residents, and 23 schools, in high noise or potential accident zones. Public opinion, as expressed in Letters to the Editor, seems to favor quality of life over economics (Virginia Beach presently enjoys good economic health, and I see no reason why that will change for the worse in the future).

2 | My family and I used to live in base quarters at NAS Oceana during the late 1960s, and we simply got used to the jet noise overhead. Today, however, I live 8 miles away from the base, and the noise off-base is like living on-base because the jets have become more powerful and, as a result, are much louder than before (at least that's my perception). Put simply, it's not as quiet around here as it used to be.

Personally, I'm in favor of letting MCAS Cherry Point (Havelock), North Carolina have the jets, or a good portion of them. After all, there are plenty of jets to go around, and it seems only fair to spread the economic benefits around (between Oceana and Cherry Point).

I will be attending the DEIS public hearing at the Va. Beach Pavilion on October 27, 1997 to hear what others think about this issue.

Sincerely

John O. Parmele Jr.

John O. Parmele, Jr.
PNCM, USN (Retired)

Served with: VT-9, NAAS Meridian, Miss.
VF-103, NAS Oceana, Va.
USS SARATOGA (CVA-60)
USS AMERICA (CV-66)

Va. Beach City Council
Candidate - 1988, 1990, 1992, 1994
(and again in 1998)

1316 Yawl Point, Laurel Cove
Virginia Beach, VA 23454-2041-39
(498-1259)

JOP-1 Thank you for your comments; no response required.

JOP-2 Thank you for your comments; no response required.

Henry B. McDonald
982 Colonial Meadows Way
Virginia Beach, VA 23454

October 23, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Sir,

I am a Senior Citizen past seventy years of age and most concerned about the aircraft at NAS Oceana. When we purchased our home twelve years ago, we had to sign a paper informing us of the flight pattern in the Hilltop area of Virginia Beach. Over the years the planes flying overhead have increased, fly at all hours and often quite low.

It is my strong belief that Mrs. Oberndorf had no concern for residents in this area when she made her pitch to bring the F/A-18 planes here. First Colonial Road has become a bottleneck and emergency vehicles have a very difficult time getting through. We have Retirement Homes, Nursing Homes, Virginia Beach General Hospital and PPI - all housing elderly and ill patients. Millions of dollars have already been spent to relocate Fairhaven Park School, which was unnecessary and will throw even more traffic onto First Colonial Road.

B-8-70

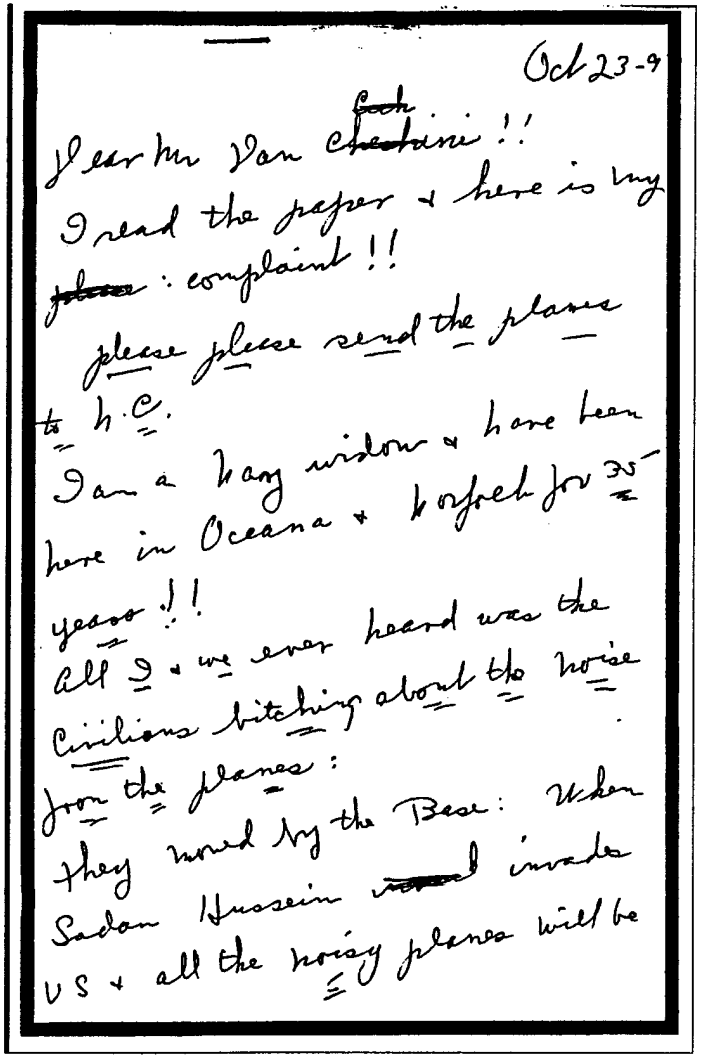
Thank you for your comments; no response required.

Henry B. McDonald
982 Colonial Meadows Way
Virginia Beach, VA 23454

Please give serious concern to the above information. We do not need more airplanes and disturbing noise. We do need a City Council that has more concern for residents of the City.

Yours truly,
Margaret W. McDonald

B-8-71



Oct 23-9

Dear Mr Van ~~Cochrane~~ Clevenie !!
I read the paper & here is my
~~please~~ complaint !!
please please send the planes
to h.c.
I am a Navy widow & have been
here in Oceana & hopefully for 30
years !!
All I & we ever heard was the
Civilians bitching about the noise
from the planes :
they need by the Bear : When
Sadam Hussein ~~moved~~ invades
US & all the noisy planes will be

B-8-72

Thank you for your comments; no response required.

on ships + in the air, then they will cry - who will protect the USA.??

I wish I could stand up + shout no noisy planes in Oceana!

Also N.C. people are more friendlier = they don't hate sailors, they despise them + us widows of service personal!!

this = is true!!

please listen to the people + not the greedy civilian, all they care about is $$. the roads are overcrowded now, imagine the chaos then.!!

thank you
Anna Tennessey

October 24, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Sir,

I am writing to you in response to the request of "my" input regarding to the Realignment of F/A-18 Aircraft and Operational Functions from NAS Cecil Field to NAS Oceana. I live in the sub-division Ocean Lakes in Virginia Beach. Almost every day I get to witness these beautiful jets fly across the sky. I have been in awe of jets for the past 8 years of so. When my husband and I where looking for a house and decided to try the Ocean Lakes area, my family and friends thought that I was nuts to buy a house in the "jet zone". I love the sound the jets make as they are blasting over my house. Knowing that NAS Oceana is close by is a comforting thought, even more so if we are to get the extra jets and crew from Florida. Some of my friends work at NAS Oceana in the tower and I think they are so lucky to be able to work so close with a pilot and a F-14 or F-18. I have always wanted to be able to ride in a F-14.

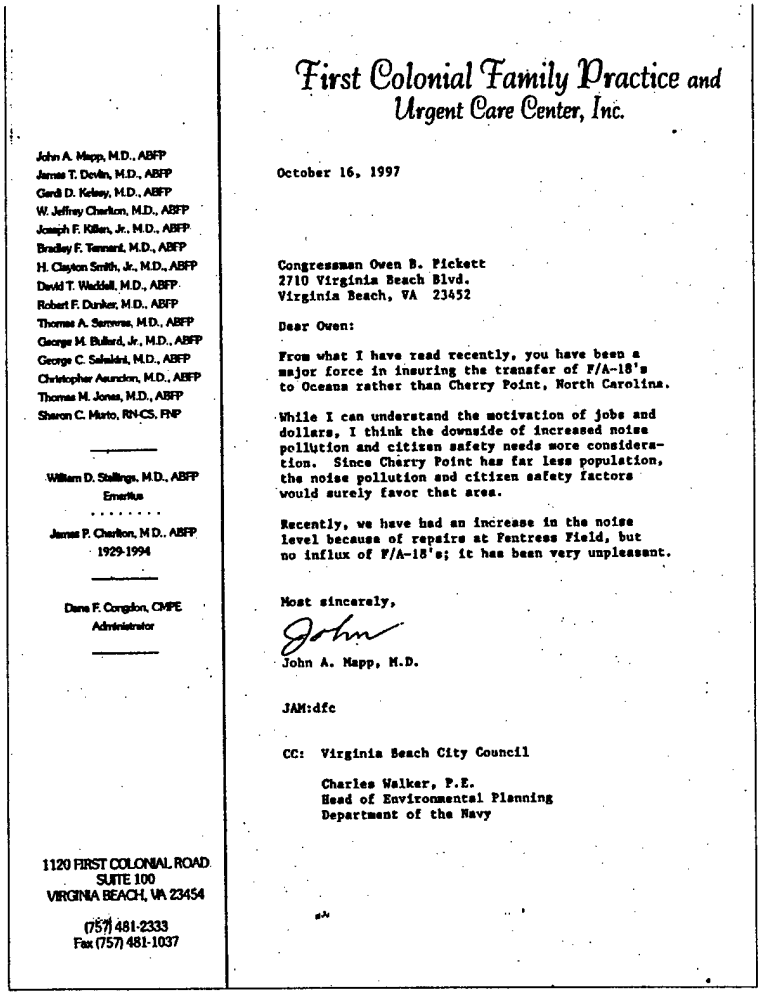
Well, I just wanted to cast my official vote of **HECK YEA, BRING ON THOSE JETS!!!**

Thank you for your time,

Stephsi L. Seger
1705 Davinci Drive
Virginia Beach, Virginia 23454

Thank you for your comments; no response required.

B-8-74



First Colonial Family Practice and Urgent Care Center, Inc.

John A. Mapp, M.D., ABFP
James T. Devlin, M.D., ABFP
Gardi D. Kelsey, M.D., ABFP
W. Jeffrey Charlton, M.D., ABFP
Joseph F. Killen, Jr., M.D., ABFP
Bradley F. Tennant, M.D., ABFP
H. Clayton Smith, Jr., M.D., ABFP
David T. Waddell, M.D., ABFP
Robert F. Dunker, M.D., ABFP
Thomas A. Serreyn, M.D., ABFP
George M. Bullard, Jr., M.D., ABFP
George C. Saladini, M.D., ABFP
Christopher Asuncion, M.D., ABFP
Thomas M. Jones, M.D., ABFP
Sharon C. Marto, RN-CS, FNP

William D. Stallings, M.D., ABFP
Emeritus

James P. Charlton, M.D., ABFP
1929-1994

Dana F. Congdon, CMPE
Administrator

1120 FIRST COLONIAL ROAD
SUITE 100
VIRGINIA BEACH, VA 23454

(757) 481-2333
Fax (757) 481-1037

October 16, 1997

Congressman Owen B. Pickett
2710 Virginia Beach Blvd.
Virginia Beach, VA 23452

Dear Owen:

From what I have read recently, you have been a major force in insuring the transfer of F/A-18's to Oceana rather than Cherry Point, North Carolina.

While I can understand the motivation of jobs and dollars, I think the downside of increased noise pollution and citizen safety needs more consideration. Since Cherry Point has far less population, the noise pollution and citizen safety factors would surely favor that area.

Recently, we have had an increase in the noise level because of repairs at Fentress Field, but no influx of F/A-18's; it has been very unpleasant.

Most sincerely,

John

John A. Mapp, M.D.

JAM:dfc

CC: Virginia Beach City Council

Charles Walker, P.E.
Head of Environmental Planning
Department of the Navy

1

B-8-75

JAM-1 A comparative summary of reasonable alternatives is provided in Table 2.5-1 of the EIS. The Office of the Secretary of the Navy will make an informed decision on the proposed realignment, considering the environmental impacts of each ARS as well as the Navy's operational criteria.

1604 Fenrose Court
Virginia Beach, VA 23454

September 27, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini,

Last year our family moved into a beautiful home in Quail Point Cove in the Great Neck section of Virginia Beach. Our real estate agent informed us at the time we would be in a Level 1 noise zone. Having moved from the peaceful North Shore of Long Island, NY, the full impact of what a Level 1 was didn't hit us until we actually settled in and the F14s began buzzing our treetops. But now we know that telephone calls between the hours of 4:00PM and 6:00PM on certain days are impossible because of the noise; watching TV can be a frustrating experience (and that includes many, many evenings as well), and sitting outside listening to the birds is a thing of the past. We stayed, however, and spent well over $100,00.00 in the last year improving our home and property. Then the news came -the Navy wants to bring in 180(!) F18s (noisier than F14s,) and the area will have to be rezoned. Millions of dollars will have to be spent noiseproofing the city's schools; others will have to be moved and an overcrowded system will become even more so. Traffic would increase and the quality of life would decrease. Thousands of residents' lives would be changed immeasurably. Our family, for one, would be in a Zone 2. I can't even imagine how disturbing life would become! The newspaper detailed ways to soundproof and seal a house against the noise. We really don't want to live in hermetically sealed homes! What a chilling thought.

But the most incredible news in the report is that there is actually a choice about where to send these planes - densely populated Virginia Beach or Cherry Point, NC, a place, I'm told, in a very remote area. A place where Hornets can fly

Thank you for your comments; no response required.

to their hearts content without ever disturbing anyone! A place where crash zones won't include people's homes and their children's schoolyards. Sounds like a place custom-made for 180 airplanes.

And so, here is our request: Please, think long and hard about the quality of life for an awful lot of Virginia Beach residents. We really don't want more congested streets, overflowing schools and unrelenting noise. Since Cherry Point is an option, please consider it and make the smart choice.
Thank you so much.

Sincerely,

Joseph and Liz Fineo

Robert Speisser

Telephone (757) 481-4408

964 Covey Street
Virginia Beach, Virginia 23464

September 18, 1997

Our family had its first taste of flyovers by F-18s. It is unbearable! They are definitely louder than F-14s and A-6s.

1 We live in the Linkhorn Point section of Virginia Beach. As we watched the jets, almost every one was dumping fuel as they flew over. This is not an environmentally safe practice.

I know Mayor Oberndorf equates 11 squadrons of F-18s as just another member of the family - well, let's move Owen Pickett, Mayor Oberndorf and the rest of the politicians who want the F-18s here to houses under the flight path and see how fast they kick the loud new family member out of Virginia Beach.

My family says no to the F-18s. Send them to Cherry Point, North Carolina, where it is less populated.

Sincerely,

Robert Speisser

B-8-78

RS2-1 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

EPA—SAVE VIRGINIA BEACH FROM ITSELF!
A letter to the Editor of the Virginian-Pilot
by Hal Levenson

In 1986, my family and I had the pleasure of relocating to Virginia Beach, to the house we now live in, to what we thought was a quiet, residential neighborhood known as Great Neck Meadows. That year, while visiting our prospective new home with a real estate agent, all had been real quiet, overhead. There had been no hint of anything unusual.

Shortly after we moved in, we came to experience - quite rudely, at first — what it is like to live directly under the Oceana flightpath. Over the years, we have had the occasion to entertain out-of-town visitors at our home, at times on the not-so-infrequent days of "flight operations." Our guests typically look at us in polite disbelief — "How can you live in a place like this??" is a customary comment. Well, unlike most members of the Virginia Beach Council, who live in other parts of the city not so immediately affected, our answer has simply been, "we do!" At the same time, I should quickly add that our neighborhood and city has not disappointed us in any other way, and we are thankful for that.

Now surely none of us — in principle — are opposed to economic growth for our community. But there are times in life when such proposed progress may come at a steep price — a price that may threaten the very fabric of the quality of life we enjoy. Although we all covet economic prosperity, at the same time, we also value other qualities in our lives, such as quiet, harmony, and tranquility. Yes, friends, the jet noise is the sound of "freedom," for sure, but there is more than one kind of "freedom" — for example, the freedom to live and work in a peaceful environment. Further, a strong national defense posture for our country can be accomplished nicely in other ways, other than to mandate experiencing sharply increased roaring jet noise directly over our homes, schools, and businesses!

So regrettably, the federal government may wish to consider whether it should step in and save us from what is obviously the temporary blindness and insensitivity of local officials. I surely do not fault the Navy, which is merely trying to do what is in its own interests. But other parts of the country may be better able to benefit from this additional Naval Air presence, without the quality of their lives being so adversely affected in a way that we now face in Virginia Beach. Perhaps the EPA will choose to remind our officials of this rather plain, painful reality. As for ourselves, let's not be selfish — let's take a pass on these proffered economic benefits so as to help insure the quality of life for all of us who reside here.

Sincerely,

Hal Levenson
President
9/13/97

(The writer of this letter is a former News Director of WAVY-TV.)

LEVENSON COMMUNICATIONS INCORPORATED

2004 Brickell Court
Virginia Beach, Virginia 23454

FAX (804) 481-4172
Phone (804) 496-0745

Thank you for your comments; no response required.

B-8-79

September 22, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Attn: Mr. Dan Cecchini (Code 2032 DC)

Re: Comments on the DEIS and Draft CAA Conformity Determination

1 Thank you for the opportunity to express my opinion on the proposed deployment of additional F-18 aircraft to the Oceana NAS. Virginia Beach does not need these aircraft. The purported economic benefits that the self serving proponents of the plan like to cite are not worth the increased taxes, overburdened infrastructure, noise and air pollution, danger, and declining quality of life. Stationing the planes at MCAS Cherry Point, a less populated and economically depressed area, would provide a real economic benefit to Eastern North Carolina and makes more sense. Since the proposed move was first announced I have talked to no one that supports increasing the concentration of aircraft in our predominately residential and resort area.

For the record and lest my comments be misconstrued; I grew up near MCAS Cherry Point and many of my friends and neighbors worked on the base. I also lived many years less than a mile from Seymour Johnson Air Force Base in Goldsboro, NC when it was a SAC facility with B-52's flying in and out 24 hours a day. I truly believe that the noise, though unpleasant at times, is the price we pay for peace and security.

In addition, my family has chosen to live near Oceana and we were well aware when we moved here of the noise and problems associated with living in close proximity to a military installation. My company also occasionally works for the Navy and I am thankful for the work. However, any positive benefit more aircraft bring to our community is far outweighed by the obvious negative aspects. Fortunately I am financially able to move if the noise and other problems become unbearable. However, many of your other neighbors are not that fortunate and must live with increased taxes, overburdened infrastructure, noise and air pollution, danger, and declining quality of life

2 At present, the current flight patterns (inappropriate for a densely populated area) and operational behavior of the pilots (ie totally unnecessary high speed 'fly-overs' and showing off) not only callously disregards the health and safety of the public but causes increasingly contentious relations with the surrounding community. More planes at Oceana will only cause a bad problem to get worse and alienate a tolerant and welcoming community.

Spread the wealth around and send the planes to Cherry Point.

Sincerely:

Edward H. Keeter
905 Cardinal Road
Virginia Beach, VA 23451
757-491-1749

EHK-1 Thank you for your comments; no response required.

EHK-2 Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)

Dear Sir:

My husband is a recently retired Marine Colonel. We lived at Cherry Point for 2 years, Camp Lejeune for 5 years, Virginia Beach for 4 years in the early eighties, and Virginia Beach now since 1991. So we are very familiar with all the areas of concern in the current discussion.

Virginia Beach was actually used in a study of city planning on how NOT to develop a city, and the Pembroke area was cited as an atrocity of poor, unplanned sprawl. To us, the entire city represents unplanned development, which seems to be exploding at an unprecedented rate, with ever-expanding strip malls, housing developments, and fast food restaurants. The result is overcrowded roads, overcrowded schools, and suburban blight.

Havelock, N.C., the home of Cherry Point, was for years a rural area, but over recent months has PLANNED for the possible arrival of additional F-18s and other aircraft by building more schools, homes, and public utilities. There is 100% support for the aviation community there, as there is in the Jacksonville/New River, N.C. (home to Camp Lejeune and MCAS New River). There, too, there is plenty of both room and support for expanding aviation, as there is in Beaufort, S.C.

Please send the planes to North Carolina, who welcomes their arrival in their community wholeheartedly, and who has the schools, housing areas, and space to put them. The only reason Virginia Beach says they want them is because they want the revenue they generate, but the civilians will then turn around and complain about how all those extra "military types"are overcrowding their city. Meyers Oberndorf has only one motive in life—more money and more expansion for the city of Virginia Beach—at the total disregard for town planning. This city should have a zero-growth policy. It is so tacky and overcrowded now that it is appalling. Havelock has lots of room and lots of love for the military. Give them the boost they need!

Sincerely,

Mrs. John R. Moore

B-8-81

Thank you for your comments; no response required.

Conrad J Faust
Phyllis V Faust
509 Sydenham Blvd
Chesapeake Va 23322

10/27/97

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St
Norfolk, Va. 23511

Facsimile: (757) 322-4894

Dear Mr. Cecchini,

1 We are very much against additional aircraft, the F/A18 coming to NAS Oceana, Virginia. Although we recognize the need for a strong military, we do not understand the need to maintain a level of readiness as if a war with a foreign power were imminent. The most objectional and unacceptable part of the training at NAS Oceana is the take offs, landings and maneuvers performed over our home after 9PM till 2Am that creates the unacceptable noise level which is so disruptive to proper rest and sleep.

2 Reducing these training and practice maneuvers by 25% during peacetime, we believe is a reasonable compromise in your desire to maintain reasonable readiness and maintaining reasonable relationships with the nearby communities. Eliminating excessive and objectionable noise level's and flights would also have the beneficial effect of saving the military substantial fuel and maintenance costs.

We expect that our conerns will be taken seriously. That excessive noise and flights will be eliminated or drastically curtailed after 9:00 PM. Failure to make these reasonable accommodations could lead to the election of federal representatives and or court action that could lead to the closure of NAS Oceana, Virginia.

Sincerely,

Conrad J. Faust
Phyllis V. Faust

CPF-1 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

CPF-2 Pilot proficiency requires a minimum amount of training regardless of world threat situations.

October 27, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert St.
Norfolk, Virginia 23511

Dear Mr. Dan Cecchini:

I am responding to the newspaper clipping in the October 27, 1997 Virginian Pilot which suggests that readers send in their comments on the realignment of F/A-18 aircraft.

I was stationed at Oceana during WW II and flew the F4U corsair, and I am sympathetic with the problem that exists today. I am now a resident in Virginia Beach and things are much different than they were 54 years ago. The city has grown considerably, and the noise problem which has seemingly grown exponentially has made residents very unhappy. The thought of adding more noisy jet planes to the area will be most aggrevating to many of the tax-paying residents. Enough is enough!

1

The accounts that I have read indicate that other east coast installations are anxious for additional squadrons to boost their economies, whereas Virginia Beach would be over-burdoned.

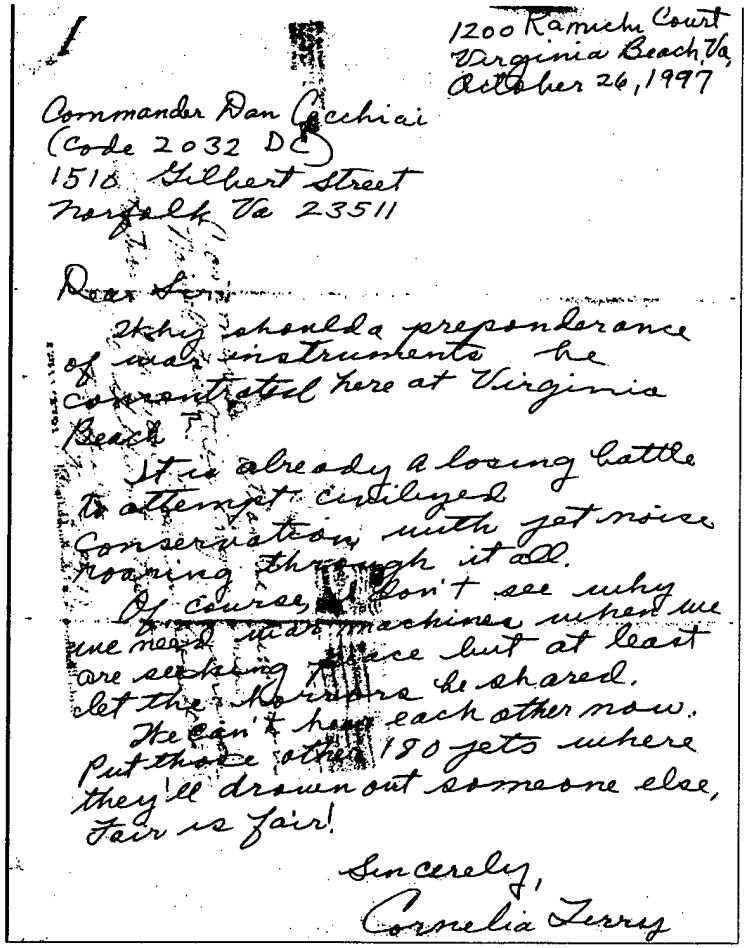
2

Diversificaion was considered a good thing years back, why has this changed?

M.P.Bishop
1409 Blue Heron, Rd.
Virginia Beach, VA 23454

WPB-1 Thank you for your comments; no response required.

WPB-2 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.



1200 Ramich Court
Virginia Beach, Va.
October 26, 1997

Commander Dan Cecchini
(Code 2032 DC)
1510 Gilbert Street
Norfolk Va 23511

Dear Sir,

1 Why should a preponderance of war instruments be concentrated here at Virginia Beach?

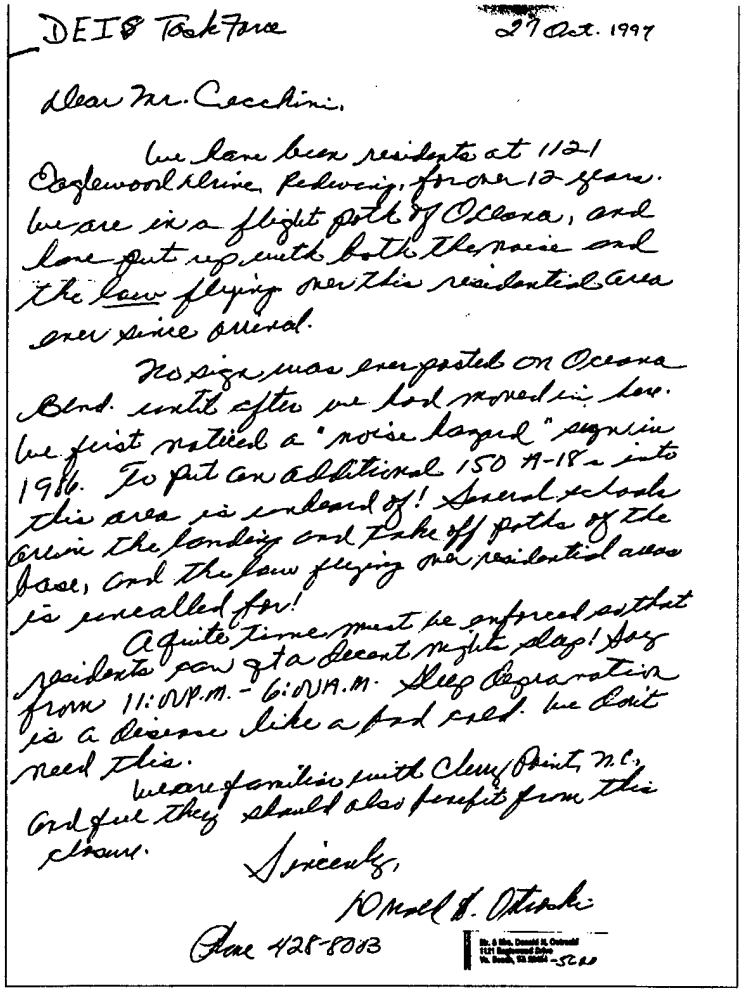
It is already a loosing battle to attempt civilized conversation with jet noise roaring through it all.

Of course, I don't see why one need war machines when we are seeking peace but at least let the burdens be shared. We can't hear each other now. Put those other 180 jets where they'll drown out someone else, Fair is fair!

Sincerely,
Cornelia Terry

1

CT-1 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Five alternatives have been evaluated under which aircraft are transferred to NAS Oceana, MCAS Cherry Point and/or MCAS Beaufort.



DEIS Task Force 27 Oct. 1997

Dear Mr. Cecchini.

We have been residents at 1121 Edgewood Drive, Redwing, for over 12 years. We are in a flight path of Oceana, and have put up with both the noise and the low flying over this residential area ever since arrived.

No sign was ever posted on Oceana Blvd. until after we had moved in here. We first noticed a "noise hazard" sign in 1986. To put an additional 150 A-18's into this area is unheard of! Several schools are in the landing and take off paths of the base, and the low flying over residential areas is unrealled for!

A quite time must be enforced so that residents can get a decent nights sleep! Sleep deprivation is a disease like a bad cold. We don't need this.

We are families with Cherry Point, N.C., and feel they should also benefit from this change.

Sincerely,

Donald B. Ostrowski

Home 428-8003

Mr. & Mrs. Donald B. Ostrowski
1121 Edgewood Drive
Va. Beach, VA 23464-5220

1

DHO2-1 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Louis G. Figari
624 Scootan Rd.
Virginia Beach, VA. 23451-7107

October 31, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, VA. 23511

Dear Mr. Cecchini,

I live in the Croatan subdivision of Virginia Beach and I'm writing you to express my strong opposition to the relocation of the Navy's F/A 18 to Oceana Air Station. I have lived here in Virginia Beach for 12 years, a former Navy F4 pilot and currently fly as a Captain of a major airline.

1 The quality of life here at the Beach is already stretched to the limit. The roads are over crowded, the schools are over capacity and the noise from the air station is often times unbearable. I hear people talking about the "pattern". The mayor and others talk about adjusting the pattern to accommodate the noise and the crash zone around our schools and our children. Who are they trying to kid? The subdivision where I live is not anywhere near that pattern on paper, however we often have jets stray over when the pattern gets a little busy. Bringing in an additional 180 aircraft will assuredly cause noise problems through out the resort area and stretch the crash zone beyond the boundaries that are drawn on paper. Additionally, the F/A 18 is by far the noisiest aircraft to ever fly around here.

2 Our city officials speak of how great bringing the additional squadrons to Oceana will be for the city. Unfortunately, our city officials can only think $$$. They have lost touch with the concerns and the quality of life of the residents. Bringing in an additional 12,500 people will not enhance the quality of life for either the Navy personnel or the current residents.

Again, I strongly oppose the relocation of the 180 F/A 18 aircraft to Oceana. The Navy would be more responsible relocating the squadrons to a base in a less populated area where noise and the possibility of an accident would have minimal impact to the community.

Sincerely,

Louis G. Figari

B-8-86

LGF-1 Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks.

LGF-2 The projected increases in noise levels and accident potential zones (APZs) under ARS 1 have been thoroughly evaluated and are discussed in Sections 4.8 and 4.4.2, respectively in the EIS.

1139 Old Vintage Rd.
Chesapeake, VA 23320
October 28, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032)
1510 Gilbert St.
Norfolk, VA 23511

Dear Mr. Cecchini:

There are very few - if any - non-environmental engineers qualified to offer relevant comments concerning the environmental impact of assigning the F/A 18 aircraft to any of the east coast installations mentioned in the recent Virginian-Pilot solicitation.

If your sole concern is the environmental impact this letter will not address your area. If however, your concerns are more far reaching, or you can pass this letter along to another analyst, this letter may serve a useful purpose.

AS I SEE IT:

(1) There are several groups having interests in the assignment outcome. These groups' interests may conflict.

First - and most influential - are the politicians. Rational discussions will not prevail with this group and they are outside our ability to influence.

Second - The national interest exercised by the Department of Defense. Since you are a member of this group, your recommendations should be considered.

Third - The vocal exhortations of the citizens of the areas under consideration, both pro and con.

Forth - The desires of the military and civilian personnel who will be affected by the assignment decision. Since this group abides by the dictum of "Growl ye may, but go ye must", this group has the least influence of all.

(2) There are considerations of effectiveness.

First - economies of size. In usual business procedures it is more economical for one large order of repair parts, consumable aircraft supplies, support personnel material requirements etc. rather than having each smaller group support its on logistic organization ordering smaller quantities. I realize that computer networking will overcome some of this consideration, but then wharehousing and transportation become problems.

Second - These aircraft need to be maintained regularly. This requires much more than an oil change every 3000 miles. Having the maintenance facility combined with the operating facility results in economy of function. I realize that the

B-8-87

1

RFG-1 The Navy conducted a multi-stage screening process to identify operationally acceptable installations with the necessary capacity and support infrastructure to accommodate F/A-18 aircraft. The screening process consisted of a capacity analysis, an infrastructure analysis, and an operational readiness analysis. One-time costs and life-cycle costs necessary to implement relocation of F/A-18 fleet and FRS aircraft were also considered. The screening process resulted in the identification of alternative realignment scenarios (ARSs), which were then further developed as the alternatives in the EIS.

BRAC was comprised of more than one person but the decision of those genii, who closed Cecil Field in Jacksonville from which the aircraft were to be moved AND NADEP Norfolk with the capacity to accomplish the maintenance task and where at least most of the aircraft would eventually be assigned, boggles my mind. In Norfolk an aircraft needing maintenance or overhaul work was towed from the carrier in the Naval Station to the Naval Air Station with a minimum of cost and time. A flyable aircraft could be flown directly from the carrier at sea to the NAS where it was towed to the NADEP.

Third - The personnel actually flying these aircraft, the active duty support personnel and their dependents require services as do the aircraft. A sick or injured human has the well-equiped Naval Station Dispensary and Dental Clinic in NAVSTA Norfolk and for care of more serious conditions the Naval Hospital Portsmouth Va. The Naval Station Commissary and Exchange provide outstanding services to the persons being discussed here. The surrounding cities of Hampton Roads; Norfolk, Virginia Beach, Chesapeake, Portsmouth, and Suffolk provide facilities and programs not available in the other two sites mentioned. Try finding a world class museum or ballet in Cherry Point! A greater diversity of housing is available in the Hampton Roads area than in the other two sites. Happy, contented people do better work - and tend to ship over.

Forth - Proximity to higher command headquarters. When a decision-maker for one of these commands needs first hand knowledge of operations or equipment, he can satisfy his requirements by car in a 20 minute drive rather than a couple of days TAD.

These considerations of effectiveness would satisfy all but the third group in the listing at the beginning of this letter. Conflict resolution has enjoyed only limited success with noise abatement operating procedures used by the pilots, super insulation and tightly closing all the homes etc. As I read and listen to the Oceana residents I discern two groups, the really oldtimers who were there before the air station was built and the newcomers who bought, built, or rented in the flight pattern knowing full well they were doing so in very close proximity to a "round the clock" naval jet base with its accompanying noise. Here my recommendation is to compensate the oldtimers so they may relocate if that is their desire, and explain to the newcomers that their failure to exercise common sense in their housing choice does not constitute a real problem for the aircraft reassignment question.

As you can see, I am in favor of assigning all of the F/A 18s to Oceana, closing NADEP Jacksonville, and re-opening NADEP Norfolk (or building NADEP Oceana).

Sincerely,

R. F. Graves

Cdr. R.F.Graves USN Ret.

B-8-88-

2

RFG-2 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini
(Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

October 29, 1997

Dear Sir:

We are writing to protest the relocation of the F/A-18 jets to NAS Oceana, Virginia Beach, VA.

Our reasons include the following items. The increased noise level, in addition to the jet noise we already suffer, day and night. We understand that these jets are louder than the F-14's, which is not acceptable to normal people living and working in this area. On top of that, we object to more people coming to a city that is already overpopulated, with overcrowded , traffic congested roads. We will need more schools and need to relocate some existing schools which will cause already high personal property and real estate taxes to escalate. Many people with children cannot afford higher taxes, it is not fair to people who have no children in school to pay more in taxes to finance the new schools, and the citizens as a whole do not want any more tax increases. 1

Another item to seriously weigh is the idea of having all these aircraft in one area , making it easy for future enemies to wipe out an enormous military force all at once. PLEASE, spread the operations out over other areas that have existing room and facilities. 2

In closing, we want to state that we are totally against any more noise, traffic, taxes, home building, destruction of our natural (and declining) open areas, and fear of accidents and disasters. 3

Thank you for allowing us to voice our opinions.

Sincerely,

Joel L. Abraham
Patricia A. Abraham

Joel L. Abraham
Patricia A. Abraham
4704 Berrywood Court
Virginia Beach, VA 23464

JPA-1 As discussed in the EIS, taxes are not expected to increase in the Hampton Roads area as a result of any of the five ARSs.

JPA-2 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

JPA-3 Thank you for your comment; no response required.

Dear Mr. Don Cecchini,

In response to the article in todays newspaper regarding the relocation of the F/A-18s to Oceana.
My comments as follows.



Roy E. Fehmel
966 Nelson Court
Virginia Beach Va 23464
WW II Air Force Veteran

Thank you for your comments; no response required.

B-8-90

Charles G. Quiter
400 Old Gate Muse
Va. Beach Va. 23452

Sir:

Thank you for this opportunity to express my opinion on the matter of the F-18's move to NAS Oceana. I have lived in the Va. Beach area several times over the past 35 years. The three areas that I have lived in are Windsor Woods (near Lake Trashmore), Hilltop (part of Great Neck), and where I am Presently Living near Lynnhaven Mall. I can remember when Va. Beach Blvd. was just a two lane road that connected Norfolk with the beach. Over this period of time there has been many changes, the most significant being the population of the area surrounding the base, I being one of these. When buying a home I was required to sign an acknowledgment of the fact that I was going to live in a noise area. It is inconceivable that the individuals who are against the movement of the aircraft in question did not do the same, seeing that most were younger than myself. This is one of the reasons that I feel they have little merit in their request.

On the subject of additional aircraft, they should take into consideration that although all of the F-14's are assigned to Oceana at this time there has been a reduction of these squadrons by half over the past several years. This results in approximately the same number of aircraft assigned to the base. In addition the Navy has removed the A-6 aircraft form the inventory, and as a result of this they have become accustom to much reduced tempo of operations and noise. With the addition of the F-18 we would be getting back the level of operation that used to be.

It is my feelings that not to add the F-18's to Oceana would be a waist of tax dollars and only satisfying the wishes of those who wish to see the Navy out of this area.

Thank you,

Charles G. Quiter

Thank you for your comments; no response required.

1400 Linlor Drive
Virginia Beach, Va 23451
November 5, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

I can not believe those peoples, who are in favor of bringing additional jets to Oceana, are overlooking the most important issue! That is playing Russian roulette with the lives of those individuals who are in any level of accident potential zones.

1 From 1983 until 1986, there were 13 crashes of Navy jets near residential areas around Oceana Naval Air Station. I don't know the recent statistics since 1986, but if one life or the lives of three in one school or one shopping center or one residential area is unfortunate enough to be destroyed in a jet crash, their "blood" will be on the hands and hearts of those who are only interested in the "buck".

We don't want the quality of our beautiful city to be sacrificed "One" way. We would hope and pray no additional jets would be stationed here. Oceana should be relocated elsewhere, where there are not the above mentioned problems along with pollution and reduced property values.

2

Yours Truly,
William E. Stiltner

WAS-1 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 aircraft is one of the safest in the history of naval aviation.

WAS-2 The Base Closure and Realignment Commissions of 1993 and 1995 thoroughly analyzed all military bases and concluded that NAS Oceana should remain operational. Therefore, closure of NAS Oceana and transfer of its assets elsewhere is outside of the scope of this analysis.

Jini L. Persons, GRI
RE/MAX 100 Club Member; T.A.R.
Diamond & Platinum Awardee of CIRCLE OF EXCELLENCE

October 28, 1997

Commander
Atlantic Division
Naval Facilities Engineering Command
ATTN: Mr. DAn Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Va. 23511

To Whom It May Concern:

RE: Cecil Field Relocation to NAS Oceana

I am writing to state that I AM in favor of the Cecil Field Relocation to NAS Oceana. I feel very strongly that the Navy families who would move to our area would find a very healthy and excellent quality of life. I am speaking from experience, as I was an active-duty pilot's wife for 21 years. We found the Hampton Roads area a wonderful place to raise our family and we were pleased with the established Navy facilities here. Our area has a very stable economy and has grown tremendously while we have lived here.

I trust that you will recommend that it would be in the Navy families' best interest and living to relocate them to NAS Oceana. I appreciate you taking the time to read my comments and thoughts on this matter.

I remain,

Sincerely;

Jini L. Persons GRI ABR
Realtor

RE/MAX Alliance
4701 Columbus St., Ste. 200
Virginia Beach, Virginia 23462
Office: (757) 456-2345, (800) 495-7420
Fax: (757) 564-0355, Residence: 490-6542

B-8-93

Thank you for your comments; no response required.

James C. Flippen & Teri R. Basil-Flippen
413 Clyne Ln.
Virginia Beach, VA 23462
Home Phone 757-496-4728

November 07, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command (Code 2032 DC)
1510 Gilbert St.
Norfolk, VA 23511

ATTN: Dan Cecchini

Dear Mr. Cecchini,

I realize the major economic benefits of the F/A-18s coming to our area. However, as a homeowner in the Brookwood subdivision I have a few concerns.

1 The first is the excessive noise. Recently, I recorded one jet a minute from 9:30 p.m. to 9:50 p.m. when I quit counting. How much will their arrival increase flights in our area? I feel safe assuming the continuous loud noise will decrease property values. It will definitely harm our hearing since it is too loud to speak over. Thus I feel a limit should be set on the number of flights and times for flights.

2 Second, I'm concerned about the renovations to the schools. The Virginia Beach School Board is in a constant battle with the City Council for funds. Thus how many years will it take to improve the schools? What will be done to protect our children in the mean time?

I hope these questions are being reviewed by the Navy and the City. I am not opposed to the F/A-18's arrival but, I do think my concerns are legitimate and should be addressed in the planning and implementation of this move.

Sincerely,

Teri R. Basil-Flippen

TRBF-1 Annual night operations at NAS Oceana under ARS 1 would increase from 7,119 to 19,420. Table 4.1-1 has been modified to separately show the increase in night operations, day operations, and total operations projected under ARS 1. To calculate the projected noise contours, the average number of day operations is used. Some days would experience more operations and some days would experience fewer operations than cited in the EIS.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

The EIS acknowledges that the projected realignment of the F/A-18 squadrons to NAS Oceana would increase aircraft operations and aircraft noise levels. However, although operations and the average daily noise levels would significantly increase, noise levels would not result in permanent threshold of hearing shifts. Although temporary threshold of hearing shifts are possible, individual noise levels would not reach the threshold of pain (i.e., 120 dB).

TRBF-2 The Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach.

Commander, Atlantic Division
Naval Facilities Engineering Command

Attention: Mr. Dan Cecchini

1510 Gilbert St.
Norfolk, VA 23511

Gentlemen:

I have been following the discussions of the relocation of the 11 F/A-18 squadrons and the F/A-18 fleet replacement squadron to NAS OCEANA.as reported in the newspaper and at the public hearings.

I would like to add my voice to those requesting that the new squadrons not be sent to Oceana. Having lived in the flight zone in the past, I know what a hardship it is on the local residents. Furthermore, I do not think it wise to have so many neighborhoods in an at risk situation from possible crashes.

Yours truly,

Eleanor J. Marshall

Eleanor J. Marshall
8208 Ocean Front
Virginia Beach, Va. 23451

B-8-95

Thank you for your comments; no response required.

ATTN: MR. DAN CECCHINI (CODE 2032DC)
COMMANDER ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT STREET
NORFOLK, VA. 23454

NOVEMBER 1, 1997

EXTENSION REQUESTED TO ASSESS

OTHER F\A-18 HOME-BASING ALTERNATIVES

I congratulate the U.S. Navy for the outstanding public meeting held at the Virginia Beach Pavillion on 27 oct regarding the proposed relocation of aircraft to NAS Oceana. Views, pro and con, were given a fair and equal hearing with the expectation that each would receive thoughtful consideration. It was clear that honest dissent, whether absolute or partial, was based on legitimate differences of opinion, perception, experience, and/or exposure to current aircraft operations. Dissent was not, as some intimated, due to a lack of patriotism or a shallow callousness for the living conditions of young Sailors.

Safety and air and noise pollution are worthy concerns of current residents; concerns that appeared to be somewhat cavalierly dismissed by virtually every elected or appointed official and others who spoke in support of bringing all the aircraft to Virginia Beach, e.g. the explicit suggestion that citizens who are impacted most can exist comfortably indoors with air conditioners turned on to mask jet noise. Residents need to continue to be engaged in the discussion on these issues which do, indeed, effect the quality of their lives and environment, and to help devise a balanced solution -- not necessarily one having parochial favor of

B-8-96

EXTENSION REQUESTED - 2 -

local politicians and business groups, and the U.S. Navy.

The issue is not whether we in Virginia Beach are obligated to provide a new home here for all 180 aircraft being evicted from NAS Cecil Field, Fl, but whether we collectively (U.S. Navy and residents of Virginia and North and South Carolina) can craft a home-basing solution which reasonably addresses many complex variables and competing interests, the cost to the Department of Defense, Sailor quality of life, and wetland mitigation being only three. Unfortunately, the draft EIS evaluates only five scenarios, the primary one favored by the U.S. Navy and most (if not all) elected officials and business groups, and four others which only marginally alleviate citizenry concerns. Indeed, the four secondary alternatives appear contrived to make the first alternative virtually unassailable. Additional alternatives, whether proven to be viable in the end or not, addressing other aircraft mixes between the three sites, flight path innovations, carrier landing training modifications, etc. should be considered.

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In this regard, I fully support the request of the State of North Carolina to extend the public comment period. This would allow time for the draft EIS to be amended to include scenarios which would place more aircraft at MCAS Beauford or MCAS Cherry Point, as well as to consider the future impact of even noisier new generation replacement aircraft. At the very least, the EIS would then clearly describe why other alternatives are deficient. The extension would also provide the City of Virginia Beach the

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B-8-97

JCS-1 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

JCS-2 The close of the public comment period on the Draft EIS was extended from November 18, 1997, to December 2, 1997, due to public request.

JCS-3 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

JSC-4 Please see response to JCS-1.

opportunity to clearly and definitively articulate to the Virginia Beach taxpayer the total cost of realignment alternatives in the current draft EIS, as well as for other possible alternatives. The City should also project the aggregate cost (monetary and otherwise) to individual homeowners and residents as they attempt to co-exist with a significantly higher tempo of flight operations (projected to be 10% greater than the 1990/1991 high).

The Navy has promised increased growth and more jobs and dollars for the local Virginia Beach economy. It should now proffer substantive remedies which mitigate the impact on the citizens most affected by flight operations envisioned in the draft EIS alternatives. Whatever course of action is ultimately taken, it should be taken as the result of a deliberate, mutually-accommodating, peacetime decision-making process. It should not be cloaked in the mantle of a wartime imperative.

5

John C. Shick
912 Duke of Suffolk Drive
Virginia Beach, Va. 23454
PH: 496-4147

B-8-98

JCS-5 Noise abatement procedures at NAS Oceana are discussed in Section 4.8 of the EIS.

The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

ROBERT E. YOUNG, DSW
668 FORT RALEIGH DRIVE
VIRGINIA BEACH, VA 23451
(757) 428-4758

October 27, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Thank you, Mr. Chairman, and others, for convening this public hearing. This meeting offers an opportunity for a local referendum on an important community issue—the realignment of F/A-18 aircraft to NAS Oceana, Virginia. I appreciate your efforts in this regard.

I am Robert E. Young, a retired social worker and Eastern Virginia Medical School professor. I live in Croatan, a mile and a half from here in what has been defined as Noise Zone 2, an area of "moderate noise impact."

I was sitting in my kitchen the other day, having a cup of coffee with a friend, when an F-14 or F-18 flew over head. (I have not learned to distinguish them.) This is a frequent occurrence in my neighborhood, and each time it reoccurs it stifles any chance of conversation or visiting. When the plane had finally passed, my friend said, as Mayor Oberndorf reported earlier, "That's the sound of freedom."

I don't think so. To me and my family, it's far more than a "moderate noise impact," and it is far from freeing.

I was a corporal in the Army during the Korean War. I remember in basic training, in bayonet training, our orders were to stab an Asian-looking dummy and either yell "kill" or "lollipop." The military was training me to kill. I complied.

I've changed in these forty-some years. It seems to me that we keep changing the face of that bayonet dummy, but we keep creating new enemies to wage war upon and justifying it with the slogans we've heard a lot of tonight about the "free world" and maintaining the "number one superpower."

What has happened to our thinking that we so blithely not only "accept," but aggressively seek and campaign for, the funding and the placement of such instruments of international destruction? How can we talk of world peace out of one side of our mouths when we devote so much of our capital and our energies to being the leader in world war-making. And how can we want that in our neighborhood? Pogo was right: "We have met the enemy and he is us."

I want to shift our thinking for a moment to the economics of all this. One F-14 costs 38 million dollars. I would think the F-18s cost certainly no less than this. At a time when schools and health centers are holding bake sales to stay afloat and when the Cold War is supposed to be over, we are spending 38 million dollars for one warplane. And you plan to bring 160 of them to this community.

B-8-99

Thank you for your comments; no response required.

We make an inordinate amount of fuss about he costs of social security, the so-called "welfare fraud," the "waste" in Medicare and Medicaid, when the greatest fraud and waste is in our arms economy. An underpublicized report by the Government Accounting Office (GAO) found that the B-2 "stealth" bomber's radar transparent skin deteriorates so rapidly in rain, heat and humidity that the plane must be kept in special climate-controlled shelters and would be suitable for fair-weather combat only. This means that $44.7 billion already spent has been wasted. And despite the Pentagon saying it doesn't need or want more B-2 money, the House members voted to continue funding it. (Source: *The Washington Spectator*, October 1, 1997.) And doesn't putting money into "stealth" bombers conflict with our planetary values of creating an "open" society?

A couple of years ago I asked the Defense Base Closure and Realignment (BRAC) Commission to close Oceana, Dam Neck and Pendleton so that they could be converted into public usage that promotes community well-being, sustainable industries and world peace. So far that hasn't happened. Obviously, there is plenty of money for all of this. It takes, not a realignment of F-18s, but a realignment of the context of our thinking.

I recall in an introductory class in economics learning about "guns and butter." Butter has a "multiplier effect" on the community. Guns do not. F-18s are guns. Let me spread some butter.

Assuming we close the bases and converted the money, space, knowhow and will to sustainable peacetime industries and services:

1. Think of the prime beachfront real estate and wooded glens that could be open to family life and to a "home where the deer and the antelope play."

2. Think of the bird sanctuary we could have to replace the terrifying screech of those Navy Hornets, with the flutter of hummingbirds and herons and geese.

3. Think of how the swords of jet-fighters could be beat into plowshares of an industry to produce mass public transportation for Virginia Beach and all of Hampton Roads.

4. Think of how well those military barracks could be used as temporary shelters for the homeless and those with disabilities, and how a new industry for producing low-cost housing could be generated.

5. Think of how some of the energy of our magnificent, abundant neighbor, the Atlantic Ocean, could be used to develop a technology for desalination, and hydroelectric power, whatever the political outcome of the Lake Gaston deliberations.

6. Think of how those highly skilled, dedicated Navy pilots and other brave, young military men and women could be enlisted into a domestic peace corps to do community work with at-risk youths in the neighborhoods and public schools.

The Navy's draft environmental impact statement (DEIS) offered five alternative realignment scenarios (ARS's). In the spirit of that document I suggest three ARS's.

- ARS 1: The plans as outlined above (close Oceana and other Hampton Roads Bases).

- ARS 2: Comply with DEIS preferred alternative of ARS 1—relocating 157 of the 160 F/A-18 fleet squadrons and the FRS to NAS Oceana. With the money from the three remaining F/A-18s ($38 million x 3 = $114 million) being turned over to a "Hampton Roads Commission for Sustainable Industries and Services."

- ARS 3: As in 2 (above) but with only $76 million—the cost of two F/A-18s going to the Commission.

Is it too late to build dreams? Is it too late to "think globally and act locally"? Is it too late to "give peace a chance"? I think not. Maybe we can learn to say "yes, in our own backyard" to peacetime conversions of the military.

Thank you for creating a forum for speaking and listening.

Sincerely,

Dr. Robert E. Young

Dr. Robert E. Young, LCSW
Associate Professor, Department of Psychiatry & Behavioral Science,
Eastern Virginia Medical School, (retired)
Consultant and Supervisor, Family Services of Tidewater, (retired)

November 7, 1997

Dear Mr. Cecchini,

As a resident of the Cavalier Park, Bay Colony area in Virginia Beach, I feel compelled to voice my concerns pertaining to the proposed addition of the 120-180 F/A 18's heading for Oceana Naval Air Station.

I am a native of Norfolk, Va. and have lived in Virginia Beach for the last 38 years with my family. We want to protect our right to live in and out of our homes without noise and air pollution. I am also very upset about jet fuel being "dumped" on our neighborhood. There is that possibility. Although Captain Benson said, "if my boys dump their fuel, I will pull their wings." That doesn't do us very much good after the "deed" is done. The crash zone is another very big concern for all the residents in our area. We are now in zone 2.

My children live within a couple of blocks of our home on Hill Road. One son lives on Abingdon Road in Bay Colony and one son is building a home on Bay Colony Drive bordering Crystal Lake.

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JMR1-1 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

JMR1-2 Ms. Randolph's residence is outside the projected APZs for all ARSs.

They each are married and have a child. (ages 1 and 2 years respectively). So I am writing not only as a resident, but as a wife, Mother, Grandmother and daughter-in-law My husband's mother lives next door and has lived there since 1948.

This is the first time I have ever written a letter begging for reassessment of the number of F/A 18's to be sent to our area. They are much louder than the planes we have here now and we will have more of them.

When are we as caring, educated citizens going to put human values and quality of life over money? That is the bottom line.

I have answers to all of the proposed positives to make them negative. I'm sure you have heard them all, but I will point out a few.

① 23 of our schools would fall into the high noise or accident-potential zones. The "City Fathers" said they

B-8-103

would hurry and make sure all of the schools would be air conditioned to seperate or reduce noise. Do our children have to stay indoors all day? What about the residents of these areas? Do we all have to stay inside? Community Voice Studies conducted in the U.S. since 1972 have indicated that adverse effects resulting from aircraft operatives, such as annoyance, sleep interference & speech interference, are generally associated with exposures exceeding an Ldn of 65-75 according to VOL. I Sept. '97 prepared by the Navy. This is what our neighborhood faces if the jets are allowed to come to Oceanna. Please, do not let that happen.

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② During a television discussion last week our Mayor said that she had only heard of "three" accidents occurring in the accident zones and she felt "comfortable" with that. It will only take one to wipe out 4 generations of my family.

③ I am also concerned about the impact that 2,700 new students

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JMR1-3 Closing of windows will significantly reduce interior noise levels due to aircraft but may require the installation of central air conditioning. These recommendations addressed the primary learning environment, the classroom. Children will not be required to be inside all day. Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration.

JMR1-4 Annoyance, sleep interference and speech interference are effects experienced between 65-75 dB Ldn.

JMR1-5 Projected impacts on school capacity under all ARSs are addressed in the EIS. ARS 1, which would result in the greatest increase in school-age children, would require the ongoing Virginia Beach school expansion program to continue. The resulting increase in total school expenditures would be at least partially offset by increased student aid and the additional local taxes paid by the new residents.

will have on our public school system. Also troublesome is the thought of 12,500 new residents in our area. Our roads are already congested. I realize the city is planning (with our tax dollars) to widen Birdneck Road, Great Neck Road, First Colonial Road and Oceana Boulevard. I just can't imagine where First Colonial Road can be made wider. It is so congested now you can barely move at a reasonable speed) if at all.

6

Our city has already spent 21 million to move 2 schools. The Navy later changed it's criteria for the accident zones but never shared the information with the City of Virginia Beach. Moving one of the two schools was completely unnecessary. And, the new school was built on First Colonial Road, the busiest road in our city. It is within sight of the Hospital of Virginia Beach. Can you imagine an Elementary School within a 25 mile per hour zone and an emergency ambulance trying to get through? Our children; our Natural Resources; need good minds, like yours, to rethink all of these proposals.

7

JMR1-6 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions (i.e., moderate traffic levels and acceptable levels of service), specific congested areas, and planned road improvements. Impacts on transportation under ARS 1 are addressed in Section 4.7 of the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

JMR1-7 Thank you for your comment; no response required.

5. They haven't been very well thought out previously.

Thank you for taking the time to read my letter. I appreciate the consideration given to my concerns.

Move the planes to Cherry Point, N.C. It may cost more in dolars for the Navy but in human lives and quality of life, in the final analysis what is more important? If we don't have our health we don't have anything.

Thank you,

Jean Marie Randolph

1152 Hill Road
Virginia Beach, Va.
23451 Zone 2

B-8-106

924 Duke of Suffolk Dr.
Virginia Beach, Va 23454

November 12, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert St.
Attn: Mr. Dan Cecchine (Code 2032DC)
Norfolk, Va. 23511

Dear Sir:

I am writing to request the following concerns be addressed during the development of the impact statement discussing the effect of bringing additional F/A 18 aircraft to the Oceana Naval Air Station. I live in Wellington Woods, an area that will be designated as a high noise zone after their arrival and have lived in the area since 1971.

1 a) What is the cost to protect homes in Wellington Woods and other established neighborhoods against aircraft noises above 65 db?
2 b) What will be the effect on the presently overcrowded public school system? What is the cost of building additional schools and/or classrooms to support the squadron families moving to the area?
3 c) What is the impact on the Virginia Beach highway and road system? At present the Hilltop area is crowded and will be more so after the opening of the new Linkhorn school - which was moved out of a high-noise area. This area feeds into the Oceana area.
4 d) The public has strongly stated a desire to keep the "Green Line". Where will these new families be housed without building new housing below the "Line"?
5 e) What protection will be provided against additional automobile and roofing corrosion caused by jet fuel emissions?
6 f) High aircraft noise is a detriment to school student's concentration. What is the cost of protecting and insulating the public schools under the flight pattern? I assume this includes the new Linkhorn School, and the Lynnhaven Middle School. Also, what is the cost of moving these schools out of the danger zones?
7 g) What is the cost and impact on 1) trash collection; 2) water supplies; 3) mosquito control; 4) parks and recreation, particularly the possible need for additional recreation centers; 5) the court system; 6) public safety, specifically the need for additional police, juvenile centers and personnel.
8 h) What is the impact and cost to the Beach of moving all or some of these squadrons to North Carolina instead of Virginia Beach?
9 i) What is the impact of an increased dependence on the military which does not pay taxes to the Beach, versus bringing in industrial and corporate organizations which do pay taxes.
10 j) Virginia Beach is in the flyway for waterfowl migrating south. What is the environmental impact of additional aircraft interference on the normal movement of these birds?

In my opinion, this move is a no-win move for the citizens of Virginia Beach. The only winners are the real estate and contracting industries. I am opposed to this move.

Kenneth Cauvet
924 Duke of Suffolk Dr.

B-8-107

KC-1 Because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy did not develop cost estimates for noise mitigation at private residences.

KC-2 Projected impacts on taxes/revenues and school capacity under all ARSs are addressed in the EIS. Implementation of any ARS would result in an increase in school-age children, which would require the ongoing Virginia Beach school expansion program to continue. The resulting increase in total school expenditures would be at least partially offset by increased student aid and the additional local taxes paid by the new residents. Overall, the EIS states, in Section 4.5.1, "*Virginia Beach and the other communities in the region would not experience any significant negative fiscal impacts from the proposed realignment under ARS 1.*"

KC-3 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions (i.e., moderate traffic levels and acceptable levels of service), specific congested areas, and planned road improvements. Impacts on transportation under ARS 1 are addressed in Section 4.7 of the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

KC-4 Projected impacts on housing availability under all ARSs are addressed in the EIS. Based on the number of housing units in the Hampton Roads area and the local vacancy rates, the projected increase in population will not significantly impact housing availability. New housing construction beyond the "Green Line" is not anticipated.

KC-5 There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

KC-6 The City of Virginia Beach has requested that the Navy work with local officials to conduct detailed engineering evaluations at those schools of particular concern. This assistance would include providing technical background information on such issues as specific Ldn values for schools and sound attenuation recommendations. However, because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, cost estimates for noise mitigation at schools and churches were not developed.

The Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach.

KC-7 The EIS discusses the potential impacts of the projected increase in population under all ARSs on local community services (i.e., medical, fire and emergency, and security services, and recreational facilities), and local or regional infrastructure and utilities (water supply, wastewater treatment). The projected increase in population under ARS 1, including the military and civilian personnel and their dependents would be less than 2% of the population of Virginia Beach, and the local community services, infrastructure and utilities have sufficient capacity to accommodate this projected growth in population. Potential impacts on trash collection services, mosquito control and the court system are assumed to be insignificant. The projected increase in population would not require new housing developments in the community which could require trash collection services or mosquito control programs to be extended.

KC-8 Consistent with the National Environmental Policy Act, the EIS assesses the potential direct, indirect, and cumulative impacts of each of the ARSs. To assess the impacts of not implementing the proposed action at a particular location is highly speculative and beyond the scope of the EIS.

KC-9 The positive socioeconomic impacts for all ARSs on the Hampton Roads area are discussed in the EIS. The Navy is exempt from paying state and local income taxes. Navy personnel will pay sales tax on all items purchased in the region and all personnel living off-station will pay local real estate taxes either directly or through their rental payments.

The growth of the Navy's economic impact on the region does not preclude other industrial or business development in Virginia Beach or the region. In fact, the additional economic activity caused by the proposed realignment would increase the demand for local goods and services and thus would increase the sales and tax revenues generated by the private sector.

KC-10 Air traffic is one of many factors that influence migrating waterfowl in the Atlantic Flyway. Other factors, including habitat loss, urbanization, water pollution, and food sources play a larger role in migration success. Moreover, the projected increase in air traffic under all ARSs is very small relative to the total commercial, civilian, and military air traffic existing in the region. The projected increase in aircraft operations at NAS Oceana would have a negligible effect on migrating waterfowl.

[redacted]

Alfred Magill Randolph

DEAR MR. Cecchini,

SHould one hundred twenty to one hundred eighty F/A-18 Fighter AIRCRAFT be based Additionally At the NAVAL AIR STATION OCEANA, the Whole OF CAVALIER PARK/BAY Colony Civic LEAGUE AREA Would be Within the "Projected 1999 65-75 DECIBEL Noise Contour" (ZONE II) WHERE it NAS Not WithIn this CONTOUR IN the 1978 decibel plot. No PART OF this AREA has EVER BEEN IN A REAL Estate NOISE disclosure ZONE.

BEFOR ANY CHANGE occurs, WE Request that the NAVY REEVALUATE its Noise Abatement PROCEDURES with the goal OF Reducing the proposed INTENSE NOISE IMPACT IN OUR RESIDENTIAL AREA.

SINCERELY,

A.M. Randolph

11/12/97

PS-
1. CAROL M. BROWNER
2. OWEN PICKETT
3. JOHN WARNER
4. CHARLES Robb
5. MYERS OBERNDORF

1

AMR-1 Military aircraft are exempt from the Noise Control Act of 1972. However, Navy aircraft conduct noise abatement procedures to the best of their ability, commensurate with safety and operational training requirements. Section 4.8 of the EIS provides noise abatement procedures used at NAS Oceana to reduce noise impacts.

November 10, 1997

Attn: Mr. Dan CecchIini (Code 2032 D C)
Naval Facilities Engineering Command - Atlantic Division
1510 Gilbert St.
Norfolk, VA 23511-2699

Dear Mr. CecchIini,

This letter is to express my feelings and opinions on bringing the additional 180 F/A 18s to Oceana..

I STRONGLY DISAGREE WITH THIS PLAN AND WANT TO SEE IT CHANGED.

I have been a resident of Virginia Beach since 1973, coming here with my husband who was in the Navy as a F/4 pilot. He has since retired with the rank of Admiral. My son was in the Navy as an F/18 pilot for 9 years and has since left the active Navy but still flies in the Navy Air Reserve. The Navy has been a part of my life for 35 years and I have great affection for it and pride in it.

HOWEVER, I do not want to see more planes brought into this area because of the noise level, which I live with daily and is already a problem, because of the possibility and likelihood of a disaster to the many people who live in the areas surrounding Oceana, and the increase of traffic and overburdening of our local resources. Virginia Beach is still a desirable place to live but bringing more planes into the area gives consideration only to the financial interests of a few and not the majority of residents who are already established in a community that **PRESENTLY** still has a high quality of living. Virginia Beach is not a huge metropolis and that is what most of the residents like about it. If we wanted to live in a huge, noisy, crowded city we would move somewhere else.

A facility that would home base the additional number of planes under consideration should be located **AWAY** from areas that contain schools, homes, parks and all the other establishments that make up a community. It makes no sense to contaminate our area with more noise and traffic and danger. We have the maximum number of planes that will allow us to keep our neighborhoods and shopping areas still livable and desirable. Recently I stopped to make a call from a pay phone and finally had to give up as I could not hear a word being said by the other party and the landing pattern was full of planes coming into Oceana. I can not imagine what it would be like if we have 180 more jets swarming overhead day in and day out as well as the necessary night maneuvers!!! **I DO NOT WANT TO FIND OUT FIRST HAND.**

What is the reasoning behind this plan besides money? There is more to quality of life than increased revenues. Unless we only want to be known as a Navy/military town, we need to listen to the needs of the people who live here presently and don't want more noise or the possibility of a disaster. We must also be aware that we will **NOT** attract future residents who do not want to live under such conditions as this influx of 180 new jets will create in Virginia Beach. In the summer, I wonder why any tourist would want to come to our beach, a place of beautiful natural assets, and pay to spend time being bombarded by the unbearably loud noise of constant planes overhead. I know this first hand as I walk the boardwalk daily.

WE ARE A TOURIST MECCA AND MUST PROTECT OUR TOURISM INDUSTRY!!!!.

B-8-111

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2

SCN-1 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Five alternatives have been evaluated under which aircraft are transferred to NAS Oceana, MGAS Cherry Point and/or MCAS Beaufort. Please see Section 2 of the EIS.

SCN-2 Thank you for your comment; no response required.

I was out of town the week of the town meetings on a medical emergency or I would have been there to loudly protest this plan. It is not too late to divide the number of jets with other locations and allow those communities to share the byproducts of noise and threat of danger and over crowding we do not need or want added to our community.

I will be watching the papers and listening to the news to see if those residents who are **AGAINST** this plan are ignored or considered to have a say in the running and planning of their community.

I WILL BE AVAILABLE TO EXPRESS THESE OPINIONS AT ANY TIME.
My phone number is 757-425-5128.

Sincerely,

Sharon C. Norton

Sharon C. Norton

B-8-112

John A. Stanley
2636 E. Kings Road
Virginia Beach, VA 23452

Commander, Atlantic Division NAVFACENGCOM
Attn Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, Va 23511

November 12,1997

Dear Sir:

I have followed the debate regarding the Draft Environmental Impact Statement recommending the assignment of 120 to 180 F/A-18s to the Naval Air Station Oceana.

A representative of Oceana appeared before a meeting of our Chesopeian Colony Civic League. He was condescending, ill informed, and rude. He blamed the Press for our lack of understanding of some matters, refused to answer a well informed resident's questions, and basically called some realtors liars. He knew virtually nothing about past Naval aircraft accidents near Chesopeian Colony.

I watched a TV replay of the DEIS hearing at the Virginia Beach Pavilion. I noted that politicians, business, and Navy personnel spoke in favor of the plan. All but two other speakers spoke against it. The politicians spoke only of additional money for the city and the quality of life of the Navy personnel who would transfer. Never a word about the affect on the residents. Many excellent reasons were given by opponents for non-asignment of the aircraft.

I am against the assignment of any F/A-18s to Oceana because:

1 | 1. The current noise level is entirely to high. Additional noise would be unacceptable. The claim that the new noise level would be less than 1990 is meaningless. Who has determined that level was not excessive? At that time we were at war and were willing to accept a temporary excess.

2 | 2. Rep. Owen Pickett, a former resident of Chesopeian Colony, said we should share our quality of life with new Navy people. That is a nice thought but he should know we are having major problems with road congestion, crowded schools, crowded beaches, lack of parking, etc. New people will not enjoy our quality of life. We and they would have a reduced quality of life.

3 | 3. The crash zone (by whatever name) worries me. In the early 1970s a Navy plane crashed in the southern part

B-8-113

JAS-1 The EIS compares the land area and number of people impacted by noise zones for 1978, 1997 and 1999 aircraft operations. The 1978 AICUZ noise zones are representative of the noise impacts to the local community when annual aircraft operations are averaged over a long period of time. Noise levels also were calculated for the aircraft operations in 1997, so that the projected noise levels could be compared to noise levels currently experienced by the local community as well. The projected increase in noise levels would be significant under any of the ARSs. Navy aircraft conduct noise abatement procedures to the best of their ability, commensurate with safety and operational training requirements. Section 4.8 of the EIS provides noise abatement procedures used at NAS Oceana to reduce noise impacts.

JAS-2 Thank you for your comment; no response required.

JAS-3 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 aircraft is one of the safest in the history of naval aviation.

There is no methodology for determining the location of air aircraft accidents away from the airfield.

of Laurel Cove. Houses were planned but not built on the crash spot. Had the aircraft continued for three more miles it would have taken out Chesopeian Colony homes. Had the crash happened two years later on the same spot, it would have been in a developed area. We still remember the badly burned girl as a result of the 1966 crash off Londen Bridge Road.

4. I remain unconvinced that market values in the crash zones will maintain pace with the market.

5. All F/A-18s at Oceana. I seem to remember the outcry after Pearl Harbor. Many said we should not have had all our fleet at one site.

I request that you consider the overwhelming desire of the civilians of Virginia Beach. Have the F/A-18s based elsewhere.

Sincerely

John A. Stanley

cc: Rep. Owen Pickett

JAS-4 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JAS-5 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

H. A. Stokely
1504 N. Horseshoe Circle
Virginia Beach VA 23451
phone: (757) 428-8064
email: herkstok@aol.com

14 November 1997

Mr. Dan Cecchini
NAVFAC NORVA

Dear Mr. Cecchini,

Not too long ago, Virginia Beach was heavily shaken by a series of explosions that shook the earth and alarmed thousands of residents. Initially the cause was a mystery. However after some time it became apparent that "***unusual atmospheric conditions***" had caused the earthquake-like events to be sensible in Virginia Beach. At least this was the explanation when Navy officials indicated that the blasts were the result of a live bombing exercise with 500 pound bombs. This ***training*** exercise was had been conducted by A-6 aircraft

There are two facts that I would like to point out relative to this event and the environmental impact of aircraft operations from Oceana. The first is that the A-6 aircraft was within a few months of ending its operational life as an active Navy aircraft. Obviously there was no need for this kind of ***training!*** Second, is the fact that these aircraft had needlessly carried these extremely dangerous bombs out of Oceana over our crowded community. Carrying practice ordinance out of Oceana should be tolerable if precautions are observed, but this community should not be needlessly subjected to the danger of overflight or worse, crashes with live ordinance on board Oceana aircraft. 1

When it is necessary that live ordinance be used in training exercises, a bit of advance planning and preparation would allow the loading and departure to take place from more rural locations such as Fentress or Cherry Point.

My point is ***not*** that Navy aircraft should be kept away from Oceana, but that the Navy ***must*** adjust its operations to reflect the fact that the base is embedded in an extensive and crowded community. Over the years since Oceana was built, the aircraft have grown ever larger, heavier, louder, and more devastating in their impact on the quality of life and safety of the surrounding community. The community has grown also; until the base is essentially surrounded by heavily populated areas. You must recognize that the world has changed and that operational considerations must change to reflect this reality. The alternative is eventual tragedy; and with that, a substantial change in community support. When I attended the EIS hearings at Virginia Beach, I was appalled that there was ***no one*** there who represented the operational side of the Navy. Are they so uninterested in what the community thinks that they didn't even come out to listen to what we had to say? 2

Sincerely,
/S/ H. A. Stokely

HAS1-1 Live ordnance is not regularly carried on flights originating from NAS Oceana. On those occasions when live ordnance is carried, it is not armed until the aircraft physically enters the target area. Aerial ordnance is designed not to explode upon aircraft impact.

HAS1-2 The purpose of the public hearing process is to provide members of the public an opportunity to present their views of the proposed action. All transcripts of the hearings, comment cards, and comment letters will be part of the permanent record and will be considered in the final decision.

NAS Oceana has an outreach program to brief civic organizations, service clubs, realtors, and other interest parties on the air station flight mission. The Commanding Officer at NAS Oceana has also established a Community Leaders Forum to meet quarterly and discuss issues of mutual concern.

Anne M. Odom
925 Windsor Road
Virginia Beach, VA 23451
November 12, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Re: Relocation of F/A-18 Jets

Dear Mr. Cecchini:

I am very much opposed to the realignment of Bay Colony from a Noise Zone I to a Noise Zone II. I understand this is due to the relocation of F/A-18 jets to the Oceana Naval Air Station.

Before relocating these jets, the flight plans should be reviewed and revised so that Bay Colony remains in Noise Zone I. The reassignment to Noise Level II will cause a decrease in the property value of my residence, which is my primary asset. Additionally, this noise will affect my ability to quietly enjoy time spent at my residence.

Please re-evaluate the Draft Environmental Impact Statement with the goal of keeping Bay Colony in the noise zone it is in currently.

Sincerely,

Anne M. Odom

Anne M. Odom

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B-8-116

AMO-1 Unfortunately, flight plans cannot be adjusted to maintain Bay Colony in Noise Zone I. Regarding property values, they are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

14 November 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini,
regarding the possibility of an increased number of planes being stationed at NAB Oceana:
my wife and I object to the noise levels and frequency of the planes presently flying almost directly over our house. This noise and increased chance of an accident are our chief concerns to having an increase in the number of planes and personnel stationed here!

There have been comments that some homes could(should) be better insulated to accomodate the increased noise. Our home is completely brick with windows of double-pane thermal type. The attic is insulated with 6 inches of fiberglass insulation. Still, when we are in the house with all windows and doors closed we cannot hear to talk to each other or guests, cannot hear the T.V., hear on the phone, etc., when the planes fly over. When outside, sometimes it is actually painful.

1 At the civilian airports when a large airliner takes off the sound level is not deafening! Why do these military planes make so much noise, not only during take-off, but even when coming in to land? Could they take-off and land more quietly?

2 As an aside, we understand that the ships at the Naval Base in Norfolk must be where the water is, but we do not understand why the planes are stored almost at the oceans' edge. We would think that the ideal location for them would be on the back-side of a mountain so that an incoming attack of planes or ICBM's would have to pass over some land and make a U-turn to reach our stored planes. Hopefully they would be intercepted before wiping out our defenses and in the case of enemy planes would have to fly over more land (and defense batteries) in order to escape if they were not intercepted on the way in. Also, it seems that we will have all of our eggs in one basket (remember Pearl Harbor?)! These planes do not need to be so close to the carriers that one air-strike could wipe out everything! They could still be flown-in to one central facility for servicing.

B-8-117

FES-1 Commercial aircraft are required to meet federally-mandated noise reduction standards. The high bypass turbofan engines used by commercial aircraft cannot be used by high performance fighter aircraft. While tactical military aircraft are exempt from federally-mandated noise reduction standards, the Navy will continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever possible.

FES-2 Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

The neighbors and friends that we have spoken to about these concerns agree, but we are sure none will write. Some take the attitude that the government will do as it pleases anyway, so why bother? Others feel that the noise levels are so bad now that they couldn't get much worse! In the first case we hope they are wrong; in the second case we know that they are!

Sincerely,

Frederick Simm
Evelyn Simm

Frederick and Evelyn Simm
708 23rd Street
Virginia Beach, VA. 23451

JOHN & KARIE ALTON
2408 ETRE HALL WAY
VIRGINIA BEACH, VA 23456

November 12, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini
Practices code 2032 (DC)
1510 Gilbert St.
Norfolk, VA 23511

Dear Mr. Cecchini:

I live in the Oceana area of Virginia Beach but I don't know how much longer I can tolerate living here. I love Virginia Beach, I love my home and my family and friends who live here also. The noise and pollution already caused by the jets flying over is at times getting close to intolerable. Why do we need enemies that these planes are protecting us from when we can destroy ourselves without their help???

Let me add my voice of opposition to those who have already voiced an opinion about the new contengent of 180 jets due to arrive at Oceana to further disturb our tranquility (such as it is). There is no need to reiterate the consequences of such a move in the 40,000 new people moving to our area that will need public facilities, schools and roads.

Is there nothing we can do to protect Virginia Beach from this offensive intrusion???

Thank you for your consideration.

Sincerely,

John + Karie Alton

Thank you for your comments; no response required.

B-8-119

1144 Cordova Court
Virginia Beach, VA 23456
November 13, 1997

Commander, Atlantic Fleet
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

I am writing this letter to address the F/A-18 DEIS. I am a citizen of Virginia Beach who cannot support the proposed plans to relocate 180 jets to NAS Oceana.

As a native of the area, I have long endured the noise and other nuisances related to the jets at Oceana. My family's experiences with NAS Oceana's jets over the years have not been pleasant. As a teenager, my wife witnessed a jet crash into a wooded area across the street from her school. Apartment buildings and an office complex now stand in the space where that crash occurred. As a young man, I helped detour traffic around the site where a jet crashed into a car, killing its driver and the unborn child she carried. Just a few weeks ago, jet fuel was dumped over my neighborhood, sending several residents to the emergency room. Even when my congressman intervened, the Navy denied any wrongdoing in that situation.

The addition of 180 jets would only serve to further deteriorate the quality of life in Virginia Beach. The noise pollution, already intolerable in many areas of the city, would be significantly increased by an additional 180 jets. The Navy often mentions that the chance of a plane crashing is insignificant. However, it must be significant if it causes our city to relocate schools out of crash zones. Jet crashes would surely increase and the crash zone would certainly have to be expanded, further encroaching on our city. Air quality would suffer more. The overall impact on the city would prove unfavorable.

It is very obvious that those who do support this proposed expansion have self interests that usually equate to money in their pockets. My interest reaches beyond that and focuses on the general quality of life in our city.

Sincerely,

Brian M. Proctor

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B-8-120

BMP-1 APZs do not predict aircraft accidents but indicate a possible location of an accident should it occur. An examination of military aircraft mishaps over 30 years shows the majority of accidents within 5 miles of an airfield tend to occur on the airfield or on the extended arrival or departure corridor, decreasing in likelihood with distance from the end of the runway. While the chances of an accident occurring at a particular location in the APZs is remote, the Navy provides APZs as a tool for communities to use in land use planning.

The EIS identifies APZs based on the flight tracks, number of operations, and distance from the end of the runway. APZs are established under flight tracks with a minimum of 5,000 annual operations, extending out 15,000 feet (except FCLP patterns which may exceed this distance) from the end of the runway.

While APZs expand in all scenarios over the environmental baseline and adopted AICUZ, this does not reflect on the safety of the F/A-18 aircraft. It is primarily due to improved criteria, which better define the zones. The F/A-18 aircraft is one of the safest in the history of naval aviation.

The concept of Accident Potential Zones (APZ) is predicated on minimizing the density of development, and consequently the concentration of people, in areas identified as APZs. Relocating a school from a site within an APZ removes a high-density land use and concentration of people (in this case students, teachers, and other staff) exposed to aircraft overflights.

MARILYN ROSS
1041 CULMER DRIVE
VIRGINIA BEACH VA 23454

November 12, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini
Practices code 2032 (DC)
1510 Gilbert St.
Norfolk, VA 23511

Dear Mr. Cecchini:

I live in the Oceana area of Virginia Beach but I don't know how much longer I can tolerate living here. I love Virginia Beach, I love my home and my family and friends who live here also. The noise and pollution already caused by the jets flying over is at times getting close to intolerable. Why do we need enemies that these planes are protecting us from when we can destroy ourselves without their help???

Let me add my voice of opposition to those who have already voiced an opinion about the new contengent of 180 jets due to arrive at Oceana to further disturb our tranquility (such as it is). There is no need to reiterate the consequences of such a move in the 40,000 new people moving to our area that will need public facilities, schools and roads.

Is there nothing we can do to protect Virginia Beach from this offensive intrusion???

Thank you for your consideration.

Sincerely,

Marilyn Ross

Marilyn Ross

B-8-121

Thank you for your comments; no response required.

JOHN SHICK
912 DUKE of Suffolk Dr.
VIRGINIA BEACH, Va. 23454
Ph 757-496-4147

I

F/A-18 RELOCATION: A LEGITIMATE DEBATE

While not categorically opposed to F/A-18's being relocated from NAS Cecil Field to NAS Oceana, I am concerned that all the options have not been fully explored and presented to the public. No one will dispute that the arrival of these aircraft in Virginia Beach may be beneficial to certain segments of the community and certainly would be of positive value to the US Navy. Conversely, it is equally difficult to dispute the fact that the aircraft will be accompanied by considerable negative 'baggage': increased accident potential, expanded noise zones and elevated noise levels, traffic congestion and public services burdens, classroom crowding and learning impairment potential, and the possibility of real estate devaluation, increased ozone levels, future noisier replacement aircraft, etc. Each of these issues (and more) is a legitimate concern, not only of those most exposed, but also to every area resident who wants and expects decisions of this magnitude to be made for the right reasons. They also expect that every substantive concern would receive thorough and credible consideration, and ultimately are addressed in the adopted solution, if appropriate.

This has, unfortunately, not been the case on this issue. Despite the fact that several tens of thousands of residents will be effected, not a single state or local politician (to my knowledge) has stepped forward to champion the concerns of this group of residents. And regrettably, residents who have expressed their concerns and reservations in public forums have all to frequently been maligned by individuals who question their patriotism and charge them with callous disregard for the living conditions of young Sailors.

Why this seemingly cavalier insensitivity and disingenuousness? The answer: Money and Influence. The US Navy understandably seeks to minimize its cost to relocate the aircraft and to accrue the benefits of single-site consolidation (some would argue that this is a strategic disadvantage). But, will other operational scenarios work nearly as well with less adverse impact? Local and state politicians are interested in tax revenue and the inherent influence the expenditure of such revenue garners. But they have demonstrated superficial and less than sincere regard for the 'baggage'. Of the eleven politicians who spoke at the public meeting at the Pavilion on 27 October, with the exception of a single 'Oh, by the way', none addressed even one of the citizen concerns. Realtors and contractors see a golden goose. It would appear that if there ever was a plan for deliberate, disciplined growth; it has been shelved for other agenda.

At this point, the 'preferred option' of those who would make a decision would bring all 180 aircraft to densely populated Virginia Beach and rapidly growing Chesapeake. This may in reality be a shortsighted option with only short-term advantages, one that only incubates continuing, long-term citizen aggravation. The draft Environmental Impact Statement (DEIS) does not address any option which would place the majority of the aircraft at Cherry Point or Beaufort. It should be amended to do so. Nor does it address the potential of maximizing the use of existing excess capacity at all three sites simultaneously, to potentially reduce construction costs. The DEIS should be amended to do so. Nor does it develop a methodology that ascribes a value to all legitimate issues and integrates them into a non-parochial, regional (vice local) solution. A working group of representatives (similar to Navy-sponsored, community-participating Restoration Advisory Boards) from Virginia and the Carolinas should, in a collaborative manner, attempt to consider all reasonable options and craft a better solution which seeks to maximize overall benefits while minimizing adverse impacts. True, the group may be unsuccessful. In any event, the legion of concerned citizens who have been told in recent editorials to accept the preferred option (as fait accompli) and to 'just get over it' might reluctantly accept whatever resolution was eventually adopted, if convinced that it was the best that honest men and women could fashion, all things considered.

I do not believe that the long-term economic vitality of Virginia Beach is contingent upon the explosive growth that would accompany these aircraft, or that the readiness of our Navy is contingent upon single-siting them all at NAS Oceana. I do believe, however, that the 'Sound of Freedom' would ring equally as sweet if it were to originate from other than Virginia Beach (if that were the final outcome). It is time to set-aside the individual, institutional, and political parochialism that currently surrounds this issue and fashion an agenda-free solution, one which disenfranchises fewer 'concerned citizens'.

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B-8-122

JS-1 Because of the need to locate the FRS with the majority of the fleet squadrons, the maximum number of fleet squadrons that can be relocated to MCAS Beaufort or MCAS Cherry Point is five squadrons. Under ARS 4, five fleet squadrons are transferred to MCAS Beaufort, and the remaining six squadrons and the FRS are transferred to NAS Oceana. Under ARS 5, five fleet squadrons are transferred to MCAS Cherry Point, and the remaining six squadrons and the FRS are transferred to NAS Oceana.

JS-2 Each ARS is evaluated in terms of meeting operational criteria and in terms of the environmental impacts associated with that ARS. A summary of operational and environmental impacts for each ARS is included in Table 2.5-1.

JS-3 The purpose of the public hearing process is to provide members of the public an opportunity to present their views of the proposed action. All transcripts of the hearings, comment cards, and comment letters will be part of the permanent record and will be considered in the final decision.

Marilyn Trudeau
1431 Gannet Run
Virginia Beach, VA.

Commander, Atlantic Division, NAVTACENCOM
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Dear Mr. Cecchini:

The purpose of my letter is to provide comments on the realignment of the 180 F/A-18 and FRS aircraft to Oceana NAS as reflected in the Draft Environmental Impact Study (DEIS).

I am a property owner in the Salt Marsh Point Subdivision. My home is located at 1431 Gannet Run and is adjacent to the Oceana NAS. Jets fly over my home at very low altitude and often fly very late into the evening hours. It has not been a problem since it did not happen often. Upon reading the DEIS, it has become apparent to me that the Navy's plan to relocate 180 additional aircraft to Oceana would result in significant aircraft noise impacts associated with the large increase in airfield operations. The DEIS states that it was for this very reason that the Navy considered MCAS Beaufort and MCAS Cherry Point as two other reasonable locations for receiving the aircraft. Beaufort and Cherry Point are less populated and would not be affected by the noise, safety issues and air quality that are very real environmental issues at Oceana. Neither Beaufort, Cherry Point, or Oceana could accept all the aircraft without a significant expenditure of funds for additional construction to house the aircraft. According to the DEIS, the Navy chose Oceana because it was determined to be the most cost effective plan. Therefore, in my opinion, the safety of the citizens, the negative effects on air quality, increased noise, and increased traffic and it's effect on the homeowners residing in the area was disregarded. In any case, it was not addressed in the DEIS. 1

I cannot argue that the decision to realign all aircraft to Oceana is not in the best interest of the Navy. Unfortunately, this decision results in the greatest level of environmental impacts relating to noise, air quality, safety, and increased traffic than what it would be at MCAS Beaufort or Cherry Point since those areas are less populated.. Very few schools would be affected unlike Virginia Beach where some 22 schools are affected. Who will pay to reinsulate and possibly move schools to another location? The Navy or the Virginia Beach taxpayer? I do not believe this action by the Navy and the City of Virginia Beach has any positive affects for me. I think the increase flight frequency and the increased noise levels in the Salt Marsh Point area will render that neighborhood a very undesirable place to live. I am a Real Estate Salesperson and I know that property 2 3

MT-1 Each ARS is evaluated in terms of cost, operational criteria and the environmental impacts associated with that ARS. Sections 4 through 8 of the EIS discuss impacts on air quality, noise levels, transportation, and safety for all ARSs. The Office of the Secretary of the Navy will consider all operational, economic and environmental issues before issuing a final decision on the proposed realignment.

MT-2 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required which the Navy does not plan to pursue. However, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts.

MT-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

values will be adversely affected . My property will certainly depreciate since market value is based on supply and demand. I don't think there will be much demand for a home in Salt Marsh Point. I agree that the Navy, the City of Virginia Beach, the Federal Government and the local businesses are all big winners, however, I feel that I have a great deal to lose. I do not think that the opportunity for public discussion and input will have served any purpose if some relief is not offered to those who have opposed this decision.

4

In January 1997, citizens of the Severna Park Subdivision in the State of Maryland were faced with similar circumstances due to increased flight frequency and noise levels from aircraft flying at Baltimore/Washington International Airport (BWI). The Federal Government and the State of Maryland implemented a Relief Program. Homeowners were offered the option of reinsulating their homes or selling the home for the market value had they not been located in the noise zone. The Federal Government paid 80% and the State of Maryland paid 20% of the cost. Since the Navy and the City of Virginia Beach stand to benefit significantly, I feel that a similar program should be implemented to assist me in selling my home. I purchased my home as a retirement home. I enjoy it very much and I have made many improvements to the property since it was purchased. However, I am greatly concerned about safety as well as increased noise. It will cost me approximately 10% of the sales price in commissions, closing costs, etc. I don't feel that I should bear the expense. I hope that the Navy and the City of Virginia Beach can assist me since I feel I cannot live in my home under the circumstances that will be created by the realignment of 180 additional aircraft. Please consider and address my comments in your final FEIS. I am looking forward to your consideration of the problem that I face and I hope that there will be a favorable resolution.

5

Very Sincerely,

Marilyn Trudeau

MARILYN TRUDEAU

B-8-124

MT-4 The purpose of the public hearing process is to provide members of the public an opportunity to present their views of the proposed action. All transcripts of the hearings, comment cards, and comment letters will be part of the permanent record and will be considered in the final decision.

MT-5 The program implemented at BWI by the Federal Aviation Administration (FAA) and the State of Maryland was funded by the FAA through Congressional authorization.

The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

/18/1997 11:29 7574282824 DALE HENDERSON PAGE 01

Mrs. Thom W. Henderson, Jr.
1116 Bruton Lane
Virginia Beach, Virginia 23451

November 18, 1997

Mr. Dan Cecchini (Code 20320C)
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

Should one hundred twenty to one hundred eighty F/A-18 fighter aircraft be based additionally at Naval Air Station Oceana, the whole of Cavalier Park/Bay Colony Civic League area would be within the "Projected 1999 65-75 Decibel Noise Contour" (Zone II) whereas it was NOT within this contour in the 1978 decibel plot. No part of this area has ever been in a real estate noise disclosure zone.

BEFORE any change occurs, we ask that the Navy reevaluate its noise abatement procedures with the goal of reducing the proposed INTENSE NOISE IMPACT in our residential area. A change of this sort will cost us, the taxpayer, considerably and noise to boot will just be unacceptable to our way of life these past thirty-five years. Now more than ever before we must preserve our relatively quiet neighborhood especially in view of our poor health. As natives of this area we have quietly watched and paid for (through taxes) many unsound changes in Virginia Beach (only in recent years we received city sewerage) but this is one proposed change we will actively oppose.

Sincerely,

Dale Page Henderson

Thom W. Henderson Jr.

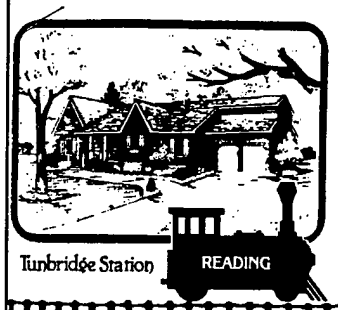
(Mrs.) Dale Page Henderson
Mr. Thom Williamson Henderson, Jr.

CC:
Ms. Carol M. Browner, Adm., Environmental Protection Agency
Hon. Owen B. Pickett, Virginia 2nd Congressional District
Hon. John Warner, U.S. Senator from Virginia
Hon. Charles Robb, U.S. Senator from Virginia
Hon. Meyera E. Oberndorf, Mayor, City of Virginia Beach

B-8-125

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TWH-1 The Navy will continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever practicable.



ROBERT J. BREHM
TUNBRIDGE STATION
241 DOWNING DRIVE
CHESAPEAKE, VA.
23322-8746

1-757-482-1090

DATE NOVEMBER 7, 1997

DEAR COMMANDER,

I AM A SENIOR CITIZEN (73 YEARS OF AGE).

FIFTY TWO YEARS AGO, I WAS IN THE NAVY FOR THREE YEARS, TWO MONTHS AND TWENTY-ONE DAYS (BUT WHO WAS COUNTING).

MY HOME IS JUST WEST OF CENTREVILLE TURNPIKE, AND SOME OF YOUR PLANES "WONDER" THIS FAR WEST, AND I LOVE IT!

WHAT LITTLE NOISE THEY MAKE, IS TO ME, "THE SOUND OF FREEDOM".

BRING ON ALL 180 JETS, I LOVE TO SEE THEM IN THE AIR.

CORDIALLY,

Robert J. Brehm

ROBERT J. BREHM



Thank you for your comments; no response required.

JAMES E. JOHNSON, JR.
[redacted]
1321 N. BAYSHORE DRIVE
VIRGINIA BEACH, VA 23451
(757) 422-9111
Fax: (757) 422-9113

November 5, 1997

Mr. Dan Cecchini (Code 2032DC)
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

RE: Proposed Addition of 180 F/A-18 Fighter Aircraft at Naval Air Station Oceana

Dear Mr. Cecchini:

As an owner of property in Bay Colony I am writing to voice my concerns regarding the possible addition of 180 F/A -18 Fighter Aircraft at Naval Air Station Oceana.

1 | Additional aircraft can only serve to increase the noise problems already experienced in the area and will create additional health and safety hazards. Also, the proposed additional aircraft would also adversely affect the residential property values which are already diminished due to the low flying aircraft in the area.

Please ensure that the Navy carefully evaluates the proposal prior to implementing changes which are certain to have a negative impact on the community and environment.

2 | I would also inquire as to whether the Navy would be prepared to adequately compensate all property owners affected for diminished property values and related damages.

B-8-127

JEJ-1 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JEJ-2 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Sincerely,

James E. Johnson, Jr.
Property Owner

JEJ/jr

cc: Ms. Carol M. Browner, Administrator, EPA
Honorable Congressman Owen B. Pickett
Honorable Senator John Warner
Honorable Senator Charles Robb
Honorable Meyera E. Oberndorf, Mayor

Commander, Atlantic Division,
Naval Facilities Engineering Command.

Attn: Mr. Dan Cecchini (code 2032DC)
@Fax 322-4894

Mr. Cecchini:

I oppose the relocation of the F/A-18 jets because of the disruption to the environment. Just a lot more takeoffs alone would be disruptive. But each individual F/A-18 plane makes twice as much noise as today's F-14 when it takes off; 106 decibels versus 97. Thats 11 decibels louder - that's a doubling of loudness.

If we have an option - and we do - we shouldn't be submitting residents, schools and workers to noise at this level. Noise at this level is also inimical to quality development and is unhealthy, mentally and otherwise. This doesn't make sense to our city, which is striving for quality development, industrial and otherwise.

I would question increasing crash exposures to the thousands who work and shop at Lynnhaven Mall, a site where further development is likely.

Finally I question whether we should be locating all of these planes at one place for reasons of military vulnerability.

Thus I oppose the location of these planes at Virginia Beach.

Don Bourquard
3113 Lynn Acres Rd
Virginia Beach, VA 23452
Fax 757-629-2849

Nov. 18, 1997

Thank you for your comments; no response required.

B-8-129

704 Bay Colony Drive
Virginia Beach, VA 23451
November 20, 1997

Mr. Dan Cecchini (Code 2032DC)
Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini,

Based on the projection of one hundred twenty to one hundred eighty additional F/A-18 fighter aircraft being based at Naval Air Station, Oceana, the whole of the Cavalier Park/Bay Colony Civic League area will be within the "Projected 1999 65-75 Decibel Noise Contour" (Zone II), whereas it was not within this contour in the 1978 decibel plot. It is my understanding that this is the first revision to the noise contour plot since 1978, although the mix and numbers of aircraft operating from Oceana have varied greatly over the intervening years. At any rate, no part of this area has ever been in a real estate noise disclosure zone.

Clearly there are both quality-of-life (in terms of ambient noise) and economic concerns to those of us who now find our homes within the projected Zone II contour for the first time. I therefore request the following:

1 First, that the Navy define <u>now</u> the noise abatement procedures it intends to implement should the 120-180 additional F/A-18's be moved to Oceana <u>and</u> recalculate the noise zone boundaries incorporating the anticipated effect of those procedures. This should be done, and the projected environmental impact assessed, <u>prior</u> to finalizing the decision to move the aircraft to Oceana. I do not believe this to be an unreasonable request inasmuch as the Navy has obviously been remiss over the past 19 years in not maintaining the noise zone boundaries current and publicizing them. Should no significant improvement in the noise impact area be projected as the result of planned noise abatement procedures, then perhaps the decision to base the aircraft here instead of North Carolina should be revisited.

2 If moving the aircraft to Oceana is a "done deal," as indicated by Captain Benson (CO, NAS Oceana) in his presentation to the Civic League meeting on October 30, then I request that the Navy aggressively and continuously pursue noise abatement measures with frequent (perhaps biennial) reassessments of the noise contour zones, the goal being to minimize both the environmental and economic intermediate and long term impact of the additional aircraft.

B-8-130

WAE-1 The Navy will continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise and safety impacts whenever practicable. The Community Plans and Liaison Office at NAS Oceana is the primary source of information for these updates. The Community Planning Liaison Officer at NAS Oceana, Mr. Fred Pierson, is the primary source of information for these updates. Mr. Pierson may be reached at (757) 433-3158.

WAE-2 Please see comment WAE-1 above.

Thank you.

Sincerely yours,

William A. Eldred, P.E.
Lieutenant Commander
U. S. Navy (Retired)

Copy to:

Ms. Carol M. Browner, Administrator, Environmental Protection Agency
Hon. Owen B. Pickett, Virginia 2nd Congressional District
Hon. John Warner, U. S. Senator from Virginia
Hon. Charles Robb, U. S. Senator from Virginia
Hon. Meyera E. Oberndorf, Mayor, City of Virginia Beach

Nov 1997

To whom it Concerns

I am writing to you Concerning the relocation of the Jets to Oceana.

I live near Fentress Air Field, and I'm Concern about the planes and night flying, and flight path I live on Black Water Rd. Chesp. VA. (to my understanding, the navy brought Air rights to fly around Kegid Jones Colony, the section I live in they're suppose to fly around my house, not over it)

I have Called Oceana on several occasion at night, about a Pilot not on the flight path and Coming down over my house. While the rest of them going around like they're suppose to. (When I Call Oceana, I'm told, that a new Pilot flying, and he's off the flight Path) That dosn't make me feel Good, knowing someone flying over My house and doesn't know where he's going.) Oceana very good about it) 15 min later / he's flying around where the rest of the Pilots are.

If you've ever a woken

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B-8-132

GB-1 Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

at night, with one coming so low across your house, you would understand how I feel! It sounds like it crashing into your house + you pray it passes by, and accidents do happen. I hope you steer the flight path + the new pilots coming in know it.

Thank you.

Gladys Brown
13/2 Blackwater Ct
Chesp. VA 23322

482-5119

Gordon & Nancy Degges
511 Biltmore Drive
Virginia Beach, VA 23454

November 18, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
ATTN: Mr Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

We are writing to express our concerns regarding the proposed realignment of 180 F/A-18 aircraft and associated functions from NAS Cecil Field to NAS Oceana. We have taken several factors into consideration in evaluating the movement, and it appears that the City of Virginia Beach, and more specifically, the residents of the City, would be on the losing side of the battle.
The impact of the realignment would be felt in many ways, some positive, but most negative.
Our evaluation is as follows:

1. Infrastructure - The City of Virginia Beach has been growing by leaps and bounds in recent years. The once "sleepy resort town" now has the largest population of any city in the Commonwealth of Virginia. Roads have been widened, new schools and recreational facilities built, and the Lake Gaston pipeline constructed, all in an effort to keep pace with the current residential and commercial growth. While the road improvement projects have been helpful, anyone who has traveled on the roads surrounding NAS Oceana, particularly Oceana Boulevard or London Bridge Road, can attest to the projects' inadequacy. With regards to the school situation, the City spent in excess of $10 million to relocate an elementary school, Linkhorn Park, out of the "crash zone", only to find that the crash zone has been redetermined, and the hundreds of students who will begin class in the First Colonial Road location in September, 1998, are no safer than the students at the Laskin Road facility.

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B-8-134

GND-1 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions (i.e., moderate traffic levels and acceptable levels of service), specific congested areas, and planned road improvements. Impacts on transportation under ARS 1 are addressed in Section 4.7 of the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

GND-2 The new location of Linkhorn Park Elementary School is not in an APZ.

2. Economy - While the additional jets will bring additional employment positions to the area, the net effect of the new employment is not as great as it appears. The military families who relocate to the area are not required to pay personal property tax on their vehicles, or purchase city decals, yet they will expect to use city facilities: Schools, emergency services, recreation facilities, libraries, etc. The financial burden of support for the additional services required falls on those of us who do pay personal property tax, city decal registration, and real estate taxes. Our schools are already suffering from population growth --- portable classrooms, "book sharing", reliance on the schools' Parent Teacher Organizations to provide necessary computer equipment, library resource materials and other physical improvements --- how will the City finance the demands of an even greater school-age population? 3

3. Quality of life - With the environmental emphasis placed on the Chesapeake Bay area, how can one justify the addition of 180 F/A -18 aircraft to our air space? The noise created by the jets currently flying out of NAS Oceana is unbearable at times. To be waken at 7 am by jets buzzing on maneuvers is bad enough, but to be waken at 11 pm by windows rattling violently and jets roaring overhead is unconscionable! Add to the noise pollution the lower air quality and the physical damage to assets from jet fuel residue, and the detriment to our quality of life is too great to bear! 4 5

In closing, we implore you to consider the other options available! Virginia Beach cannot afford to move the estimated 23 schools that will fall in the high-noise or accident potential zones. It will be a difficult task for our financially burdened public schools to provide quality educations to an additional 2,700 students. Sending most of the F/A - 18 aircraft to Cherry Hill may be more expensive to the Navy, but it would preserve the quality of life for those of us who have chosen Virginia Beach as home. Cherry Hill wants the expansion and is better prepared to cope with the influx of the jets and the related support personnel, so please make Cherry Hill your main consideration. 6

Sincerely,

Gordon S. Degges
Nancy Degges

B-8-135

GND-3 NAS Oceana personnel living or shopping off-base pay property and sales taxes, which create revenue for the area. Positive impacts on the local economy due to increased payroll and construction outlays at NAS Oceana would also create additional revenue. These revenue increases may be partially offset by the increased demand for community services and facilities. Please see Table 4.5-2 for estimates of economic and fiscal impacts to local communities under ARS 1.

GND-4 The Navy recognizes that the increase in noise levels will be significant under the proposed action. NAS Oceana will continue to monitor the noise abatement procedures to reduce the impact of the realignment to the community to the greatest extent practicable.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

GND-5 Air emissions also will increase under the proposed action, but the projected increase will not affect the attainment status of the Hampton Roads Air Quality Control Region.

Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to

completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

GND-6 The Navy recognizes that the costs to local school authorities of noise mitigation is a significant impact. Because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy cannot comment on specific mitigation measures and associated costs. The Navy has offered to work with local officials to conduct detailed engineering evaluations at those schools of particular concern.

Relocating the schools may not be required for aircraft noise. Sound attenuation can significantly improve the quality of the classroom environment. The Navy will continue to evaluate its operation procedures to mitigate noise and safety impacts wherever possible.

Dear Ms. Browner,

1 I am writing to express my opposition to the relocation of 120 to 180 F/A-1s to NAS Oceana. As the mother of two small children, I am very upset with the prospect of increased noise and Air pollution that the addition of these jets would cause. I am also concerned with the possibility Of airplane crashes in our area with the increase in air traffic.

The noise level we experience now is downright horrible at times. We installed a hot tub on our Deck last year, and there are times even now when we have to go inside while the jets are flying Due to the noise. The jet activity has also caused our noise and motion sensors on our burglar alarm to set our alarm off, causing the police to come out unnecessarily. I dread the thought of what the noise will be like with 120 more planes buzzing overhead.

2 I am also concerned with the pollution which will be put out by the exhaust. It is bound to settle on our lawns, beaches , and ocean. We moved back to the beach several years ago to be able to enjoy all these areas of outdoor life. I hate to think that I will be exposing my young children to health risks.

Please take these concerns into account while making the decision on where to relocate the jets.

Sincerely,

Cheryl S. Madison

Cheryl S. Madison
1144 Crystal Lake Drive
Virginia Beach, VA 23451

c.c.Mr. Dan Cecchini, Commander Atlantic Division
Congressman Owen Pickett
John Warner
Charles Robb
Meyera Oberndorf

CSM-1 The EIS discusses the projected increases in noise, air emissions, and accident potential zones under ARS 1 in Sections 4.8, 4.9, and 4.2, respectively.

CSM-2 The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

Ellen Keeter
905 Cardinal Road
Virginia Beach, VA 23451

November 11, 1997

Commander, Atlantic Division
Naval facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini,

1 I hope my concerns will be forwarded on to the EPA office as decisions are made concerning the relocation of the F/A-18's to Virginia Beach. I have watched with interest and sadness as the Navy tries to convince residents like myself that these jets will improve the quality of life in Virginia Beach. I strongly disagree and feel that the noise and air pollution these jets will bring to our neighborhoods will hurt us all. I also believe it will hurt tourism; who would want to vacation in a town that's essentially a noisy airstrip.

I have been embarrassed by the lack of communication between the Navy and the city as far as crash and noise zones being redefined. I am not optimistic this will change and fear that the Navy will harbor information that should be passed on to residents as long as they hold the upper hand.

2 I hope the EPA and the Navy will seriously consider sending all of these Hornets to Havelock, North Carolina where they would be welcomed and where only 3 of their schools would be in the noise zone rather than our 23 schools in the noise zone. When I read in the Virginian-Pilot that an F/A-18 will be 'nearly 32 times as loud as the living room stereo', it depresses me to think my local government leaders believe I should be able to get used to this. I

3 work from home, only blocks from the crash zone and in the 65 db noise zone and each jet disrupts my thinking, my phone conversations and basically my life. My house was not built to insulate us from this amount of noise so my only recourse is to either move or hope that the Hornets will be moved to Cherry Point.

Sincerely,

Ellen Keeter

Ellen Keeter

cc: Mayor Meyera E. Oberndorf

EK-1 Thank you for your comment; no response required.

EK-2 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

EK-3 The Navy will continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever practicable.

Kirk A. Batsel
326 Cripple Creek Ct.
Virginia Beach, VA 23452

Mr. J. Daniel Cecchini
Atlantic Division, Naval Facilities
Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Certified Mail
Return Receipt Requested

RE: U.S. Navy proposal for realignment of 11 F-18 squadrons and the F-18 FRS from Cecil Field, FL.

Dear Mr. Cecchini,

I would like to thank you for the opportunity to comment on the subject proposal for relocation of the Navy's F-18 squadrons and the F-18 FRS from Cecil Field, FL. I have spent considerable time and effort reviewing the Draft Environmental Impact Statement (DEIS) and Appendix prepared relative to this proposal. In addition, while I did not speak, I did also attend the public comment forum held at the Virginia Beach Pavilion. As a resident of Virginia Beach, each of the proposed ARSs affect me and my household.

I would like to state that I currently reside at 326 Cripple Creek Court within the City of Virginia Beach. I just recently purchased this property, my first house, in June of this year. I am a riparian owner on the Eastern Branch of the Lynnhaven River just North of Virginia Beach Boulevard. It is in this approximate location that London Bridge Creek turns into The Eastern Branch. I therefore live, and am a riparian owner, within the receiving stream watershed of NAS Oceana. This area is also located outside of the existing NAS Oceana 1997 Noise contours. Prior to and since I purchased the house, I have observed noise encroachment from low flying aircraft, and while disturbing at times, have considered it tolerable. However, after review of the current proposal, there exists several environmental concerns which have direct effect on the health and welfare of myself, my household, and the surrounding community.

Based on the navy's own assessment and as stated in the DEIS, one of the most significant impacts to health and welfare of surrounding residents from the proposed action is the very significant increase in noise. Each of the Alternative Realignment Scenarios (ARSs) significantly impacts very large numbers of residents residing in the Virginia Beach area around the base and operational areas.

NAS Oceana is presently located in a very densely populated residential area. This area has experienced a significant population growth over the last twenty years, and now contains thousands of residents, families, churches, and schools. Significant aircraft noise impacts to these residents, associated with the large increase in airfield operations, will occur with each of the ARS proposals. Currently, the majority of operations at Oceana consist of F-14 operations. These planes are very loud and intrusive, but are actually much quieter (if I dare say) than the subject F-18 planes. Having experienced the piercing sound of both, I can say first hand that the noise pollution generated by the F-18 is not only bothersome as with the F-14, but is actually painful. So much so that when heavy flight operations of F-18s exist, one is forced to retreat from ones own yard, to the relative safety of an indoor enclosure. The DEIS indicates sound levels at 1000 ft. It is a fact that air operations occur at much lower altitudes that this over my house and the residents of many others. I would expect that under these conditions, the noise exposures are much greater than what is currently published in the DEIS. In fact, my experience is that it must be a hearing loss levels. Compared to the F-18s, the noise from the other occasional transient prop or jet propelled plane, and the F-14s, is manageable.

1

ARS1, the Navy's preferred option, will negatively impact the lives of the most U.S. citizens through noise pollution. Due to the population of this area, 78,687 people will be exposed to noise levels of 65 dB or greater. 51,544 people will be exposed to noise levels ≥ 75dB. Based on the percentages listed in the DEIS, this will result in 19,071 - 27,318 people highly annoyed from noise pollution. This will also result in speech interference, sleep disturbance, increased learning difficulties with exposed children, potential loss of hearing and decreased health and welfare of exposed residents.

In addition to the number of noise exposed residents, 22 schools will be in noise zones 2 and 3. Virginia Beach schools are already very overcrowded. The City is and has been trying to deal with this problem for years. Any of the ARSs, particular ARS1, will only serve to exasperate the problem. The answer to this overcrowding problem, at least for the short term, for the Virginia Beach school system has been the use of mobile classrooms. Basically, trailer classrooms. With, 1) the large number of school age children proposed to relocate, and 2) the current use of these classrooms due to excessive numbers of children, the noise problems are only heightened. I am not aware of any way that noise levels as proposed will be able to be attenuated in these classrooms.

2

KAB-1 The EIS notes that the F/A-18 is louder than the F-14. Noise levels at 1,000 feet above ground were provided for comparative purposes.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

The EIS acknowledges that the projected realignment of the F/A-18 squadrons to NAS Oceana and NALF Fentress would increase aircraft operations and aircraft noise levels. However, although operations and the average daily noise levels would significantly increase, noise levels would not result in permanent threshold of hearing shifts. Although temporary threshold of hearing shifts are possible, individual noise levels would not reach the threshold of pain (i.e., 120 dB).

KAB-2 Sound attenuation of mobile classrooms will be harder to achieve. However, improvements in manufactured housing technology has led to significant improvements in the attenuation properties of these structures. The Navy will work with the City of Virginia Beach to address this issue and to provide technical consultation concerning the use of mobile classrooms.

3 Even if the noise levels within the school buildings proper are able to be attenuated <45 dB, the playgrounds, a necessary component, will be exposed to excessive noise. Our children should not be faced with this situation. The Navy has stated that schools are not compatibly with noise zone 3. Two schools, Seatack Elementary and Linkhorn Elementary, are located in noise zone 3. The navy did state in the DEIS that they have coordinated plans to relocate these schools. From what has been publicized, I'm not sure just how smooth this coordination has been. Similarly, the Navy has indicated a willingness to work with local officials to conduct sound engineering evaluations at schools of concern. My

4 questions/comments are simple. Who will pay for evaluations? Who will pay for school relocation? The taxpayers of Virginia Beach? Who will pay for noise attenuation, extra classrooms, etc??? And How?

While I'm on the subject of noise, there are several other concerns over the proposal. These are applicable to all ARSs, but particularly to ARS1. Any of the ARSs will expand the noise zones around the base. The expansion from 1997 zones to predicted 1999 zones directly place 51,544 people in noise zone 3 (ARS1). This, up from 1,295 residents in "real life" noise zones in 1997. Many of these people, like myself, moved into the area and are accustomed to, and have accepted the 1997 noise zones. Any of the current draft proposals will substantially increase resident exposure. As I understand it, current construction requirements within zone 3 requires the use of sound attenuating materials and the use of triple-pained windows and sliding glass doors. However, most of the houses affected are already constructed. I strongly agree that triple-pained windows, sound dampening materials, etc. should be used in homes within affected noise zones. This would go a long way towards mitigating in-house disturbances, particular at night. However, these materials and repairs are costly. If a resident needs to upgrade to sound reducing materials to current code (as much as possible) in his/her house to help with the noise

5 problem from relocated Jets, does the individual owner have to bear the financial burden alone? It is right for the government, in the name of saving money by relocating jets, to disproportantly increase costs of affected home owners which simply want to maintain a reasonable level of peace and quiet within their homes by using the same sound reducing materials required by new construction codes. There should be a policy established whereby the Navy or Federal government shares in this cost. Programs have been established and are currently operating for grants or cost sharing to reduce unwanted environmental pollution. This is unwanted environmental pollution, its Noise pollution. Will the Navy financially assist home owners (all) within at least noise zone 3 with installization of sound reducing building materials? I strongly believe this is fair to the Navy, to U.S. Taxpayers, and to affected home owners.

KAB-3 Outside noise cannot be mitigated. Outside noise levels will vary and temporary interference with speech communication may occur for individual aircraft flights during the day. However, the impacts will be of short duration.

KAB-4 The Navy does not have legal authority to expend federal funds on improvements to state, local, or private property. Specific Congressional authorization and appropriation would be required which the Navy does not plan to pursue at this time. The Navy will, however, continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever practicable. Also, at the request of the Mayor of Virginia Beach, the Navy has been working with the City of Virginia Beach School Administrator to help quantify school impacts. For example, the Navy has provided detailed aircraft noise level data and has critiqued the school board design for the new school concerning the relocation of Seatack Elementary School.

KAB-5 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field. The Navy will, however, continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever practicable.

Other concerns over the increased noise include reduced property values, reduced ability to purchase homes in the subject area, and a reduced quality of life. As I sat and listened at the public comment forum, I heard a variety of views on the result of noise on property values. It seemed to me to basically be split between property owner/residents and business/elected individuals. The owner/residents felt that property values would plument while business figures felt they would not be effected. I must say I believe the owners are correct. I think I will have a much harder time selling my house (if I decide to) and I wouldn't buy a house in these areas knowing the levels and frequency associated with these proposals. This view is further supported by the fact that HUD, FHA, and VA mortgage policies generally prohibit guaranteeing mortgage loans in these zones. I consider myself responsible, have good credit, am college educated and have held a professional job for over eight years, yet I could not have purchased my first home without a FHA mortgage. I feel that there are many people in similar positions today. And finally, one can not relax, a common measure of quality of life, with constant exposure to excessive noise. Considering this, property values are certain to be negatively impacted for owner/residents.

6

Another factor related to noise is the duration and frequency of noise events. I know from experience that repeated, repeated, repeated flyovers are absolutely nerve-racking. Based on the information presented in the DEIS, it appears that a major increase in frequency and duration is expected with all ARSs, particularly ARS1. Living in a particular noise zone is different than frequency of exposure to that level. FCLP is one such repeated exercise. Based on the numbers presented in the DEIS, FCLP requirements = 1.7 hours/F-18 squadron and up to 6.8 hours/FRS. At peak-use periods, this results in 25.5 hours needed. Should this be interpreted as non-stop use? With all of the F-14s already there, and the current proposal what will the frequency of exposure be? Duration? (This refers to duration as in how long will exercises last until peace and quite resumes). This is the type of information and how the information should be presented in an EIS so that people may understand the effects. How does the Navy propose to fit all of the fights into a 24 hour day? In addition to all of the Navy's operational relocation criteria, the navy should also consider the hours, frequency, and duration of noise and the associated human health effects. Specific hours of operation and noise should be established (under normal conditions) for an air base located in such a densely populated residential area. I think that this is fair and reasonable. People and children have to sleep to carry on responsible and positive developmental lives. It is clearly understood that during non-normal conditions (eg. conflict, war or planned airshow, etc.) the normal schedule will change.

7

KAB-6 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

KAB-7 Based on the EIS and NASMOD, the proposed realignment of F/A-18 squadrons to NAS Oceana will result in an increase in operations into the night in order to accomplish all training requirements will be accomplished. The daily tempo of activity will depend on carrier deployment cycles, which squadrons are at home, and where each squadron is in its workup cycle prior to deployment for the fleet squadrons.

Another environmental concern associated with the subject proposed action is impacts to water quality in surrounding receiving streams. The large buildup of aircraft operations and the significant increase in maintience necessary to support these operations will also result in operations (aircraft washing, firefighting training, etc.) and activities (and construction) which have the potential to contribute pollutants to the designated receiving streams. These streams are largely beautiful meandering saltwater, brackish, or freshwater streams which are critical nursery areas for freshwater, transitional and saltwater aquatic life. The Eastern Branch of the Lynnhaven River, London Bridge Creek, West Neck Creek, and the North Landing River have all been designated as Scenic waterways by the City of Virginia Beach. This waterway is actually navigatable by johnboat or canoe. Since moving to the banks of the Eastern Branch, I have talked with many long term residents and all have confirmed that fish (and other aquatic life), wildlife, and general water quality is improving in this aquatic system. Rather than just rely on VA DEQ to require the proper monitoring through the VPDES permit and/or a construction general permit, it is recommended that baseline/background conditions of these waterbodies be established (in addition to the limited available historical monitoring points). This baseline information can be used to establish water quality trends in these streams. Periodic monitoring in the future could be conducted to determine trends. 8

Air quality is also an issue with this proposal, especially with ARS1. The Hampton Roads area is currently in attainment with the low level ozone standard. However, a large increase in air pollution emissions will occur with any of the ARSs, but most especially ARS1. While all of the documented pollution emissions are of concern, VOCs and NOx are of particular concern because they are ozone precursors. The large increase in facility operations will contribute significant amounts of these pollutants into the air of Hampton Roads. This large increase is predicted to result in increased ground level ozone. The DEIS indicates that the predicted emissions will be in compliance with the General Conformatory Rule and the VA SIP, however, this does not leave this region much room to spare (only 2 tons of NOx) for future growth of activities which contribute these pollutants. In addition, other sources currently considered de minus also contribute to these emissions and the development of ground level ozone. The DEIS indicates that sources (and contributions) occurring in Northeastern North Carolina were not included in the current calculations. This is in apparent fault with reality. Air is not subject to state line restrictions. Sources and emissions in North Carolina can and do effect VA air quality. In addition, as the DEIS indicates, the current projections are in compliance with the mentioned requirements. However, EPA has already approved a new standard of .08 ppm/8hr and is in the process of implementing this standard. 9 10 11

KAB-8 Baseline/background conditions of local water bodies have been established and frequent monitoring is conducted by the Virginia Department of Environmental Quality (VDEQ) to ensure water quality standards are maintained and to assess water quality trends. Drainage from a majority of the station, including a majority of the developed areas and all of the proposed construction/project sites, is directed into Oceana's main drainage canal. This canal eventually discharges into west Neck Creek, which is a tributary of the North Landing River. The VDEQ collects water quality data from two monitoring stations in West Neck Creek. This monitoring data is used by the VDEQ as baseline (or background) data to assess water quality and trends. In addition to the VDEQ's monitoring stations, NAS Oceana monitors water quality at seven additional locations on the base or immediately adjacent to the base. This data is reviewed by the VDEQ and is also used as baseline data to assess water quality and trends.

KAB-9 A net increase in ground level ozone is not expected due to emissions of ozone-forming compounds. In its air quality planning process, the Virginia Department of Environmental Quality (VDEQ) constructed a maintenance plan to maintain the Hampton Roads ozone precursor emissions at the 1993 levels. The plan included a growth allowance of 800 tons per year and No_x and 200 tons per year VOC for emissions from any possible new aircraft assigned to NAS Oceana.

The maintenance plan VDEQ developed also contained a growth factor for future years, by accounting for expected reductions in emissions and setting some of those reductions aside for future use. A small portion of the emissions are "retired" so that there is an overall reduction of VOC and No_x in future years.

KAB-10 The EIS does not consider and is not required to analyze emissions from northeastern North Carolina that are not related to the proposed action. The EIS does provide an analysis of aircraft emissions associated with each ARS that occur in Dare County. VDEQ would be responsible for accounting for the impact of VOC and NO_x emissions from sources in North Carolina into the Hampton Roads Air Quality region.

How does this effect air quality attainment with each of the proposed ARSs? Will this mean that the Hampton Roads region will be in non-compliance? Will this area have poor quality air due to this proposal. What about future growth? And how about the NC additional input? These items should be determined and contained in the EIS for this facility. Also do all the numbers form the AIRS database match the numbers presented for General Conformity.

The only other comment to add about air quality impacts associated with this proposal is that the EIS should be written so that people can understand it. Frankly, with each proposal will the air outside the facility boundaries be clean or will it be polluted from proposed operations? 12

Based on the above, and my review of the DEIS it is obvious that the only options which help to mitigate impacts to such a large number of residents in VA are ARS4 and ARS5. Each of these proposals require construction (as well as ARS1). However, instead of looking at construction as only additional cost, I would recommend that new construction be viewed as an opportunity to install "state of the art" facilities. These facilities can have inplace all currently available environmental controls and corrective accident/spill containment/cleanup systems. These facilities could be built with modern storage, transfer, and fueling design technology to minimize impacts and releases to the environment. This has been and continues to be a significant and costly expense at past and present facilities. 13

Also based on numbers of people impacted, both MCAS Cherry Pt and MCAS Beaufort have much lower numbers of people negatively impacted verses NAS Oceana. The DEIS dismisses the option of locating the planes at these two facilities. This should be considered. To blindly look at the 1995 BRAC recommendations based solely on a analysis of available capacity does not include the important cost factor of citizen impact. This has to be considered. 14

It also appears that the relative cost (300 million) of single-siting the jets at MCAS Cherry Pt is attractive, especially considering the much lower number of citizens impacted. This also should be a ARS. 15

KAB-11 The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementations Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. SIP revisions, if any, addressing the new standards are not expected until after 1999. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard. There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with the potential transfer of F/A-18s to NAS Oceana are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

KAB-12 Air quality standards, numerical values indicating the threshold between "good" and "bad" air quality, are used to evaluate if mitigation is needed to improve air quality. The emissions produced under each ARS have been incorporated by VDEQ into its analysis of ozone standard compliance. VDEQ's analysis demonstrates that the ozone standard will be maintained.

KAB-13 Thank you for your comment; no response required.

KAB-14 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and

If the Navy decides not to look at this proposal further, I must cast my recommendation for ARS5 which helps (although small) to mitigate some of the noise impacts on residents of VA Beach.

I feel this needs more time and analysis so I also request an extension of the public comment period.

Again, I would like to thank you for the opportunity to comment.

Sincerely,

support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

KAB-15 Please see response to KAB-14.

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511

Attn. Dan Cecchini (Code 2032DC)

My name is Carolyn Dittrick and I have been a resident of Virginia Beach and a Navy pilot's wife for more than 26 years. I have lived in both Point O'Woods and Chesopeian Colony, and , as you may know, both these areas as well as many of our oceanfront beach properties and subdivisions north and south including Bay Colony and Croatan will be included in the noise zones areas or accident potential zones projected in the 1999 AICUZ MAP. According to the map, the decibel ranges will be an average of DN sound level of 65-85 decibels. That is in the categories which can generate significant to very severe community reaction because of noise.

The most severe noise problem is close to the air station where the FCLP or Touch and Go Operations take place. According to the Chief of Naval Operations Instruction (OPNAVINST) the greatest problems in a move of 180 F/A 18 Aircraft to Oceana would be noise, air quality and traffic -- WITH THE MOST SIGNIFICANT BEING NOISE. If we can reduce the AVERAGE DAY-NITE SOUND LEVEL by removing one of the greatest noise offenders, the proposed 69,000 Touch and Go Operations slated for 1999, to an auxilliary field south or southwest (U.S. Naval Radio Station property) or open space in Suffolk area, the quality of life for our industrious and hardworking long-term residents in these recently redesignated high noise and accident potential zone areas can be saved! Think of the future of our children who are our

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B-8-146

CD2-1 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

greatest hope for the future! It is they who will be attending the 22 schools in the high noise and accident potential zone areas. There is too much too lose in a situation as grave as this. You can be sure it is devastating to families who suffer underneath the Touch and Go Operations. The new 11 F/A 18 squadrons will bring an excrutiating 108 decibel noise level on take off and remain at least at 97 decibels of sound (and more as they fail to remain in those computerized patterns) during Touch and Go operations-- truly more more than human beings should have to tolerate. Do we have no choice? Seemingly, the approach and lack of concern in this area seems to express an unconcerned (warlike) attitude against a certain segment of our population.

There will be more than 69,000 Touch and Go Operations alone starting with 1999. Fentress has a full plate of FCLP operations, etc. and cannot except more. For that reason and the reason of repairs which happen at least twice yearly at Fentress, we need to develop another auxilliary field. We need to move those operations away from a public who is saturated by the noise, even if it costs a bit more money to do so. In the long run it will be cheaper and better for you to consider this situation now.

Research implicates airplane noise as a factor producing stress-related health effects such as heart disease, high-blood pressure, stroke, ulcers, etc. Studies on the cognitive abilities of school-age children show that chronic exposure to aircraft noise can result in reading deficit, impaired speech perception and above all can impair learning. There is an adverse reaction to people

B-8-147

2

CD2-2 Please see response to CD2-1.

living in noisy environments that causes speech interference, sleep disturbance, desire for tranquil environment, and the inability to use a telephone, radio, television, or to study or concentrate satisfactorily.

By removing the noise you will also be removing some of the PRESENTLY VERY CONTROVERSIAL AND EXTENSIVELY POLUTANT AIR EMMISSIONS in this intensively residential area. At the same time you will remove the weight of responsibility for crashes in the newly created accident potential zone areas -- needless to say the economic handicap you will be releasing on those current and most unfortunate homeowners.

How can you say you are just adding 10% to the noise level when you are adding 50% to the operations and to the hazard of airplane crashes into a thriving fully-populated community? 3

We are not the enemy! We equally pay our taxes and support our military. Please rethink your strategy. We have enough in our populated environment to be overwhelmed about this onerous disturbance of any sense of peace and tranquility. We need you to perceive us as human beings, friends, neighbors, fellow Americans and patriots who have sacrificed and must be considered a factor in your relocation equation.

Thank you,

Carolyn Dittrick

757-498-4722

November 15, 1997

CD2-3 The noise impact analysis in the EIS is based on the widely-accepted Day-Night Average Sound Level (Ldn) noise metric. Ldn is a measure of sound energy over an average annual day, and not a measure of the noise from a single aircraft. A 50 percent increase in touch and go operations, for example, would produce only 1.8 dB change in Ldn. APZs are established under flight tracks with a minimum of 5,000 annual operations.

Dear Mr. Cecchini,

My husband and I are writing this letter to you to voice our great concern and opposition to the relocation of 180 (F-18 Hornet) jets to NAS Oceana.

We are three-year residents of the Fentress area, living at 2208 Fentress Airfield Rd. Our twelve-acre property would be very much affected by additional jet noise and air pollution.

While in the process of purchasing our land in 1994, we were informed of the flyover rights of Navy F-14s and the radar planes. To still our misgivings, our realtor told us to call the Fentress Airfield to find out a "flying time" and to park and observe the noise from our possible driveway. We did as she suggested and did observe both radar planes and F14s (practicing touch and go.) The droning engines of the prop planes and the intermittent roar of the F14s was not "encouraging", but it seemed that the noise was not a major problem. The planes flew a short while and were gone, and the countryside again was quiet and peaceful. Several periods of two-hour practice sessions

B-8-149

did not concern us enough to cause us to change our plans. We spent thousands of dollars remodeling our property, since our plan was to remain in Fentress into our old-age years.

In the last three years, we have noticed an increase in traffic and/or practice time. Sometimes we have had loud noise into the wee hours of the morning. Standing in our backyard, we have often observed the jets swinging "out and over" in various patterns — They were very low and very loud — to the point of having to cover our ears with our hands to prevent pain! Also, in flying in from other areas - coming into the NALF area, Many planes seem to fly in so fast and so low (" cracking the noise barrier" - right over our house) however, when the pilots settle into their proper pattern, the noise is very much reduced and tolerable. Must the pilots buzz in at top speed - hurting our ears - and circle - and THEN settle into pattern? Couldn't they fly in more slowly and save our ears? I truly believe some are "hot doggers" with illusions of Tom Cruise and Top Gun!

We have never, in three years, called to complain about the patterns or noise. We were willing to "bite

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MHL-1

Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

the bullet" and "accept" the F14 noise, with some reservations. Now, we are asked to accept 180 hornets - LOUDER AND more numerous THAN the F-14s!

The thought of 51% increase in touch-and-go plus more night flying - and weekends? Well these is frightening.

2 hornet pilots "crack the skies" as they fly in - before getting into pattern? Will the 180 additional planes observe the true flight patterns at the proper altitude?

I have to be fair ... we did move here, knowing about jet noise near us, but the 1994-1997 noise is nothing compared to the levels we can expect from early 1998 - late 1999. Enduring long periods of jet roar, day and/or night, really concerns me - and how about air pollution from these hornets? According to your data in the DEIS - SECTION E, page E-6:

"The NAVY's initial projection of net annual VOC (volatile organic compounds) emissions caused by this alternative realignment scenario, (I.E. in the full build-out year - 1999) is 105 TONS per year, WHICH exceeds the de minimis exemption levels specified under the General Conformity Rule (I.E. 100 TONS per year) by 5 TONS. Initial projections of reasonably foreseeable net

MHL-2 Please see response to MHL-1.

annual emissions of NO_X total approximately 396 tons per year in 1999, exceeding the de minimis exemption levels by approximately 296 TONS."

The information following the above paragraph, in the DEIS, leads us to believe that through "juggling" clean air statistics from one scenario to another, the state of Virginia is turning a blind eye to the TONS of ozone-damaging pollutants going into the air here, in Fentress!

3 The last paragraph on page E-6 states that Virginia has submitted an ozone maintenance plan to the US EPA in accordance with the CAA. My question? How CAN excess tons of damaging VOCs emitted yearly, in the same practice area, be okayed by the state of Virginia? Pollution is pollution and tons of it in our fresh, country air is unthinkable! "Fresh", country air in rural Fentress? I DON'T THINK SO! NOT IF WE HAVE AN ADDITIONAL 180 HORNETS FILLING OUR SKIES!

Sir, we are not foolish enough to think that the Navy will close Fentress to make us happy ... we

MHL-3 The pollutants of concern, VOC and NO_x, are not ozone-damaging pollutants but rather combine to form ozone in the atmosphere close to the ground. The ozone maintenance plan developed by VDEQ is based on scientific analysis of the amount of VOCs and NO_x that can be emitted into the air from all sources (including cars, factories and military facilities) that will not cause the ozone standard to be exceeded. All projected emissions from the F/A-18 aircraft operations at NAS Oceana and NALF Fentress are included in VDEQ's analysis. The analysis indicates that the ozone standard will be maintained under these conditions.

are merely asking for the Navy to consider 5
how this influx of noise and pollution will change (and ruin) our quality of life in a small, rural pocket of Chesapeake.

We speak for our family, but I also believe my neighbors feel as we do: A few jets and radar planes (as we had prior to the BRAC agreement) were tolerable. To live in the country and enjoy its pleasures, we were willing to "share" our living space. NOW, we are horrified that 180 LOUD intruders will change our lives forever. Our lifes' savings are tied up in our properties — and surely — "new, prospective buyers will SEE AND HEAR (MAYBE smell the fuel too) of the jets and will WISELY WITHDRAW ANY OFFERS.

Not long ago, the EPA favored an endangered species of owl in a dispute over timberland habitat. The owl was "threatened", his "quality of life" was in question and the timber business suffered great loss in the Northwestern U.S. AND - in the DEIS, it was stated that there was a "concern" about ducks and the "1 decibel of noise" in affected wetlands.

Is our Government concerned about the human residents most affected by noise, air pollution and crash zones? Please consider our point of view. Sincerely, M.H. Little

4

MHL-4 The EIS assesses the potential environmental impacts from the realignment of F/A-18 aircraft on both natural and man-made environments. In particular, the EIS evaluates noise, air pollution, and safety impacts for all ARSs.

HIGHLAND MEADOWS, LLC
PO Box 309
Monterey, VA 24465

November 18, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, VA 23511

Dear Commander, Atlantic Division:

As manager of and one of four principals in Highland Meadows, LLC, a residential development project aimed toward young retirees, I intend to state the reasons we oppose the unanalyzed expansion of the Evers Military Operations Area as a direct consequence of adopting any of the recommendations in the Final Environmental Impact Statement (FEIS) for Realignment of F/A-18 Aircraft and Operational Functions From Naval Air Station Cecil Field, Florida, to Other East Coast Installations.

The recommended alternative, ARS 1, would relocate all 180 Cecil Field aircraft to NAS Oceana. This alternative would increase the number of sorties at NAS Oceana by 118 percent, from the current 19,910 sorties to 43,068 sorties. (FEIS, Appendix C, C-86.) Nearby NALF Fentress sorties would increase 51 percent from about 104,668 sorties to 158,194 sorties (Ibid., C-94.). The other four alternatives would also generate increased sorties from both fields, though the increase would be less than the preferred alternative's. All five alternatives would generate increased use of Virginia airspaces, with ARS 1 generating the highest level of increase.

The cost of the realignment under ARS 1 is $250 million, the least expensive of the five alternatives considered.

1 A No-Action Alternative was not considered in this FEIS owing to the BRAC Commission's 1993 directive that Cecil Field be closed. The cost of a No-Action Alternative is not given in this FEIS.

The BRAC realignment recommendation appears to have been made without the benefit of any NEPA process. It appears, further, that the current FEIS is not in compliance with NEPA's provision that a No-Action Alternative be considered in a FEIS. Neither the

HM-1 As discussed in Section 2, the No Action Alternative is not considered because the F/A-18 realignment is mandated under Defense Base Closure and Realignment Act.

BRAC recommendation nor this FEIS considers a No-Action Alternative. Absent a complete FEIS and compliance with NEPA, the recommendations arising from this FEIS should be rejected.

The FEIS projects increases and decreases in various airspaces that NAS Oceana and NALF Fentress use, including the Evers MOA, which includes all of Highland County, and portions of Bath, Augusta, Pendleton, Pocahontas and Randolph Counties in Virginia and West Virginia.

The USAF Langley proposed expanding the Evers MOA in February, 1997, following a two-year Environmental Assessment that was not adequately publicized or well-prepared. That EA was withdrawn in March for various reasons, with which the Navy should become familiar

This FEIS provides no NEPA analysis whatsoever of the environmental and economic impacts on the area within the Evers MOA, using Military Training Routes IR-714 and VR-1754, that would directly result from implementing the recommended alternative and to lesser extents the other alternatives as well.

2

IR-714, which leads from central Virginia to Highland and Bath Counties, now carries 173 sorties and is scheduled under ARS 1 to increase to 214 sorties in 1999. VR 1754 now carries 450 sorties through Highland and Bath Counties and into Pocahontas, Pendleton and Randolph Counties, West Virginia; this MTR is scheduled for a reduction of 27 sorties in 1999. The net increase of the ARS 1 alternative over Highland County is projected at 14 sorties for 1999. No usage projections are made for any year beyond 1999.

3

NEPA requires an agency to look at likely long-term and cumulative impacts of a proposed action. By limiting its scope to the proposed realignment's projected impact on a single year (1999), this FEIS has not complied with this requirement. Moreover, by failing to include likely usage increases from Langley AFB and other users of Virginia airspace, this FEIS does not address cumulative impacts on the Evers MOA and other Virginia and West Virginia corridors.

4

The Notice of Intent to prepare an EIS (Federal Register, Vol. 60, No. 221, November 16, 1995) states that the Navy intended to "...evaluate the potential effects to the built environment, including land use patterns cultural resources, transportation, housing, community services, and the regional economy." This FEIS limits its socio-economic impact analysis to the area adjacent to the various airbases involved. No analysis of the regional economy--of which we are a part--is offered. Absent an analysis of the economic impact of this proposal, the FEIS should be rejected.

The major impact on Highland County is the "startle effect" created when military aircraft fly within a few thousand feet of the ground. The measure of startle effect that

HM-2 The EIS addresses proposed operations for 1999. F/A-18 operational tempo and training requirements are expected to remain constant for the foreseeable future beyond 1999. Based on F/A-18 training requirements, significant utilization of the Evers MOA or low level MTRs is not expected. Under all ARSs, F/A-18 training operations would occur near NAS Oceana, in eastern North Carolina, or in offshore waters.

HM-3 The EIS addresses the change in utilization of several MTRs which pass through the Evers MOA. No significant increases in utilization of the Evers MOA is anticipated based on the F/A-18 training requirements.

Of the training routes analyzed, the total projected increase in operations from 1997 (existing) to 1999 is approximately 800 operations under ARS 1 and slightly less for the other ARSs. This represents an average increase of less than two operations per day over all affected MTRs.

HM-4 The areas used to evaluate the socioeconomic impacts under each ARS were determined based on various factors, including the use of predefined, well-acknowledged regions of economic influence, the geographical distribution of existing civilian employees, and the location of major suppliers and contractors that service the bases. The regions of economic influence were defined so that areas that are expected to experience the most significant economic impacts associated with each of the proposed ARSs would be studied in depth. This designation does not preclude the fact that some relatively minor economic impacts may occur in areas outside these regions of economic influence.

this FEIS uses translates an extremely high noise level that occurs for a very short period of time into a time-weighted average. A time-weighted average has salience as a measure of health impacts from noise, but has no salience at all as a measure of the economic loss incurred by residents on their property and livestock.

5 Our project has targeted a market of young retirees who are seeking homes in a small, quiet, peaceful mountain town like Monterey. We will not be able to sell our 29 houses if residents and likely buyers are startled every day by military aircraft flying low through our narrow valley. The likely impact of this proposed action is that we will not be able to sell our houses at market value, or at all. This potential $4 million-plus opportunity cost--and similar losses throughout the Evers MOA-- is not discussed in the FEIS. Such a result is a taking, and we will pursue loss and damages through the courts as they are incurred from the proposed action.

6 Our County and the others in the Evers MOA have made much effort to promote low-impact recreation and tourism in recent years to supplement traditional employment. To the extent that we are made into a "startle-effect" corridor, these efforts are diminished at substantial cost to part of NAS Oceana's regional economy. We cannot market peace and quiet if military aircraft allow us to be neither.

7 This FEIS amounts to an unannounced and unanalyzed expansion of the Evers MOA without benefit of following NEPA requirements.

Rather than prepare a second Evers MOA EA, this FEIS expands Evers and certain other airspaces without any NEPA analysis at all. Usage will increase in Evers with no expansion of area, thus increasing the intensity of use-related impacts on our communities. Such an action is a clear violation of NEPA.

8 And once again we find our Department of Defense keeping its plans out of view. This FEIS was not distributed to our Congressman Bob Goodlatte, West Virginia Senators and Congressmen, Virginia delegates and senators from our area and county officials. Following a written request and two phone calls, I finally received a copy on November 10, leaving eight days within which to prepare comments. This is the same pattern of no-analysis, non-analysis, flawed analysis and keep-the-mushrooms-in-the-dark that the Air Force followed with the original Evers MOA.

For these reasons, we oppose the recommended alternatives and reject the FEIS because it does not comply with NEPA and its case law. We oppose any usage expansion of the Evers MOA, particularly over Highland County and the Town of Monterey.

Sincerely,

Curtis Seltzer

HM-5 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise or "startle-effect" on property market values. Therefore, we cannot quantify whether the increase in noise will affect property values.

HM-6 Please refer to response HM-5.

HM-7 Please refer to response HM-3.

HM-8 The EIS was prepared to assess the potential environmental impacts from the realignment of F/A-18 aircraft from NAS Cecil Field, Florida to other east coast installations as was mandated by the 1995 Base Closure and Realignment Commission. The EIS analyzes impacts to military training areas including offshore warning areas, restricted areas, target ranges, and military training routes, and it focuses its analysis on military training areas which the Navy specifically determined would be utilized by Navy F/A-18 aircraft, depending on the chosen alternative. Although the F/A-18s may use military training areas not specifically addressed in the EIS, the projected utilization of those areas will be negligible and a detailed analysis was not conducted.

The Distribution List initially included those federal, state, and local agency representatives either representing an area potentially impacted or with agency jurisdiction in the proposed action. Citizens and officials who commented during the scoping period were also included. The Navy responded to all requests for copies of the DEIS. Notice of Availability of the DEIS was published in the *Federal Register* on September 19th, 1997, and a 60-day public comment period was initiated. Notice of this extension was published in the *Federal Register* on November 14th, 1997, and a post card was sent to all who received copies of the DEIS advising them of the extension.

Copies of the DEIS were not sent to state and local officials in the Highland County area along with numerous other counties in Virginia, West Virginia, North Carolina, and South Carolina which fell under designated MTRs because of the small increase in operations projected.

However, if any of these officials had requested a copy, one would have been provided.

649 Margaret Drive
Chesapeake, VA 23322
November 18, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
Attn:Dan Cecchini

Dear Sir,

I'm writing this letter to voice my opposition to the relocation of 180 F/A-18's to Oceana. I am particularly opposed to the impact it would have on the land surround NALF Fentress. From what I understand, bringing in the F-18's will mean more planes using the Fentress. This field is already over-used by every type of aircraft at Oceana, and the increased number of planes means increased use of this field.

As a resident of King James Colony in Chesapeake I know about the noise that is already a part of being located near Fentress. Although I don't live in the "direct" flight path of the "Touch and Goes" of Fentress I have come to dread the continual stream of aircraft when in operation. The planes are loud. They go on, plane after plane, day and night, for an undeterminable number of days or weeks.

1 I did not attend the information meeting at Fentress, largely because I did not know about it until the day before and had scheduling conflicts. I only have to look at my roof to see the effects of the planes flying overhead (twenty five year shingles destroyed in ten years). That is aside from the fact that I cannot even enjoy a cool summer evening outdoors when the
2 planes are flying. What impact does all this have in the long run on myself, my wife and my children? I have lived in the vicinity of Kennedy and La Guardia Airports in New York in the
3 past and at least some effort was made towards noise abatement, especially at night. Does the Navy have any plans to do likewise?

As a Government employee for over twenty-five years, I understand that you will listen to any opposition, and then do as you want. Environmental Impact Statements, no matter how good or bad a picture they present, can be ignored in the final analysis if properly and truthfully filed.

I am not opposed to military training, and have tolerated the current level of noise as "The Sound of Freedom". What I am opposed to is the effects the increased level of activity
4 will have from the viewpoint of pollution of all kinds and public safety. I strongly request that you look at alternate sites that would not impact growing communities such as Virginia Beach and Chesapeake.

Sincerely,

Philip J. Libraro

Philip J. Libraro

B-8-158

P\OV8903\D5321\APPENDIX B\B8\CCLETTER3.WPD-02/26/98-33

PJL-1 There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

PJL-2 The EIS indicates significant increases in daily operations at NALF Fentress for Field Carrier Landing Practice (FCLP) training under all ARSs.

PJL-3 Military aircraft are exempt from the Noise Control Act of 1972. However, Navy aircraft conduct noise abatement procedures to the best of their ability, commensurate with safety and operational training requirements. Section 4.8 of the EIS discusses noise abatement procedures used at NAS Oceana to reduce noise impacts.

PJL-4 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

NOV. 18, 1997

Dear Sirs,

I am writing in reference to the newly proposed OF-15. I attended and commented at the recent public hearing held on this subject. I had no prepared speech for that hearing but spoke from the heart. once again, I am speaking to you from the heart. I am neither a politician nor a community business leader who is looking for economic gain. I am not an old warrior reminiscing about the good ole days nor am I a naive homeless advocate protesting for peace, love and rock-n-roll. I am your typical, tax paying American who happens to live under the high level military air craft noise zone we call Oceana.

The political and business leaders of Hampton Roads, as well as many former military individuals spoke frequently about the "quality of life" the increased fleet squadrons will bring to our area. When they speak of quality of life, they are speaking only in economic terms. Admittedly, I do not know all of them. I do know many of them however, and I know they do NOT live in the noise zones we are talking about. How can they call our concerns "petty noise complaints" when they do not live with it? They seem to want the benefit of economic gains, while those of us who

Thank you for your comments; no response required.

live in these zones, pay the price, must endure the noise, and give up true quality of life. One politician I know of, Glen Crawshaw, who did not speak at the hearing, did live in my neighborhood. However, he has since moved and I know he spends much of his time in Richmond, which is far away from the Oceana jet noise. When I speak of quality of life, I am referring to the comfort one finds in knowing that our military men & women are doing their jobs in defending our country in an evenly distributed manner. It also means that I do not have to install extra insulation and stay inside my home. It means that I can take comfort in stepping outside and breathe clean air knowing that, yes, I will occasionally hear a jet fly overhead, but that I will not be held prisoner inside my home or be subject to the constant bombardment of the noise that bringing all the 11 F/A 18 fleet squadrons will produce. I am willing to take all the economic consequences this decision will bring. I am urging you to implement ARS option # 4 or 5.

Sincerely,

DB Scarborough

DEBBIE LOU TUCKER HAGUE

1105 Chumley Road

Virginia Beach, VA 23451

November 15, 1997

Mr. Dan Cecchini (code 2032DC)
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Dear Mr. Cecchini:

Should one hundred twenty to one hundred eighty F/A-18 fighter aircraft be based additionally at Naval Air Station Oceana, my neighborhood in Bay Colony would be within the "Projected 1999 65-75 Decibel Noise Control" (Zone II). It was not within this contour in the 1978 decibel plot. No part of this area has ever been in a real estate noise disclosure zone.

1 Before any change occurs, my family and I request that the Navy reevaluate its noise abatement procedures with the goal of reducing the proposed intense noise impact in my residential area.

Sincerely,

Debbie Lou Tucker Hague

Debbie Lou Tucker Hague
Resident of the City of Virginia Beach

B-8-161

DLTH-1 The Navy will continue to review its operational procedures at NAS Oceana, as required by the AICUZ Program, in order to mitigate noise impacts whenever practicable.

Nov. 1997

Dear Mr. Cecchini,

As a long time resident of Virginia Beach, I strongly support bringing the F-18's to Oceana. I like not far from the back gate entrance to Oceana. We experience noise from flying aircraft over our neighborhood regularly. Eleven years ago, we lived on the flight path at the South End of the Oceanfront. We have never objected to the "Sounds of Freedom". I say to the complaining new residents that I have read about in the newspaper that - this is part of Virginia Beach and its eclectic mix of sounds & sights. That minor inconvenience of noise is far outweighed by the multitude of benefits brought to our city. Some of our best neighbors are associated in some way with Oceana Naval Air Station. These Navy folks are involved in our civic leagues, PTA's and other community activities such as coaching little league baseball, soccer, etc. I welcome any more that the Navy brings our way.

Sincerely,
Kathleen A. Carter
2133 Tall Pines Bend

PH. 427-0058

B-8-162

Thank you for your comments; no response required.

December 15, 1997

To Whom it May Concern:

I am a 19 year resident of VA. Beach & grew up in Portsmouth (18 yrs.). Tidewater & the military are one. Of course we WANT the Jets at Oceana. I love the sound of planes & the presence of the military, their families, & the visitors (family, friends, dignitaries, etc.) they bring here.

I lived in St. Louis, Mo. for 13 yrs. — 10 of which were spent working

Thank you for your comments; no response required.

B-8-163

2 miles or less from the airport (St. Louis). I also lived there ~~#~~ (near the airport) for 9 years. It never would have crossed my mind to "complain" about that. It was necessary & that was that. (As a matter of fact, it was convenient for travel.) Anyway, the noise never concerned me - & I am a very light sleeper. Bring on the jets - & more if necessary. Thank G-D for the military & thank you for considering my

Comments.

Sincerely,

Judith E. Anapol

JUDITH E. ANAPOL

November 18, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, VA 23511

Subject: Relocation of F/A-18s

Dear Mr. Cecchini,

We live in the landing pattern for NAS Oceana. Better we should be inconvenienced by the sound of our warplanes than the impact of some other nations shells, bombs or missiles. Bring on the 180 more F/A-18s.

Sincerely,

D. R. Thrush
Virginia Beach

Thank you for your comments; no response required.

B-8-166

informing her that the portion of the meeting in question was not open to the public because personnel matters were being discussed.

Massie's letter reads in part, "I have asked that the process be structured so that matters of general content or process review may be open to the public, including but not limited to you, and that matters and discussions which pertain to individual candidates be closed. Again, do not regard this as a personal reflection upon you in any way.. . . "

Massie refused to comment on Daniels' allegations of discrimination and the lack of promotions among blacks.

He said Daniels is welcome to attend meetings in which they do not discuss personnel matters or applicants.

Massie said Portsmouth's deficit, now minimal, represents tion in the city government."

The Church and Community in Action, a group of mostly black ministers and community leaders, invited Massie to one of their meetings to discuss what they perceive as his problem with hiring and promoting African-Americans for the city. They noted that of the 10 staffers in the city manager's office, there are only two black employees.

Massie pointed out that the current staffing was in place before he was appointed city manager.

"I met with them (CCIA) about two years ago. They announced their concern, and I share that concern," Massie said.

Daniels said she will convene a meeting sometime after Thanksgiving, open to the community, to discuss plans for meeting with Massie about the citizen panel.

attle: Invest in education

search the Internet.

While job training and business development are offered in Hampton Roads at Tidewater Community College and Old Dominion University, local officials complain that the state of Virginia isn't contributing enough funding. They also have said there isn't enough cooperation among government, business and education.

Hans Gant, executive director of the Hampton Roads Economic Development Alliance, a public-private partnership formed to market the region to business, pointed out that public officials often ask about educational opportunities.

"They ask me about ongoing certified industry programs and if our schools cater to specific industries," Gant said.

For example, the Chubb Group of Insurance Companies agreed to locate in Chesapeake after ODU pledged to develop a program to meet company needs in areas such as insurance licensing and adjusting.

TCC does its part for economic development by training students in such disciplines as computer science technology.

But after the day's lecture, Gant said he is convinced that the region needs to invest more in its schools.

"When specific industries look at the region, there is no critical mass," he said. "That makes me think we have some work to do."

Oct. 23 hearing attracted just five people, only one of whom commented. The Navy announced last week that it would hold another meeting to encourage more input.

The Navy last month held six public hearings in South Carolina, North Carolina and Virginia.

Hearings in Virginia Beach and Chesapeake drew about 500 residents and political leaders, many offering enthusiastic support for the jets. But a group of residents, afraid of the increased noise levels, asked that the Navy find another home for the Hornets.

The public comment period was scheduled to end today, but the Navy announced last week that it would extend the deadline to Dec. 2 at the request of North Carolina officials. They asked for the additional time to review the draft Environmental Impact Statement.

The statement outlines the effects and costs of relocating 180 F/A-18s from soon-to-close Cecil Field, Fla. It recommends that all the jets be relocated to Oceana. Other options include splitting the jets between Oceana and installations at Cherry Point, N.C., and Beaufort, S.C.

The Navy is expected to make a final decision on where to land the jets in the spring.

TO COMMENT

The public comment period ends Dec. 2. Written comments can be submitted to:
Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, Va. 23511
Fax (757) 322-4896

1815 S. Lille Garden Court
Virginia Beach, Va., 23456
November 15, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert St.
Norfolk, Virginia 23511

Dear Mr. Dan Cecchini:

I am not in agreement to the moving of all the F-18 fighter planes to Oceana , Va. Beach.

First: I do not feel that strategically this is the best move. All the same fighter planes should not be based at one place. One direct hit, and all your planes are GONE.

Second: Noise Pollution: These jets give out a mighty roar when coming in to land. There are times that every five minutes for two to three hours, these jets are landing. That is very noisy! They must have their training, but the noise compromises our quality of life. During landings one cannot sit in the yard. While inside the house, the windows cannot be opened because of the noise. We are prisoners in our homes. Sometimes the wall pictures and knicknacks rattle because of the strong vibrations.

Let North Carolina share some of the housing for these planes. This is a neighboring state and meetings and training can be continued since the two bases will not be too far apart.

We need to look at total security, safety and the need of Virginia's largest city.

Very truly yours,

Anne W. Labuda

B-8-168

Thank you for your comments; no response required.

Att Dan cecchini

in my comments I have

I Feel the 180 F/A 18 Jets

heed to Be Put in oceana

Naval AIR Station in VIRginia

You all so Need to help the

American People save money

and tell someone in High in

the Navy Commander to shut

the dooR's at cherry Point NADEP.

Please help

thank's

James BRADford

Thank you for your comments; no response required.

B-8-169

LINDA J. & CLAYTON C. MAGUIRE
2209 HALFMOON CRESCENT, VIRGINIA BEACH, VA 23454

November 29, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert St.
Norfolk, VA 23511

RE: Proposal of F/A-18 Home-Base

Dear Commander:

We are writing to advise you that we are opposed to the relocation of some 180 aircraft to Virginia Beach. We are, also, opposed to other proposals which would bring a smaller, but still sizeable number of these aircraft to Oceana.

Our primary objection is due to the noise. At this time the noise level in our neighborhood is too great. The proposal would cause our neighborhood (Great Neck Meadows) to be designated a ***high noise zone***. We do not wish to have this increase in noise level for ourselves (with the accompanying loss of property value) nor for our city. In fact only three blocks from us a large new school is nearing completion which was constructed exclusively due to the danger from the current planes. With the relocation the school will probably need to be relocated for the same reason. We, therefore, feel that while the relocating of the planes here might well boost the local economy it might also have extensive costs. We, therefore, support the City of Virginia Beach preparing a cost analysis.

We feel that the noise level will be too problematic for school learning, as well as for residences. We believe that further crowding, both on our roads and in residential areas will occur.

We appreciate your hearing our concerns.

Sincerely,

Clayton C. Maguire

Linda J. Maguire

cc Representative Owen Pickett
Mayor Myra Oberndorf

B-8-170

Thank you for your comments; no response required.

November 30, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511
Attn: Mr. Dan Cecchini (Code 203DC)

Dear Sir,

I am writing to express my grave concern over the possibility of 180 FA-18 Aircraft being repositioned to Oceana. As a daughter of a 32 year veteran of the Navy, I can assure you I understand the economic impact such a move would have on our region.

However, several years ago we relocated from the oceanfront area to find a more suitable neighborhood environment and a top-notch school district for our children. We own a beautiful home in Great Neck Meadows on a safe cul-de-sac with terrific neighbors. Our children attend Trantwood Elementary which ranks one of the top three elementary schools in the region. Since we purchased our home, we have seen the value of the neighborhood rise dramatically, which positively affects our investment.

Our main concerns are for the safety of our children, as well as their ability to learn in a noise zone exceeding 75 decibels. There is also the "quality of life" factor to consider. In addition, there is the decline in the resale value of our home.

Please consider this letter our formal declaration **AGAINST** the relocation of part or all of these aircraft to Oceana.

Sincerely,

Ronald W. Jackson Susan L. Jackson

B-8-171

Thank you for your comments; no response required.

December 1, 1997

Dan Cecchini
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilber Street
Norfolk, VA 23511

Dear Commander:

I would like to express my concerns about the proposed relocation of the F/A-18 Aircraft to Oceana Naval Air Base. I currently live in Wellington Woods which would be adversly impacted by the F18's flight pattern.

I moved here two years ago from a neighborhood that was in a "moderate" noise zone and I'm frightened to think what a "high" noise zone would be. If you were on the phone when a jet flew over you would have to stop your conversation until it passed overhead. If you were outside you could not hear someone talking to you three feet away. During Desert Storm they would fly at night and I was not able to fall asleep till they stopped flying.

I understand that the relocation of these aircraft brings money to the Beach but it is at my expense. I'm not even convinced that a full impact study has been done for this project that clearly defines the total cost. There are other options that should be considered such as Cherry Point or Beauford.

I know I am just one voice but I hope you will listen. The neighborhoods that will be impacted have a lot at stake and I hope you consider that when making a decision.

Sincerely,

Scott B. Johnson

Scott B. Johnson

B-8-172

1

SBJ-1 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Five alternatives have been evaluated under which aircraft are transferred to NAS Oceana, MCAS Cherry Point and/or MCAS Beaufort.

To Commander Atlantic Division, Naval Facilities Engineering Command,
Attn. Dan Cecchini (code 2032DC) 1510 Gilbert Street, Norfolk, Va. 23511

We, the undersigned taxpayers of Virginia Beach, concerned about sound and air pollution, as well as safety, oppose the Navy's plan to bring 120 to 180 F/A-18 Hornets to NAS Oceana. We do not share the politicians' assertion that the proposed move would enhance life in densely populated Virginia Beach

I

Thank you for your comments; no response required.

	NAME (PLEASE PRINT)	SIGNATURE	ADDRESS
1	Kristie J. Randolph	Kristen Randolph	1125 Abingdon Dr Va Beach
2	Karen H. Frazier	Karen H. Frazier	1209 Hill Rd Va Beach 23451
3	Jane L. Evans	Jane L. Evans	1208 Bruton Lane VA Beach 23451
4	Nancy Freeman	Nancy Freeman	1112 Lee Road Va Beach 23451
5	Jean Marie Randolph	Jean Marie Randolph	1132 Hill Road Va Bch. Va 23451
6	Gay K. Tiffany	GAY K. TIFFANY	5744 D. Atlantic Va Bch Va
7	Elizabeth W. Kight	E.W. KIGHT	1112 Kittery Dr 23464
8	Emily Sleighuff	Emily Sleighuff	1217 N. Bay Shore Dr.
9	ALFRED M. RANSDELL		1132 Hill Rd Va Bch 23451
10	Lelia Deveraux	Lelia Deveraux	3946 Ocean Hills Ct 23451
11	Herman Brink	Herman Brink	1208 Bruton Ln VB
12	Joyce Klingensmith	Joyce Klingensmith	1222 N. Bay Shore Dr. 23451
13	E. STANLEY WHEELER	E. Stanley Wheeler	1248 N. Bayshore Dr. 23451
14	Marcia C. Wheeler	Marcia C. Wheeler	1248 N. Bayshore Dr. 23451
15	Susan A. Halic	Susan A. Halic	1136 York Lane 23451
16	ELAINE WAREING	Elaine Wareing	1208 Bluebird Dr. VA Bch 23451
17	NANCY H. HODGES	Nancy H. Hodges	1201 White Heron RD. 23451
18	Betty Wiltshire	Betty Wiltshire	4500 Queen Front 23451
19	Julia M Brock	Julia M Brock	421 Bay Colony Dr 23451
20		Neal M. Brock	421 Bay Colony Dr 23451
21	Dick Savage	Dick Savage	220 44th St. 23451
22	Mary Willett	Mary Willett	1253 E. Bay Shore Dr.
23	Sallie Moore	Sallie Moore	211-84th St. 23451
24	FRANCES RICHARDSON	Frances Richardson	1128 Hill Rd. 23451
25	Lucy Hatch	Lucy Hatch	409 Bay Colony Dr. Va Beach, Va 23451

Copy to: Ms. Carol M. Browner, Administrator, E.P.A.
Hon. Owen B. Pickett
Hon. John Warner
Hon. Charles Robb
Hon. Meyera E. Oberndorf

DEC-02-97 TUE 16:42 MAIL DEPOT 757 425 1745 P.01

B-8-174

	NAME (PLEASE PRINT)	SIGNATURE	ADDRESS
1	Cheryl Madison	Cheryl S Madison	1144 Crystal Lake Dr
2	WANDA SELLERS	Wanda Sellers	1108 Ditchley 23238-0961
3	LEE BERGEN	Lee W Bergen	733 Circle Ln VB
4	BARBARA BRADLEY	Barbara B Bradley	460 Goodspeed Rd
5	Mary Robb Sayre	Mary Robb Sayre	2204 44th St. N.
6	William R Buffington	William R Buffington	205-86 St VA Beach 23451
7	DSCOTT HUNTER	dScott Hunter	415 HARBOUR PT 303, VA BEACH 23451
8	Debbie McLaughlin	Debbie McLaughlin	112 50th St, VA Bch 23455
9			
10			
11			
12			
13			
14			
15			

Copy to: Ms. Carol M. Browner, Administrator, E.P.A.
Hon. Owen B. Pickett
Hon. John Warner
Hon. Charles Robb
Hon. Meyera E. Oberndorf

DEC-02-97 TUE 16:44 MAIL DEPOT 757 425 1743 P.02

B-8-175

	NAME (PLEASE PRINT)	SIGNATURE	ADDRESS
1	Jane Evans	Jane Evans	1308 Bonita Ln. V.B. 23451
2	Leyton Vita	Leyton Vita	1073 E. Bay Shore Dr. VB 23451
3	Karen Vita	Karen Vita	1073 South Bay Shore Dr. V.B. 23451
4	[illegible]	[illegible]	[illegible]
5	Phillip Richardson	Phillip Richardson	1313 Cedar Point Dr. VA Beach 23451
6	Margaret Williamson	Margaret Williamson	1226 Crystal Lake Circle VB 23459
7	Harry Ashton Williamson	Harry Williamson Jr	1226 Crystal Lake Circle VB 23451
8			
9			
10			
11			
12			
13			
14			
15			

Copy to: Ms. Carol M. Browner, Administrator, E.P.A.
Hon. Owen B. Pickett
Hon. John Warner
Hon. Charles Robb
Hon. Meyera E. Oberndorf

DEC-02-97 TUE 16:47 MAIL DEPOT 757 425 1745 P.01

NAME (PLEASE PRINT)	SIGNATURE	ADDRESS Va. Beach
ANNE LANNING	Anne Lanning	Renton
Teresa Perrol	Teresa Perrol	Chesapeake Beach
Josephine J. Trant	Josephine J. Trant	Bay Colony
ABETTE RICHARDS	Babette Richards	109 47th St
Nancy C. Johnson	Nancy C. Johnson	1148 Crystal Lake Dr.
Allan R. Johnson	Allan R. Johnson	" " "
Mary Ann Lawrence		2076 Thomas B Shop Ln Lt Beach
Clarence Murphy		813 Cleveland Ave, Portsmouth
Art Richardson	Art Richardson	629 Meadows Dr. Va Bch
Evelyn Kalagayan	EVELYN KALAGAYAN	1600 Meeting House Lane
[illegible]	1600 Meeting House	Va Bch 23455
[illegible]	1852 Pine Cone Cir #100. Va Bch, 23456	
[illegible]	1148 Crystal Lake Dr Va Bch, Va 23451	
George E. Alexander	1135 CRYSTAL DR.	VA. B. 23451
[illegible]	1135 Crystal D.	VA Bch 23451
Paula P. Peckar	1136 Crystal Dr.	Va. Bch. 23451
B. Warren Peckar	1136 Crystal Dr.	Va. Bch. 23451
Edward T. Miles	1525 E. Bay Shore Dr.	Va Beach
Elisabeth F. Miles	1525 E. Bay Shore Dr.	Va. Beach 23451
Sarah C. Miles	1525 E. Bayshore Dr. Va Beach Va 23451	
[illegible]	2135 Whispering Sands Lane Va. Beach 23455	

Copy to: Ms. Carol M. Browner, Administrator, E.P.A.
Hon. Owen B. Pickett
Hon. John Warner
Hon. Charles Robb
Hon. Melvera E. Obernauf

B-8-177

NAME (PLEASE PRINT)	SIGNATURE	ADDRESS
Norman Theberge	Norman Theberge	810 Clam Ave
LARRY GRIGGS	Larry Griggs	1413 VINE ct.
Eric Griggs	Eric Griggs	253 Whites Neck Lane
Betty M. Sundin		401 49th St VB
Linda M. Smith	Linda M. Smith	1825 Ashley VB
Margaret Rita Forcucci		925 aspen circle VB Beach
Sharon M Murphy		3241 Shoreham Rd VaBeach
Allen Sundin		401 45th St, Va Beach

Copy to: Ms. Carol M. Browner, Administrator, E.P.A.
Hon. Owen B. Pickett
Hon. John Warner
Hon. Charles Robb
Hon. Meyera E. Oberndorf

DEC-02-97 TUE 16:50 MAIL DEPOT 757 425 1743 P.03

DEC-02-1997 17:59 FROM ENGINEERING CODE 250 TO 93224894 P.02

FAX

2204 Beckman Ct
Virginia Beach, VA 23454

Date 12/01/97
Number of pages including cover sheet 2

To:
Dan Cecchini, Code 203DC
Commander
Atlantic Division
Naval Facilities
Engineering Command
1510 Gilbert St
Norfolk, VA 23511

Phone
Fax Phone 322-4894
CC:

From:
Eric & Lori SanNicolas

Phone 757-496-8044
Fax Phone

REMARKS:

☒ Urgent ☐ For your review ☐ Reply ASAP ☐ Please comment

This fax concerns the F/A-18 aircraft relocation to NAS Oceana.

We recently became aware of the impact of relocating up to 180 aircraft to NAS Oceana. We are limited to what information is privy to us by form of a "DRAFT Environmental Impact Statement" available at a local library. We are also limited by time to give comments on this impact due to poor information availability & poor attempts to make the general public aware of this impact. We are limiting our concerns to the effects of noise levels on neighborhoods. All references below are specific to the "Draft Environmental Impact Statement" produced by the government.

Three years ago, our family bought a home bordering the 65-75dB AICUZ area of Great Neck (noise zone 2 according to the 1978 Zone figure). This indicates our home experiencing noise levels of about 65dB. We were comfortable moving into this home because it bordered the <65dB & the 65-75dB zones. It was a dramatic improvement from our previous residence in the Birdneck area which is in the 75dB zone. In Birdneck aircraft noise was a serious problem. We were often awakened by night flights & normal conversations were frequently interrupted. We were incredibly relieved to move out of this loud neighborhood.

As stated above, the Impact Statement illustrated (from a 1978 noise zone contour map) that our current home lies on the outside border of the 65-75dB noise zone. According to fig. 3.1-23 "Existing AICUZ & 1997 Noise Contours at NAS Oceana", produced from a modeling program giving a more "accurate" rating of the noise levels, we actually experience levels less than 65dB. There is NO WAYthis figure took into consideration that Oceana experienced higher volumes of air traffic this past summer due to runway closings at Fentris Air Station. Noise levels at times matched those we experienced in the Birdneck area (currently 75dB & higher) making Great Neck a very undesirable place to live. We believe that relocating the aircraft to Oceana will cause Great Neck to experience unbearable noise levels and the area will suffer.

1

B-8-179

ESN-1 When the runway at NALF Fentress is closed for maintenance, FCLP operations are conducted at NAS Oceana. The noise contours in the EIS are based on normal operating conditions at NAS Oceana and NALF Fentress.

DEC-02-1997 17:59 FROM ENGINEERING CODE 258 TO 93224894 P.01

Page 3.1-139 states "At levels of 75 Ldn, possible noise impacts include intermittent speech interference & occasional sleep disturbance." I suppose that the words "intermittent" and "occasional" factor in the times that there will *not* be any planes flying overhead. Yes...I suppose that quote is true. **EVERY TIME** a plane flies over our neighborhood supplying us with 75dB or greater noise levels, we will be UNABLE to carry a conversation whether on the phone or talking to children. **EVERY TIME** a plane flies over we WILL be awakened due to the jet engines. How many adults & children have experienced sleeping through any noise at 75dB or higher? The Impact Statement shows that day flights are from 7am to 10pm. Night flights are from 10pm to 7am. Ten jets practicing touch and go at 9pm is excessive. Technically, 9pm is a "day flight" and most children are in bed by 8pm. Rules and frequencies for flying need to be addressed.

Noise is a huge issue. Businesses, hospitals, schools, homes, and churches will be greatly effected. The value of Great Neck will decrease dramatically as neighborhoods and schools lose their appeal. Great Neck has been a wonderful area with low noise levels, great schools, and excellent neighborhoods. This area will become much louder, property values will drop, and the quality of schools will drop due to families moving out of the area. What made the Great Neck area a great place to live will be lost.

This family is against relocating the 180 aircraft to Oceana. We will no longer want to live in the Great Neck area. Our opinion is only one of the 38 thousand people affected.

12-2-97 12-2-97

2

3

B-8-180

ESN-2 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

ESN-3 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

B-8-181

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA
Attention: Mr. Dan Cecchini (Code 2032DC)

Dear Mr. Cecchini:

Thanks for once again allowing me to write to you on the realignment of F/A-18 aircraft headed for Oceana. I will get right to my opinion. The additional aircraft will have a very negative impact on my quality of life. Increases in pollution from jet fuel, noise, traffic, and a strain on the infrastructure of Va Beach are just a few of the obvious problems that will occur.

1

Commercial planes are restricted or penalized from flying in the early morning hours, yet the present flight schedules from the Oceana jets seem to enjoy flying at those hours. Many times my wife and child have been woken up by planes flying between 11 PM and 5 AM in the morning. I also find it interesting how the most maneuverable aircraft in the world takes such a low landing approach, when commercial planes are able to take a more steep approach when they land.

But the biggest issue that concerns me is the safety of an area of this size. I'm glad the pilot of the jet that crashed off Va Beach yesterday is safe, but it should show you just how catastrophic an accident will be when one or more of these jets crashes in Va Beach. It is my opinion

DO-1 Flying aircraft at night is an integral part of an aviator's training program. In particular, simulating landing on the deck of an aircraft carrier at night at NALF Fentress is crucial training for aviators. Unfortunately, not all night training requirements can be completed before 10:00 P.M. During summer months, sunset does not occur until 8:30 or 9:00 P.M. In addition, training requirements increase just prior to deployment of an aircraft carrier resulting in a higher number of scheduled night operations.

This situation is an unavoidable consequence of training requirements and the cyclical nature of aircrew deployment aboard carriers. Strict procedures govern the frequency and timeliness of practice landing operations. The Navy does everything within its capability to even out operations, but peaks in operational tempo are unavoidable because of aircraft carrier deployments.

Training of aviators with night vision goggles may also require late night operations. This training is dependent on the moon phase and moonrise and moonset, to take advantage of the moonlight.

Landings aboard an aircraft carrier require techniques and procedures considerably different from those used by civilian, or even Air Force aircraft. Naval aviators must conduct FCLPs consistent with aircraft carrier landings procedures.

2

that when a jet finally crashes and kills people on the ground, the public opinion towards the navy will change forever. Doesn't it make more sense to avoid or lower the chance of this happening? Why place all the jets in the highest population area? It seems to make more sense to place the jets in a more remote area where the pilots won't have to make a decision as to how long they stay with a jet they can no longer control.

It's not a matter of "if" a jet will crash and kill people in Va Beach, it's a question of when. The more jets you jam into Oceana, the greater the chance of that happening on your watch.

Regards,

DAVE OGREN
1113 Tanager Trail
Va Beach, VA 23451

DO-2 The F/A-18 aircraft is one of the safest ever to enter Naval service. Although the accident rate for a particular aircraft is independent of traffic density and number of aircraft, the number of mishaps occurring in a given area can reasonably be expected to increase incrementally as the total number of operations in that area increases.

However, one of the primary goals of the Naval Aviation Maintenance Program is to reduce the accident rate as an aircraft ages. Again, the overall chance of an aircraft mishap occurring at a given location is remote.

The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

901 EARL OF ESSEX ARCH
VIRGINIA BEACH, VA 23454
NOV. 26, 1997

COMMANDER
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST.
ATTN: MR. DAN CECCHINI (CODE 2032DC)
NORFOLK, VA.23511

DEAR MR CECCHINI,

I AM WRITING TO YOU IN CONCERN FOR THE FUTURE LIVING CONDITIONS OF VIRGINIA BEACH. I AM A NEW RESIDENT OF WELLINGTON WOODS AND I AM VERY CONCERNED WITH THE FUTURE VERY HIGH NOISE LEVEL (ABOVE 75DB) WHEN THE 180 NAVY AIRCRAFT COME TO OCEANA IN VIRGINIA BEACH. YET YOU OWN NAVAL INSTRUCTIONS, RECOMMEND THAT NO RESIDENTIAL BUILDINGS BE CONSTRUCTED IN AREAS WITH 65-70DB, AND STRONGLY DISCOURAGE AGAINST BUILDING RESIDENTIAL BUILDINGS IN AREAS ABOVE 70DB. YOU ARE WILLINGLY BRINGING IN THE PLANES TO CREATE NOISE ABOVE THAT LEVEL KNOWING FULL WELL THERE ARE HUNDREDS OF RESIDENTS IN THE AREA. WHAT WILL HAPPEN TO THE PEOPLE LIVING IN THESE AREAS? THIS IS NOT FAIR TO THE RESIDENTS OF THE GREAT NECK AREA. WHY ARE YOU ENCOURAGING NEW DEVELOPMENT IN VIRGINIA BEACH WHEN YOU DO NOTHING TO PROTECT THE QUALITY OF LIFE OF THOSE WHO HAVE BEEN LONG-TIME RESIDENTS OR TO PROTECT THE VALUE OF THE HOMES CURRENTLY IN EXISTENCE? 1

PLEASE, PLEASE RECONSIDER WHAT YOU ARE DOING TO THE PEOPLE OF THE AREA AND TO THE VALUE OF THE HOMES. PLEASE RECONSIDER AT LEAST SPLITTING UP OF THE PLANES OVER DIFFERENT AREAS. IT IS NOT FAIR THAT ONE AREA HAS TO PAY THE TOTAL PRICE. 2

THANKING YOU IN ADVANCE FOR ANY CONSIDERATION YOU CAN GIVE THIS SUBJECT.

SINCERELY,
Helen C. Carroll
HELEN C CARROLL

FAX # (757) 322-4894

B-8-183

HCC-1 Most individuals living in the vicinity of NAS Oceana or NALF Fentress will experience a significant increase in noise levels. Please see Sections 4.8, 5.1.8, 6.1.8, 7.1.8, and 8.1.8 of the EIS for a discussion of these impacts.

HCC-2 Thank you for your comments; no response required.

916 Earl of Essex Court
VA Beach, VA 23454
November 25, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Attention: Mr. Dan Cecchini (Code 2032DC)

Dear Mr. Cecchini:

My husband and I have lived in Wellington Woods off Great Neck Road for the past twenty-five years and for two years before that in Point O' Woods. Both neighborhoods are in the flight area of Oceana NAS.

We are IN FAVOR OF bringing additional Navy aircraft to Oceana; in fact, if we had our way, we would also urge you to relocate the S-3's to VA Beach. We have enjoyed having our own air shows over the years, and our children have grown to adulthood with absolutely no loss of hearing or evidence of mental impairment.

We believe that the people in our neighborhood who are raising their voices in protest against the jets are "johnnies-come-lately" who should have investigated their choice of home location in more depth than they obviously did. We were here when the F-14's and A-6's flew in great numbers, and we knew before we bought that we would be watching television by reading the lips of the actors. That did not (and does not) bother us a bit.

Bring 'em on!

Sincerely,

Martha and David Dennis

B-8-184

Thank you for your comments; no response required.

1228 Green Cedar Ln..
Va. Beach, VA 23456
Nov. 24, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert St.
Norfolk, VA 23511
Atten: Mr. Dan Cecchini

Dear Mr. Dan Cecchini,

I would like to take this opportunity to voice my concerns regarding the realignment of 180 F/A-18 aircraft and associated functions from NAS Cecil Field to NAS Oceana. I am highly opposed to this for several reasons. Even though it will bring $226 million into the economy of this area, there are too many risks and negative factors involved.

1 Studies show that Hampton Roads has a high number of road rage incidents already This is because the roads in the area are inefficient for the population. Think about what will happen with more people here. There isn't any money in the budget to expand the roads. Traffic will be a worse nightmare than it already is.

2 Va. Beach schools are already overcrowded. Look at the amount of portable classrooms in the area. Adding more to accommodate the extra children will not solve the problem. What about gym space, cafeteria space, restrooms and buses? Are there plans to expand this, too? Class sizes cannot afford to be increased without cheating the students of a quality education.

3 There has been talk of relocating two elementary schools if this realignment happens. What about the hospitals, retail and office space, and homes that will be in the noise zones increased by this move. I now live in the edge of the noise zone. The statistics research in the reports show day flying to 10 PM. This is not day time. Towards the end of the month when pilots need to be recertified, flights over my home run every 10-15 minutes from

B-8-185

CJS-1 Section 3.1.7 of the EIS discusses the current transportation system associated with NAS Oceana, including general conditions (i.e., moderate traffic levels and acceptable levels of service), specific congested areas, and planned road improvements. Impacts on transportation are addressed in the EIS, which states that traffic conditions may be impacted in the short-term, but that LOS would not degrade from that projected with completion of planned roadway improvements.

CJS-2 The building program currently planned by the Virginia Beach Public School District will address the need for additional classroom space as well as other auxiliary needs (e.g., gym space, cafeteria space, etc.).

CJS-3 There are no hospitals located in Noise Zone 2 (65-75 Ldn) or Noise Zone 3 (greater than 75 Ldn). The term "daytime" is defined as the period from 7 AM until 10 PM for acoustic modeling.

about 4 PM until about 11 PM.. The noise is so loud that you cannot watch television or even conduct a phone conversation because you cannot hear.

Statistics show that from 1968-1982 that 72% of the accidents that occurred involved jets. That is not a very comforting thought.

4

Another concern of mine involves the risk on the area from foreign countries. We have a very large number of military areas in the Hampton Roads area without adding more jets to be targeted.

Since there are more people in the area now than there were in 1978, more people will be put at risk by the larger Accident Potential Zones. Does that not bother the military?

After looking at these risks and negative factors, I sincerely hope the military will reconsider this realignment.

Sincerely,

Catherine J. Snow

B-8-186

CJS-4 The majority of Navy and Marine Corps aircraft are jet aircraft; therefore, the majority of accidents would involve jet aircraft. The Navy is concerned about the development in the region. Since 1978, the Navy has worked with local jurisdictions to incorporate land use and density controls into local comprehensive plans and zoning ordinances. As indicated in the EIS; the City of Virginia Beach adopted such an ordinance in 1994.

Assessing first strike threat possibility and the concentration of military assets is beyond the scope of the EIS. The BRAC 95 Commission directed the closure of NAS Cecil Field and realignment of east coast F/A-18s. Accordingly, this EIS undertakes a multistage screening process to develop alternatives that would be feasible for completion of this realignment. Consistent with the BRAC 1995 directive, air stations were screened for necessary capacity and support infrastructure as well as their ability to meet operational criteria the Navy considers essential to the F/A-18 aircraft.

2220 Ebb Tide Road
Virginia Beach, VA. 23451
Novemrer 18, 1997

Commander, Atlantic Division
NFEC

Dear Sir:

I have been an opponent of further buildup at Oceana Naval Air Station for many years, once engaging in a daalogue with then Congressman G. William Whitehurst.

The latest proposed expansion of the base has, for the first time, drawn solid opposition from a considerable number of citizens, despite the profit-driven support of our leadership.

I believe it would be smart for the Navy to keep the Cherry Point option alive by sending them enough planes to justify the support work they are planning, and not put all your eggs in the Virginia Beach basket. The city is still growing, the hazard to ctizens remains: things aren't going to get any better. At some point citizens will get tired of having their musical events interrupted, their industries banned from expansion, and a constant overhead threat.

I would keep the Cherry Point option alive by diverting some of the planes from Oceana, which, it seems to me, is close to its capacity.

Very truly yours,

Edward F. Bacon

481-2170

Edward F. Bacon

Thank you for your comments; no response required.

B-8-187

\4

Flying Low

By Ed Bacon

The City of Virginia Beach went all out to give the impression that the city is standing with open arms waiting for the 180 jets the Navy may send them.

Despite the enthusiasm of business people, the Mayor and Congressmen Owen Pickett, there are many people who see plenty of problems and slight benefit from their arrival. These people have been criticized as unpatriotic, unrealistic, and against progress.

I am one of those people. Some other members of the Citizens Action Coalition see benefits where I don't. This is one man's opinion.

One thing Virginia Beach does not need is more people. That, in addition to the noise, will be the main result of the expansion. More people with steady jobs, bringing fresh money into the local economy. But is that good?

With the wage earners come 2,700 children to join our school system. Retirees are considered good because they don't add to school overcrowding. Here we have people who not only have school kids, but are fertile and may add, who knows, how many more? Thus we will have the problem of relocating schools due to the danger, and building new schools to take care of surplus kids.

The Navy's desire to cut population in danger zones will put growth restrictions on many churches, day care centers, and even schools and hospitals.

The fresh money the Navy will bring will go for new housing, cars to drive on our overcrowded roads, doctors visits, day care centers, all things that mean a larger, more dense city.

There are two dumb arguments that proponents of the expansion give. One is that Oceana was here first. Yes, a much smaller Oceana was built on Princess Anne County farmland. What has that to do with it being in the middle of the state's largest city today? The situation has changed.

The second is that we can thank God that the planes are protecting us. Remember, that the planes are coming here as a result of downsizing. They are due here because the Navy closed an air field. It amuses me how area officials support cutting back on the military as long as their turf benefits.

It wouldn't hurt the Navy a bit to give Beach residents a break by sending some of those jets to North Carolina. From an environmental point of view it makes a lot of sense.

Finally, it goes without saying that as individuals, the people in question are the best. I have dealt with military people here for 30 years, and like most others I have only one complaint. It's tough when your good friends pull up stakes and return to their roots. The trouble is that we don't have room for a lot more people in Virginia Beach. North Carolina has plenty, and they've prepared facilities for them. Let's share the wealth.

And face it, the planes are a major nuisance. As a teacher and occasional public speaker, I am always stopping to allow the jet noise to abate. Now we face a big increase in this. You can't deny that the vast amount of people under those jets are facing danger. The Navy doesn't.

I am surprised that the Mayor has turned a deaf ear to those suffering from the jet noise.

Editors note: Mr. Bacon fails to mention that there is a mindset among the movers and shakers that unending expansion and development in the City is inevitable but not for the Navy. Also, had past City Councils listened to the Navy, there would not be so much development in crash and high noise zones.

SUBSCRIBER DINNER

The Citizens Action Coalition Board of Directors plans to have a dinner for the subscribers on January 15, 1998 at Gus and George's Restaurant, 4312 Virginia Beach Blvd.

Cocktails (cash bar) - 6:00 pm
Dinner - 7:00 pm
Menu - Choice of the following:
Delmonico Steak
Chicken Teriyake
Fried Shrimp
Seafood Platter
$20.00 per person

Contact Ed Usowski (424-4116) by January 5, 1997 for Reservations.

NEXT BOARD MEETING IS THURSDAY, NOVEMBER 20, 1997 AT 7:30 P.M. IN THE KEMPSVILLE PUBLIC LIBRARY.

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Those who are not currently a sponsor and wish to become one and receive the Monitor through 1997 are invited to fill out this form, send to the address above with a check payable to Citizens Action Coalition, Inc. for $15.00.

12/02/97 10:14 FAX 7574284038 Office Max @02

912 Duke of Suffolk Drive
Virginia Beach, VA. 23454

December 1, 19[illegible]7

RE: Draft Enviro mental Impact Statement: Realignment of F/A-18 Aircraft and Operational Functions from Naval Air St ation Cecil Field, Florida, to Other East Coast Installations

COMMANDER
ATLANTIC DIVI ION
NAVAL FACILIT ES ENGINEERING COMMAND
1510 GILBERT S TREET
NORFOLK, VA. 3511

Attention: Mr. De i Cecchine

Dear Sir:

Subject: Comm ents/Input Regarding Draft EIS

As provided for by the National Environmental Policy Act (NEPA) of 1969, comments and input recommendation s regarding F/A – 18 aircraft realignment from NAS Cecil Field are submitted as enclosure (1) her eto.

Additionally, a ge neral comment regarding the public comment process deserves mention. Throughout the public comm ent period, it was very evident that virtually all elected officials, the print media, and those segments of the community who had the most to gain (politically and economically) from the realignment of al 180 aircraft to Virginia Beach were singularly unconcerned regarding the impact such a decision would have on several tens of thousands of residents. Further, while many editorials lauding the arrival of th e aircraft where routinely published in the only local newspaper having a wide distribution (The Virginian Pilot), it was virtually impossible to get dissenting views published in the 2-3 months preceding the end of the public comment period; when they would have the most impact. Therefore, in ord er for the public to become as well-informed as possible regarding the impacts of this proposal (which are significant, but which appear to be of little consequence to those mentioned above), I recom mend that the substance of the draft Environmental Impact Statement be faithfully summarized and provided to the several local newspapers for publication at the request of the US Navy.

And lastly, the re ocation of all 180 aircraft to Virginia Beach may, in the end, be the final decision due to the absence o other truly viable alternatives. I do not believe, however, that given the magnitude of all the various im pacts, especially with respect to expanded noise zones and greatly increased noise levels (in some c ases well beyond those recommended by the US Navy itself for residential properties), that a Finding of No Significant Impact can reasonably be made.

Sincerely,

John C. Shick

John C. Shick

Enclosure (1). C omments/Inputs Regarding the F/A – 18 Draft Environmental Impact Statement

Cc:

B-8-189

1

2

JCS1-1 The Executive Summary of the EIS provides a description of the proposed action, the five ARSs, and significant environmental impacts. The EIS was prepared in accordance with implementing regulations of the National Environmental Policy Act (NEPA). NEPA requires that Federal agencies notify the public of the availability of the Draft EIS and to ensure that the Draft EIS is made available for review by all requesting to review the document. The Navy made a considerable effort to ensure the public was aware that the Draft EIS was available and to solicit public review and input. Numerous articles were published in *The Virginian-Pilot* summarizing the impacts of the various alternatives. These articles, in addition to the Navy's paid advertisements, listed the libraries where the document could be reviewed and a contact for citizens to request a copy of the Draft EIS. The Navy also held two public hearings in the Hampton Roads area in October 1997 to inform the public on the findings of the Draft EIS and to solicit their input.

Navy efforts to notify the public of the availability of the DEIS and to solicit their input are consistent with the requirements of NEPA.

JCS1-2 A finding of no significant impact is applicable to Environmental Assessments only. An EIS was prepared because the proposal is a major Federal action and would result in some significant environmental impacts.

COMMENTS/INPUTS REGARDING DRAFT F/A – 18 EIS

3 • The draft EIS should be amended to include options which site the majority of the aircraft at either MCAS Cherry Point or MCAS Beaufort. Otherwise the community will be 'buying in' to a 'preferred alternative' without the benefit of establishing with a degree of certainty that it is truly the alternative which minimizes adverse impacts.

4 • The draft EIS should be amended to address the possibility and advantages of moving non-F/A–18 Marine Corps aircraft from MCAS Cherry Point to MCAS Beaufort in order to 'free up' additional aircraft hanger space at MCAS Cherry Point for additional F/A-18 aircraft while utilizing excess capacity existing at MCAS Beaufort. This should be done even if outside the current charter. This may be the best option if derived in an unconstrained environment.

5 • The draft EIS should be amended to address the possibility and advantages of moving all Marine Corps aircraft from MCAS Beaufort to MCAS Cherry Point and transferring MCAS Beaufort to the US Navy for use as the East Coast master jet aircraft air station. Again, this should be done even if beyond the existing charter of this EIS to establish, at a minimum, that it is not the best, politically unconstrained alternative.

6 • The draft EIS needs to clearly describe the hazards and impacts of peak noise generated by F/A-18 and future generation replacement aircraft. The existing EIS addresses only day/night average noise levels. It also needs to describe the noise parameters of future generation replacement aircraft, e.g. F/A-18E/F.

7 • The draft EIS needs to describe what the US Navy's future initiatives will be to ensure that F/A-18 aircraft operating from NAS Oceana will operate within prescribed flight parameters, i.e. on flight path and at approved altitudes, AND what penalties will be incurred for frequent and routine violations of agreed-upon parameters

8 • Since the cost to the US Navy is a major element mitigating for the 'preferred option' of bringing all 180 aircraft to NAS Oceana, the draft EIS should be amended to include a comprehensive and accurate estimate/itemization of all costs which the community must bear to accommodate their arrival, AS WELL AS outlays which individual homeowners and residents could be expected to make (especially by those who live in noise zones with average DB levels above 65).

9 • The draft EIS should be amended to include an independent assessment of the impact that the projected increase in aircraft operations and coincident increased noise levels and expanded noise zones and potential accident zones could be expected to have on real estate values within the various zones, and contrast them with the property values and changes in value of those outside the various zones.

B-8-190

JCS1-3 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

JCS1-4 The EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, moving aircraft from MCAS Cherry Point to MCAS Beaufort is outside of the scope of this analysis.

JCS1-5 The EIS addresses the directives of the 1995 BRAC Commission, specifically the realignment of F/A-18 aircraft from NAS Cecil Field to other installations. Therefore, moving aircraft from MCAS Beaufort to MCAS Cherry Point is outside of the scope of this analysis.

JCS1-6 The 24-hour day-night average sound level (Ldn) has been determined to be a reliable measure of community sensitivity to aircraft noise and is the standard noise metric used in the United States to measure the effects of aircraft noise. Ldn takes into account both the noise levels of all individual events that occur during a 24-hour period and the number of times those events occur. Please see Section 3.1.8 of the EIS for a detailed description of Ldn.

The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

With the exception of approved low level routes or within Special Use Airspace, Federal Aviation Administration (FAA) regulations require aircraft to maintain at least 1,000 feet altitude in congested areas and at least 500 feet in rural areas, except on takeoffs and landings. The Navy at a minimum adheres to these altitudes. Additionally, the Navy has raised the minimum flight altitude at NALF Fentress to 800 feet for pattern operations. Low level flights (i.e., under 800 feet) are not permitted at NALF Fentress unless the aircraft is landing or taking off.

Pilots are periodically briefed on the existing patterns and the need to maintain the published patterns. Aircraft in the FCLP pattern are in constant radio contact with the landing signal officer (LSO) for pattern control. One of the functions of the LSO is to provide feedback to the pilots in the pattern. The Navy will continue to enforce pattern discipline. Unrelated to the proposed action, the Navy is installing a permanent TACAN (navigational device) at NALF Fentress to provide aviators aid in pattern control. Further, future FAA regulations will require onboard global positioning system (GPS) capability for all military and civilian aircraft. GPS will further assist pilots in maintaining flight patterns.

- An annex o the EIS addresses the impact (impairment) of high noise levels on a child's lea ing ability, presumably while at school (approximately 35 hrs/wk). The EIS should be amended to address similar impacts on child development relative to those who ive within high noise level areas the remaining 133 hrs/wk.

10

- The US N/ .VY needs to justify, and the EIS needs to address, the dichotomy wherein the US NA VY recommends against building homes in areas with routinely occurring noise level in excess of 65 DB and 'strongly discourages' such activity in areas with noise level in excess of 70 DB, yet proposes as its 'preferred option' an alternative which imp ses these levels on some 39,000 additional Virginia Beach residents. (OPNAVI ST 11010.36A)

11

- The draft I IS should include a methodology which applies a weighted value to the various im acts which will occur incident to the arrival of aircraft under the various options an integrate them numerically with aircraft numbers, flight hours, number of affected re idents, noise levels, etc. so as to generate a non-parochial, regional (vice local) solut on.

12

- The US N vy should charter a regional (Virginia and North and South Carolina) working gr up, similar in structure to the recently established Restoration Advisory Boards (R \B) used to resolve installation environmental remediation issues and having pub ic participation, to examine and consider all reasonable options and craft a solution wi ich seeks to maximize overall benefits while minimizing adverse impacts. This would, hopefully, obviate parochial agenda.

13

- The draft IS should be amended to address the consequences of NAS Oceana's recently in reased allocation of air polluting emissions approved to facilitate the expected a rival of 180 F/A-18 aircraft. Specifically, what entities will have to be required t achieve further reductions in their emissions to compensate for NAS Oceana's i crease and what will be the impact when the recently approved and more stringent a : quality standards are imposed on this community.

14

JCS1-7 Several environmental statutes allow fines and penalties to be assessed against federal agencies. In those cases, Congress has expressly provided for imposition of fines and penalties. There is no corresponding Congressional authority to assess fines against the Navy.

JCS1-8 Because the Navy does not have legal authority to expend federal funds on improvements to state, local, and private property, the Navy did not include costs to be incurred by residents or the local community. However, the EIS states that the community would not likely experience any significant negative fiscal impacts, because expenditures would be offset by increased tax revenues generated by the transferred personnel.

JCS1-9 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

JCS1-10 The EIS addresses schools as the primary source of a child's education. The EIS further provides information on potential speech interference, sleep disturbance, and other factors associated with aircraft noise.

JCS1-11 Community planning and zoning is a local government responsibility. Hence, while residential development is not encouraged in areas impacted by aircraft noise, the Navy's guidelines acknowledge that sound attenuation is effective in reducing interior noise levels.

12/02/97 10:14 FAX 7574284039 Office Max 005

20 NOVEMBER 1997

A SUBMISSIO ¶ FOR THE 'LETTERS' SECTION OF THE VIRGINIAN PILOT

PROPOSE D F/A-18 RELOCATION TO NAS OCEANA: IS IT FAIT ACCOMPLI?

I FOUND WED ESDAY'S VIRGINIAN PILOT ARTICLES ON NAVY DOWNSIZING/ RELOCATION OF F/A-18 AIRCRAFT TO NAS OCEANA SOMEWHAT TROUBLING. READERS NOT WELL INFC MED AS TO THE PROCESS LEGISLATED BY ENVIRONMENTAL LAW WERE, UNFORTU NATELY, GIVEN THE DISTINCT IMPRESSION THAT THE DECISION HAS ALREADY BEEN MADE TO BRING ALL 180 AIRCRAFT TO VIRGINIA BEACH. THIS IS NOT THE CASE, OR AT LEAST IT'S NOT SUPPOSED TO BE THE CASE. INDEED, THE PROPOSAL TO RELOCATE THE AIRCRAFT IS STILL OPEN FOR PUBLIC COMMENT. AND, THERE ARE A NUMBER OF LEGITIMATE CONCERNS (E.G. NOISE/AIR POLLUTION, SAFETY, POTENTIAL REAL ESTATE D EVALUATION AND CHILD LEARNING IMPAIRMENT, AND COST TO THE CITY/HOMEOWNE R) THAT STILL REMAIN VIRTUALLY UNADDRESSED AND UNRESOLVED AS FAR AS A LA RGE SEGMENT OF THE COMMUNITY IS CONCERNED. STATEMENTS TO THE CONTRARY BY LOCAL, STATE, AND SENIOR NAVY OFFICIALS (SUPPORTED BY THE PRINT MEDIA) B RING INTO QUESTION THE INTEGRITY OF THE PROCESS; IE. THAT THE DECISION HAS BEEN MADE FAIT ACCOMPLI, WITHOUT THE FULL AND FAITHFUL CONSIDERATION OF SUBSTANTIVE ISSUES. ALL CITIZENS SHOULD HOPE THAT THIS IS NOT THE CASE.

JOHN C. SHICK
912 DUKE OF SUF OLK DR.
WELLINGTON WI ODS
VIRGINIA BEACH VA 23454

PHONE: 757-496-4 47

Dan,
FY.I. One of several articles that the Virginia Pilot has not published.
R/jcs

15

B-8-193

JCS1-12 Each ARS is evaluated in terms of meeting operational criteria and in terms of the environmental impacts associated with that ARS. A summary of operational criteria and environmental impacts for each ARS in included in Table 2.5-1. The Navy strongly believes that all feasible and reasonable alternatives have been evaluated in the EIS.

JCS1-13 The purpose of the EIS is to analyze and compare the various alternatives and to present that information to the public and the Navy's decision-maker. Table 2.5-1 allows reviewers of the EIS to assign their own importance to identified impacts and to quantitatively and qualitatively compare the five alternative realignment scenarios (ARSs) analyzed in the EIS.

The NEPA process requires a full discussion of significant environmental impacts and reasonable alternatives for any proposed major Federal action. In addition, public participation is required early on in the process (scoping meetings) and after the Draft EIS is made available (public hearings). All agency and public comments are addressed in the Final EIS. The Navy is required to comply with NEPA. Virginia, North Carolina, and South Carolina have provided verbal comments during the scoping meetings and public hearings and written comment letters.

JCS1-14 In the final rule notifying the public of approval of the redesignation of Hampton Roads from ozone nonattainment to attainment and approval of the maintenance plan and mobile emissions budget (Volume 62, Number 123 of the *Federal Register* dated June 26, 1997, pages 34408-34413), the USEPA discusses the allocation of emissions to NAS Oceana. In summary, the Commonwealth of Virginia accounted for the emissions associated with the BRAC relocation action at NAS Oceana by placing source specific emission caps on two existing large sources of emissions in the Hampton Roads area. The specific sources are not identified in the *Federal Register* notice.

The Hampton Roads area is not required to comply with the new ozone and particulate air quality standards until revisions to the State Implementations Plan (SIP) are developed that identify measures to be implemented for attainment of the new standards. Until that time, the current standards remain in effect. SIP revisions, if any, addressing the new standards are not expected until after 1999. In this case, the conformity rule requires the Navy to analyze impacts in the full build-out year (1999) and compare those impacts to air quality standards and regulations in effect during the build-out year. EPA's preliminary list of counties projected to not meet the new ozone standard does not include Virginia Beach or Chesapeake; although the list does include Suffolk and Hampton. All counties in Virginia meet the current particulate matter standard. There are no counties in the Hampton Roads area on EPA's preliminary list of counties projected to not meet the new particulate matter standard. Since the emissions associated with each ARS are all known to VDEQ, the Navy is confident these emissions will be factored into development of the new SIP.

JCS1-15 Thank you for your comments; no response required.

F. Mason Gamage
476 Southside Road
Virginia Beach, Va 23451
(757) 428-0473

December 2, 1997

Commander, Atlantic Division, Naval Facilities Engineering Command
Attention: Mr. Dan Cecchini (Code 2032DC)
1510 Gilbert Street
Norfolk, Va 23511
Fax: (757) 322-4894

To whom it may concern:

I was unable to attend the Public hearing concerning the Environmental Impact Study prepared by the Navy concerning movement of additional aircraft to Oceana. The following comments are the result of an accumulation of 30 years adjacent to Rudee Inlet and on the flying of the aircraft approach to Oceana. The once quiet neighborhood where I live at times sounds like a war zone. In addition to the noise created by the aircraft the neighborhood is subject to tow planes with banners flying up and down the waterfront, jet skies, the announcement of divers coming off bungee jump on P.A. system, emergency vehicles day and night on General Booth Boulevard, the noise and smoke and water pollution of Rudee Inlet dredge, a commercial dive boat operating a large diesel engine with no muffler, and from time to time the Navy seals running the Inlet at high speeds usually at night and with no lights (an inspection of two of these high power vehicles by our repair yard revealed no signs of lights or equipment on boats). When wind is in the west the noise of jets warming up and taking off is particularly bothersome. I would like to point out that myself and other neighbors complain vigorously about the large Navy helicopters which arrive and depart from Oceana using the corridor over heavily populated residential areas of Croatan and Harbour Point. I have talked with operators concerning this movement and they tell me Rudee Inlet is a visual, and helicopters use this as a turning point thence going and coming to Oceana. Since these are rotor wing aircraft and function without regard to wind direction to land and take off this could be moved south to Camp Pendleton thus eliminating the above aggravation. This is particularly troublesome when a carrier is being off loaded off shore. It would seem that a better understanding could be reached between the residents of Virginia Beach and the Navy if some regard for the civilian population was exercised.

1

I will list a few items in which adjustments could be made: restraint use of after burners when departing the station and headed off shore. Other environmental concerns need be discussed such as the water quality run off Oceana and acrobatics preformed in low proximity of Oceana take place on a daily basis. Most of these problems could be solved within the command.

2
3

B-8-195

FMG-1 Helicopter operations were not considered in the baseline aircraft noise exposure because of their infrequent operations relative to the existing and proposed tactical jet operations. In addition, the contribution to the overall noise contours as described and depicted in the EIS would be insignificant. Although helicopters would not contribute to the overall noise level, helicopters generate low frequency noise which may be objectionable to some listeners. Relocation of NAS Oceana helicopter assets is outside scope of this EIS.

FMG-2 Use of afterburners allows aircraft to reach altitude sooner, lessening impacts on the surrounding community. Department aircraft secure afterburners by the field boundary. Further, certain atmospheric conditions and aircraft configurations require the use of afterburners to achieve a safe takeoff.

FMG-3 Acrobatic flight is strictly prohibited by Navy regulations outside of designated areas, within a control zone on a Federal airway, and over congested areas or open air assemblies of persons. The aircraft must remain clear of clouds at an altitude of at least 150 feet above the highest obstacle to flight within a horizontal distance of 5 miles. Airshow practices, required for the maintenance of safety and standardization, are very limited and have specific waivers.

Pilots perform overhead breaks at NAS Oceana. Elimination of the overhead break and Field Carrier Landing Practice (FCLP) would unacceptably compromise training and would contribute to delays in landing pattern entry with resulting increases in flight time, fuel expenditure, and aircraft wear. Also, this would significantly compromise safety because these types of approaches are used aboard ship, and training must reflect actual operations.

NAS Oceana currently operates under a Virginia Pollution Discharge Elimination System (VPDES) permit for all stormwater discharges through ditches, channels or point source conveyances. Permit conditions, as well as Virginia regulations limit pollutant loads at discharge points into water bodies. The majority of the station's run-off flows to West Neck Creek through the station's primary drainage canal. Virginia Department of Environmental Quality (VDEQ) sampling of the creek from 1989 to 1991 indicated no water quality violations for measured parameters. Any land disturbance created by the expansion of NAS Oceana would likely require a modification of

12/02/97 TUE 14:35 FAX 8043601251 MCLESKEY AND ASSOCIATES 002

Commander, Atlantic Division, Naval Facilities Engineering Command
Attention: Mr. Dan Cecchini (Code 2032DC)
Page -2-

6 I am advised that the Environmental Protection Agency must also review and report favorably on the relocation of the subject aircraft. I am counting on an unfavorable report from this agency and should that occur what is the Navy's next position. Trusting the command will give some attention to the other complaints that I am registering.

Truly yours,

F. Mason Gamage
Former Director of Planning, City of Va Beach

the existing VPDES permit. Long term minor impacts resulting from an increase of impervious areas would be offset through the incorporation of appropriate stormwater collection systems into the design of new facilities.

FMG-6 EPA has provided comments on the draft EIS (see USEPA-1 through 26); however, the Office of the Secretary of the Navy will issue a final decision concerning the five alterntives evaluated in the EIS. This decision is a formal document called the Record of Decision (ROD). The ROD is submitted to EPA for publication in the *Federal Register*.

Commander Atlantic Div.
Naval Facilities Engineering Command
1510 Gilbert St. Norfolk Va. 23511

December 1, 1997
1145 Crystal Lake Dr.
Virginia Beach, Va.
23451

Dear Mr. Cecchini,

We oppose the proposal to bring 120 & 160 F/A-18 aircraft to NAS Oceana. Why does there not a sixth alternative realignment scenario bringing no F/A 18's here? The Pearson of Oceana has told us that there would be practically no difference in sound impact between 160 and 120 aircraft. Therefore the consideration should be none or neither of these figures if Virginia Beach residents are to have a voice in the matter.

Virginia Beach markets itself as a resort city. Sound events that can cause temporary deafness are not compatible with that image. Activities associated with beach resorts, boating, golfing, tennis, walking, jogging, picnicing, boating & water play, would be adversely affected. Significant noise impact would be experienced in residential areas placed in 65 & 75 Ldn and church playgrounds as well as the 23 public school playfields potentially would be impacted.

According to the E+S on page 3, "adverse effects result... with exposures exceeding an Ldn of 65." Page 4-8-9 states that "... the response to 65 to 75 Ldn ranges from insignificant to severe [with] temporary threshold shifts... depending on an individuals outdoor exposure." Sound proofing does not mitigate this! There are good reasons that FAA standards

up 1 of 3 pages

1

NCJ-1 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

set 65 Ldn and above as not compatible with rural land use!

2 If, indeed, noise impact will not be threatening we suggest that the Navy plans and publicizes a visit of several F/A,18 squadrons to NAS Oceana that the public can become aware of the noise impact! If we are unnecessarily concerned, this would certainly allay our fears.

3 Ron Mettelholtz, the Washington, D.C. E.P.A. noise expert, has informed us that the EPA no longe regulates noise and that the FAA has no jurisdiction over the military. This places the potentially impacted concerned residents in the frustrating position of having no regulatory protection with the dubious assurance that mitigation of noise impact will be a continued concern of the Navy.

The Desert Storm threat was a total effort and as patriotic citizens, although we were awakened at night and frequently had to hold our hands over ears during the day to block out the deafening roar, we heartily backed the short term effort. What is being proposed is permanent carrying us well into the 21st century. We can not live with that!

One public hearing in Virginia Beach does inadequate, unnecessary.

page 2 of 3 pages

NCJ-2 One squadron of F/A-18s is currently stationed at NAS Oceana and performs the role of the adversary squadron (i.e., performs the role of the enemy in combat training operations). This squadron is not a "typical" F/A-18 squadron and does not conduct fleet carrier landing practice or bombing range training.

The purpose of the EIS is to present a complete analysis of projected noise impacts, for five alternative realignment scenarios. The Office of the Secretary of the Navy will consider projected impacts of all alternatives prior to making a final decision.

NCJ-3 Thank you for your comment; no response required.

We are concerned about air pollution from aircraft emmissions. We are concerned that over 50% of crashes occur beyond accident potential zones We are concerned about the negative impact on air quality that the vehicles will have belong to the 12,500 additional people traveling to and from the base and eleswhere on roads yet to be built. We are concerned about overcrowded schools reduction quality of education. We are concerned about raised taxes for infrastructure and services and new school construction.

Recently we observed commercial pilot training and retraining in the remote desert in Arizona. We submit that a low density populated area would be more appropriate for a base that lacks of maximum capacity proposed for Oceana. While ours Mayor and the elected municipal think that bigger is better and that Oceana is necessary to our healthy economy, we maintain that Virginia Beach will grow with or without the base. Oceana does not need another Low flyover Mall in its flight path and there will be more if our leaders stay in power and have their way.

Would it be good planning and a service in the long run to expand a base where there is zoning planned development to carry the Navy and its most vital needs into the 21st Century?

Sincerely yours,

Nancy C. Johnson

P. 3 of 3 pages

DEPTNET 804-425-7200V TEL:8044251745 Dec 02.97 16:29 No.014 P.03

4

5

NCJ-4 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Construction of a new airfield is thus beyond the scope of this EIS.

NCJ-5 The BRAC 95 Commission directed the realignment of F/A-18 aircraft to existing east coast air stations with the necessary capacity and support infrastructure. Five alternatives have been evaluated under which aircraft are transferred to NAS Oceana, MCAS Cherry Point, and/or MCAS Beaufort.

ALBERT & MONA SAFERSTEIN
746 VIRGINIA DARE DRIVE
VIRGINIA BEACH, VA 23451

December 8, 1997

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511
Attn: Mr. Dan Cecchini (Code 2032DC)

Dear Mr. Cecchini,

We appreciate the time extension you allowed us to study and prepare the enclosed marked exhibits which we received immediately before the deadline for submission of comments and submit them on behalf of a group of concerned citizens in Virginia Beach.

The purpose of this letter is to provide the Navy with vital references, clinical studies, and pertinent information which will encourage the Navy to perform a great deal more analysis before making a hasty judgment to realign the entire F/A-18 jet fleet to NAS Oceana. We are citing several of the many references relating to the national uprising in cities in the USA to eliminate or reduce the significant impacts of airline jet noise; these should serve as meritorious benchmarks for Naval realignment decisions.

Under The Flight Path , Community Response to Aircraft Noise at Westchester County Airport and an Assessment of FAA Noise Measurement Policy, published March 1997 (Exhibit A) is a seventy one page book which we have read and marked with yellow highlight, information applicable and pertinent to NAS Oceana / Virginia Beach noise impact issues.

We reviewed the Draft Environmental Impact Statement (DEIS) for Realignment of F/A-18 Aircraft from NAS Cecil Field, FL to Other East Coast Locations which the Navy had prepared. We believe the selection of NAS Oceana, Virginia Beach, VA as the site for the realignment of the F/A-18 aircraft is the least desirable of the possible choices because it affects the most densely populated area, approximately 135,000 citizens in a city of 450,000. These people are constantly in harm's way living within noise zones 2 and 3. A serious deterioration to the quality of life for those living in the noise zones as well as a devastating impact to the 22 schools indicated and the innumerable church and learning centers not mentioned, many of which lack proper sound attenuation to allow optimum learning, will occur if NAS Oceana is chosen. Even with sound attenuation, some schools are too close to flight paths to properly inhibit noise levels (see 1997 Cornell University Study Exhibit B, Airplane Noise Interferes with Children's Learning). The researchers for this study tested one hundred sixteen children and found that first and second grade children who attended a New York elementary school and experienced frequent jet noise had "significant deficits" in reading when compared with children of similar age and socioeconomic background who attended school in a quiet area of the city. The study indicated that children in the jet noise zone do not learn to read as well as children who attend quiet schools because they tune out speech along with airplane noise. As a result, these children will have trouble learning to recognize and differentiate between speech sounds, a prerequisite to learning to read. Numerous other studies have supported the educational impact issues as it relates to jet noise and learning.

B-8-200

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[Exhibits A through I referenced in this letter are not attached, but are included in the Administrative Record.]

AMS-1 The EIS addresses the potential aircraft noise impacts on schools and school-aged children. The EIS states that, of the 22 schools analyzed in ARS 1, 7 would likely experience minimal indoor interference (educational impacts). For the remaining 15 schools with school-day Leq values between 71 and 80 dB, mitigation measures would need to be incorporated to minimize indoor interference. At the request of the Mayor of Virginia Beach the Navy has been working with the City of Virginia Beach School Administrator to identify noise mitigation options.

2 The DEIS page 3.1 - 134 states that "schools are compatible in a 65 - 75 decibel DNL with sound attenuation." Title 14 Code of Federal Regulations, Part 150 Appendix A Table 1 states that areas characterized by 65 - 75 decibel DNL (noise zone 2) would be incompatible for residential use. The FAA considers the 65 - 75 decibel level a "DO NOT BUILD" zone.

If a federal regulation says that a 65 - 75 decibel noise level is not compatible for homes and living, how can it possibly be acceptable for schools and learning?

3 The general populace including most elected officials do not have a clear understanding of decibel ratings. It is a highly technical and complex matter so, a rush to judgment without fully assessing the technical data would be grossly negligent and enormously inappropriate. Scientist have explained that a small increase in decibels can represent a large increase in sound energy (i.e. a 3 decibel increase, 60 to 63 decibels, yields a doubling of sound energy). An increase of ten decibels represents a tenfold increase in noise; the ear perceives this to be a doubling of loudness! In as much as the Navy has reported that F/A-18's at 1000 feet are 11 decibels louder than F/A-14's on departure a perceived doubling of loudness will occur in the noise zones. These impacts are not discussed in a manner that is germane in the DEIS and should be a primary issue for the Navy to consider.

HUD, DOT, and EPA recognize a 55 decibel LDN as a goal for outdoor noise in residential areas in protecting the public health and welfare with an adequate margin of safety. (see Exhibit C Dr. Alice Suter , Administrative Conference of the United States, Noise and its Effects, November 1991) This is a vital document covering the adverse health effects from noise exposure. We have submitted the entire document for your review.

Research indicates that the EPA's proposed 55 decibel level is not sufficiently low to provide a comfort zone for the general population. The Palo Alto (CA) Weekly of August 20, 1997, reports that quality of life has "deteriorated significantly" for people living beyond the 65 decibel impact area. These people are in a quieter zone and the noise is still intrusive!

4 Another potential health problem is discussed in the Arizona Comparative Environmental Risk Project (Exhibit D) which was completed in 1994 and concluded, from studies of human volunteers, that hypertension is increased by noise. The DEIS page 3.1 - 139 indicates that the Navy is aware of this problem, but does not seem to consider it important.

Karl Hecht ,German scientist at the Institute of Stress Research, and Christian Maschke, scientist at the Technical University Institute of Acoustics completed research on the precise health effects of nocturnal traffic noise which was reported on October 1, 1997, in the Deutsche Press-Agentur, Munich, Germany (Exhibit E) The findings , published in the medical Journal "Fortschritte der Medizin", concluded that night time noise disturbs sleep, encourages psychosomatic illnesses, and may cause cardio-circulatory problems.

Measures are being undertaken in Europe to regulate noise in the environment in all possible ways because of the detriment to society. On February 2, 1997, the Deutsche Presse - Agenter reported that the German Federal Environmental Agency has asked tire manufacturers to label products with the amount of noise produced at high speed. The article explains that noise on roads could be halved if the use of quieter tires were more common. The European Union is preparing guidelines to ban the loudest tires.

AMS-2 Federal guidelines discourage residential construction in noise zone 2 (65-75 dB Ldn). However, the guidelines recognize that if development occurs, sound attenuation would make residential development compatible. Hence, the federal guidelines for residential development and schools are consistent.

AMS-3 Loudness is generally discussed in Appendix H of the EIS (Section H.1). The average person perceives a 10 dB increase in noise as twice as loud, so the F/A-18 will be perceived as twice as loud as the F-14 at certain distances. However, for purposes of assessing aircraft noise impacts on the community the EIS expresses impacts in Ldn, rather than loudness of a specific event.

AMS-4 The EIS identifies the potential health effects from exposure to aircraft noise. The projected increase in noise levels is considered a significant impact in the EIS.

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We learned that noise pollution along with other negative environmental impacts on air, water, and property had not been addressed adequately in the DEIS. Safety for the inhabitants of the Accident Potential Zone (APZ), or shoppers at Lynnhaven Mall also located in the APZ , is not focused nor are funds allocated for mitigation measures in the event that any of the F/A-18 fleet is realigned to NAS Oceana. The APZ clearly represents the most compelling reason why the Navy should seek to move the F/A-18's to other airfields in rural areas. To accelerate operations in a densely populated area such as Virginia Beach is simply encouraging accidents to happen.

The Navy has reported that noise levels and flights will increase in ARS 1 by 118% (Table 4.1). Therefore, home dwellers will experience noise levels far in excess of existing levels and well beyond any reasonable expectation they may have had when they purchased their homes. The Navy itself has revealed that relocating the number of F/A-18 aircraft to NAS Oceana under ARS 1,2, and 3 would result in "significant noise impacts" with a large increase in airfield operations. The Navy has stated that in order to "lessen the magnitude of noise impacts", other operational feasible sites would be examined at Beaufort, SC or Cherry Point, NC.

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Of all the issues, the method used by the Navy to present the impact of noise are both misleading and disingenuous. In lay terms, the current method of identifying jet noise levels is to add all the individual noise occurrences and then divide these into a twenty four hour average. Obviously, this does not accurately reflect the disturbance created at specific times and diminishes the true impact that jet noise creates. Furthermore, people do not hear "average noise". Many sound authorities have stated; "when you use averages to determine noise levels, you constrict the size of the noise contour". While an average noise level (LDN) appears to be the preferred method cited throughout the Navy's DEIS, the FAA in a noise abatement policy statement has always indicated that many noise evaluations do not properly represent a good mathematical formula that accurately represents human reaction to noise. In this policy statement, the FAA has stated that human reaction to single noise events is a more accurate measurement than LDN's.

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There are numerous ordinances in cities throughout the US for permissible noise levels which when ignored subject offenders to fines. For example, complaints are issued by neighbors when radios blast at high decibel levels. Those who complain are concerned with the immediate impact of the loud noise; if the evaluation of ground noise disturbance was determined based on a twenty four hour average, there would probably be no violation, no valid monitoring, and no recourse for intrusive sound.

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Helicopters, which produce high frequency and extreme noise levels, particularly in the Croatan area, also fly in the noise zones and have been omitted as part of the overall LDN. Eliminating the noise analysis from helicopters further dilutes the overall noise impacts and we would appreciate comments from the Navy as to why these were not consolidated along with the jet noise impact study.

Noise receptors should be placed at schools and subdivisions within zones 2 and 3 to ascertain actual noise levels at the specific time it occurs. Single noise events could than be tracked and provide more meaningful quantitative data for daily analysis. This procedure was instituted this year in Lake in the Hills, Illinois, as well as many other communities in the United States before an airport expansion was undertaken

AMS-5 The EIS has been updated to include a discussion of the potential impact of the proposed realignment on property values. All of the other subjects mentioned are discussed in the EIS at a level of detail sufficient for decision-makers to accurately assess the impacts from the five ARSs.

AMS-6 Accident Potential Zones (APZs) do not predict aircraft accidents but only the likely location of an accident should an accident occur. The F/A-18 is one of the safest aircraft ever to enter into Naval service. Moving aircraft (and operations) to a rural location does not guarantee any greater degree of safety in the long term. Historically, areas around military installations experience significant growth because the installation is a work center and attracts development. Clearly, the area in the vicinity of NAS Oceana is more densely developed than other areas under consideration in the EIS.

AMS-7 The 24-hour day-night average sound level (Ldn) is the accepted methodology for describing long term noise exposure. The Ldn methodology also recognizes the intrusiveness of nighttime operations and is extremely useful in comparing various alternatives. In addition, the Federal Interagency Committee on Noise (FICON) recommended Ldn as the best methodology for describing the noise environment in the vicinity of airfields. The EIS fully discusses the impacts of aircraft noise on speech communication, presents typical aircraft noise levels for various modes of flight, and presents a discussion on potential health effects as well.

AMS-8 Helicopter operations were not considered in the baseline aircraft noise exposure because of their infrequent operations relative to the existing and proposed tactical jet operations. In addition, the contribution to the overall noise contours as described and depicted in the EIS would be insignificant. Although helicopters would not contribute to the overall noise level, helicopters generate low frequency noise which may be objectionable to some listeners.

10 | 11 |

The zone noise model is based on a one year period, so that the decibel level achieved by concentrated landing and departures is not accurately reflected. The loudness could be reduced if Navy Senior Officers instituted and enforced flight procedures such as eliminating touch-and-go landings at NAS Oceana and observing the FAA 250 knot maximum speed for all jets approaching or leaving NAS Oceana. Virginia Beach is fortunate to have several ex-Navy pilots who are intimate with operational procedures at Oceana and can provide pertinent information on methods to substantially reduce jet noise. It is our hope and we respectfully recommend that the Navy and the City consult with these former Naval officers.

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The political leaders in Virginia Beach have not revealed to the impacted constituency the negative implications which may be expected from the accelerated noise levels, nor did they seek opinions or conduct surveys which could have indicated citizens views. Many political leaders live outside the noise zones, so it would be difficult for them to identify the severe impact the accelerated noise levels would have on quality of life issues. It appears that their primary focus has been the potential economic gain to the area. While there may be potential economic benefits, a true assessment of the economic gains can not be made until a thorough analysis of quality of life impacts and other related issues are comprehensively addressed. These include identifying property value deterioration and potential devaluation, tax increases or decreases, environmental, health and educational implications, and duplication of mitigation opportunities that currently exist under FAA programs for many impacted communities in airport noise zones. (see Exhibit F, Flying Off Course, Environmental Impacts of America's Airports, published October 1996) This 194 page comprehensive study undertaken by the National Resources Defense Council (NDRC) addresses the problems inherent in airports, and therefore is equally germane to Naval Air Stations and should be scrutinized. It determined the most important environmental issues connected with airports, and the best management techniques airports used to mitigate the problems. A major portion of the study was devoted to jet noise and its deleterious effects on health and well being. NRDC has written that the measurement of noise and its impact on humans is the subject of much heated debate. Mainly, the controversy centers around the measurement and threshold uses (summarized as the 65 dB DNL metric) to determine land use compatibility around airports, and to allocate funds for noise mitigation measures.

NRDC believes that the 65 dB DNL threshold is flawed in two respects: (1) as an average noise measurement the DNL masks the tremendous single events of noise that are a most significant aspect of aircraft noise, and (2) the threshold of 65 dB underestimates the level at which many people are annoyed or impacted by aircraft noise, and ignores evidence that would require analysis and mitigation of noise impacts at lower levels on a case-by-case basis.

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The Navy along with appropriate government agencies should be obliged to provide Virginia Beach with all the opportunities which exist under Part 150 of the FAA regulations. Part 150 noise mitigation programs include home acquisition, extensive insulation, or other treatment to reduce indoor noise from aircraft. To isolate cities which house Naval Air Stations from participation in federal programs is discriminatory. In other words, all citizens subjected to aircraft noise should be entitled to equal treatment regardless of the facilities affiliation (i.e. - military or commercial). As of March 1995, 181 airports in the US had FAA approved part 150 programs and 30 more had submitted applications for participation in the program.

AMS-9 Installation of aircraft noise monitors around NAS Oceana would provide only current daily noise levels, since the F/A-18 realignment is planned for 1999.

AMS-10 The Federal noise metric used for assessing aircraft noise exposure in communities in the vicinity of airfields is the 24-hour day-night average sound level (Ldn). Ldn is an energy average sound level generated by all aircraft operations (including touch and go operations) during an average 24-hour period (day). Since NAS Oceana would likely be operating seven days a week, although the tempo would be reduced on weekends, annual flight operations were averaged over 365 days. Arrival and departure procedures for NAS Oceana are focused on the safe and expeditious sequencing of a mix of aircraft to and from the airfield under both Visual Meteorological Conditions (VMC) and Instrument Meteorological Conditions (IMC). While Federal Aviation Regulations (FAR), Part 91.117, does limit the speed of aircraft under 10,000 feet MSL (mean sea level) and/or in the Airport Traffic Area, it also states, "If the minimum safe speed for any particular operation is greater than the maximum speed prescribed in this section, the aircraft may be operated at that minimum speed." Navy F-14 and F/A-18 aircraft routinely use the Visual Flight Rules (VFR) overhead pattern with flights of two or more aircraft in formation, necessitating higher air speeds for greater maneuverability and an added margin of safety. This training reflects the type of approach used aboard ship, and training must reflect real operations.

AMS-11 The intent of Appendix H is to provide a general background discussion on aircraft noise and its potential effects.

AMS-12 See responses to comments AMS-7 and 10. The value of the Ldn methodology is in its ability to provide a basis for comparing various operational alternatives.

AMS-13 These regulations provide authority to the Federal Aviation Administration to implement noise mitigation programs.

One example of proactive noise control is the Seattle-Tacoma International Airport program. The homes in the airport vicinity are insulated, at no cost to the homeowner, to reduce the decibel level. For your further reference we are also submitting a recent report on Indianapolis Airports new noise proposals which reaches out in every degree to provide a comprehensive mitigation program for its impacted citizens. (Exhibit G).

Congresswoman Nita Lowey sponsored H.R. 536: The Quiet Communities Act of 1997 which is a bill (enclosed) to restore the Office of Noise Abatement and Control in the EPA which lost its funding during the Reagan Administration. The thrust of this new legislation is to determine new noise standards and promote research on the impact of noise pollution. (Exhibit H)

14 Additionally, both the Navy and the City Administrators of Virginia Beach have failed to inform the impacted constituents, in a manner that is easily understood, the numerous implications of all the issues relating to the significant increase of sound and noise levels. A thorough understanding of "sound basics and mitigation opportunities" in a manner that lay people can understand has not been disseminated to citizens and has been clearly omitted from any meaningful discussion by the political leadership. The leadership has attempted to put a positive spin on the economic opportunities and has refrained from discussing the economic liabilities to their impacted constituents many of whom live in dwellings which represent a significant tax base to the city.

Finally, in a recent land mark court decision, the U.S. Court of Appeals has ruled that flight noise made by U.S. Air Force planes conducting low-altitude training exercises over a Texas property constituted a "taking of private property" for which just compensation must be paid. The court stated that a taking of a property occurred if the landowner proves that low-level flights result in direct, immediate, and substantial interference with the enjoyment and the use of the property, the landowner has established a taking for which he/she must be justly compensated. (Exhibit I) Brown vs. United States, 73 F .3d 1100, Fed. Cir. 1996.

We trust that the exhibits presented herein will be thoroughly studied before a final decision is made. Thank you for giving us the opportunity to express our position on the realignment of the F/A- 18 fleet.

Sincerely,

Mona and Al Saferstein

cc: Participating Citizens

B-8-204

AMS-14 The EIS includes a thorough analysis of noise impacts on the local community. Section 3 discusses the significance of various noise levels and how noise can affect hearing, learning, and sleeping. The Navy published notices in the *Virginian-Pilot* and the *Federal Register* to let the public know about the availability of the Draft EIS and where they could go or call to obtain/review a copy. In addition, the Navy held two public hearings (one in Virginia Beach and one in Chesapeake) in the Hampton Roads area to inform the public of projected impacts and receive their input.

From: William M. and Jennifer A. Cryan
805 Navigator Court
Virginia Beach, VA 23454
(757) 496-2104 (Home)
(757) 322-7745 (Work)

27 October1997

To: Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2031 DC)
1510 Gilbert Street
Norfolk, Virginia 23511

Subject: QUESTIONS FOR THE RECORD FOR CONSIDERATION AND ADDRESSAL IN THE FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS) FOR REALIGNMENT OF F/A-18 AIRCRAFT AND OPERATIONAL FUNCTIONS FROM NAVAL AIR STATION CECIL FIELD, FLORIDA, TO OTHER EAST COAST INSTALLATIONS

1. The DEIS contains specific flight paths for Fleet Carrier Landing Practice at NAS Oceana. Those flight paths are not the paths currently flown by aircraft practicing carrier landings. Will the actual flight paths be modified? If the public can not be guaranteed that the tighter patterns will be followed at all times, will the DEIS noise contours be modified to reflect the larger noise pattern and the additional residences that will be affected? How many people will then be affected?

2. The Navy has plans to replace the FA-18 models at NAS Cecil Field and NAS Oceana with newer models, the FA-18 E/F. The Navy's recommendation to move all aircraft or a majority of aircraft to NAS Oceana predisposes a decision regarding the location of the new FA-18 E/F's. According to trade journals, the FA-18 E/F has a more powerful engine which means it will be noisier and dirtier. What's the impact of the conversion of FA-18's to the newer model? Will this be addressed in the FEIS?

3. The DEIS says the Navy will work with the City of Virginia Beach to mediate impacts. What does that mean specifically? Will the Navy buy my property? Will the Navy conduct an engineering study of my home to noise proof it? Will the Navy pay for the repairs or modifications to my home? Will the Navy compensate me for the reduced value of my property or for the reduction in my ability to enjoy my home and property? If so, where and how do I sign up for payments? If the Navy won't pay me as a homeowner, why is it offering to pay the City of Virginia Beach? Were any of these costs computed and considered in the DEIS?

4. If the City of Virginia Beach sues the Navy to recover the cost of the schools it moves, will that be considered in the financial analysis in the DEIS? If the City of Virginia Beach sues the Navy for other damages that it perceives, will the Navy include those costs in the DEIS?

5. Who makes the decision whether all, some, or none of the aircraft come to NAS Oceana? What will be the basis of the decision? Will the decision weigh financial considerations more heavily than environmental, noise, and quality of life issues?

6. What other aircraft home-basing options were considered but not included in the DEIS? Why were they excluded?

7. Did the Navy know of the potential noise and environmental impacts when the BRAC 1995 recommendations were made?

8. What are the costs of ameliorating all noise impacts? How would those costs, if considered in the DEIS, alter the financial recommendation?

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B-8-205

WJC-1 Flight tracks represent the approximate centerline of flight patterns and corridors and are used for noise modeling purposes. Actual patterns may vary due to type of aircraft, aircraft weight, aircrew technique, number of aircraft in the pattern, wind, etc. Section 3.1 has been amended to clarify the description of flight tracks.

NAS Oceana and NALF Fentress operate 24 hours a day. Notice of unusual operations is provided to the media to inform citizens surrounding NAS Oceana and NALF Fentress. NAS Oceana also has an outreach program to brief civic leagues, service clubs, realtors, and other interested parties on the air station flight mission. The Commanding Officer at NAS Oceana has also established a Community Leaders Form to meet quarterly and discuss issues of mutual concern.

WJC-2 The F/A-18 E/F aircraft is programmed to replace the Navy F/A-18 C/D and F-14 aircraft, which cannot accommodate new weapons and weapons systems. The Draft EIS for the initial siting of the F/A-18 E/Fs on the west coast was published on December 5, 1997. Similarly, National Environmental Policy Act (NEPA) documentation will be prepared before the Navy sites the E/Fs on the east coast. The public will have an opportunity to review and comment in accordance with NEPA. Please see Section 9 of the EIS for a discussion of the cumulative impacts associated with the F/A-18 E/F aircraft.

WJC-3 The Navy will continue to review its operational procedures to mitigate noise and safety impacts wherever practicable. The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

WJC-4 There is no way of predicting if the Navy will be sued or what the costs of any law suit would be. Accordingly, such costs, if any, are far too speculative for inclusion in the EIS.

WJC-5 The Office of the Secretary of the Navy will make a final decision concerning the five alternatives evaluated in the EIS. Operational, economic, and environmental issues will all be considered.

Cryan (Cont.)

WJC-6 The EIS undertakes a multistage screening process to arrive at those alternatives that would be feasible for completion of the realignment in a manner consistent with the BRAC 95 Commission recommendations, which have the force and effect of law. Installations were screened for necessary capacity and support infrastructure as well as the installation's ability to meet various operations criteria. (Please see Section 2.1). Within that process, various installations and basing scenarios were considered. Numerous alternative basing options were examined, with only five being fully compared as feasible, reasonable alternatives. The five feasible, reasonable alternatives were given a full comparative analysis in which economic, environmental, and social concerns were evaluated for each alternative. The remainder were eliminated from further analysis as not being feasible, with a short discussion as to why (as required by the CEQ regulations). The following two alternatives were considered but eliminated from further analysis because they would not be consistent with the BRAC 95 Commission goal of using existing infrastructure to the greatest extent possible: 1) relocation of all aircraft to MCAS Cherry Point and 2) relocation of all aircraft to MCAS Beaufort. Please see Section 2.6 of the EIS.

WJC-7 Noise and other environmental impacts were assessed during the preparation of the EIS.

Cryan (Cont.)

9. Will NAS Oceana be able to accommodate 100% of all required flight operations? If not, where will those operations be flown? Will the ranges and targets accommodate 100% of all required operations? If not, where will those operations be flown?

10. What will be the operating hours of NAS Oceana? What will the noise levels be after 2100? Can the noise levels for any particular pass of aircraft over my house actually be louder than the noise maps indicate? If so, how loud can they be and when will they occur?

11. What is the average life of a military airfield? When do citizen complaints about noise usually begin to create so many problems that the airfield is closed? Where is NAS Oceana in that life cycle?

12. If the DEIS is correct and noise is detrimental to school children and the learning process, what's the impact of noise of adults with home businesses, children who are home schooled, and adult students? How will the Navy compensate those affected in these categories for their reduced ability to learn or concentrate?

13. Have all of the communities and elected official in all areas received the same level of access to information throughout the DEIS process? Has the City of Virginia Beach received any special briefings, information, or promises? Have Virginia elected officials had special access to people or information or received special briefings throughout the process?

William M. Cryan Jennifer A. Cryan

WJC-8 Many of the costs, including noise impacts and most environmental effects, are difficult to quantify in economic terms. The EIS provides construction cost information, environmental effects, and economic benefits in order to provide the information necessary for decisionmakers. A cost/benefit analysis of intangible values, such as quality of life, is outside the scope of the EIS analysis.

WJC-9 As described in Section 2.4.1.1 of the EIS, NAS Oceana (and its associated fields, ranges and targets) would be able to accommodate all flight operations under ARS 1 because of significant existing excess capacity at the station. Some additional facilities to support operations and maintenance of aircraft and training of personnel would be necessary. The necessary construction for each ARS is provided in Section 2.4 of the EIS.

WJC-10 NAS Oceana operates 24 hours per day. The noise contours presented in the EIS figures represent day-night average sound levels; therefore, noise levels for an individual event may be higher than these contours. Section 3.1.8 of the EIS presents a detailed discussion of the various measures of sound level and provides a table of expected sound levels for various events (Table 3.1-21).

WJC-11 There is no defined "average lifespan" of a military airfield. To our knowledge, no military airfield has ever been closed due to noise complaints alone.

WJC-12 Although little or no research has been conducted to quantify the effects of noise on child development (learning) while not at school or adult students, it is recognized that learning and (to some degree) operating in the workplace are dependent on speech communication. The EIS states (Section 4.8) that disruption of speech would occur in some areas due to the proposed realignment. Hence, although residential structures and businesses provide some degree of sound attenuation, periodic interference in speech communication may occur at some locations in the vicinity of NAS Oceana. The EIS focused its discussion of noise effects on child development in public schools.

Cryan (Cont.)

WJC-13 Citizens, communities, elected officials, and others received the same level of access to information throughout the EIS process. The Navy has provided briefings to local officials in Virginia, North Carolina, and South Carolina upon request.

Ms. Theresa M. Fockln
3009 Ferry Farm Ln.
Virginia Beach, VA

Theresa M Fockln
3009 Ferry Farm Lane Va B.

1. AFTER VIRGINIA BEACH SPENT 21 MILLION DOLLARS TO MOVE 2 ELEMENTARY SCHOOLS BECAUSE THE NAVE SAID THEY WERE IN A POTENTIAL CRASH ZONE. THE NAVY FINALLY SHARED THE NEWS THAT THEY HAD CHANGED THE CRITERIA FOR THE CRASH ZONE 2 YEARS EARLIER.
   ARE THEY GOING TO PULL THE SAME THING AFTER WE MOVE BROOKWOOD AND PLAZA ELEMENTARY SCHOOLS?

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2. WHERE WILL WE MOVE THESE SCHOOLS?

3. HOW FAR WILL THE STUDENTS FROM THESE SCHOOLS HAVE TO TRAVEL TO NEW SCHOOLS?

4. WHAT WILL IT COST VIRGINIA BEACH? NEW ROADS, MORE BUSES, MORE DRIVERS FOR EXAMPLE. (WHICH ARE SCARCE NOW)

5. VIRGINIA BEACH SAYS THERE ARE MORE OPPORTUNITIES JOBS (FOR SPOUSES). VIRGINIA BEACH RESIDENTS, WHO HAVE LIVED HERE FOR YEARS CAN'T EVEN FIND JOBS WITH DECENT PAY, AND AS FAR AS COLLEGE, YOU HAVE TO BE HERE A FULL YEAR TO OBTAIN IN-STATE FEES.

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6. OPTIONS 4 AND 5 SOUND GOOD TO ME!!!

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7. WHAT WILL HAPPEN TO REAL ESTATE SALES?

B-8-209

TMF-1 The Navy has no authority to respond; however, we invite you to submit your questions and concerns to the City of Virginia Beach

TMF-2 The relocation of F/A-18 aircraft to NAS Oceana is expected to have a long-term, positive effect on the local economy in South Hampton Roads, including employment. For example, it is estimated that 1,260 new jobs will be created in the area as a result of ARS 1. Section 4.5.1 of the EIS provides a discussion of these impacts and how they were calculated.

TMF-3 Thank you for your comment; no response required.

TMF-4 It is reasonable to assume that real estate sales will increase under all five ARSs because of the influx of additional home buyers.

October 27, 1997

Citizen Comments/Concerns
F-18's to Oceana

Dear Sir or Madam,

My husband and I purchased a home off Laskin Rd. in 1992. We were so happy when we found a home in an established neighborhood with many oaks, dogwoods and azaleas. We were told we were in a "LOW NOISE" zone and, of course, never heard a jet until the day we moved in! We happily added a deck and hot tub in 1994. The noise has been low to moderate, as we were told, and almost always tolerable, until the increase in the number of jets to Oceana. Now, Fentress Field is closed for repairs (we try our hardest to tolerate this noise because we know it is temporary). No more dining on the deck, enjoying the sound of the birds and the beauty of the grass that we've spent every weekend trying to grow. Quite often, we can't even sit INSIDE and have a normal conversation. No more watching our favorite shows on Discovery or The Learning Channel; we normally miss part of the audio due to "fly overs".

We normally don't call to complain because we know there is nothing we can do about it. But, there are times when stress levels get so high, you have screamed at your husband (and/or anyone else that comes in sight), considered purchasing a bazooka, and finally decided the best choice is to make "the call". Of course, you normally get a young "chap" who tells you in no uncertain terms that "you bought a house a mile away from the runway and what do you expect?" I've prayed some mornings that I told my husband how much I loved him before he left for work or that I've called my mother recently, because it sounds as though the jet is crashing or landing on my house! This is a stress level that others can't understand if they haven't lived through it. People say "just get use to it" or "the noise is only for a minute or so". Recently, on my day off, the jets flew from 9:00 am to 11:00 pm, They were doing "touch and goes". The noise was CONSTANT, no time in between each jet. One after another, again & again & again & again. The noise is nerve-wracking!

1 What about the environment? I have jet fuel splattered on my boat cushions from leaving them uncovered ONCE and I CAN NOT get it off. I wonder what this is doing to the water, or the beautiful trees, or my lungs! We use to have "screech owls" in our back yard and they have all left the area. Aren't we concerned about the environment at all!

Our Mayor continues to state that the increased jet traffic will cause "minor" inconveniences to the affected residents. The noise is deafening and very aggravating. I'd like to invite the Mayor, who lives outside of the noise and crash zones, to come sit with us on an evening that the pilots are practicing "touch and goes". Or, when the jets fly so close to my home that it shakes and I look up to see the color of the hair of the pilot as he goes by!

2 Must we continue to pay taxes to expand roads to welcome the military and their families, whom themselves pay NO property taxes and shop at base commissaries? Any so-called tax benefits to my city will be eaten up by all the improvements that MUST be made due to increased traffic on our roads and noise in our schools. Will my taxes, and those of my neighbors, be decrease based on the inconveniences that WE must shoulder that other Beach residents don't have? Our Mayor claims that there will be an increase of 5,000 jobs to our community. What happens to those jobs when the roadwork and base improvements are finished? Won't a lot of these jobs be filled by the family members the service personnel bring with them?

B-8-210

MWV-1 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

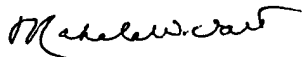
There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

MWV-2 As described in the EIS, no significant adverse fiscal impact on the communities around NAS Oceana is expected under any ARS. NAS Oceana personnel living or shopping off-base pay property and sales taxes, which create revenue for the area. Positive impacts on the local economy due to increased payroll and construction outlays at NAS Oceana would also create additional revenue. These revenue increases may be partially offset by the increased demand for community services and facilities. For example, please see Table 4.5-3 for estimates of economic and fiscal impacts to local communities under ARS 1.

Vail (Cont.)

Let's allow North Carolina to enjoy some of the so-called benefits of the jets. The residents there are happy to see them coming. Any increased costs due to sending the jets there will be shared by the entire nation. This cost will be offset by the savings we will all enjoy from closing Cecil Field. Let's give some relief to the TAXPAYING CITIZENS whom have already been THROWN into higher noise zones, that have DECREASED our quality of life. I don't mind an LITTLE inconvenience for "the price of freedom", but enough is enough!

Sincerely,



Mahala Wilson Vail
Linlier Resident
1404 Carolyn Drive
Virginia Beach, VA. 23451

The mayor and city council sold there soles to the devil for as few as five thousand salaries and ever fewer "new" support jobs. Jobs and salaries that could be easily made up during one good summer season at the beach. And what did the mayor and council sell their soles for? Votes? So they think.

And what did the tens of thousands of families living in the noise zone get out of this deal? One hundred and eighty new opportunities for a jet to fall out of the sky and kill one of them. A decrease in the quality of life due to noise. A decrease in the value of their homes because of the noise. So who's paying the devil for this deal? Ask the folks living in harms way .. in the noise zone. Ask these families who's paying the devil.

For those not living in the noise and danger zone who say, "Jobs are jobs. Money is money." Think again. Do any of us need the added stress that will be put on our police departments, fire departments, schools, hospitals, roads, services and recreational areas?

Add the relentless and deafening noise of low flying jets to these problems of stretched cities resources and you may .... those of you in the Zone1, you may just begin to understand the problems for the ten of thousands of us living in the "noise zone".

Knowing you're moving into a noise zone has nothing to do with the actual affect noise has on a human being. Noise and it's affect on the quality of life is intolerable, regardless of what you thought you knew before moving into the zone. Only the tolerance of the deaf can deal with the relentless sounds of an F-18 ... let alone over two hundred of them with screaming engines starting at 7:00 am and at time continuing until after mid-night.

If the mayor and city council spent their time, money, intelligence and energy bringing in clean industry to this city rather than trying to keep NAS open by making promises to move schools and jumping through hoop, the quality of life in this city would be unparalleled along the eastern sea board.

We should choose our industry carefully because there is always a cost. It's not too late ... it's never too late. Virginia Beach should be working a deal with NC and the military to move all of NAS to a state that wants their business. Needs their business. With tobacco crop on the wane, jet could be just what they are looking for to offset the non-smoking trend. Virginia Beach has the foundation to start the NAS move out. The destine shown VB residents by the military during the re-zoning/school moving and building fiasco could be that start. Building on this it could be declared that VB has gotten too big to safely have an air station in the city.

The point: NAS has over stayed their welcome. Virginia Beach has used Oceana to their benefit over the years, as NAS has used Virginia Beach. Both of us should be able to say with some regret, but with honesty .... "It's been great, for us both. We've had some great years together, but as it is with many relationships we've grow in different direction. We can no longer be partners. Let's shake hands and part friends. OH, tell our very good friends in North Carolina, we were glad to be of help."

Fosses (Cont.)

As strongly as I feel that Ocean should be shut down completely or moved to North Carolina, I also feel that IF NAS is going to stay and the planes are to be based here, we in the danger zone (5 mile radius of Oceana) should receive "Hazard Duty" compensation.

1 It should be pointed out that some unlucky person or persons on the ground retains more of a risk of dying than the flier, in that the pilot can bail out and parachute to safety. We all know it's going to happen, a jet falling out of the ski, it's just when and who and how many on the ground are going to die.

The above compensation should be in one of two forms: a lower tax rate given by the city or a $100.00 a month per given to those homes in the Noise/Crash Zones. In the case of the lower tax rate, that rate should be established and frozen until the planes are gone. In the case of the cash compensation, a check for $1,200 to be paid at the end of each year.

Either plan will help offset the depreciation in property values due to the noise and risk of damage and death resulting from the jet mishap ... a mishap we all know is going to happen.

John Des Fosses
1819 Tree Line Road
Virginia Beach, VA 23454
496-4722

JDF-1 The Navy does not have the authority to condemn property, provide sound attenuation, or otherwise compensate property owners without Congressional authorization and appropriation of funds. The Navy does not intend to seek specific Congressional authorization and appropriation of funds for these purposes to support the realignment of F/A-18 aircraft from NAS Cecil Field.

Oceana Naval Air Station,
Is not the best for economic development for Virginia Beach, the Salaries generated from Oceana are a product of enlisting in the Navy, The best for the economy of any community in the Country, Is FREE ENTERPRISE.

On november 1940,the U.S. government purchased the original 328.95 acres in what was them Princess Anne County, for the purpose of construction of a small air field....the air-planes used them made a little more noise than a large lawn mo-wer,
Today the tailhookers flying at a 1000 ft. would sound like shou-Ting in the ear,or 100 dbl. Noise factor.

Oceana has under 6000 acres today,the city of Virginia Beach, Is the most populated and large on the State, according to a Mr. Warner, I believe his name is, 61% of the 425.000 inhavitants, Are Navy, 39% are sometning else.

Virginia Beach, has 5 of the top 10 residentiel real estates in the Entire country, this is because the Navy move their people around Very often(4 or 5 years),plus the people leaving the service, do not Find minningfull employment here, retail clerks,working in a fast Food busissness, filling tacos or flipping burgers. No one with some Ambition leaving the Navy, would choose to stay in Va.Bch.. Personal income is 10% below average in the State, there is no Universities and only one Community College. We do have A substantial ammount of Pawn Shops, typical of military commu-Nities, in resume our economy is a mess.

This is a beautifull city that deserves to grow economically,to have A proffetional sport team and all the amenities of a progressive Modern city.

Sherry Point N.C.is eager to have the F-18/Hornets,why not let Them have them,the original Base Realigment and Clossing Co-Mmision (BRACC) HAD CHOSSEN Cherry Point, that still is In the U.S. isn't it. The Point have 16000 acres base and no popu-Lation encroaching it. Consolidation with U.S.M.C. makes a lot Of sense.

Gabriel Jimenez, Virginia Beach Va October 21,1997

Thank you for your comments; no response required.

THE SOUND OF FREEDOM.....IS THAT WHAT IT IS , OR IS IT MORE A NOISE MACHINE MAKING A LOT OF NOISE .

U.S INVOLVEMENT IN VIET NAM WAS A MISTAKE, OUR INVOLVEMENT IN THE POLICE ACTION IN VIETNAM, DID NOT ATTAIN ITS STATED GOAL OF STOPPING COMMUNISM. WHAT IT GAVE US INSTEAD WAS A COMMUNIST VIETNAM COUPLED WITH THE DEATH OF 58.000 AMERICANS AND THE DISABLING OF MANY THOUSAND MORE.(I MEAN NO DISHONOR TO THE SOLDIERS VICTIMIZED BY THE WAR)

NOW 18 YEARS AFTER THE WITHDRAWAL OF U.S. FORCES IT IS THE VIETNAMESE THEMSELVES SEEKING TO EMULATE AMERICAN IDEAL OF FREE MARKET AND REJECTING COMMUNISM.

THE COLD WAR IS OVER AND WE WON.THE SOVIET UNION NO LONGER EXIST,THERE IS NO OTHER COMPARABLE SUPERPOWER NOW IN EXISTENCE SO WHY THE U.S. IS STILL SPENDING OVERER $250.000 .000 000.00 (250 billions dollars)

DESPITE WAR MONGERS CLAIMS THAT CLINTON HAS DANGEROUSLY WEAKENED THE MILITARY,TOTAL U.S. DEFENSE SPENDING OVER THE NEXT SIX YEARS WILL AMOUNT TO ABOUT $$ 1.6 TRILLION , BY COMPARISON,GREAT BRITAIN ,FRANCE GERMANY AND JAPAN WILL EACH SPEND LESS THAN $200 BILLION EACH FOR DEENSE OVER THAT TIME SPAN.

What are our potential enemies spending? Russia $47 billion,China $21.8 Billions North KOREA $5.1 Billions, Iran $4.3 Billions ,Libia $1.8 Billionsand Cuba $1.3 Billion.

100 decibels (jet flyover at 1000 ft) shouting in the ear!

From Gregory L. Vistica-Fall from Glory-
Stricken Tom Cats,Crash records,provided by Grumman the builders of the F-14.
The Navy lost about 120 jets overall up to 1995 at a cost of 2.5 Billion dollars,
Some Navy aviators believe that as many as half of the crashes where engeene-fly
System caused-since that time some 10 more Tom Cats have fallen down.
Is our communityin danger ? the pilots generally bail out of the plane and survive,
What about the civilian population on the ground ?

FAA title 14 of Federal Regulations Section 91.119 of the General Operating and
Flight Rules which specifically prohibits low flying aircraft.(whether Military or
Civilian) quote: Over congested areas,any congested area of a City,town or settlemen,
Or over any open assembly of persons, no less than 1000 ft. above the highest obstacle,
Withing a horizontal radius of 2000 feet of the aircraft'

If Oceana can comply with the FAA rules,I guess we can live with it ! But if there should
Be a terrible accident, well <I TOLD YOU SO.>

Admiral Jeremy Boorda, (R.I.P.),pet project the New Arsenal Ship:It should be the center
Piece of the Navy beyond 2000, Will carry launchers for 500 or more land attack-anti-
aircraft and anti-ship missiles and will have enough storage space for several re-loading
The Arsenal Ship will make the Navy's most extensive use over of automated systems;
It's missiles will be lawnched by Radars and Computers. The crew will be limited to 50
And at a cost of only $ 525 000 000 00 (one is allready in the pipeline) versus the
Carriers at a cost (tax payers money) of $ 5 Billion dollars, another $ 5 Billion for the
Planes and 5000 sailors to operate .
The Hornet was the navy's newest warplane,Billions of Dollars had already been
pumped into the single seat aircraft designed to be a fighter and a bomber. ""The word
Among aviators was that it was unruly, even dangerous.....by 1985 the Hornet was
shaping up to be a billion dollar LEMON. ...The biggest unknown,one the Navy did not
Address, was why was the trouble Hornet still flying ? ? Let us pray !

October 28, 1997

Members of the hearing committee

I am Ernest F. Kerekes and my wife Eileen are life long residents of old Princess Ann County and old Norfolk County. We both are residing at 904 Ballyhan Rd in Virginia Beach.

We both are Retirees from the Department of Defence.

We are both familiar with Aircraft as I was a supervisor at NAD Naval aviation Depot and She worked at Oceana when the supply system was built.

She retired with 30 years of Service, I had 34½ years of Service.

I served in the old Army Air Corps during World war II. I was with the Eighth in North Africa and England

When an Aircraft passes overhead We both say thank god its one of ours and from a foreign Country.

Thank you for your comments; no response required.

We Say to the Navy thank you for Considering bringing the F18 to Oceana.

~~Any~~ ANY Problems that exist or will occure with Cooperation Can be resolved-

New Comers to VA. Beach should Know Oceana NAS exists and there Will be some Noise. The Noise is a sign of a robust ~~economy~~ Economy.

To Those who say that the Noise Interrupts thier golf game I say Sorry but that the Noise is a Sign of progress.

To the Navy we say bring ON your F-18, we can Save money by doing so. we welcome you to Oceana and Virginia Beach

Ernest F Kerekes
904 Ballylinn Rd.
VA. Beach, VA 23464

1309 Pamlico Boulevard
Chesapeake, Virginia 23322
October 28, 1997

To the US Navy:

1 I would like to express my objections to the proposed deployment of additional aircraft to the Fentress Air Station near my home in Chesapeake, Virginia. When my husband and I purchased our house in 1996, the available information about noise zones figured into our buying decision in the Albemarle Acres West subdivision. Now if the Navy brings additional jets to the area, all our caution will have been for naught. If we stay, the noise will make our lives miserable. If we go, our property value will be so diminished that we will lose a great deal of money. What a choice!

Virginia Beach has lobbied heavily for the jets at Oceana, but there was no involvement with Chesapeake officials over sending some of these planes to the Fentress Air Station in our municipality. I am alarmed that the impact on residents here has been totally ignored in the rush of Virginia Beach to gain an economic advantage.

2 I have additional concerns about the ability of the military to issue noise zone information for real estate purchasing decisions then retroactively redraw the lines so that homes and schools are in new crash zones and new noise zones. Cheerleaders for this new deployment say that if we pay $500 each to triple pane every window in our home, if we turn up the TV, if we blast the air conditioner, if we never venture outdoors, why then Chesapeake will remain a lovely place to live even if the jets are relocated here. I assure you that if more jets arrive, Chesapeake will be the last place that most people will want to live.

It seems short-sighted to look at this decision in terms of economics alone. I find it cruel of local officials to try to lure more employees to the area only to have jet noise degrade the quality of life for them and the people already here to the point where all become prisoners in their own homes.

I beg you to reconsider any plans for bringing additional aircraft to Fentress Air Station.

Sincerely,

Kathy L. Pearson

Kathy L. Pearson

KLP-1 Property values are determined by a combination of neighborhood characteristics (e.g., the quality of local schools, local property taxes, access to transportation, and the crime rate) and individual housing characteristics (e.g., age of the house, number of rooms, and amenities such as garages). There are no definitive federal standards for quantifying the impact of aircraft noise on property values. Therefore, we cannot quantify whether the increase in noise will affect property values.

KLP-2 Thank you for your comments; no response required.

3811 Holly Dune Lane
Va. Beach, VA 23451-2613
Nov. 26, 1997

Cdr, Atl Div, NavFacEngCmd
Attn: Dan Cecchini (Code 2032DC)
Gilbert St.
NORVA 23511

Thank you for your reminder card. Please know that I am very concerned about and oppose the introduction of additional aircraft at NAS Oceana. My wife and I live less than 500' from, and in a line with, the noise zone/NW landing pattern for the runways. Day and night the aircraft come in very close. They are so noisy one must stop talking (noise pollution). You can see particles spraying from them (fuel dumping?) (liquid/air pollution and water pollution). The additional people will require various services--roads, schools, homes, sewer, water, etc. (negative impact on Va. Beach's fragile environment and infrastructure). 1

V. rspy,

K. C. GIMBERT

KCG-1 Fuel release procedures are governed by FAA and Department of Navy rules. Navy pilots are prohibited from dumping fuel below 6,000 feet above ground level, except in an emergency situation. Above 6,000 feet, the fuel would have enough time to completely vaporize and dissipate and would therefore have a negligible effect on the ground below. In an emergency, a fuel release may be performed to save the aircraft and/or pilot. The environmental impact of an emergency release will depend on the quantity released, height above the ground of the release, and atmospheric conditions.

There are no jet engine operating conditions under which raw fuel would be emitted through the engine exhaust. The F/A-18 C/D engine is designed to emit negligible amounts of particulate; this engine characteristic minimizes the likelihood of oily particulate settling out of the atmosphere and causing an impact on the ground.

Anne Christine Pierson
2428 Enchanted Forest Lane
Virginia Beach, Virginia
23456

To whom it may concern,

I, as a resident of noise zone 3, and about as close a neighbor to the base as anyone can get, do hereby adamantly insist that we welcome all 180 planes, and the new families coming into the area. I am very pleased to have them!

People who have actually taken the time to examine the facts do agree with me, also. These are very fine people who are coming up to Virginia Beach with the F 18s! They will be a great asset to our community!

I was reminded of the fine caring people who make up the Navy last night, in the midst of our rainstorm. My husband and I had our tire blow out while driving down the street. We quickly pulled into a gas-station minimart and limped to the air hose. Out in the pouring down rain changing that tire, three different cars pulled up in the next half hour--the drivers coming over and asking if they could help us. Two of the three were Navy for sure— the third probably was! They went way out of their way to try to help us! I say, let's get more people like this here. It puts all the noise whiners to shame!

Sincerely,

Anne Christine Pierson

Thank you for your comments, no response required.

Georgia

P.O. Box 2374
Darien, Georgia
31305
November 11, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Attn: Mr. Dan Cecchini (Code 2032 DC)
1510 Gilbert Street
Norfolk, Virginia

Dear Sir:

This letter is in regard to the proposed increased use of the Townsend Bombing Range. I recognize the need for military preparedness (my Dad died in WW II) and respect our Armed Forces.

However, there MUST be another site which could share the burden of bombing practices. I live at Belleville overlooking Creighton and Sapelo Islands, and the bombing ruins whatever peaceful environment we have left to enjoy. This area is already environmentally pressured. We do not need to wait until numerous other species of life have approached the endangered category. This area is one of the last close-to-pristine environments, and is uniquely foundational to marine life production. The birds are disappearing,

CONT'D

B-8-225

other wildlife is stressed. And, I must say, the stress of the bombing noise, the ground shaking (yes, it is noticeable even here), my windows rattling has a jarring effect on me and on this place (that should be a place of respite from the rigors of daily life).

It's more than just a few endangered species (however important), it's the fragile quality of life and environment for all of us.

This is not some backwoods community you can ignore as an important citizenry.

But, notably, your ads in the media did not make for ease of responding (or fully understanding) to the TBR proposals. Was that deliberate? I hope not.

With a genuinely respectful salute to our military, I feel it is also time to draw the line and say "NO" to further stress on this area from the TBR. Let some other area/region accept a fair share of preparedness responsibility.

Sincerely,
Shirley E. Bland LCSW

1

B-8-226

CEB-1 The newspaper advertisements that were published in the local newspaper were meant to be easy to read. Thank you for your comment.