



THE ASSISTANT SECRETARY OF THE NAVY  
(INSTALLATIONS AND ENVIRONMENT)  
1000 NAVY PENTAGON  
WASHINGTON DC 20350-1000

DEC 12 2007

Richard Grosso, Esq.  
Executive Director General Counsel  
The Everglades Law Center, Inc.  
818 U.S. Highway 1, Suite 8  
North Palm Beach, Florida 33408

Dear Mr. Grosso,

Thank you for your letter of November 15, 2007, on behalf of the Florida Keys Citizens Coalition and local Key West, Florida resident John Hammerstrom regarding compliance with the National Environmental Policy Act (NEPA) for aircraft operations at Naval Air Station (NAS) Key West.

In your letter, you question Navy compliance with NEPA for operations at NAS Key West and the treatment of NAS Key West in the Environmental Impact Statement (EIS) for Introduction of the F/A-18 E/F to the East Coast of the United States. The EIS for F/A-18E/F introduction was an analysis of alternative home basing sites and their associated outlying landing fields for the F/A-18 E/F. Because NAS Key West was eliminated as a potential home basing site for the aircraft, and was never considered as a possible site for an outlying landing field to support one of the six home basing alternatives, that EIS did not further analyze impacts at NAS Key West.

In 2003, the Navy complied with NEPA for transient aircraft operations at NAS Key West by completing an Environmental Assessment (EA) for Fleet Support and Infrastructure Improvements. That EA, and its incorporated references, analyzed impacts to the human environment, including noise and flight paths resulting from all transient aircraft operations, including the F/A-18 E/F. As a result of that analysis, the Navy reached a Finding of No Significant Impact which addressed off-base noise exposure from aircraft operating at NAS Key West.

You also question the noise modeling techniques used in the 2003 EA and the 2007 Air Installations Compatible Use Zone (AICUZ) Study. In preparing AICUZ and NEPA studies, the Navy uses the most current model, NOISEMAP, to provide the most accurate aircraft noise exposure analysis and recommendations for compatible use development around air stations. Non-linear noise propagation is a phenomenon recently noticed in the next generation of high-exhaust velocity aircraft. A new acoustic model for modeling aircraft noise, the Advanced Acoustic Model (AAM) is in development that will help determine whether non-linear noise propagation will be a significant noise variable, and, if so, address such propagation. This model has not yet been approved for

use by the Department of Defense. Until development and validation of the AAM are complete, NOISEMAP continues to be the most scientifically valid program for calculating noise exposure around airfields.

The State of Florida, local government, and the U.S. Navy continue to work closely together to ensure the health, safety, and welfare of our citizens and visitors while preventing incompatible land use and unintended consequences from transient aircraft operations at NAS Key West. As you are aware, the Navy hosted a public AICUZ workshop in Key West, on October 23, 2007. We also met with Monroe County and City of Key West Commissions just last week to discuss the most recent AICUZ results.

The Navy takes seriously its environmental protection responsibilities as well as the public's perception of how well those responsibilities are met. We can assure you that, in our continuing operations at NAS Key West, thoughtful consideration of impacts from our aircraft operations will continue to be emphasized.

Sincerely,

A handwritten signature in black ink, appearing to read "BJ Penn", with a horizontal line extending to the right.

BJ Penn

