

December 10, 2007

Monroe County Commissioners
Monroe County Florida

Dear Commissioners,

I would like to thank you for allowing public input, regarding the 2007 NAS Key West AICUZ document, at the December 5, 2007 joint meeting. Your request of NAS Key West to provide current sound decibel levels and meter readings (not aged computer models), at the locations which are affected by the F18 Super Hornet flyovers, will begin to identify the health, hearing degradation and environmental assault now taking place in our county.

We would like to take this opportunity to review some of the discussions that brought to light and identified credible deficiencies in the latest NAS Key West 2007 AICUZ document. Noting the vast amounts of discrepancies throughout the document, We hope that you concur that the Navy should prepare a valid, indepth Environmental Impact Statement to address all the impacts of the F/A-18E/F Super Hornet on the communities and the environment surrounding NAS Key West. I formally request that the BOCC petition NAS Key West to discontinue flying the F18 E/F Super Hornets over our communities until such time that a valid EIS is approved.

DOD AICUZ PROCEDURES

1. OFFICIAL DOD AICUZ PROCESS:

The Military currently uses a multi phase approach to preparing and releasing an AICUZ study*: Data Collection and Analysis: The first step involves collecting detailed aircraft flight and ground maintenance data. Pilots, aircraft maintainers, air traffic controllers and other individuals associated with aircraft operational activities are interviewed to collect the required information.

* DOD Instruction 4165.57 establishes the AICUZ program which is similar to the Federal Aviation Administration's Federal Aviation Regulation Part 150 program for civil airports.

AICUZ PROGRAM PROCEDURES AND GUIDELINES FOR DEPARTMENT OF THE NAVY AIR INSTALLATIONS, OPNAVINST 11010.36B, 19 Dec 2002, page 32 DOCUMENTATION OF LOCAL EFFORTS:

“Records of important discussions, negotiations, testimony, etc., with and before local officials, boards, etc., must be maintained by the local command. Such records shall be available for inclusion in military construction project submissions if required by CNO/CMC. This will ensure that documentation is available to indicate all reasonable and prudent efforts were made to preclude incompatible land use through cooperation with local government officials and that all recourse to such actions has been exhausted.”

REALITY:

a) Repeated Freedom of Information Requests (FOIAs) directed to present NAS Key West Commander J.R. Brown, have revealed no such archive and constitutes a direct violation for the DOD Guidelines stated above. No such repository exists relative to the 2007 AICUZ changes.

b) Official City of Key West and State of Florida documents* reveal that only the US Navy Commander Jim Scholl, Florida Keys Defense Alliance and their consultant Robert Natter established the criteria for moving the flight paths off a developers high end proposed development. The documents also support the involvement of a Key West developer and other unqualified individuals

* Scanned documents are available for viewing or download at www.stoptheplanes.com

c) At a meeting of citizens at Harbor Shores Condominiums, located in South Stock Island, Navy Capt. Dewalt, Top Gun trainer, was asked the following question. “Were you consulted about the changes to the 2007 AICUZ flight paths?” His response was... “NO”.

2. Data Review, Validation and Computer Processing:

The second step involves analyzing, organizing and confirming that the data is accurate, consistent and complete. This phase is typically conducted by whichever agency collected the data, be it a contractor or Navy personnel. It is then reviewed by the installation and/or the Major Command (MAJCOM).

REALITY:

The proposed 2007 AICUZ changes were revised by the Florida Keys Defense Alliance, their supporters, developers, paid Navy consultants and the former NAS Key West Commander, Jim Scholl. The Final 2007 AICUZ approval process was engineered through a paid lobbying effort* by R. Natter Associates.

* Scanned invoices documents are available for viewing or download at www.stoptheplanes.com

2007 AICUZ CHANGES AND UPDATES

1. Existing AICUZ created in 1977 - 30 years ago

2. 2004 AICUZ update created, but not codified

3. In 2007, another AICUZ update was required because noise and accident zones were moved away from Key Haven.*

*NAS Key West 2007 AICUZ Update - Section 1.5 "Changes that Require an AICUZ Update," p.1-4

4. Federal law - specifically the National Environmental Policy Act (NEPA) requires that "Proposed Actions" - such as replacing the F-14 Tomcat with the much louder F18 Super Hornet require an Environmental Assessment (EA) to determine if there will be "significant impacts" on the human environment.

5. According to the Navy, the Super Hornet is as much as 27 decibels louder than the Tomcat*

* Final Environmental Impact Statement for the Introduction of the F/A-18E/F to the East Coast of the United States (Table 6-13, page 6-29)

6. A ten decibel increase is twice as loud. Twenty decibels is four times as loud.

7. 2003 Environmental Assessment (EA) This is the 232-page document about dredging and support facilities that the Navy claims addresses the question of the impacts of the Super Hornet on the community around Key West. However, although the dredging and support facilities are detailed, the Super Hornet is:

NOT MENTIONED in the Table of Contents

NOT MENTIONED in the "Proposed Actions"

NOT MENTIONED in the "Alternatives"

The Super Hornet is only discussed on three pages, with no mention of the greater loudness. Those three pages are curiously unrelated and unconnected to the rest of the document. It bears repeating - although the dredging and support facilities are discussed in detail, the Super Hornet is not mentioned elsewhere in the remaining 229 pages of the 2003 Environmental Assessment.

8. The 2003 Environmental Assessment which supposedly supports the AICUZ change has references to 160 documents*.

-- A study of the development of grunts and snappers of south east Florida, 419 pages.

-- Spatial patterns in conditions of feeding of juvenile weakfish in Delaware Bay.

-- Turbidity enhances feeding abilities of larval pacific herring.

-- The effects of suspensoids on fish.

-- Effects of light and turbidity on the reactive distance of bluegill.

-- Diving Patterns of two leatherback sea turtles during interesting intervals at Sandy Point, St. Croix, U.S. Virgin Islands.

The debilitating effects of the F-18 Super Hornet on our human population were not raised to the level of concern given to the grunt and snapper population in reference to the Key West Harbor dredging.

*chapter 6, 2003 EA Key West Harbor Dredging reference section

9. After an Environmental Assessment, if impacts are expected, the government agency (Navy) is required to produce an Environmental Impact Statement (EIS).

10. FONSI: The Navy issued a "Finding of No Significant Impact" letter on April 14, 2003, which the local Navy (and at least one level higher in Jacksonville) claims fulfilled their legal obligations to assess the impacts of the F18 Super Hornet on the community surrounding NAS Key West. And yet . . . Although the dredging and related subjects are detailed in the FONSI letter, the F18 E/F Super Hornet is NOT MENTIONED.

11. How is it possible . . .for the Navy to introduce a much louder airplane, flying more operations to have “No Significant Impact” and to have satisfied the National Environmental Policy Act when it is not mentioned in the 2003 Environmental Assessment Table of Contents, nor the “Proposed Actions,” nor the “Alternatives,” nor the FONSI letter?

12. Operational Navy Instructions OPNAVINST 5090.1C Under chapter 5-3.7 A FONSI. Navy procedures for implementing the National Environmental Policy Act are contained in *"A document in which the Navy briefly presents the reasons why an action not otherwise categorically excluded will not have a significant effect on the human environment and for which an EIS will not therefore be prepared. The FONSI shall include a brief summary of the proposed action and brief summary for the basis of the finding regarding any relevant issues, mitigation, and/ or regulatory concurrence used by the action proponent to make the finding."*

The 2003 Environmental Assessment which appears to have been done mainly for the Key West Harbor dredging project states on the second page after the cover sheet of the document.

13. The new 2007 AICUZ flight paths has encroached on a community that was not in the 1977 AICUZ.

Former Commander Jim Scholl... *"This change has a negative impact on air operations but was modified due to several factors including: the majority of operations are by tactical military aircraft capable of tighter turns; pilots using the airfield are experienced in tactical maneuvers; weather for Boca Chica Field provides for 97 percent VFR flight conditions; and the pattern could be managed through a modification of course rules, thorough flight briefings and aggressive air traffic control procedures. This flight path will likely change in the future when the next generation of tactical fighter jets is introduced."*

REALITY:

Capt Brown confirmed that the former NAS Key West Commander met with Monroe County Commissioners, County personnel, The Florida Keys Defense Alliance (David Paul Horan, a Key Haven resident and a member of the Key West City Manager's Screening Committee), real estate developers and others to discuss proposed AICUZ flight paths moved from Key Haven.

14. Jet Fuel Efficiency and Residual Pollution

At a meeting of citizens at Harbor Shores Condominiums, located in South Stock Island, Navy Capt. Dewalt, (Top Gun trainer), Capt Mike Giardino, (Executive Officer at NAS Key West) and Jim Brooks (Public Affairs Officer) was asked the following question. “What is the percentage of efficiency regarding jet fuel consumption by the F18 Super Hornet?” Their answer... 95% -100%.

REALITY:

*"Jet engine efficiency calculation is very complicated and depends on a lot of things such as the speed, altitude, and temperature of the air. In general, efficiency is better at high altitudes, and high speeds. Also there are many kinds of efficiency: propulsive, heat, fuel, etc. For details on how all this is calculated try this Chapter from a book at NASA or this page from a report by the Intergovernmental Panel on Climate Change, especially figure 7.12 which shows how engines have improved over time, and how the Boeing GE90-115B engine is the most efficient one in common usage today with efficiencies of about 37%."**

*John Jones, Mechanical, Aeronautical and Automotive Engineering, Engineering Science Professor, Simon Fraser University, B.Sc. University of Sussex, Falmer, Sussex, 1974, Ph.D. University of Reading, Reading, Berkshire, 1983.

In conclusion, I leave you with a familiar guideline -- “To protect the public health, safety, and welfare of the citizens of the Florida Keys and maintain the Florida Keys as a unique Florida resource.”

Respectfully Yours,



Paul S. Caruso
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