

FY 2014 Supplemental Environmental Impact Statement for Introduction of P-8A Aircraft into the U.S. Navy Environmental Planning Team Narrative

Introduction

U.S. Fleet Forces Command (USFF) nominates the Navy team responsible for preparation of the Supplemental Environmental Impact Statement (SEIS) for the Introduction of the P-8A Aircraft into the U.S. Navy (aka P-8A SEIS) for the FY14 CNO Environmental Planning Team Award. The P-8A SEIS Environmental Planning Team was led by USFF, involved a large number of Navy stakeholder commands and was comprised of more than 65 individual team members and subject matter experts.

The team prepared the P-8A SEIS to evaluate changes to the home basing alternatives and analysis contained in the 2008 *Final EIS for Introduction of the P-8A Multi-Mission Maritime Aircraft (MMA) into the U.S. Navy Fleet*. The purpose of the P-8A SEIS was to supplement the home basing alternatives and analysis contained in the 2008 Final EIS in light of new conditions and information. Circumstances and conditions that underwent significant change since the 2008 Record of Decision (ROD) were reexamined to better inform Navy decision-makers and the public about the environmental effects of dual-siting P-8A squadrons (vice the original plan for triple siting) as a cost savings measure while still meeting current strategic operational objectives and timelines.

In accordance with the 2008 ROD, the transition from legacy P-3C squadrons to P-8A began at NAS Jacksonville in 2012. The P-8A is the congressionally approved, new acquisition program to replace the Navy's aging P-3C maritime patrol and surveillance aircraft. Typically, a SEIS takes 24-36 months or longer to prepare. The P-8A SEIS was completed in 17-months. The P-8A SEIS project began with the publication of the Notice of Intent to prepare a Supplemental EIS on 15 November 2012. The Notice of Availability of the P-8A Final SEIS was published on 25 April 2014. After the 30-day wait period and public comments on the Final EIS were addressed, PDASN(EI&E) signed the ROD on 3 June 2014, and published it in the Federal Register on 11 June 2014.

The P-8A SEIS was prepared in compliance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321 *et seq.*); the Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Parts 1500-1508); and Department of the Navy Procedures for Implementing NEPA (32 Code of Federal Regulations 775). Furthermore, the P-8A SEIS supported the goals and initiatives for home basing P-8A squadrons in accordance with the 2014 Quadrennial Defense Review, 2014 CNO's Strategic Laydown Plan and 14-2 Naval Air Force's Master Aviation Plan. The P-8A SEIS and signed ROD are integral to implementing the Navy's long term aviation vision that will support Fleet operations for years to come.

Background

The Navy's mission is to organize, train, equip, and maintain combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas. U.S. Fleet Forces and U.S. Pacific Fleet (CPF) fulfill this responsibility by establishing naval forces and forward

presence, executing training programs and ensuring naval forces have access to ranges, operating areas, and airspace needed to develop and maintain critical operational skills. The Navy's acquisition community builds and tests next generation aircraft to maintain military operational readiness using latest technological advances and to address future global threats. While meeting this operational mission, the Navy is also required to comply with applicable laws and regulations associated with environmental planning and protection, including NEPA, Clean Air Act, and the Coastal Zone Management Act.

In May 2014, USFF prepared the *Supplemental Environmental Impact Statement (SEIS) for the Introduction of the P-8A Multi-Mission Maritime Aircraft into the U.S. Navy Fleet*. The purpose of the proposed action was to provide facilities and functions to support home basing the P-8A at two established maritime patrol home bases. This P-8A SEIS supplemented the 2008 Final Environmental Impact Statement (2008 Final EIS) with additional alternatives to provide facilities and functions associated with the proposed home basing action, changes to circumstances at the home base locations, and the latest P-8A project information.

Previously, the Navy completed the 2008 Final EIS to evaluate the environmental impacts of home basing P-8A squadrons at three established maritime patrol home bases. The Assistant Secretary of the Navy for Energy, Installations, and Environment (ASN(EI&E)) reviewed the 2008 Final EIS, and after carefully weighing the operational, social, and environmental impacts of the proposed action, determined the Navy would home base P-8A squadrons at three locations (NAS Jacksonville, NAS Whidbey Island and MCB Hawaii Kaneohe Bay) with periodic squadron detachments at NB Coronado, California. A notice of the 2008 ROD was published in the *Federal Register* on January 2, 2009. The transition of legacy P-3C patrol squadrons to new P-8A squadrons began at NAS Jacksonville in 2012.

Since the 2008 ROD, the Navy determined that home basing P-8A squadrons at two locations, rather than three locations, could provide potential cost savings while still meeting current strategic operational objectives and timelines. Consistent with the guidance provided in 40 CFR 1502.9, the purpose of this P-8A SEIS was to supplement the basing alternatives and analysis contained in the 2008 Final EIS in light of current conditions and new information. Circumstances, conditions, and information that had undergone significant change since the 2008 ROD were reexamined. The P-8A SEIS considered home basing P-8A aircraft at two locations in order to meet the current requirements of the Navy, maximize the efficiency of support facilities and simulation devices, and optimize the number of personnel required. Accordingly, the process for developing home basing alternatives sought to ensure the efficient and economical transition to the P-8A at two locations. The P-8A SEIS assessed the potential environmental effects of home basing P-8A aircraft, the related changes in aircraft operations and personnel, and facility modifications and construction requirements identified since the 2008 ROD. By supplementing the 2008 Final EIS, this P-8A SEIS advanced NEPA's purpose of informing Navy decision makers and the public about the environmental effects of the proposed action to home base P-8A squadrons.

The environmental analysis in the P-8A SEIS focused on: aircraft replacement and transition, facility and infrastructure requirements, personnel requirements, and aircraft operations in the airfield environment of NAS Jacksonville and NAS Whidbey Island, operational detachments at

NB Coronado and MCB Hawaii Kaneohe Bay, and Special Use Airspace within the vicinity of each installation. The P-8A SEIS evaluated the direct, indirect, and cumulative effects of the proposed action on airspace and airfield operations, noise, air quality, land use, socioeconomics, transportation, topography and soils, water resources and wetlands, biological resources, cultural resources, hazardous materials and waste, and safety.

Organization and Collaboration of Navy Stakeholder Commands

The P-8A SEIS Environmental Planning Team was led by USFF N46 as action proponent and involved 16 additional Navy stakeholder commands. The team was comprised of more than 65 individual team members and subject matter experts, who worked in collaboration with ASN(EI&E), OPNAV N45 and OPNAV N98 staffs. Navy stakeholder commands included:

- U.S. Fleet Forces, action proponent
- U.S. Pacific Fleet
- Naval Air Forces (CNAF)
- Patrol and Reconnaissance Wing 10 (CPRW 10, NAS Whidbey Island)
- Patrol and Reconnaissance Wing 11 (CPRW 11, NAS Jacksonville)
- Navy Patrol and Reconnaissance Group (CPRG)
- NAS Jacksonville
- NAS Whidbey Island
- NB Coronado
- MCB Hawaii Kaneohe Bay
- Headquarters, Marine Corps (Aviation, Land Use and Installations)
- Navy Installations Command (CNIC)
- Navy Region Southeast (CNRSE)
- Navy Region Northwest (CNRNW)
- Navy Region Southwest (CNRSW)
- Naval Facilities Engineering Command Atlantic (NAVFAC LANT)
- NAVAIR Aircraft Environmental Support Office (AESO)

USFF is the unified voice for all naval forces and training requirements and is responsible for organizing, manning, equipping, and training Navy units to conduct combat operations. USFF oversees all operational unit level and integrated/coordinated training for Commander Task Force 80 (CTF 80) and is responsible for environmental planning and NEPA documentation for CONUS home basing actions and Atlantic training ranges. Similarly, CPF oversees all unit level and integrated training for Third Fleet, Seventh Fleet and subordinate commands (such as CNAF and CPRW Pacific), and is responsible for environmental planning and NEPA documentation for Pacific training ranges.

Due to the complexity of the project and the need to balance the roles, responsibilities and command equities of all Navy stakeholder commands, extraordinary measures were necessary to manage the project and to meet an aggressive 17-month schedule. There was continuous coordination by USFF N46 and 16 additional Navy stakeholder commands to identify and define operational requirements and shore infrastructure needs, brief and discuss range of alternatives,

prepare and review special studies, analyze potential environmental impacts in 11 resource areas, evaluate the cumulative impacts of related actions in 4 regions, ensure Navy leadership was fully aware of all the proceedings prior to any press coverage, and brief the operation and shore infrastructure chains of command for document endorsement prior to forwarding P-8A SEIS to Echelon I. Furthermore, USFF coordinated with other DON action proponents to ensure P-8A training requirements were adequately addressed in various training range complex NEPA documents under the Tactical Training Theater Assessment and Planning (TAP) program. To promote transparency by informing the public about all aspects of the P-8A mission, the P-8A SEIS included an appendix outlining the P-8A training occurring in existing military training ranges and at-sea operational areas analyzed in three TAP Phase II projects (specifically, the Atlantic Fleet Training and Testing EIS/OES, the Northwest Training and Testing EIS/OEIS and the Hawaii-Southern California Training and Testing EIS/OEIS and the seven previous TAP Phase I EISs.

Program Management Approach

The scope of P-8A SEIS and the complexity of the issues required expertise in a wide range of subject matters, including airfield operations, noise analysis, environmental planning and compliance, natural resources, and program management. Core team members representing all Navy stakeholder commands are listed in Table 1. The P-8A SEIS Environmental Planning Team developed an approach that was built around the following core principles:

- Establish and maintain a project team, aligned with roles and responsibilities of USFF and 16 additional Navy stakeholder commands and the information needs of command leadership
- Achieve clarity on proposed action related to operational and training requirements, and update environmental impact analyses as P-8A program of record changed (different maintenance strategy, increased size of squadron in aircraft and personnel) and with lessons-learned from actual stand-up of P-8A squadrons
- Use a consistent QA/QC approach which included EIS endorsement by all Navy stakeholder commands to prepare a defensible NEPA document to withstand technical, regulatory review and met the standards for legal sufficiency

Name	Title/Position/Organization	Discipline
Lisa Padgett	USFF NEPA Home Basing Program Manager	Environmental Engineering
Rick Keys	USFF Operational Shore Readiness	Operational and Facility Planning
Ted Brown	USFF Environmental Public Affairs Officer	Public Affairs
CDR Mike Maule	USFF Environmental Counsel	Environmental Law
Cory Zahm	NAVFACLANT EIS Project Manager (Lead)	Environmental Planning, Cumulative Impacts
Sarah Stallings	NAVFACLANT EIS Project Manager (Deputy)	Environmental Planning, Team Coordination, NEPA Endorsement
Bonnie Curtiss	NAVFACLANT Noise and Encroachment	Noise Modeling, Noise Science
Amberly Hall	NAVFACLANT Environmental Counsel	Legal Consistency
Dan Duquette	CPRG	Training Requirements, Facility Requirements

Brock Durig	CNRSE	Environmental Consistency Review, NEPA Endorsement
Tim Curtin	NAS Jacksonville Environmental Planner	Land Use, Socioeconomics, Transportation
Miriam Gallet	NAS Jacksonville Public Affairs	Public Outreach
Matt Schellhorn	NAS Jacksonville Airfield Operations	Airfield Operations, Airspace and Range Usage
George Hart	CNRNW	Natural Resources, Consultation
Brian Tyhuis	NAS Whidbey Island Public Works	Utilities and Infrastructure
Jackie Queen	NAS Whidbey Island Environmental Planner	Natural Resource, Cultural Resources, Land Use
Mike Welding	NAS Whidbey Island Public Affairs	Public Outreach
Bill MacMillan	NAS Whidbey Island Airfield Operations	Airfield Operations
Christopher Stathos	CNRSW Regional Environmental Coordinator (Lead)	Environmental Consistency Review, NEPA Endorsement
Ecology & Environment	Consulting Firm	NEPA document preparation
Wyle Laboratories	Consulting Firm	Noise Modeling and Analysis
ATAC	Consulting Firm	Airspace Usage and Modeling

Environmental Planning Goals

The objectives laid out for the P-8A SEIS Environmental Planning Team were ambitious:

- Produce high quality environmental planning documents and obtain a ROD in May 2014 to meet operational timelines for FY14 military construction and FY16 aircraft delivery at NAS Whidbey Island.
- Support environmental analyses with the best available science and special studies to evaluate the potential environmental effects of aircraft operations, training, military construction, air quality and socioeconomic impacts of home basing P-8A aircraft, military personnel and their families.

Outstanding Efforts

- *The P-8A SEIS was very complex which required a higher degree of planning.*
 - a. Supplemental analysis is often more difficult to prepare. Supplemental analyses require considerable planning and forethought to explain the changes and to determine if the proposed action has substantially changed or whether new circumstances or information relevant to environmental concerns require another look. The action proponent must determine if existing EIS should be supplemented in a meaningful way or if a new EIS should be prepared. After careful review, the NEPA team determined that the proposed action was essentially the same as that described in 2008 Final EIS, which was to provide facilities and functions to support home basing of the P-8A at established maritime patrol home bases and to replace retiring P-3C aircraft. Furthermore, the NEPA team determined the need to supplement the basing alternatives in light of new conditions and information:
 - i. new aircraft maintenance concept;
 - ii. increase number of authorized aircraft per squadron from 6 to 7 aircraft;
 - iii. increased used of training simulators with corresponding decrease in the amount of in-flight, in air operational training requirements;

- iv. changes in other aircraft programs (retention of expeditionary VAQ squadrons, disestablishment of VQ and VPU squadrons); and,
 - v. Additional facility requirements at NAS Whidbey Island.
- b. Implication of a phased transition plan and the definition of baseline conditions. The definition of baseline was complicated by the phased implementation plan to replace retiring P-3C aircraft with new P-8A aircraft. The aircraft transitions, which occur in different years, in different geographical locations and under different local conditions, made it difficult to define a single baseline year. Typically, SEIS baselines are established using the date of the past ROD, the current year or at a point in time just before the project is undertaken. However, the P-8A transition was already underway at NAS Jacksonville while status quo conditions with P-3C aircraft remained at the other locations. As a result of the phased transition, the definition of the baseline year had the potential to create false socioeconomic effects with regards to military construction and salaries. Therefore, the team defined the baseline as the existing conditions present at the time a new home basing decision is made, which was expected to be April 2014. As such, the baseline year for the SEIS analysis was defined as 2014 and comparisons between the baseline year and the end state of the proposed action implemented under each alternative and in each location could be explained and easily understood.
- i. Baseline conditions at NAS Jacksonville account for squadron transitions that had already occurred in accordance with the 2008 ROD. At NAS Jacksonville, by April 2014 four of six squadrons had transitioned from P-3C to P-8A, and the Fleet Replacement Squadron (FRS) will be a combination of P-3C and P-8A aircraft. The baseline number of aircraft, personnel, and air operations for NAS Jacksonville reflected the P-8A transition through April 2014.
 - ii. No P-8A transitions or related facility improvements had occurred or were planned to occur at NAS Whidbey Island or MCB Hawaii Kaneohe Bay by 2014. P-3C aircraft were present at NAS Whidbey Island and MCB Hawaii Kaneohe Bay in 2014 and were considered in the baseline conditions. Therefore, for the purposes of this analysis, the baseline condition for NAS Whidbey Island and MCB Hawaii Kaneohe Bay were considered zero for P-8A squadrons.
- *Maintained an aggressive 17-month project schedule.* The typical SEIS requires 24-36 months to complete. The P-8A SEIS Environmental Planning Team carefully managed project tasks, streamlined processes with parallel efforts and monitoring schedule on a weekly basis to accomplish an aggressive 17-month project schedule. Furthermore, the team overcame impacts of administrative furloughs while finalizing the Draft P-8A SEIS and a 2-month schedule delay when Draft P-8A SEIS public meetings were rescheduled and public comment period extended as unintended consequences of the government shutdowns.
 - *Received highest possible rating based on US EPA Review.* US EPA provides independent review of draft EISs and uses a document rating system which provides a basis upon which EPA makes recommendations to the lead agency for improving the Draft EIS, if required. The rating system considers (1) potential environmental impact of the proposed action and effects of mitigation measures, and (2) adequacy of the environmental analysis. P-8A Draft

SEIS received a rating of “LO” (Lack of Objections) and “Adequate”, the highest possible rating in each category. US EPA determined that the P-8A Draft SEIS adequately set forth the environmental impacts of the proposed action, mitigation measures were appropriately applied and that no further analysis or data collection was necessary.

- *Directly supported Naval Aviation Program to home base P-8A squadrons and to realize actual cost savings to achieve fiscal budget requirements.* P-8A SEIS supported the goals and initiatives for home basing P-8A squadrons in accordance with the 2014 Quadrennial Defense Review, 2014 CNO’s Strategic Laydown Plan and 14-2 Naval Air Force’s Master Aviation Plan. The 2014 ROD enabled the elimination of a third home base site for the P-8A resulting in a cost avoidance of over \$100M in infrastructure and equipment costs while meeting operational needs and reducing environmental impacts. Modification of existing facilities at NAS Whidbey Island cost far less than the estimated \$172M required to construct a new hangar at MCB Hawaii Kaneohe Bay. Additionally, fewer aircraft simulators were needed to support the two home base option.
- *Ensured Chain of Command alignment through life of project.* Throughout the life of the project, USFF and 16 additional Navy stakeholder commands collaborated in the development of the P-8A SEIS and all supporting studies, addressed command equities and information needs of command leadership, met project schedule milestones, and briefed the chain of command for document endorsement.

Accomplishments

P-8A SEIS Environmental Planning Team achieved all its objectives, prepared a high quality, defensible NEPA document which received the highest possible ratings from US EPA, and met 17-month aggressive project schedule to support operational timelines for construction and aircraft arrival. Furthermore, the collaboration of all Navy stakeholder commands ensured that all command equities to home base twelve P-8A fleet squadrons and one P-8A training squadron were met; that P-8A training requirements were adequately addressed in various training range complex NEPA documents; and, that the Naval Aviation Enterprise was poised to support mission requirements for years to come.