



**FINAL
SUPPLEMENTAL ENVIRONMENTAL
IMPACT STATEMENT**



**DISPOSAL OF PORTIONS OF THE FORMER
HOMESTEAD AIR FORCE BASE, FLORIDA**

DECEMBER 2000



VOLUME IV: RESPONSES TO COMMENTS

IN THIS VOLUME

Volume IV contains responses to the comments contained in Volume III. This volume includes an Introduction, Responses to Comments, and a Response Index.

The **Introduction** explains the contents of this volume.

The **Responses to Comments** section contains summaries of the comments and responses to each summary comment. The summary comments and responses are grouped into the following 25 topics:

- | | |
|---|--|
| 1. General | 14. Earth Resources |
| 2. SEIS Process | 15. Water Resources |
| 3. Purpose and Need | 16. Biological Resources |
| 4. Alternatives | 17. Cultural Resources |
| 5. Content and Methodology | 18. Minority and Low-Income Populations |
| 6. Socioeconomics | 19. Department of Transportation Act
Section 4(f) Lands |
| 7. Transportation | 20. Secondary Development |
| 8. Utilities | 21. Buffer Area |
| 9. Airspace and Safety | 22. Mitigation Measures |
| 10. Noise | 23. Cumulative Impacts |
| 11. Land Use and Aesthetics | 24. South Florida Ecosystem Restoration |
| 12. Hazardous Materials and Waste
and Petroleum Products | 25. Base Realignment Process and Property
Disposal |
| 13. Air Quality | |

Some of the topics are further divided into subtopics. Each individual summary comment and response has a unique identification number.

The **Response Index** lists commentors, first, alphabetically by last name and, second, alphabetically by organization. Responses that pertain to specific comments can be found using the following steps:

1. In the Response Index, find the commentor's last name in the **Individuals** index or the organization in the **Organizations** index.
2. Next to the name/organization is a column of "Relevant Response Number(s)." These refer to the topics and numbers in the Responses to Comments section. The column contains the numbers of all responses that appear to be relevant to that individual's or organization's comments. In some cases, the numbers refer to an entire topic, and in other cases to a specific response.
3. The last column of the Response Index lists the page number(s) where the actual comment(s) can be found in **Volume III**.

**FINAL
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Volume IV: Responses to Comments



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INTRODUCTION

This volume contains responses to the comments submitted during the public review and comment period for the *Draft Supplemental Environmental Impact Statement (SEIS), Disposal of Portions of the Former Homestead Air Force Base (AFB), Florida* that raised questions or issues related to the analysis reported in the Draft SEIS. Many of the comments are similar to one another or address related topics. The Responses to Comments section therefore summarizes and groups them for response. These summarized comments and their responses are grouped into the following subject matter categories:

- | | |
|---|--|
| 1. General | 14. Earth Resources |
| 2. SEIS Process | 15. Water Resources |
| 3. Purpose and Need | 16. Biological Resources |
| 4. Alternatives | 17. Cultural Resources |
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Lands |
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| 12. Hazardous Materials and Waste and
Petroleum Products | 25. Base Realignment Process and Property Disposal |
| 13. Air Quality | |

Some of the categories are further divided into specific topics. Within each topic, there may be several comments that are summarized and given a response.

At the back of this volume is a Response Index with two listings. The first lists individuals whose comments are presented in Volume III, alphabetically by last name. The second is a listing of those comments and letters alphabetically by organization, when one was given. The column next to each name and/or organization identifies topic areas (e.g., Alternatives, Noise, Water Resources), each of which is followed by a set of numbers. These topics and numbers refer to the summary comments and responses contained in the Responses to Comments section of this volume. Readers may refer to the corresponding numbers in that section to find responses related to their comments. In some cases, commentors are referred to overall topic areas, if their comments were general in nature. In other cases, commentors made specific comments and are referred to specific responses.

The last column of the index lists one or more page numbers. These are the pages in Volume III where the actual comment(s) can be found.

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RESPONSES TO COMMENTS



RESPONSES TO COMMENTS

1.0 GENERAL

This category addresses general comments about the Draft SEIS. General topics include the distribution of the Draft SEIS, general views on the document, and general comments concerning the significance and acceptability of the impacts.

Many commentors expressed an opinion about the proposed commercial airport or another alternative. About 5,000 commentors and petition signers expressed support for the development of former Homestead AFB as a commercial airport, and almost 10,000 commentors and petition signers expressed opposition to the commercial airport. In some cases, the commentors gave general reasons for their conclusions. The most common reasons included economic benefits, noise, impacts on Biscayne and Everglades National Parks, and increased growth and congestion. Several commentors were concerned about how the commercial airport would be developed or managed by Miami-Dade County. Unless the comments contained specific points or questions, no specific response is provided. However, the Air Force and Federal Aviation Administration (FAA) appreciate all inputs, and these views will be taken into consideration in the decision making.

Some commentors made vague comments or criticisms about the analysis in the Draft SEIS. In general, it is difficult to respond to vague comments or criticisms, so responses are limited to specific issues that could be addressed. A number of commentors pointed out factual errors, errors in word choice, or made editorial comments on the Draft SEIS. Rather than address them individually, those comments have been used to correct the errors for the Final SEIS. Specific comments that assisted in improving the document have been incorporated in the Final SEIS.

1.1 Distribution of the Draft SEIS

Comments concerning the distribution of the Draft SEIS ranged from confusion about when and how the Draft SEIS was distributed for public review, to comments on the form and availability of the document.

1.1.1 Comment: A few commentors thought the Draft SEIS was released in February when the public hearings were held.

Response: The Draft SEIS was distributed for public review on December 29, 1999, and the Notice of Availability that officially started the 60 day public review and comment period was published on January 7, 2000. Copies of the Draft SEIS Summary were made available at the public hearings in February, but it was actually released in December.

1.1.2 Comment: Distribution of the Draft SEIS to the community and to public libraries was inadequate.

Response: The Air Force and FAA made every effort to ensure the Draft SEIS was available to the affected public. About 700 copies of the Draft SEIS and 1,500 copies of the Summary were distributed. Copies were sent to 12 libraries in the region, listed in Volume I, Section 1.5.2, of the Final SEIS. In addition, a toll-free telephone number was available for people to request copies of the documents.

RESPONSES TO COMMENTS

1.1.3 *Comment:* The CD of the Draft SEIS was not usable on some Macintosh computers.

Response: The Draft SEIS was offered in printed form and provided to anyone who requested it. In addition, copies of the Draft SEIS were available in several libraries. The CD was provided as a convenience to reviewers and was compatible with most computers, but for people who could not use the CD, including people who do not own a computer, other options were readily available.

1.1.4 *Comment:* Distribution of the Technical Appendix on Noise was inadequate.

Response: The results of the noise analysis were extensively reported in the Draft SEIS. Sections 3.5 and 4.5 of the document devoted over 90 pages to reporting the main findings, and a 109-page Noise appendix was included. The Technical Memorandum on Noise was one of many source documents used in the analysis, all of which are listed in the SEIS References (Chapter 5). Copies of the Technical Memorandum were sent to all the libraries that received copies of the Draft SEIS.

1.2 General Comments on the Draft SEIS

1.2.1 *Comment:* Some commentors had general criticisms about the adequacy of the analysis in the Draft SEIS or about a particular topic or resource area, but did not specify why they felt it was inadequate or suggest what needed to be added. As an example, numerous letters were received indicating that the Draft SEIS “underestimates the noise pollution and urban sprawl” the proposed commercial airport would cause.

Response: The Air Force and FAA put a lot of effort into ensuring the SEIS adequately addressed all environmental issues of importance for making a decision about the disposal of property at former Homestead AFB. The SEIS addresses relevant environmental issues that were identified as areas of concern in scoping, or that were identified in the course of conducting the analysis. Specific comments on the Draft SEIS that assist in improving the thoroughness and accuracy of the document have been incorporated in the Final SEIS. Criticisms that did not identify specific omissions or errors were too vague to be useful in improving the document. Specific comments on noise are addressed in category 10.0, and secondary development is addressed in category 20.0 below.

1.2.2 *Comment:* The Draft SEIS presents inaccuracies in relation to topographic elevations of the former base and adjacent areas of proposed development, groundwater issues, wetlands, geology of the site, and rainwater flows in relation to catchment areas.

Response: This comment does not provide a specific enough description of the alleged errors to enable them to be corrected. The information in the SEIS was reviewed, and no discrepancies were found.

1.2.3 *Comment:* The Draft SEIS does not adequately depict the impact of a commercial airport on traffic, crime, or the quality of schools in the area.

Response: The SEIS contains an analysis of socioeconomic impacts, including community services, in Section 4.1 and addresses traffic issues in Section 4.2 of Volume I.

1.2.4 *Comment:* The Draft SEIS does not describe the damaging impact of a major airport on the national parks.

Response: Nearly all the impact sections in the SEIS discuss impacts on the national parks. In particular, impacts on the national parks and their resources are discussed in depth in the Noise, Land Use and

Aesthetics, Water Resources, and Biological Resources sections, and a major portion of the summary of impacts in Section 2.9 and the Summary is devoted to the national parks.

1.3 Comments on the Significance/Acceptability of Impacts

Several commentors had observations about the “significance” or “acceptability” of the impacts reported in the Draft SEIS. The Draft SEIS did not use those terms. The focus of the analysis has been to present qualitative and quantitative information that could be used by reviewers to arrive at their own conclusions concerning the importance of the reported impacts. Because significance and acceptability are subjective personal views, readers of the Draft SEIS were able to interpret the reported impacts according to their own priorities and values. The Air Force and FAA respect those individual personal views. They are not individually responded to (unless they contained errors of fact or misinterpretations of the Draft SEIS findings), but the Air Force thanks all commentors for their participation in the process.

1.3.1 Comment: The Draft SEIS states the proposed commercial airport will not have “any significant impact on our natural parks and/or their surroundings” or “will not cause significant noise or water pollution.”

Response: The Draft SEIS provided information and quantitative data and did not make statements about whether impacts were “significant.” Readers may reach their own conclusions about the significance of the impacts reported.

1.3.2 Comment: The environmental analysis in the 1994 Final EIS and Record of Decision have been validated and confirmed in the Draft SEIS.

Response: The Draft SEIS did not make any findings worded in this way.

1.3.3 Comment: The Draft SEIS did not find adverse impacts from the proposed commercial airport or find the proposed airport to be unacceptable.

Response: The purpose of the SEIS is to describe the environmental impacts that could be associated with each of the alternatives examined. It does not address the acceptability of the alternatives. When adverse impacts are identified, the SEIS describes potential mitigation measures that may be able to reduce the impact.

1.3.4 Comment: The Draft SEIS discounted the adverse impacts of the proposed commercial airport by claiming that they are acceptable because the surrounding areas are already exposed to aircraft operations and noise.

Response: The SEIS compares projected conditions under each of the alternatives (including No Action) with existing conditions in the region of influence. It does not imply that the changes are or are not acceptable. That conclusion is left to the reader.

2.0 SEIS PROCESS

This category addresses general comments on the SEIS’ compliance with the National Environmental Policy Act (NEPA) and the NEPA process. It specifically discusses the decision to prepare the SEIS. It addresses comments on the public review of the Draft SEIS and the public hearings held in February 2000. This section also addresses comments on the objectivity of the SEIS.

2.1 Compliance with NEPA Requirements

This category focuses on general NEPA compliance or process issues raised in the public comments. A number of commentors made specific statements about the Proposed Action and alternatives or the treatment of a particular subject matter or resource in the context of NEPA compliance. Those comments are addressed in the relevant topical categories (for example, comments on the Proposed Action and alternatives are addressed in category 4.0) rather than here.

2.1.1 Comment: The fact that there was no environmental impact study done before making plans for the commercial use of the land is a violation of the law.

Response: Two environmental impact statements were prepared to address the proposal for a commercial airport at former Homestead AFB, along with alternative reuse plans. The first was completed in 1994. The second is this SEIS, which was initiated in February 1998, with a Draft SEIS published in December 1999, and culminating in this Final SEIS.

2.1.2 Comment: In response to pressure by the Council on Environmental Quality and environmental groups, the Air Force began planning in December 1997 to initiate an SEIS process, which has further delayed the transfer of former Homestead AFB.

Response: The decision to prepare an SEIS was made as a result of a review of the 1994 EIS that was begun by the Air Force and the FAA in the spring of 1997. Also participating in the review were the Department of the Interior, Department of Justice, U.S. Environmental Protection Agency, and the Council on Environmental Quality. The purpose of the review was to determine whether the 1994 EIS adequately addressed the issues associated with proposed transfer and development of facilities for a one-runway civil airport. After considering fully a contractor's draft report, the Air Force and FAA concluded that the potential environmental issues needed to be addressed further. The decision to prepare an SEIS was made by the Air Force and the FAA, and it was announced December 1997.

2.1.3 Comment: An SEIS was required because the first EIS was inadequate and did not conform to the law.

Response: The Air Force and the FAA did not decide to prepare a supplemental EIS because the 1994 EIS did not conform to the law, or because any particular group or agency requested it. Rather, elements of Miami-Dade County's proposal had changed, as had other conditions since the original EIS was prepared. In 1997 the Air Force and FAA undertook a review of the 1994 EIS to determine whether it remained adequate to support the then-current proposal. The primary focus of the review was on the potential consequences of new circumstances arising since publication of the 1994 EIS. Based on the initial draft results of the review, and consultations undertaken with other federal agencies, the Air Force and the FAA decided that an SEIS was required.

2.1.4 Comment: According to Council on Environmental Quality (CEQ) regulations, an SEIS is to be prepared only if "...the agency makes substantial changes in the proposed action that are relevant to environmental concerns; or [t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." An SEIS is to be prepared without a scoping process or the addition of new alternatives. The SEIS is to begin where the original EIS ended. It is not intended to be an opportunity for a new EIS process whereby new alternatives are considered. Moreover, any new alternatives, if permissible at all, must be added during the scoping process, following a formal public hearing and opportunity to comment, not through some secret process midway through the formal NEPA procedures. Otherwise, the public is denied notice of the SEIS' proposed content and is denied an opportunity to comment.

Response: The preparation of an SEIS is not necessarily limited to the circumstances quoted in the comment. The CEQ regulations provide that agencies “[m]ay also prepare supplements when the agency determines that the purposes of the Act will be furthered by doing so.” In other words, although the decision to prepare an SEIS is mandated in some circumstances, it is also something that an agency may choose to do.

In 1997, the Air Force and the FAA undertook a review of the 1994 EIS to determine whether it remained adequate to support the then-current proposal. The primary focus of the work was on the potential consequences of new circumstances arising since publication of the 1994 EIS. Based on the initial draft results of the review, and consultations undertaken with other federal agencies, the Air Force and the FAA decided that an SEIS was required.

The results of the review and the reasons for that decision were explained in December 1997 when the decision to prepare the SEIS was announced. As was explained at the time, the Air Force and FAA believed, based upon the information then available, that an SEIS was required. But even if that judgment had been incorrect, the decision to prepare an SEIS would not have been an abuse of discretion. The Homestead SEIS has facilitated valuable community debate, has reexamined environmental issues in greater detail than was done before, and has evaluated newly developed reasonable alternatives that did not exist at the time of the 1994 EIS. The purposes of NEPA have been furthered by preparation of this document.

Next, there is no prohibition on conducting a scoping process for an SEIS. The CEQ regulations do not require one in the case of an SEIS, but neither do they prohibit it.

The scoping process was conducted from February 27 through July 10, 1998. The complaints now being made about it are being made almost two years after the fact. At the time, no one suggested that scoping was unlawful or even undesirable. The time taken to accomplish scoping was not a substantial portion of the time to prepare the Draft SEIS, particularly in light of the fact that scoping was performed concurrently with initial data gathering and other preparatory work. In the opinion of the Air Force and FAA, scoping was a valuable use of time. Preparing for scoping and listening to the comments provided during it was an important education about the issues, concerns, and complexities that should be addressed in the SEIS.

Similarly, there is nothing improper about including new reasonable alternatives in an SEIS. The claim that an SEIS is limited to the alternatives and issues analyzed in the previous document(s) has no basis in the regulations or case law. Indeed, a new reasonable alternative is just the kind of “significant new circumstance” that can require an SEIS. This particular SEIS may have been begun for different reasons, but addressing the additional alternatives that arose during its preparation was both lawful and prudent.

The claim that alternatives can be added only during scoping is also incorrect. This claim is coupled with the notion that alternatives can be included only after a formal public hearing and an opportunity to comment. However, scoping is a flexible process, and nothing in NEPA or the CEQ regulations impose such constraints. Although the goal of scoping is public input into an early determination of the scope of the issues to be addressed, those decisions can be changed later as needed to produce an adequate environmental analysis. Indeed, the CEQ regulations may require federal agencies to revise their determination if substantial changes are made later in the proposed action, or if significant new circumstances or information arise. The scoping process is merely a means to an end. It is a tool for preparing the SEIS, not a contract.

Finally, the allegations of a secret process and the absence of public opportunity to comment completely lacks merit. The December 1997 press release announcing the beginning of the SEIS process stated that

the SEIS would “comprehensively” address potential environmental impacts. (The accompanying explanation of the Homestead EIS Review Process also stated that the SEIS would address “all” potential impacts, and that the approach would be “comprehensive.”) The press release announced further that there would be “extensive consultation with government agencies and the public on the scope of the SEIS,” and that written input would be welcome “at any time.”

During the eight public scoping meetings held in April and June 1998, the presentation made by the Air Force stated that the SEIS analysis would be a detailed study that comprehensively addresses the environmental impacts of the proposed transfer. It also stated that the SEIS would analyze any reasonably alternatives that a property transfer might lead to, and it solicited input from the public on alternatives that should be examined. The presentation gave specific examples of alternatives that had been suggested to the Air Force and stated that other alternatives identified during the scoping process would be considered for possible inclusion and analysis in the SEIS.

The Air Force also periodically published a Homestead SEIS Newsletter and distributed it to the public. Six of these have now been published. The focus of the one distributed in February 1999 was on the alternatives being analyzed in the SEIS. The newsletter stated that the SEIS would examine both a Commercial Spaceport alternative and a Mixed Use alternative, neither of which had been analyzed previously in the 1994 EIS.

Thus, the allegation of a secret process is simply not correct in the face of numerous federal statements about a comprehensive environmental analysis, the public solicitation of additional disposal alternatives, and public identification (almost a year before the Draft SEIS was available) of new alternatives that would be included in it.

Moreover, these matters were reported in the press. Later in 1999, after the Air Force had evaluated the Collier and Hoover proposals and public interest in them had increased, the Air Force answered inquiries from county officials, congressional offices, and journalists by stating that the Collier and Hoover proposals would be analyzed in the Draft SEIS as part of the analysis of the Mixed Use alternative. Descriptions and discussion of the Collier and Hoover proposals appeared in stories, columns, and editorials in the *Miami Herald*, such as those on April 11, 14, and 15, 1999, and on October 8, 1999. The issue of the *Miami New Times* dated October 7–13, 1999, ran a lengthy story about the proposals and reported that the Draft SEIS would include an analysis of the Collier and Hoover proposals. These matters were not secret, were reported openly, and should not have been a surprise to anyone monitoring the process.

2.1.5 Comment: The consideration of new alternatives violates NEPA. It also offends the due process rights and threatens the civil and equal protection rights of the members of the Equal Justice Coalition. It also is inconsistent with the base realignment and closure process.

Response: The Air Force and the FAA disagree. The consideration of newly developed reasonable alternatives does not violate NEPA, due process, equal protection, or any civil rights laws, nor is it inconsistent with policies and requirements of the base closure and realignment process.

2.1.6 Comment: The Collier proposal is not a reasonable alternative. The “concept of alternatives must be bounded by some notion of feasibility.” [citing *Vermont Yankee*] The Collier proposal is based upon a number of events happening that are contrary to existing U.S. law. Unless these events are carried out, the Collier Resources Company would be unable to carry out its plan.

Response: The Air Force does not agree with the premise of the comment, that implementation of the Collier proposal would be contrary to existing law. But even if that were the case, the fact that an

alternative is contrary to law does not necessarily make it unreasonable. Laws can be changed or exceptions to them made, and in the appropriate circumstances federal agencies might wish to ask for such changes. It is not improper to advocate changes in law, and it is not improper to consider alternatives, otherwise reasonable, that might benefit from or require legislative action.

2.1.7 Comment: The NEPA process must not be used to violate environmental justice and the civil rights of members of the Equal Justice Coalition. The delays in acting on the 1994 Record of Decision, the decision to prepare a supplemental EIS, and the subsequent delays in the NEPA process violate Title VI of the Civil Rights Act and their equal protection and due process rights under the Constitution. The transfer has been delayed and the people of this region have been held hostage for the past five years while the procedures and substantive purposes of NEPA and the Base Realignment and Closure (BRAC) process have been violated. The poor and minority people of this region have been exploited for their powerlessness by denying them the benefits of federal programs, under BRAC, so that their communities could be exploited for the recreational and aesthetic benefit of those with wealth and power.

Response: In addition to being offered here as comments on the Draft Supplemental EIS, these claims have also been made by the commentator to the Civil Rights Division of the Department of Justice. The Air Force and FAA believe that they have acted in compliance with all applicable laws. Neither the civil rights laws, the base closure laws, the environmental laws, nor the Constitution entitle the members of the Equal Justice Coalition or any other person to a particular outcome at former Homestead AFB. The commentator's opinions about the motivations of some of those opposing an airport transfer are noted.

2.1.8 Comment: The time period for an SEIS should be less than that of an EIS and certainly should remain within a year as established by the Department of Defense.

Response: The Air Force initially concluded the NEPA process in 1994. This was within twelve months from submission of the Local Redevelopment Authority's redevelopment plan. Neither the base closure statutes nor Department of Defense regulations specify time periods for supplemental actions.

2.1.9 Comment: The Natural Resources Defense Council (NRDC) incorporates by reference its prior correspondence (with attachments) concerning the Draft SEIS and the decision to prepare this document. This correspondence and the documents contained therewith bear directly on what NRDC believes to be the Draft SEIS' deficiencies. NRDC requests that the Air Force ensure that these documents have been placed in the administrative record for this proceeding.

Response: In 1996, NRDC began corresponding with the Air Force over its position that an SEIS should be prepared. Since that time, the NRDC has submitted boxes of material to the Air Force. The volume of material submitted in 1996 and 1997 was the most extensive. It exceeds 32 inches (not counting video tapes). The volume of material submitted after the decision to prepare the SEIS was announced in December 1997 is less substantial only by comparison. The height of the NRDC's scoping comments was about three inches. The height of the NRDC's comments on the Draft SEIS is a little over one inch.

It is not credible to claim that all of these documents "bear directly" on deficiencies that the NRDC believes it has found in the Draft SEIS. The material submitted to the Air Force includes old newspaper articles; video-taped meetings of the Miami-Dade County Commission, the Governor's Commission on Sustainable South Florida, and the South Florida Ecosystem Restoration Task Force Working Group; and many other irrelevant items.

Starting in 1998, this material was reviewed as part of preparing the Draft SEIS. Judgments were made about what was relevant, outdated, partially useful, and so forth, on a wide variety of material obtained from many sources, including NRDC. Over many months, the products of those judgments were reviewed

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and discussed by the lead agencies, the cooperating agencies, and the other participating federal agencies. The Draft SEIS published in December 1999 reflects the final conclusions of the Air Force and FAA about what was relevant and important.

To the extent that a commentor disagrees with the environmental analysis, it is incumbent on the commentor to identify the deficiency with some specificity, not wave vaguely at a large volume of material that was already considered once during the preparation phase. If a commentor identifies a deficiency, the Air Force and the FAA can correct it or can supply reasons for believing that a correction is not appropriate. It is simply not possible, however, to guess which pages from over three feet of material might now be considered relevant to any particular environmental issue.

All of the NRDC's prior correspondence and attachments have been retained. However, in the absence of specific claims presented in a lawsuit, it is premature to judge which documents comprise the administrative record.

2.1.10 Comment: The Air Force and all other federal agencies should implement the less-damaging alternative. Why have a detailed environmental review and a public input process if the decision can ultimately be to ignore the less-damaging alternatives?

Response: NEPA prescribes a required process, but it does not mandate a particular result. Federal agencies are required to identify reasonable alternatives and take a hard look at potential environmental impacts. However, the agencies are not prohibited by NEPA from deciding ultimately that other values outweigh the environmental costs.

2.2 Public Comment Period and Hearings on the Draft SEIS

This section addresses comments on public involvement in the SEIS process, the public hearings held in February 2000, and the public comment period in general.

2.2.1 Comment: The community has not been brought into the SEIS process. People have been left in the dark.

Response: Opportunities for community input into the SEIS began with a four and one-half month public scoping period that lasted from February 27 to July 10, 1998. During that period, eight public scoping meetings were conducted in Homestead and Miami, and over 20 meetings were held with community groups, agencies, and interest groups, including in Naranja. While the Draft SEIS was being prepared, four newsletters were broadly distributed in the community to keep people informed of the document's progress and contents. Public comments on the Draft SEIS were received at five public hearings and through written correspondence during the 60 day public comment period. Over 8,000 comments were received during this public comment period. This indicates that a large number of people took advantage of the opportunities provided for public involvement.

2.2.2 Comment: The National Environmental Policy Act does not require public hearings.

Response: NEPA does not require public hearings. However, Council on Environmental Quality regulations encourage them, and the Air Force always holds them for environmental impact statements.

2.2.3 Comment: An inadequate number of public hearings were conducted in the communities closest to former Homestead AFB. Only one hearing was conducted in Homestead and two were conducted in Kendall, which will not be affected. No hearings were conducted in communities like Naranja, Princeton, and Goulds.

Response: The Air Force was limited by the number of large facilities available in the area capable of holding the public hearings. A large turnout was expected, so the hearings were held in the largest facilities available close to the former base. Only one hearing could be held at the Homestead High School because of conflicts with school activities. There are no large meeting facilities in communities like Naranja, Princeton, and Goulds. Considering the number of people who did come to the hearings, the smaller facilities in these communities would not have been adequate to accommodate the attendance.

2.2.4 Comment: The size of the facilities in which public hearings were held was inadequate.

Response: The only location where inadequate space was available for the number of attendees was the hearing in Homestead on February 1. This hearing was conducted in the Homestead High School auditorium, the largest facility in the area. The number of people allowed into the auditorium at any one time was limited by fire safety codes. Every effort was made to allow more people in as others left, so that as many people as possible were able to participate.

2.2.5 Comment: The time and locations of the public hearings made it difficult for working class people to attend.

Response: Hearings were scheduled both in the afternoon and in the evening to provide alternatives for people who have to work at particular times. In addition, anyone who was unable to attend the public hearings was encouraged to send in written comments, which are given the same weight as comments provided at the hearings. See also response to comment 2.2.3.

2.2.6 Comment: Public hearings should have been conducted in Key Largo/Upper Keys, Key Biscayne, and across the United States.

Response: The public hearings were held in southern Miami-Dade County, the area where the majority of impacts from reuse of former Homestead AFB are anticipated to occur. Public hearings were not the only opportunity for providing comments on the Draft SEIS. Written comments were encouraged and given equal consideration with comments provided at the public hearings.

2.2.7 Comment: Public hearings should have been conducted in Opa-Locka because it is an alternative location for a reliever airport.

Response: Section 1.2 of the SEIS explains that the purpose of the SEIS is to examine alternative reuses for surplus property at former Homestead AFB. A commercial airport is one of the alternatives examined in the SEIS for the use of that property. Opa-Locka is not an alternative under consideration in this SEIS. Therefore, public hearings were not conducted near Opa-Locka. However, written comments on the Draft SEIS were accepted from any location and are considered equally with public comments furnished at the public hearings.

2.2.8 Comment: The public hearings were inadequately advertised.

Response: Notices were put in the *New Times*, *Miami Times*, *South Dade Newsletter*, *Miami Herald*, *The Reporter*, and *Cutler Courier* on January 5–7 and 19–20, including Spanish-language notifications provided in *El Nuevo Herald* and *Diario Las Americas*. Two press releases were sent to about 100 media contacts on January 3 and 18. Public service announcements were sent to local radio stations in both English and Spanish. An estimated 2,000 people attended the public hearings. The notifications apparently reached a large number of people.

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2.2.9 Comment: No public workshops to explain the SEIS or its significance or the comment period were scheduled in the affected communities.

Response: Several actions were undertaken to inform people about the SEIS and the public comment period. A newsletter was widely distributed before the Draft SEIS was released explaining its purpose and discussing how to make comments. During the public hearings, displays and handouts were made available and time was allotted for people to review the materials and ask question of government and contractor personnel who were made available. The Air Force encourages people to read the SEIS and draw their own conclusions. The large number of comments received during the comment period indicates that readers were able to interpret the findings and understood the purpose of the comment period.

2.2.10 Comment: Inadequate information about the Draft SEIS and public hearings was provided in Spanish. Spanish language materials were hidden underneath tables at the public hearings.

Response: Press releases about the public comment period for the Draft SEIS and public hearings were provided to about 100 print and broadcast media contacts on January 3 and 18, 2000. No air time was purchased at English or Spanish language radio or televisions stations. However, both English and Spanish language television and radio stations provided extensive coverage of the Draft SEIS and public hearings. Handouts at the public hearings were bilingual, with Spanish on one side and English on the other. Copies of the Air Force briefing slides were not generally distributed, but Spanish language copies were available on request. Those were the materials kept underneath the sign-in tables. No English language copies of these slides were distributed; they were only available in Spanish.

2.2.11 Comment: The public hearings were supposed to start at 5:30 but did not get started until 7:00 p.m.

Response: The public hearings consisted of an “open house” period and a “town meeting” period. The open house period was designed to provide people an opportunity to obtain information about the Draft SEIS by reviewing a number of displays and talking to agency and contractor representatives. A court reporter was available during that time to take private oral comments. At the evening sessions, this was scheduled for 5:30–7:00. The town meeting portion of the hearings that started at 7:00 (in the evening sessions) was provided to offer participants the opportunity to make public oral comments on the Draft SEIS.

2.2.12 Comment: People who will be most affected by the reuse of former Homestead AFB property were not able to speak.

Response: A large number of people signed up to speak at the public hearing in the Homestead High School on February 1. Not everyone was able to speak by the time the hearing was adjourned. The meeting had to be adjourned before midnight because of school policy. At the subsequent hearings, priority was given to people who had signed up in Homestead but had not spoken. Not everyone was able to attend another hearing. Everyone who did attended the other hearings was able to speak. Anyone who was not able to speak at the hearings was encouraged to submit written comments, which are given equal consideration with comments given at the hearings.

2.2.13 Comment: Elected officials were given priority over members of the public. Elected officials/politicians were allowed 10 minutes to comment at the public hearings, while the general public was only given 3 minutes. Not everyone who signed up was given a chance to speak at the public hearings.

Response: The Air Force routinely allows elected officials to speak first at public hearings. At the first public hearing in Homestead on February 1, 18 elected officials signed up to speak and were given this courtesy. A total of 51 people spoke at that hearing. At the other hearings, the courtesy of speaking first was only offered to elected officials who had not already spoken at a previous hearing. One elected official spoke at the beginning of the afternoon hearing in Kendall, two at the evening hearing in Kendall, one at the afternoon session in Miami, and two at the evening hearing in Miami. In all, elected officials represented 24 of the total 361 people who provided comments at the public hearings.

The format for each of the public hearings consisted of an introductory presentation on the NEPA process by the Air Force (about 15 minutes long), followed by an opportunity for proponents of each of the alternatives to explain their proposal (10 minutes each), and then public comments (3 minutes each). This opportunity to explain their proposals was offered to Miami-Dade County for the Proposed Action, Florida Spaceport Authority for the Commercial Spaceport alternative, Collier Resources Company, and the Hoover Environmental Group. All declined the offer except Miami-Dade County, which made a presentation at each public hearing. During the public comment portion of the hearings, all commentors were allowed 3 minutes to give their comments, including elected officials.

2.2.14 Comment: An elected official representing the area where the hearing took place was not afforded the opportunity to speak with the other elected officials.

Response: The Air Force apologizes for this inadvertent oversight. The intention was to call on all elected officials who expressed an interest in speaking. Apparently, the information did not make its way to the moderator as it should have.

2.2.15 Comment: Speakers at the public hearings should have been required to state their address.

Response: The transcripts of the public hearings are published in this Final SEIS. Therefore, the hearing moderator asked speakers not to give their address if they did not want to have it published in the Final SEIS. This was done to ensure compliance with the Privacy Act of 1974.

2.2.16 Comment: Why was a representative of the Turkey Point Nuclear Power Plant not invited to the public hearings for the Draft SEIS to answer questions?

Response: The public hearings were conducted by the Air Force and FAA as the co-lead agencies responsible for the SEIS, and included participation by the cooperating federal agencies (specifically the National Park Service). Other participants included the proponents of alternative reuse plans for former Homestead AFB. It was not practical to have every organization or agency that might have information relevant to the SEIS also participate. The primary purpose of the hearings was to receive comments, rather than answer questions. Questions raised during the public comment period are addressed in the Final SEIS.

2.2.17 Comment: The comment period should be extended.

Response: The Air Force went beyond regulatory requirements and provided a 60 day public comment period for the Draft SEIS. National Environmental Policy Act regulations require a minimum of 45 days for public review of draft environmental impact statements. The Air Force received over 8,000 written comment letters on the Draft SEIS, many of which included extensive and detailed comments. This suggests the comment period was long enough for many people to make meaningful comments.

2.2.18 Comment: The public comment period for the Draft SEIS should be extended to provide the public the opportunity to review the risk assessment on the Turkey Point Nuclear Power Plant, which was not included in the Draft SEIS.

Response: The Air Force and FAA do not feel additional public review is needed for the property disposal decision making that is the subject of the SEIS. The Nuclear Regulatory Commission (NRC) has adhered to its own process for evaluating and reviewing the risk assessment prepared by Florida Power and Light concerning the Turkey Point Nuclear Power Plant. This process included making documentation publicly available. The Final SEIS summarizes the findings of the study. Correspondence from NRC is contained in Appendix I of Volume II. If members of the public still have questions concerning the risk assessment, they should be raised with NRC, which has regulatory authority over the operations at the Turkey Point Nuclear Power Plant.

2.3 Objectivity of the SEIS

NEPA requires environmental impact statements to contain objective analyses. Some commentors questioned the objectivity of the analyses in the SEIS.

2.3.1 Comment: The Air Force and FAA wanted an airport, and the report is somewhat slanted because of that. When negative impacts were identified, their importance was downplayed.

Response: The SEIS provides quantitative and qualitative information about potential changes associated with the Proposed Action and alternatives. Readers may come to their own conclusions about the importance of those changes. The SEIS does present data in the context of existing conditions and regulatory standards, and in some cases, the changes reported are relatively small. How important those changes are, regardless of size, is subject to reader interpretation. Based on the comments received by the Air Force, reviewers did in fact reach different conclusions from the information provided in the Draft SEIS. Some commentors indicated that the Draft SEIS findings convinced them that a commercial airport at former Homestead AFB would be acceptable, while others indicated that the impacts reported in Draft SEIS would be unacceptable.

2.3.2 Comment: The company that prepared the Draft SEIS is an aviation consultant (Landrum & Brown) and is biased in favor of the commercial airport. The Draft SEIS was not prepared by environmental scientists.

Response: The Draft SEIS was prepared by Science Applications International Corporation (SAIC), a professional services company specializing in telecommunications, research and development, environmental and health services, energy, and national security. SAIC has over 3,000 environmental scientists and conducts environmental analysis for a wide variety of agencies, including the Department of Defense, U.S. Environmental Protection Agency, Department of the Interior, other federal agencies, state agencies, and local communities throughout the U.S. and overseas. Landrum & Brown, a company specializing in airport planning, prepared the Airport Planning Report included in Appendix A of the SEIS and the aircraft noise analysis contained in Appendix E of the SEIS, as well as a separate Technical Memorandum on Noise.

The SEIS was independently reviewed and evaluated by the Air Force and FAA to ensure completion of a comprehensive environmental document meeting the requirements of NEPA, Council on Environmental Quality regulations, and other applicable laws, regulations and administrative guidance.

3.0 PURPOSE AND NEED

This category addresses comments related to Chapter 1, Purpose and Need for the Action, in Volume I of the SEIS. Comments in this category pertain to the Air Force goals for transfer of the surplus property at former Homestead AFB, lead and cooperating agencies, the purpose of the proposed property transfer, and federal decisions to be made once the SEIS is completed. This section discusses the SEIS' consideration of possible future airport expansion and construction of a second runway should a commercial airport be developed at former Homestead AFB.

3.1 Air Force Goals

3.1.1 Comment: It is important to note that the Air Force and FAA goal does not include maximization of economic revitalization nor development of a commercial airport.

Response: The goal that was stated in December 1997 at the beginning of the SEIS process was as follows: "the Administration seeks to transfer surplus property in a manner that supports local plans for economic revitalization of South Florida and protects Biscayne Bay and the nearby national parks." At the time this goal was announced in 1997, the only local plan for economic redevelopment was Miami-Dade County's airport proposal, a proposal that had been approved by the Air Force in 1994. Since then, additional alternatives have surfaced, and the Air Force and other federal agencies are carefully evaluating them too.

3.1.2 Comment: If the Proposed Action is not selected, the best alternative would be the No Action alternative. This alternative could be developed as follows:

1. The Air Force Reserve mission is preserved.
2. Government activities at Opa-Locka would be transferred to Homestead.
3. Increase drug enforcement activities particularly with the new threats coming from Haiti as well as Colombia, and so forth could be located at Homestead.
4. All military reserve activities (Army, Navy, Marine and Coast Guard) might consider the location as well as the Air Force Reserve.
5. Cuban military and political threats during and after Castro could be better monitored and kept in a state of readiness.
6. Airport use would be preserved until the airport crisis in south Florida has reached such proportions that public outcry for increased airport capacity will outweigh the media generated uncompromising environmental protests founded primarily on emotion.

Response: Although one never knows how the future might develop, the developments described in the comment are very speculative. The Air Force does not have and has not received any proposals to relocate other military units to Homestead. The No Action alternative analyzed in the SEIS is based on a continuation of the status quo.

3.2 Lead and Cooperating Agencies

3.2.1 Comment: The Air Force should be circumspect about the FAA as co-lead agency on the SEIS.

Response: The Air Force has confidence in the objectivity and expertise of the FAA and has relied upon them for important portions of the environmental analysis.

3.2.2 *Comment:* The exclusion of non-environmental organizations as cooperating agencies casts heavy doubt on the objectivity of the SEIS. It is lamentable that the Department of Commerce was excluded, and the lack of input from Department of Defense's Office of Economic Adjustment appears to be a major omission.

Response: The lead agencies preparing the SEIS are the Air Force and the FAA. Cooperating agencies are U.S. Environmental Protection Agency, National Park Service, and U.S. Fish and Wildlife Service. The Department of Justice and the Council on Environmental Quality participated in an informal basis. No other federal agency sought to be involved, and no federal agency that asked to be involved was excluded from participating. Of the two agencies mentioned specifically in the comment, neither one commented on the Draft SEIS, although comments were received from the National Marine Fisheries Service, a component of the Department of Commerce. If there has been any lack of input from other federal agencies, it has been from their own choice and not from a lack of objectivity by the lead agencies, or an unwillingness to consider another agency's views.

3.2.3 *Comment:* The Final EIS must address fully and resolve the objections of the Department of the Interior (DOI), especially concerning noise.

Response: The Air Force and FAA have worked extensively with DOI on a number of issues important to DOI, including the noise analysis. DOI's opinions and preferences are very important to the Air Force and FAA, and the SEIS has addressed DOI's environmental concerns in great detail. The Air Force and FAA will continue to weigh carefully DOI's views during final decision making.

3.3 Need for Proposed Action

3.3.1 *Comment:* A stated key basis for the Proposed Action has always been that Miami-Dade County requires a reliever airport for Miami International Airport (MIA). Specifically, the Draft SEIS in Appendix A states that MIA's capacity will be exceeded between 2006 and 2010.

Response: The Air Force disagrees that the basis for the Proposed Action is that Miami-Dade County requires a reliever airport. As the SEIS explains in Chapter 1 of Volume I, the purpose and need for the action is to dispose of property determined to be excess to military needs. Department of Defense regulations provide that the local redevelopment plan will generally be used as the basis for the proposed action in the National Environmental Policy Act analysis for property disposal (32 CFR §175.7(d)(3)). The Proposed Action identified in the SEIS represents the reuse plan developed by Miami-Dade County, the Local Redevelopment Authority (LRA). Thus, the basis for the Proposed Action in the SEIS is that it is the local reuse plan.

Although it is correct that Miami-Dade County seeks an airport at Homestead because the capacity of MIA will be exceeded sometime in the future, the Air Force followed the established practice of identifying the LRA's reuse plan as the Proposed Action in the NEPA disposal analysis.

3.4 Second Runway

The purpose of the SEIS is to provide information relevant to the transfer of existing surplus federal property, including a single runway, at former Homestead AFB. The SEIS acknowledges the possibility of future expansion outside this property and construction of a second runway if the former base property is transferred to Miami-Dade County for a commercial airport. However, as Section 1.3 in Volume I indicates, this is not part of the decisions stemming from this SEIS. Such a decision would require a future NEPA process. This category responds to comments that a two-runway airport should have been the basis for the analysis of the Proposed Action in the SEIS.

3.4.1 Comment: Some commentors believe that the planned two-runway airport should be the Proposed Action for NEPA purposes and pointed out that this was requested in scoping comments and other written arguments and documentation. These commentors felt the Draft SEIS did not adequately address the environmental impacts of a second runway as an integral component of the airport development plan.

Response: A detailed analysis of a second runway is not required for this SEIS. However, the potential impacts of a second runway were not ignored. The subject of possible airport expansion is discussed in Section 2.9.2.7 of Volume I. The SEIS recognizes that at some point the one-runway airport could reach its operating capacity. That could occur about 2038, were the airport to grow as quickly as the forecasts used for the analysis assume. However, the ability to analyze environmental impacts so far into the future is highly speculative.

Moreover, a second runway cannot be accommodated within the boundaries of the disposal property, and its implementation is uncertain. The Airport Layout Plan developed by the county includes, for future facility planning purposes, a second runway. Over 1,000 acres off site would need to be acquired for its construction. Also, were a second runway actually ever to be proposed, a new federal EIS would be required before any second runway could be approved or constructed.

In comments made at one of the public hearings, the Mayor of Miami-Dade County stated that the county was committed to the development of a single-runway facility. Though the county's intentions could change, it is accurate to say that a second runway is not part of the existing proposal. It certainly is not, at this time, an "integral component."

Even so, the SEIS attempts to speculate to some degree about the possible future consequences of a second runway, were one ever to be sought. Each of the resource topics in Chapter 4 of Volume I examines the possible additional consequences of a second runway. Those discussions are summarized in Chapter 2 along with the other environmental consequences. These discussions far ahead of the possibility of a second runway are necessarily speculative and limited, but the possibility is recognized and the potential issues are confronted. This issue was further highlighted in the Summary.

4.0 ALTERNATIVES

This section addresses questions and comments concerning the alternatives examined in the SEIS, including the Proposed Action, Commercial Spaceport alternative, Mixed Use alternative, and Independent Land Use concepts. Comments concerning other alternatives are also addressed. Finally, the section responds to comments concerning the preferred alternative.

4.1 Definition of Alternatives

4.1.1 Comment: The discussion of the alternatives to the project is deficient.

Response: The Draft SEIS discussed the environmental effects of the Proposed Action and five other alternatives in detail, including No Action. Two of those alternatives have been merged into a sixth alternative in the Final SEIS. The SEIS also addresses a number of independent land uses. As described in Section 2.1.2 of Volume I, these were the only alternatives found to be reasonable, and they reflect a highly diverse range of reuse options. They could be selected in whole, in part, or in combination.

4.1.2 Comment: The alternatives to the Proposed Action considered in the Draft SEIS are highly speculative from a permitting perspective as well as an economic perspective. None of the alternatives have firm plans or permits processed or available in order to commence the redevelopment process at

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former Homestead AFB, unlike the Proposed Action which has the benefit of expedited review under Florida Statutes, Chapter 288, together with preliminary approvals from the South Florida Water Management District and the State of Florida. None of the other proponents have submitted full and specific plans that have been reviewed by local or state agencies, or have been the subject of any public hearings locally. The Collier-Hoover proposal is dependent on the ability to exchange property, and it is not certain such an exchange can occur.

Response: The Commercial Spaceport and Mixed Use alternatives are admittedly less well developed than the commercial airport proposal. The ideas behind those alternatives have been in planning for about two years, while the commercial airport proposal began development in 1993.

Even so, the Collier-Hoover proposal is not significantly less well developed than was the commercial airport proposal when it was included in the 1994 Final EIS and later selected by the Air Force in October 1994. With respect to the factors identified in the comment—lack of firm plans, permits processed, and preliminary approvals from the South Florida Water Management District and the State of Florida—the same could have been said of the airport proposal in 1994. Just as the lack of a more advanced stage of planning did not prevent the Air Force from selecting the airport proposal in 1994, it would not prevent the Air Force from selecting the Collier-Hoover proposal now, were that to be the final decision.

Indeed, it is not the Collier-Hoover alternative but the Commercial Spaceport alternative that is the most speculative possibility at this point, requiring the promulgation of FAA regulations and the preparation of a second complete EIS. The Air Force believes, however, that the Commercial Spaceport alternative is a legally available disposal option despite lack of knowledge about how it would ultimately be permitted.

For that matter, even the commercial airport proposal can still be considered speculative. The permit pending before the South Florida Water Management District is in litigation, and the State's 288 process is not yet complete.

The Air Force believes that the speculative aspects of the Proposed Action and each of the alternatives would not prevent any of them from being chosen as the final disposal decision.

4.1.3 Comment: The table of estimated reuse-related influencing factors in the Summary and Section 2.9 of Volume I shows significant increases in the number of aircraft operations in 2000 for every alternative, but no increases in any other factor. The magnitude of the increase seems improbable, especially for the Mixed Use alternative.

Response: The aircraft operations shown in this table encompass all operations estimated to use the Homestead airfield, including ongoing military and other government operations. The 19,824 operations shown for the Mixed Use alternative in all years reflect the ongoing operations at Homestead Air Reserve Station. Those numbers are also incorporated in the total operations for the Proposed Action and Commercial Spaceport alternative in all years.

4.1.4 Comment: Some commentators appeared to be under the impression that the Air Force proposes to expand at former Homestead AFB.

Response: The Air Force has no plans to expand or develop additional property at Homestead AFB. The Air Force proposes to transfer surplus property at the former base to another entity for redevelopment. The SEIS examines a number of uses this property could be developed for, including a commercial airport, a commercial spaceport, and non-aviation development.

4.2 Proposed Action

4.2.1 *Comment:* How/why was the commercial airport selected as the Proposed Action?

Response: Sections 1.4 and 1.5 in Volume I describe the Air Force process for preparing environmental impact statements for property disposal actions stemming from base realignments and closures. The commercial airport plan is the reuse plan submitted by Miami-Dade County, the Local Redevelopment Authority. Therefore, it was designated as the Proposed Action, in accordance with defense base realignment and closure policy. However, the Air Force may ultimately select any of the alternatives analyzed in detail in the SEIS.

4.2.2 *Comment:* The discussion of the commercial airport in the Summary provides no justification for this alternative. The SEIS does not address the airport option within the context of the needs of Miami-Dade County for additional commercial airport. Nor does the SEIS address the impact on the regional economy should the airport not be adopted, considering that 25 percent of the county's economy is aviation related, and 95 percent of the tourists arrive by aircraft. The fact that the county has searched for two decades to find an additional suitable airport should be addressed.

Response: The commercial airport was selected as the Proposed Action because that was the proposal put forth by Miami-Dade County, the Local Redevelopment Authority. The need for a reliever airport for Miami International Airport is briefly summarized in Section 2.2 in Volume I and discussed in more detail in Appendix A in Volume II of the SEIS.

4.2.3 *Comment:* How was the decision made to award the airport property to a group of politically connected developers. Were any other groups seriously considered?

Response: The decision to select Homestead Air Base Developers, Inc. (HABDI) was made by Miami-Dade County. Another developer was also considered early in the process. After HABDI was chosen, the county negotiated its business deal with them. The selection of an airport developer is a local matter.

4.2.4 *Comment:* The Draft SEIS did not indicate whether any airlines or cargo operators have expressed interest in using Homestead as a commercial airport. Any airlines that have expressed an interest in locating to Homestead should be identified.

Response: FAA's office in Florida received some informal inquiries from airlines about Homestead in the mid-1990s. This was a time when, based on the original environmental impact statement, the Air Force had issued a Record of Decision approving transfer to Miami-Dade County for a commercial airport. However, the transfer had not been implemented, and Homestead was not yet available for commercial service. The FAA did not record these inquiries. No expressions of interest from airlines or cargo operators have been received by FAA since the initiation of the SEIS. This is not particularly surprising, considering current uncertainties about the future of Homestead, the estimated timeline for initiation and growth of commercial operations at Homestead, and the immediate anticipated capacity improvement at Miami International Airport with the construction of the fourth runway. Airlines generally operate on a short-term time horizon to base their air service decisions on the latest market conditions.

Commercial service, both passenger and cargo, is forecast to grow gradually over time if former Homestead AFB is converted to a civil airport. There is no airline or cargo activity included in the forecast for the first 5 years of Homestead's operation as a civil airport, and only a small amount of activity in the 2005 forecast. However, the large size and expected population growth of the greater Miami market are factors that contribute to aviation demand and to the forecast need for additional airport capacity.

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4.2.5 Comment: Nowhere in the United States is there a dual field with heavy and fighter operations in a single place.

Response: There are many airports in the country that support large commercial operations and military fighter operations. Most Air Reserve Command and National Guard units are collocated with public use and commercial airports.

4.2.6 Comment: The commercial airport is anticipated to have 231,000 flights annually initially, but that could increase in the future.

Response: It is difficult to forecast how many airline operators would want to use a new civil airport. The proposed commercial airport is estimated to have 60,658 operations initially (including military and government operations), increasing to 150,735 by 2015. An operation can be either a takeoff or a landing, so these numbers represent about half as many “flights.” The 231,000 operations represent the estimated maximum use of the runway at Homestead, which is not expected to be reached until possibly near the middle of the century.

4.2.7 Comment: How does the air traffic projected for the Proposed Action compare with the traffic at Homestead AFB when it was active?

Response: The level of aircraft operations at Homestead AFB varied over the years. When the base was quite active in the years before Hurricane Andrew, it had about 525 military aircraft operations a day, five days a week, including takeoffs, landings, and closed patterns. There were substantial numbers of high-performance military aircraft, including F-4, B-52, and F-15 aircraft. In comparison, the Proposed Action is estimated to have an average of about 166 operations a day, seven days a week, by 2005, increasing to 413 per day by 2015. At maximum use of the single runway, there could be an average of 634 operations per day at Homestead. The numbers of civil aircraft operations include both high-performance jet aircraft and low-performance propeller aircraft. Table 4.5-1 in Volume I of the SEIS provides a summary of the different categories of aircraft that comprise the forecast daily average.

4.2.8 Comment: There is no timeline given for when the proposed commercial airport would generate 38,000 jobs. There is no guarantee that the airport will ever operate at full capacity.

Response: Full buildout/maximum use was analyzed in the SEIS for all alternatives to give a sense of the maximum potential impacts. There are no guarantees concerning when or if any of the alternatives would achieve full buildout. As Appendix A in Volume II indicates, the Proposed Action is projected to possibly reach maximum capacity at about 2038, based on available information.

4.2.9 Comment: The proposed commercial airport will require clearing of protected lands.

Response: There are no plans included in the Proposed Action for clearing or developing lands that are protected under environmental law or regulation, such as wetlands or protected habitat areas. As Section 4.11 in Volume I indicates, it is possible that secondary development from the Proposed Action would result in loss of small, unprotected wetlands and pine rocklands.

4.2.10 Comment: Will residences near Homestead be evicted in order to build warehouses?

Response: The Air Force and FAA are not aware of any plans to evict residences in connection with the proposed commercial airport at former Homestead AFB.

4.2.11 Comment: Homestead Air Base Developers, Inc.'s commitment to an environmentally safe airport has been shown through approvals under the Chapter 288 process, the Surface Water Management Master Plan approved by South Florida Water Management District, and the approval of Governor Chiles and the Cabinet.

Response: As described in Section 2.2.6 of Volume I, the approval by Governor Chiles and the Cabinet was reversed and remanded by the Third District Court, and the Surface Water Management Master Plan is the subject of litigation. These approvals cannot be considered final.

4.2.12 Comment: The U.S. Environmental Protection Agency (USEPA) has serious environmental objections to the Proposed Action and requests some additional information/clarification in the Final SEIS.

Response: The Final SEIS has been expanded to incorporate additional information in response to comments received during the public comment period on the Draft SEIS.

4.2.13 Comment: What qualifications do Homestead Air Base Developers, Inc. have to run an airport, and why do they need to use our taxpayers money to build it?

Response: If Homestead property is conveyed to Miami-Dade County for a commercial airport, the county as the airport proprietor would be ultimately responsible for the operation of the airport in accordance with federal requirements. The normal funding sources for airport development include tax-exempt bonds, federal grants, passenger facility charges, airport revenue, state aviation fuel and airline property taxes, aircraft registration fees, state bonds, and state general fund appropriations. While some airport costs may be offset by taxpayer revenue, the proportion is generally a small amount of the overall cost.

4.2.14 Comment: A number of commentors consider the commercial airport described by the Draft SEIS to be unacceptable just 2 miles from Biscayne National Park and 10 miles from Everglades National Park. Commentors expressed particular concern based on their estimates of the potential frequency of civil flights, such as one aircraft operation a minute.

Response: The Air Force and FAA respect the views of those who regard the proposed commercial airport as unacceptable near the national parks. Numerous commentors indicated this concern based on various mathematical estimations of aircraft overflights (e.g., every minute, every 90 seconds, every 2 minutes). Understanding the overflight and noise effects of the Proposed Action is more complex than simply taking aircraft operations numbers and dividing by days, hours, or minutes to figure out how many aircraft of which size would be over a particular point on the ground and would produce noise levels high enough to be annoying or even noticeable to people at that location. That is why the SEIS noise analysis is complex.

Many commentors' calculations result in an inaccurate conclusion that there would be a large, low-flying, noisy aircraft overhead—whether in the community setting or in the national parks—every 2 minutes, or every 1 minute, or continuously, and so on. There are several reasons why simple calculations like these do not provide an accurate portrayal of aircraft overflight noise at any particular location. Each takeoff and each landing counts as an aircraft operation. Therefore, the number of aircraft operations should be divided by 2 to arrive at the number of aircraft using Homestead, since each individual aircraft is counted twice, once as it lands and again as it takes off. A person on the ground would not be located under both the arrival and departure paths of aircraft, which would be on different sides of the airport. Civil aircraft would use a variety of flight tracks, as shown in the SEIS, depending on aircraft performance and origin/destination. Not every aircraft would fly over the same point on the ground, except in close

proximity to the runway. Homestead as a civil airport would serve a broad mix of aircraft from small single engine piston to large commercial and cargo jets. Large and small aircraft have different performance characteristics and different noise emissions levels. Noise dissipates rapidly with distance. Aircraft altitudes abate noise as distance from the runway increases. Noise also dissipates with lateral distance from directly beneath flight tracks (i.e., the slant distance).

The best way to judge noise effects of a commercial airport is to look at the noise contours and grid point analysis data in the SEIS for particular locations. In response to concerns about numbers of aircraft, tables in Appendix E of the SEIS that report daily average civil aircraft numbers by type of aircraft on each flight track have been summarized and added to Section 2.2.2 in Volume I of the Final SEIS. The detailed tables remain in Appendix E in Volume II (Tables II-7 through II-16).

4.2.15 Comment: Some commentors with concerns about the proximity to the national parks stated that it would be the closest large commercial service airport in the U.S. to national parks, with 236,000 flights per year in its first phase.

Response: It is acknowledged that the proposed commercial service airport is close to national parks. The location of former Homestead AFB in relation to these parks has generated a great amount of concern. The SEIS provides an extensive evaluation of potential environmental impacts, with very particular attention given to the national parks.

The comment overstates the commercial airport's projected operational activity. A total of 231,274 annual operations has been calculated to be the maximum capacity potential of the single runway at Homestead, a level that could be achieved around 2038 if Homestead's commercial service continued to grow. The first phase of airport operation is forecast to be 60,658 annual operations. Table 2.2-5 in Volume I of the Final SEIS provides estimated aircraft operations for each forecast year. Response 4.2.14 includes more information regarding the difficulty of assessing an environmental impact (such as aircraft noise) simply from looking at numbers of aircraft operations.

A number of commercial service airports exist within close proximity (10 miles or less) to national parks. Jackson Hole Airport, a commercial service airport in Wyoming, is actually located inside the Grand Tetons National Park. This circumstance does not negate the concern regarding such locations or the strong interest in protecting the national parks.

4.2.16 Comment: The commercial/air cargo development of Homestead AFB forecasts 300 daily aircraft operations, equivalent to a plane taking off or landing every 4.8 minutes. Current average use of Homestead is approximately 50 daily operations, at maximum. The potential negative environmental and quality of life impacts of more than a sixfold increase in aircraft operations cannot be denied, disputed, or minimized.

Response: Table 4.5-1 in Volume I of the SEIS provides a summary of forecast average daily aircraft operations for the Proposed Action. In 2015, the total forecast daily aircraft operations would be 413, including 140 passenger aircraft operations and about 60 air cargo operations. At maximum use, there could be 634 total daily aircraft operations, including 346 passenger aircraft operations and 74 air cargo operations.

The response to comment 4.2.14 describes the difficulty of reaching conclusions about the environmental effects of aircraft overflights and noise from simply looking at numbers of aircraft operations. The SEIS does not suggest that there would be no environmental impact from the reuse of former Homestead AFB. Extensive analyses have been conducted on the potential environmental impacts of the various alternatives, including a commercial airport. A broad array of resource topics were evaluated, including

socioeconomics, noise, land use, hazardous materials, air quality, water resources, biological resources, and so on. The environmental consequences of each alternative are described in Chapter 4 and summarized in Section 2.9 of Volume I.

4.2.17 Comment: The SEIS study included the proposed arrival and departure flight paths that show the airport will bring 500 commercial size airplanes, including jumbo jets, over and around Ocean Reef every day. This is not to mention the problems caused by the same air traffic over Everglades and Biscayne National Parks that have been deemed some of the nation's most vulnerable natural environments.

Response: The total daily number of commercial airplanes in the aviation forecast for Homestead is lower than 500. Response 4.2.16 addresses average daily numbers of total aircraft operations that are forecast for Homestead, as well as the numbers of commercial passenger and cargo operations that comprise the total. Not all of the commercial aircraft would be large jets. The projected fleet mix includes a sizeable number of turboprop aircraft and smaller regional jets (see Table 2.2-5 in Volume I). Only a portion of aircraft operations would be on a flight track near Ocean Reef. Section 2.2.2 of the Final SEIS includes a table that summarizes average daily civil aircraft operations that are forecast for each flight track. An extensive portion of the SEIS is devoted to evaluating the potential effects of alternative reuse proposals on the national parks.

4.2.18 Comment: The SEIS does not properly assess the need for an airport in Homestead. The projections are flawed and do not consider factors such as the expansion of existing facilities and available airport capacity. The FAA and Miami-Dade County's own studies indicate that there may not be an absolute need for a new airport in Homestead. The SEIS must take into the account the Dames & Moore Report of 1995 analyzing airport needs in Miami-Dade County, which concluded that Opa-Locka Airport could be expanded, with a longer runway to serve as a reliever airport for Miami International Airport (MIA). The Miami-Dade County Aviation Department has authorized an \$80 million expansion of Opa-Locka with Stagecoach Aviation, who will build two aircraft hangars. Miami-Dade County Mayor Alex Penelas announced on March 2 a deal with Renaissance Airpark to build hangars, terminals, a hotel and convention center, as well as warehouses and manufacturing facilities at Opa-Locka Airport. The idea is to develop Opa-Locka as an option to MIA for low-cost and commuter airlines and for cargo use. There are other alternatives that the Aviation Department has not mentioned publicly that must be addressed in the Final SEIS. The SEIS did not consider the Aviation Department's own long-term cargo needs analysis prepared by planner Peter Reavely that shows Miami International Airport with a surplus in cargo facilities after completion of the new cargo facilities.

Response: The SEIS has taken into consideration the county's projections of aviation demand, capacity, and the anticipated roles of the various airports in the county. In addition, an independent evaluation was done by the FAA, assisted by consultants, for the SEIS. Based on the projections of aviation demand for the region, there is a long-term need for additional supplemental commercial air service facilities, beyond those existing and planned at existing airports, which Homestead could help to fulfill. While it is true that Miami-Dade County is currently pursuing opportunities for limited commercial service at Opa-Locka, this will not satisfy the long-term airport capacity needs. Therefore, the pursuit of limited commercial expansion at Opa-Locka does not negate the need for commercial service capacity that Homestead could provide. In addition, all of the county's airports are affected to varying degrees by environmental factors that pose problems for expansion. Reasonable and balanced plans to add airport capacity in Miami-Dade County at both Homestead and Opa-Locka would be complementary efforts, rather than competing efforts, considering the forecast aviation growth in south Florida, future capacity limits at MIA and Fort Lauderdale-Hollywood International Airport (taking into account planned expansion at both airports), population growth expectations and distribution, and environmental issues surrounding both Homestead and Opa-Locka.

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The Final SEIS includes information in Section 2.7 and Chapter 4 of Volume I and in the Addendum to Appendix A of Volume II regarding the region's need for additional commercial service airport capacity.

4.2.19 Comment: It seems that the only justification for the proposed airport is the perceived need to replace 6,753 jobs lost after Hurricane Andrew wrecked Homestead AFB and displaced 100,000 South Dade residents.

Response: Jobs and economic development are important community concerns that have received a lot of attention. The Air Force is seeking to dispose of surplus property at Homestead in a manner that supports local community plans for economic revitalization. Economic benefits to the Homestead area would be a beneficial consequence of developing a commercial service airport.

Although it has received less public attention, there is a long-term need for more commercial service airport capacity in the region, which Homestead could provide. Commercial aviation demand in the region exceeds the capacity of existing airports, including proposed expansions. Other responses in this section provide more information on the need for regional commercial airport capacity.

4.2.20 Comment: In 1992, 26.5 million passengers used Miami International Airport. By 1998, the total passengers were just under 34.0 million, a 28 percent increase. Total passengers are forecast to reach 48 million in 2005. Likewise, the total tonnage of air cargo has increased from 1.1 million tons in 1992 to nearly 2.0 million tons in 1998, and is forecast to reach 4.0 million tons by 2005. This rapid growth in MIA airline passengers and freight has placed increased demand on aircraft maintenance and overhaul, plus manufacturing of new aircraft and aircraft parts.

Response: The data on year 2005 air passenger demand at MIA is acknowledged. Furthermore, passengers are forecast to continue to increase at an average annual rate of 3 percent.

The SEIS estimates that some aircraft maintenance activities could occur at Homestead. Aircraft maintenance operations are estimated at 570 annually in 2005 and 1,470 in 2015. An estimated 1.6 million square feet of aircraft maintenance facilities in 2015 would accommodate the forecast demand.

4.2.21 Comment: In 1999, The Beacon Council and the Miami-Dade County Aviation Department conducted an aviation industry study. Based on the aviation industry leaders' conclusions, industry needs must be addressed. The aviation industry needs more facilities. Since no additional aviation operations can be located at MIA, Miami-Dade County's general and regional airports must be developed.

Response: The SEIS forecast for the proposed Homestead Regional Airport takes into consideration that future forecast demand for commercial air service in the county exceeds the capacity of existing facilities, including planned expansion at MIA.

4.2.22 Comment: The Draft SEIS asserts that the county will be in need of a reliever airport for Miami International Airport by late in this decade. But this conclusion relies upon outdated projections and traffic levels. When more current traffic levels and projections are used, MIA does not appear to require a reliever airport until approximately 2025. A report by Geospec Inc. (submitted by the Natural Resources Defense Council) calculates a mid-2020s time frame in which MIA would require a reliever airport. Even aviation officials admit the present airport is adequate until 2050 and beyond.

Response: The SEIS forecast for the proposed commercial airport at Homestead has taken into consideration the county's and the FAA's projections of aviation demand and the ability of the county's system of airports to meet this demand. As discussed in Appendix A of Volume II, demand at MIA is

forecast to exceed the capacity of the airport, including the fourth runway, within a reasonably foreseeable time frame. The Draft SEIS indicated that demand was estimated to exceed capacity in the 2006–2010 year range. The review of current traffic levels and forecasts that have become available since the Draft SEIS was issued has resulted in an estimate that is toward the end, rather than the beginning, of this range. The Final SEIS includes the latest calculation that demand will exceed capacity at MIA in 2009–2010. The FAA does not agree that either 2025 or 2050 is a realistic estimate of the time frame when demand would exceed capacity at MIA.

4.2.23 Comment: The Draft SEIS has provided that Miami International Airport is expected to reach full capacity between 2006 and 2010.

Response: The most recent information places the dates at 2009–2010. The Final SEIS includes this information. It does not substantially affect the analysis of the foreseeable need for additional commercial airport capacity.

4.2.24 Comment: The FAA reported in its study on the fourth runway at Miami that an airport in Homestead is not feasible because airline companies are typically unwilling to divide their operations within a single region, and local air travelers are unlikely to drive to South Dade to catch flights. The distance of the proposed airport from the urban center of Miami-Dade County (26 miles) is an additional factor. According to the report, most passengers who depart from Miami International Airport live in Miami or Miami Beach. But as many as 20 percent live in Broward or Collier County. Air travelers from these areas could experience travel times of 90 to 120 minutes depending on local and regional traffic conditions. The combination of additional mileage, travel times, and peak hour roadway congestion would serve to deter MIA passengers from using an airport in Homestead, the FAA report concluded. Furthermore, no aviation companies or cargo transporters have come forward demanding to use Homestead or even indicating a need for the facility. History shows that reliever airports are rarely successful.

Response: Foremost among the reasons for eliminating Homestead as a viable alternative to address immediate capacity needs in the referenced 1998 FAA EIS for the fourth runway at MIA was the uncertainty regarding decisions and conditions relating to reuse of former Homestead AFB. Chapter 2 in Appendix A of Volume II of the SEIS describes both positive and negative factors that influence the development of new commercial service airports. An Addendum to Appendix A provides additional information. The largest U.S. cities, such as New York, Chicago, and Los Angeles, often have multiple airports within their metropolitan areas. There are several factors that can result in multiple airports serving major metropolitan areas such as greater Miami, including:

- Urban sprawl and roadway congestion which make alternative airport locations attractive to passengers.
- Major hub congestion that drives new air carriers and passengers to less congested airports.
- Development of niche air carriers that specialize in service from lower cost and/or less congested airports.
- Development of unique markets and services from secondary airports.

Fort Lauderdale-Hollywood International Airport already supplements MIA in the northern metropolitan area. Additional commercial air service in the southern part of the air trade area could be provided in the future at Homestead, particularly as the population grows in that portion of the county.

The SEIS forecast for Homestead takes into consideration all of these factors as well as the county's need for supplemental commercial airport capacity, which cannot be met entirely by existing airports, including proposed expansions. The SEIS forecast identifies regional air service, including service to Latin American and Caribbean destinations, as well as service by low-cost, new entrant carriers as primary components of estimated future passenger activity at Homestead. Chapter 1 of Appendix A in Volume II explains the assumptions of the Homestead passenger forecast. Additional discussion regarding supplemental and replacement airports can be found in Chapter 2 of Appendix A.

The FAA's analysis regarding the non-suitability of Homestead as an alternative to the fourth runway at MIA is still valid. Homestead Regional Airport is not envisioned to capture the market that is better served at MIA. The SEIS forecast (Chapter 1 of Appendix A) acknowledges that passenger and cargo demand that is dependent on the connecting air service network established at MIA is not anticipated to be captured by a civil airport at Homestead. Instead, Homestead could serve a "niche" role for new entrant, low-cost carriers and for regional service.

4.2.25 Comment: In order to assess the environmental impact of any proposal, the future must be predicted. In this case, the environmental impact depends on, among other things, the air traffic and employment created by the proposed airport. Because of the difficulties of predicting the growth of the airport for the purpose of assessing the environmental impact, optimistic assumptions were made about the level of air traffic. The Airport Planning Data Technical Report in Appendix A of the Draft SEIS states on page 2-7: "Therefore, because it is difficult to judge the potential of a new airport, optimistic air traffic forecasts were developed for Homestead Airport so as to ensure that potential environmental impacts are not underestimated." From an environmental standpoint this makes sense because more air traffic is worse for the environment. However, from an economic standpoint, the optimism leads to unrealistic employment projects. The major airlines at Miami International Airport have publicly stated they will not relocate to or use the proposed Homestead airport. This is quite understandable because they all have substantial capital invested in their facilities at MIA and they have no financial incentive to relocate to a new airport. Further, the passenger and cargo activities of all the airlines now at MIA are so intertwined with connections to each others' flights, baggage and cargo transfers, that relocation would be very costly. The reality is that any airline activity at the proposed Homestead airport would be activity new to the Miami-Dade County area, not activity relocated from MIA. This means that any commercial flight activity (and resulting employment) at the proposed Homestead airport would have to await market forces which cause the development of new airlines or airlines new to Miami-Dade County. This introduces large uncertainties into any economic projections about the proposed Homestead airport and increasing uncertainties into derivative projects, such as employment, with the magnitude of the uncertainties growing as the time horizon increases.

Response: The comment is correct about the difficulties of forecasting air service and growth at a new commercial service airport. The comment is also correct that market forces govern decisions by commercial air operators. The future cannot be predicted with certainty when trying to make either environmental or economic projections. Best reasonable estimates and assumptions must be used. Aviation forecasts for Homestead are grounded in the county's and the FAA's best available long-term assessment of anticipated aviation activity compared to airport capacity in southeast Florida. For any particular year, the rate of growth may turn out to be higher or lower than the forecast. The SEIS indicates that the 2015 forecast is based on a high growth rate. If the growth rate is slower, the 2015 level of operations might not occur until a later year.

Alternatively, there are factors favoring a high growth rate. Greater Miami is the 12th largest metropolitan area in the country (U.S. Census estimates for 1996), and the regional historical and forecast population growth rates are above national averages. The result is an anticipated increasing local demand for air service. Tourism, convention and other visitor traffic show no indication of slowing down. Miami

International Airport has historically been the prime North American gateway airport to the Caribbean, Central and South America. The SEIS analysis assumes that MIA will retain its international aviation gateway status, as well as continue to serve local residents and visitors. The addition of transfer passengers between aircraft and from aircraft to cruise ships results in extensive anticipated growth of demand. A continued expansion of aviation demand creates opportunities and requirements for some airlines to seek new airport facilities. Homestead, as a commercial airport, would have a high potential to serve a portion of that demand.

The aviation demand initially served at Homestead would likely be new-entrant passenger airlines seeking a unique market and charter airlines that do not depend on transfer passengers. The growth of charter activity at Homestead could be similar to Orlando Sanford, which has become a charter carrier airport. Low-cost carriers in particular are seen as prospective users because of their desire to operate at less congested, non-hub airports to keep their operating costs down. Finally, integrated air cargo companies such as Federal Express and UPS are also potential users of Homestead because they do not depend on transfer of cargo between airlines.

4.2.26 Comment: Assumptions regarding projected air carrier use of Homestead are very speculative in that there is no commitment from any airline to provide such “lower priced service,” as well as the fact that there would be an incentive for Miami-Dade County to capture as much of their capital investment into the infrastructure of the airport as possible. This type of speculation does not seem reasonable.

Response: There are limited facilities at Miami International Airport for new entrant airlines, particularly low-fare carriers. Therefore, it is reasonable that such low-fare carriers would be drawn to an airport such as Homestead. Examples are Islip and Newburgh (Stewart Airport) in New York and Midway Airport in Chicago, which have attracted low-fare carriers that serve New York City and Chicago, respectively. At this point, it is too early to speculate on which particular carriers might choose to serve Homestead.

4.2.27 Comment: Which air passengers will be told to use Homestead? How will flights be scheduled to make sure that Broward passengers won’t need to make the 40–50 mile trip to Homestead?

Response: Air passengers will not be told to use any particular airport. Homestead would be selected, or not selected, by air passengers on the same basis as other commercial airports. Passengers essentially “shop” for air service much like customers shop for any other type of service whenever there are multiple options from which to choose. Factors such as ticket price, distance to the airport, seat availability, airline “brand” name, and frequency of flights are weighed by passengers in deciding which airport to use. Prospective airlines would also determine which flights to schedule at Homestead based on a series of economic factors including demand for air service, cost, availability of facilities, and competitive position. Broward County has never been viewed as the potential air service market for a commercial airport at Homestead, although lower-cost air carrier service or special air charter service can attract air passengers from greater distances than would normally be the case. Broward passengers would be more likely to use Fort Lauderdale-Hollywood International Airport or Miami International Airport.

4.2.28 Comment: The need for an additional commercial airport in Miami-Dade County must be re-examined due to the fact that United, Delta, Continental, and American Airlines are in the process of setting up flights from New York, Atlanta, Houston, Dallas-Fort Worth, and Los Angeles that will bypass Miami to Latin American, Central America, and the Caribbean. These carriers realize that airline passengers are not all going to Miami, and to eliminate an unnecessary stopover in Miami is a positive selling point. Port of entry at Miami International Airport for passengers continuing to other cities is a time-consuming, troublesome adventure to be eliminated if at all possible. The reduction in passenger traffic at MIA is already happening. Therefore, Homestead will not be needed.

Response: The development of non-stop passenger air service to Latin America, Central America, and the Caribbean from major U.S. cities, thus by-passing Miami, is to be expected to a limited degree as a result of the continued growth in the demand for air service between the U.S. and these international regions. However, Miami is expected to retain its status as the North American gateway to these destinations, much as Los Angeles has retained its gateway status to markets in the Pacific and New York to Europe, while non-stop service to these international regions has developed at other U.S. cities over time. There is a very limited number of “airport cities” in the U.S. that have the population volume and the connecting domestic feed to support non-stop international service. In addition, geographic location, airport facilities, limited route authority, and other factors limit the number of international gateway airports. International service to most cities will continue to require connecting through a major hub or gateway airport, such as Miami International.

4.2.29 Comment: Miami-Dade County estimates indicate that in 2015, the proposed facility will handle only 2 percent of the commercial airline passengers arriving or departing the county. It hardly seems worth building terminal facilities to handle 2 percent of the county’s airline passengers.

Response: In 2015, as many as 1.3 million annual enplaned passengers could be using the proposed Homestead Regional Airport. Enplaned passengers are departing passengers. Thus, in total, 2.6 million annual arriving and departing passengers are possible in 2015. A number of existing commercial service airports in the U.S. have this level of passenger activity, or even less.

4.2.30 Comment: Additional capacity can be realized by dividing operations between existing airports, including Miami International, Fort Lauderdale-Hollywood International, Opa-Locka, and Palm Beach International. The SEIS also indicates that three Miami-Dade airport facilities (Opa-Locka, Opa-Locka West, and Tamiami-Kendall) will only be 60 percent utilized in 2028. Combined, the three airports will have four times as much unused capacity as Homestead is proposed to use.

Response: The SEIS has taken into consideration the projections of aviation demand, capacity, and the anticipated roles of the various airports in the air service area. Based on the projections of aviation demand for the region, there is still a long-term need for additional supplemental commercial air service facilities, beyond those facilities existing and planned at existing airports. Miami International Airport is forecast to reach capacity by 2009–2010. Fort Lauderdale does and can supplement Miami International Airport in the northern part of the Miami-Dade County service area. It is forecast to reach capacity by 2015. Palm Beach is considered to be north of the Miami air service area, particularly as Miami-Dade County grows southward, and this airport has its own constraints. Opa-Locka West and Kendall-Tamiami Executive Airports are not reasonable candidates for commercial service. More discussion on why existing airports are not viewed as providing sufficient commercial capacity to meet forecast aviation demand is in Appendix A of Volume II. The response to comment 4.2.18 addresses Opa-Locka Airport.

4.2.31 Comment: A number of commentors have assumed that the proposed airport at Homestead would be an “all cargo airport” and have questioned the need for such an airport. Several commentors added concerns regarding the possibility of 1,000 or more low-flying cargo flights a day.

Response: The Proposed Action is the development of a commercial service airport rather than an “all cargo” airport. Future airport operations are forecast to include passenger, cargo, general aviation, aircraft maintenance, and military/government operations. Table 4.5-1 in Volume I of the SEIS shows projected average daily aircraft operations in each forecast year for the Proposed Action. In 2015, approximately 60 daily operations are forecast to be air cargo (about 15 percent of total operations). At maximum use of the existing runway, which could occur in the 2038 time frame, air cargo operations are forecast to total 74 operations a day (about 12 percent of total operations). Total operations of all categories of aircraft could be 634 operations a day (not 1,000 operations) at maximum use of the runway. The majority of aircraft

operations would be civil aircraft arrivals and departures using standard approach and take-off procedures and maintaining altitudes above 4,000 feet in the airport vicinity, except during the final approach and initial climb segments of flight.

4.2.32 Comment: Utilizing Homestead as a cargo airport is not viable. Does this mean that all cargo must be handled through this cargo-only airport, or just all cargo airlines? How will this affect the airlines that handle both cargo and passengers? Will they no longer fly cargo into Miami International Airport? Will the carriers who do land at MIA be allowed to fly cargo out of MIA to other U.S. cities and foreign countries? Miami International Airport is spending millions of dollars developing cargo terminals—what will happen to these since they are not suitable for passengers? A segment of the cargo business deals with transfers that are very time and temperature sensitive. What about the resources that U.S. Customs and the Department of Agriculture will have to expend to maintain two airports? The cargo infrastructure that has been established over many years will have to be relocated. This includes airlines, transportation companies, freight forwarders, floral import companies and many other users and service providers, which are too numerous to list.

Response: The Proposed Action is not to develop an all cargo airport, as addressed in the response to comment 4.2.31. The SEIS forecast of commercial aircraft operations at Homestead is based on anticipated demand in a market-driven situation in which airlines and air cargo operators may choose to operate at Homestead, rather than Miami International or other airports. The choice of airports is expected to be based on market factors such as demand for services, cost, availability of facilities, and other considerations. No limitations or restrictions are assumed on the airlines or the types of air cargo services that would be offered in the future at Miami International Airport.

As indicated in Chapter 1 of Appendix A (Volume II), the SEIS recognizes that most air cargo to Miami-Dade County currently goes through Miami International Airport, but it is reasonable to assume that some cargo traffic could be attracted to Homestead in the future. Air cargo services at Homestead Regional Airport would supplement, not replace, those at Miami International Airport. Mail and other cargo that transfers from one aircraft to another and thus relies upon extensive domestic and international connecting service is not expected to be attracted to a location like Homestead. Air cargo that depends on transfers moves in the belly of passenger aircraft as an adjunct to passenger flights at Miami International Airport would be expected to remain at that airport. The SEIS forecast also takes into consideration that air cargo growth is partially dependent on facilities such as customs, clearance warehousing, and repackaging either on-airport or close to the airport, which would need to develop at Homestead as necessary. The forecast assumes that, over time, the needed infrastructure (particularly the vital U.S. Customs capability) could be achieved.

4.2.33 Comment: The plan is to move cargo operations to Homestead from Miami International Airport to allow expansion of passenger traffic at the existing airport.

Response: The SEIS forecast of future aircraft operations at Homestead is not based on cargo operations moving from MIA to Homestead. Cargo service that is dependent on the connecting air service network and on facilities established at Miami International Airport would be expected to continue to be served there. The response to comment 4.2.32 addresses this issue in more detail.

4.2.34 Comment: The *Miami Herald* reported that more cargo space is not needed to supplement MIA and Fort Lauderdale-Hollywood International Airport because trade with Brazil and Venezuela is way down.

Response: Air cargo traffic was down in 1999 versus 1998 at Miami International Airport due to a recession in most major South American economies. With the return of economic growth in Brazil and

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Chile, among other countries, the volume of cargo is again increasing. Several new cargo facilities are under construction at MIA, indicating the return of traffic. The Boeing Current Market Outlook released in July 2000 states: "Latin American countries are expected to recover from the recent financial crises and will experience some of the world's fastest traffic growth rates."

4.2.35 Comment: Much more than 50 percent of the commercial jet activity will be by cargo aircraft, which are older aircraft with dirty emissions. Most of them would be from Central America, South America, and the Caribbean. These areas do not have the best aircraft maintenance in the world.

Response: As addressed in the response to comment 4.2.31, about 15 percent of total forecast operations at Homestead in 2015 and about 12 percent at maximum one-runway use are in the air cargo category. If forecast cargo activity is calculated as a percent of commercial jet activity, the comment is correct that in 2015, about 50 percent of the projected commercial jet activity would be cargo jet aircraft. However, at maximum one-runway use, cargo jet operations are estimated to account for 22 percent of commercial jet activity because passenger jet operations are projected to increase at a faster rate than cargo jet operations.

All foreign carriers, regardless of origin and regardless of whether they are in passenger or cargo service, are required to meet applicable federal standards to operate safely into and/or within the United States. They are also required to meet emission standards.

4.2.36 Comment: The SEIS is based upon an imagined complement of planes that will never materialize. For example, turboprop planes are estimated to account for 60 percent of commercial operations at the proposed facility. Many airlines are eliminating turboprop planes from flying flight legs much shorter than those anticipated for Homestead.

Response: The commercial passenger aircraft forecast does include a fleet mix of approximately 60 percent turboprop aircraft operations. There are a number of reasons for this ratio. Turboprop commuters carrying origin and destination passengers are expected to be a major user of Homestead if it becomes a civil airport. Connecting service at Homestead to both scheduled carriers and charters is also projected to be largely via turboprop commuter aircraft. Because turboprop commuter aircraft have only 19 to 50 seats and typically fly at less than 50 percent load factor, they are numerous in operation, but account for a much lower proportion of total passengers.

Commuter aircraft (principally turboprops) would be expected to provide shuttle service from Homestead to points within Florida, including Miami International Airport, Fort Lauderdale-Hollywood International Airport, Orlando, Fort Myers, and the Keys. The passengers on these flights are estimated to be split between origin-destination passengers and persons flying to other Florida airports to make onward connections, such as a person going from Homestead to Miami to Minneapolis.

The future shuttle-type commuter carrier fleet at Homestead is estimated to be split between regional jets and turboprops; however, the predominant aircraft are estimated to be turboprops because:

- The short stage-lengths to Miami International Airport, the Bahamas, other Caribbean islands, and other Florida points are ideal for turboprops that would serve the markets in virtually the same scheduled time as jets.
- The seasonal nature of service, with higher demand in the winter, is anticipated to preclude the use of high-cost regional jets and favor the use of lower cost turboprops.
- The smaller passenger capacity of most of the turboprops (19 to 30 seats) is ideally suited to the identified Homestead routes.

- The economical operating characteristics of turboprops are ideal for principally the leisure market (low-fare) and peak-demand nature of the Florida tourist area market.

The air service forecast is also based partly on commuter airlines providing feed to the large jet carriers, both scheduled and charter. Therefore, growth of connecting commercial passenger service at Homestead would likely depend on turboprop service feeding the jets. Six or more 34-passenger turboprops are needed to fill a large jet (for example, a 200-seat Boeing 757). If 19-passenger aircraft such as the Beech 1900 are used, more commuter aircraft would be needed to fill each large jet. Large jets are envisioned to be utilized on the long-range high-density scheduled and charter routes, such as to New York.

4.2.37 Comment: The Draft SEIS incorrectly states that general aviation is on the decline in Miami-Dade County. Current numbers retrieved from the Miami-Dade County Aviation Department (February 3, 2000) show that while some of the aircraft at Opa-Locka and Tamiami airports were destroyed by hurricanes and tornadoes during the 1990s, the numbers of based aircraft and operations at both airports have increased since 1997, Opa-Locka at 7.6 percent and Tamiami at 9.1 percent (by 1999).

Response: The Draft SEIS stated that general aviation activity will not rapidly recover to pre-hurricane levels; it did not say that there would be no current general aviation growth. The SEIS forecast for general aviation is consistent with FAA's national general aviation outlook and FAA's Terminal Area Forecast. There is no evidence that this is not still the case. The SEIS forecasts are based on long-term trends, rather than one-year increases.

4.2.38 Comment: The Everglades, according to some statements, will be avoided by aircraft. That is easy to say, but practically impossible to do. The Everglades will be adversely affected.

Response: The SEIS does not say that Everglades National Park would be avoided by aircraft. There are existing overflights of Everglades National Park by aircraft currently using Homestead and other south Florida airports. A commercial airport at Homestead would increase overflights of Everglades National Park. Portions of the park would experience less overflight activity with the Proposed Action with the implementation of one or more noise abatement flight procedures, but some areas of Everglades National Park would still be overflowed.

4.2.39 Comment: The altitude for flights crossing into Biscayne National Park will be 1,600 feet or less. The altitude for flights crossing into Everglades National Park are from 3,000 to 4,300 feet. The cruising altitude for these planes is anywhere from 25–35,000 feet.

Response: These statements are accurate. Aircraft over Biscayne and Everglades National Parks would be in their climbs from or descents to Homestead Airport.

4.2.40 Comment: A single runway airport would, at best, be marginally profitable, attractive only to operators seeking the very lowest financial cost to themselves. Consequently, the plan drawn by the Miami-Dade County Commissioners called for a future additional runway.

Response: The potential need for a future second runway at Homestead has been based on anticipated future aviation demand in Miami-Dade County and does not relate to financial profitability. Airlines, including both low-cost and major carriers, can operate profitably (and do so) at airports that have a single runway. The financial performance of airports is related to passenger levels.

4.2.41 Comment: Eventual construction of a second runway would entail 507 aircraft operations every day directly over Biscayne National Park. This would amount to a nineteenfold increase over current level of operations.

Response: The SEIS acknowledges that Miami-Dade County's long-term plan for Homestead has included a future second runway, but there is no presumption in the SEIS that a second runway will eventually be constructed (see Section 2.2.7 of Volume I and the response to comment 3.4.1). The comment correctly computes the average daily number of operations that could be present over Biscayne National Park for an average day of operation if a second runway were constructed and if a two-runway airport were operated at full capacity. The time frame in which a two-runway commercial airport, if approved at some later date, could reach full capacity has been roughly computed to be about 57 years into the future.

4.2.42 Comment: In order to protect the two national parks from pollution, the planes would be required to use north and south corridors over the Florida Keys.

Response: In east flow (the prevalent operating mode), Homestead departures to the north would be required to make a southbound turn shortly after takeoff, in order to properly separate these departing aircraft from arrivals into Miami International Airport. Protection of the national parks is not the reason for this departure procedure. The flight paths presented in the SEIS, other than those specifically identified as alternative noise abatement flight tracks, are the normal operating flight corridors that would be expected for a commercial airport at Homestead, regardless of the national parks. The noise abatement flight tracks presented for consideration are for the purpose of mitigating aircraft noise in the national parks.

4.2.43 Comment: Exhibit 1-1 in Appendix A shows that the forecasted operations have been changed in four different ways, and the last one shows that the forecast is much lower than what it would be for 2015.

Response: The comment is correct that several forecasts of aircraft operations have been presented for Homestead as part of various planning studies conducted since 1994. The SEIS undertook the task of collecting the various forecasts, reviewing and comparing them, and making an independent assessment of the most reasonable forecast to use for the SEIS analysis. The documents that were reviewed and the forecasts presented in each document are described in Chapter 1 of Appendix A (Volume II). The SEIS indicates that the forecast developed as part of the 1994 Master Plan was the most rigorous, and so the SEIS forecast was largely based on the 1994 Master Plan forecast. Two main reasons support the lower number of operations in the SEIS forecast when compared to the 1994 Master Plan forecast. The SEIS has a lower forecast of general aviation operations at Homestead and shows an overall shift of the Master Plan forecast by five years into the future to account for the delay in the initiation of airport development, if an airport is approved. Appendix A in Volume II explains the details of the SEIS forecast.

4.2.44 Comment: No consideration is given in the SEIS to building another runway at Miami International Airport, because the county doesn't want to.

Response: The county is taking all possible steps to maximize MIA. A new fourth runway has been approved and will be developed. The SEIS forecast has taken the fourth runway into consideration. As discussed in Chapter 4 of Appendix A and in the Addendum to Appendix A in Volume II, demand at MIA is forecast to exceed the capacity of the airport, including the fourth runway, by 2009–2010. There is no room at MIA for more runways beyond the fourth. MIA is the tenth busiest U.S. airport, with over 16 million passengers enplaned annually, but it occupies a relatively small land area of 3,300 acres. The average size of the 31 busiest airports in the U.S., with activity ranging from 9 to 38 million annual passenger enplanements, is 6,054 acres—almost twice as large as MIA.

4.2.45 Comment: The SEIS indicates there will be over 200,000 flights a year, putting Homestead at a par with JFK. On the other hand, there is no information from the airlines as to whether they support this development at all.

Response: If the proposed airport at Homestead were to attain the maximum capacity of its single runway, it could accommodate about 231,000 annual aircraft operations. Such a status is not estimated to occur, if it does occur, until around 2038. Homestead is never expected to be an airport like JFK, even if a second runway were added. With only the single runway, it would have even less capability. If Homestead were to experience an optimistic growth rate as a one-runway commercial airport, its aircraft operational level would resemble commercial airports in Baton Rouge, LA, or Norfolk, Virginia, around the 2015 time frame. Homestead's maximum use (estimated to occur in 2038) potential with a single runway could achieve the operational capacity of San Diego's commercial airport. The issue of airline interest in Homestead is addressed in the response to comment 4.2.4.

4.2.46 Comment: There has not been a true flight operations analysis of the effect of the aviation activity in the Homestead airport.

Response: The SEIS includes a very thorough analysis of potential flight operations of a commercial airport at Homestead. The lead federal agencies preparing the SEIS took particular pains to develop and use the best available information and most reasonable assumptions for aviation forecasts and flight operations. The SEIS preparation has included the examination of Homestead planning documents (back to 1994) in an effort to identify, review, and update previous analyses related to the aviation activity forecasts, facility requirements, and airspace flight tracks. In addition, an independent evaluation was done for the FAA that is reported in an Airport Planning Data Technical Report in Appendix A in Volume II. This evaluation made some changes to previous forecasts. FAA Air Traffic personnel also performed a new review of flight tracks. The federal agencies, together with FAA, engaged in several reviews of this information before it was used for the analysis of impacts in the SEIS.

4.2.47 Comment: The most recent authoritative study of airport options in Miami-Dade County was performed for the county by KPMG Peat Marwick, with the Final Report issued in July 1988. This study was initiated, in part, to meet the recommendations of a special team appointed by Governor Bob Graham. This study included exploration of the potential use of Homestead AFB. The Draft SEIS did not reference this study and apparently ignored its technical data. This study points out that Opa-Locka Airport has the highest capacity and annual service volumes of the county's airports. It also says that airspace interactions with Miami International Airport would be minor. Since the time of the Final Report in 1988, there have been airfield improvements at Opa-Locka, as well as air traffic control improvements that extend the operational envelopes for Opa-Locka's runways 9L/27R and 12/30.

Response: The 1988 study referred to in the comment is not the most recent study. The Draft SEIS did not use or reference this study. A study completed in 1988 would be based on a snapshot of activity almost 10 years older than the Draft 1996 Dade County Aviation System Plan, and six years older than the only master plan for Homestead Regional Airport, completed by the county in 1994. More recent studies were reviewed and were used for the SEIS to the extent appropriate. Chapter I in Appendix A of Volume II describes previous planning documents relevant to the proposed airport at Homestead that were reviewed. More recent information than 1988 has been considered for Opa-Locka as well.

4.2.48 Comment: The draft SEIS makes reference to the "1997 Dade County Aviation System Plan." No such Plan exists. A Draft Dade County Aviation System Plan Technical Report (emphasis added) was prepared by Dames & Moore at the request of Miami-Dade County. Not only was the report commissioned and the work initially instructed at a time of great political enthusiasm for the acquisition of former Homestead AFB by the county, but the draft output was never presented to the County

Commission. It did not undergo detailed scrutiny by the Aviation Department's own professional staff, and it was never presented for public or interagency scrutiny. Furthermore, the raw data presented is well out of date for an SEIS in 2000. 1993 traffic figures are the most recent included in the draft report. Recently, Dames & Moore was hired by the Miami-Dade County Aviation Department (January 2000) to revise this Draft Technical Report with current and corrected data, so as to permit its submission to the county for review by staff and public comment preparatory to Board of Commissioners review, amendment if needed, then approval and acceptance as a System Plan. As such, any reliance by the SEIS on the earlier desk draft seems inappropriate. Only independently verifiable current data from source documents should be utilized for the SEIS.

Response: Any reference made to a "1997 Dade County Aviation System Plan" in the Draft SEIS has been revised in the Final SEIS to read, "Draft 1996 Dade County Aviation System Plan."

The statements that the study "did not undergo detailed scrutiny by the Aviation Department's own professional staff" and that it "was never presented for public or inter-agency scrutiny" are not entirely accurate. Although the 1996 Dade County Aviation System Plan, Final Technical Report (by Dames & Moore) was not officially adopted by the county, the draft recommendations were presented to the County Manager and to the Board of County Commissioners in 1996. Furthermore, the progress of the report was received by and discussed with the Study's Advisory Committee throughout the planning process. The Study's Advisory Committee also approved the report's recommendations.

The Draft SEIS was based on a combination of technical data and information available at the time of the study, as well as the county's position regarding the reuse of former Homestead AFB. In addition, an independent evaluation was done for the FAA that is reported in an Airport Planning Data Technical Report in Appendix A in Volume II of the SEIS. Several planning documents were used to identify and review previous analyses related to the Proposed Action, including the Draft 1996 Dade County Aviation System Plan, the 1994 Homestead Air Force Base Feasibility Study/Airport Master Plan (1994 Master Plan), and the 1998 Proposed Comprehensive Development Master Plan for Metropolitan Dade County, Florida. These documents reflected the county's position on development of its airports at the time of the preparation of the Draft SEIS. The county is currently updating the Aviation System Plan and the Opa-Locka Master Plan. These studies have not been completed yet, nor their recommendations approved. However, the SEIS has been reviewed and modified where appropriate to reflect the most current available information on the county's plans for airport development. No updated county planning substantially changes the aviation evaluation in Appendix A that is reflected in summary form in Volume I of the SEIS.

4.2.49 Comment: A year ago, the FAA released a report that said a commercial airport in Homestead did not serve the general public and certainly could not be expected to serve the residents of Broward County, who would then be another 35 miles farther from the Homestead airport than they would be from Miami International Airport. The report was quickly killed, probably by the White House. Why is there a need for an additional commercial service airport, given the fourth runway at MIA, the availability of Opa-Locka, and the distance of Homestead from Dade center and Broward center?

Response: The FAA has not prepared any such report and has not submitted any report resembling the above description to any other agency or to the White House. The comment may be referring (inaccurately) to the FAA's 1998 EIS for the fourth runway at Miami International Airport. This EIS was made available for public review according to National Environmental Policy Act procedures. The response to comment 4.2.24 describes why Homestead was not regarded by the FAA as a reasonable alternative to constructing a fourth runway at MIA. Broward County has never been viewed as the potential air service market for a commercial airport at Homestead, although lower-cost air carrier service or special air charter service can attract air passengers from greater distances than would normally be the

case. Responses to comments 4.2.18, 4.2.22, 4.8.1, and 4.8.3 address the need for additional airport capacity in relation to Homestead and other county airports.

4.2.50 Comment: The number of operations in the year 2015 is confusing.

Response: Table 4.5-1 in Volume I of the SEIS provides a summary of the forecast numbers of average daily and annual operations for each year analyzed in the SEIS. The summary identifies categories of potential airport users (i.e., commercial passenger operations, cargo, general aviation, aircraft maintenance, and military/government).

4.2.51 Comment: According to information in the SEIS, even if a commercial airport is built at Homestead, the capacity of that airport and Miami International Airport will be under the capacity needed in 15 years. What about the other 17,000 flights? Are they going to build another runway, three runways, five runways?

Response: This comment appears to be based on a misinterpretation of the operational information presented in the SEIS for 2015 and for maximum use. The SEIS forecast projects operations to reach 150,735, not 235,000, by 2015. Operations at Homestead could reach the maximum capacity of the single runway (231,000 operations) by around 2038. According to the SEIS forecast, if Homestead serves as a commercial service airport, there would not be a shortage of airport capacity in 2015.

4.2.52 Comment: I challenge anybody to put that many airplanes on a single runway in a 24 hour period anywhere in the world.

Response: Operational and fleet mix forecasts are presented in the Draft SEIS. The updated aircraft operations/fleet mix forecast for Homestead Regional Airport is summarized in Table 1-10 in Chapter 1 of Appendix A (Volume II) for 2000, 2005, and 2015. The forecast operations/fleet mix for 2015 is compared to 2038 in Table 1-12 in Chapter 1 of Appendix A.

Large and small aircraft have different performance characteristics. Therefore, the aircraft operational fleet mix is an important factor in determining an airport's operational capacity. For the purposes of calculating capacity, aircraft are categorized according to their approach speed and size. Operational capacity decreases as the diversity of approach speeds increases. This is because aircraft following each other, either on takeoff or landing, are spaced according to the difference in their air speeds. Also, aircraft create wake turbulence and wing tip vortices that require greater spacing between relatively larger and smaller aircraft. The greater the difference in size and speed of the aircraft in the fleet, the greater the space required between aircraft and, therefore, the lower the operational capacity.

The SEIS went beyond the end of the forecast period (2015) in an effort to project demand to the point where the maximum capacity of a single runway could be reached. Projections were made, starting with 2015 forecast demand, until the annual aircraft operations forecast reached the runway capacity estimation of 231,274 annual operations, which is estimated to be around 2038. Therefore, the maximum use condition attempts to estimate when the single runway could run out of capacity. San Diego is a single-runway airport that currently operates at this level. The 2015 forecast of 150,735 operations is well within the capacity estimated for Homestead.

4.2.53 Comment: The largest proposed airport, in the Big Cypress Swamp, was defeated in the late 1960s along with several other proposed airports in or near the Everglades Water Conservation Areas. All these previous proposals were justified on flawed projections of over-capacity at Miami International Airport and could not be justified legally, economically, or environmentally.

Response: The Dade-Collier Training and Transition Airport, often referred to as the Everglades Jetport, and the subsequent proposed airport at Site 14 in a Water Conservation Area were respectively limited and never developed because of environmental reasons. A single runway was proposed for each site (and actually built at Dade-Collier). The primary impetus at that time for building a single commercial-grade runway away from Miami International Airport was to relieve MIA of extensive flight crew training operations. The development of advance flight simulators for training provided that relief. The long-term plan for these locations was ultimately to develop additional commercial service capacity as MIA reached congestion. Miami-Dade County's inability to develop additional commercial service capacity at a new site has contributed to the need to use the available commercial-grade runway capacity that has already been constructed at Homestead.

4.2.54 Comment: The FAA cannot limit the number of airports built due to interstate commerce, and this lack of control is a very scary thing.

Response: Congress has specifically defined the regulatory role of the federal government in developing the national system of airports. While it is true that there are limitations on the FAA's role with respect to civil airports, which are owned and operated by non-federal entities, all new commercial service airports and the expansion of existing airports require some type of FAA approval or decision (e.g., airport layout plan approval, federal funding) in order to develop. FAA approvals and decisions are federal actions subject to the National Environmental Policy Act. It is within FAA's authority to deny federal approval of airport development based on significant adverse environmental consequences. If federal approval is denied, airport development effectively does not proceed. In the case of Homestead, the federal government presently owns the property proposed to be transferred and has even greater control over whether the property is transferred for an airport or for an alternative use.

4.2.55 Comment: There is little or no way to limit airport operations once former Homestead AFB is transferred to the county and begins commercial operations. Operational levels are apparently dictated by demand and safety considerations, and not by environmental considerations or even the municipal owner (were Miami-Dade County inclined to do so). Therefore, to comply with the National Environmental Policy Act, the SEIS must consider maximum operations of a two-runway airport, as such a level of operations is the primary goal of Homestead Air Base Developers, Inc. and Miami-Dade County.

Response: Other than statutory provisions on very limited regulations related to slots and essential air service, there is no statutory provision for federally imposed aeronautical use restrictions at a civil airport. There is legal provision for an airport proprietor to adopt airport restrictions to limit noise under prescribed statutory conditions. The SEIS addresses this subject in greater detail under Mitigation Measures in Section 4.5 of Volume I dealing with aircraft noise.

Section 2.2.7 in Volume I and response to comment 3.4.1 address the issue raised about the second runway. If a second runway were to be proposed in the future, the FAA's approval would be required, and that approval would be subject to the National Environmental Policy Act.

4.2.56 Comment: The proposed use of former Homestead AFB for a commercial airport is inconsistent with the purpose of the national parks and the site location recommendations of the FAA.

Response: The Air Force and FAA acknowledge and respect the views of those who believe that a commercial airport is inconsistent with the purposes of the national parks. An extensive portion of the SEIS is devoted to evaluating potential effects on the national parks. A commercial airport at Homestead is not inconsistent with FAA requirements.

4.3 Commercial Spaceport Alternative

4.3.1 Comment: The Summary did not provide justification for the Commercial Spaceport alternative. The nation has a significant space launch shortfall, and any effort to satisfy that need will address a national interest. That aspect is not reflected in the SEIS.

Response: The Commercial Spaceport alternative is included in the SEIS because various entities proposed it as a potential reuse for former Homestead AFB. The need for such facilities is acknowledged in Section 2.3 of Volume I.

4.4 Mixed Use Alternative

The Draft SEIS presented three different non-aviation scenarios for the Mixed Use Alternative. These scenarios included a Market-Driven scenario, a proposal submitted by Collier Resources Company, and a plan developed by the Hoover Environmental Group. Subsequent to the publication of the Draft SEIS, Collier Resources Company and the Hoover Environmental Group submitted a new joint proposal apparently intended to replace their separate proposals. This new plan is described and analyzed in the Final SEIS. Several of the comments received on the Collier and Hoover plans analyzed in the Draft SEIS have therefore been superseded by the submission of the new proposal. This section addresses comments received on all of the scenarios analyzed under the Mixed Used alternative.

4.4.1 Comment: The information in the Draft SEIS summary tables about the Mixed Use alternative lumps together the three scenarios (Market-Driven, Collier Resources Company, and Hoover Environmental Group) into a range. Separate data should be presented for each scenario.

Response: The Mixed Use alternative in the Final SEIS has been modified to include a joint proposal submitted by Collier Resources Company and Hoover Environmental Group. The Final SEIS presents individual data for that proposal and each of the other scenarios of the Mixed Use alternative.

4.4.2 Comment: The Market-Driven scenario does not seem realistic. If there were a market for development, businesses would already be coming to south Miami-Dade County.

Response: As Appendix D in Volume II indicates, there is a limited market for commercial and industrial development in south Miami-Dade County. It is anticipated that there will be more of a market for residential development in the area. This is the reason the Market-Driven scenario is projected to develop slowly and take several decades to reach full buildout.

4.4.3 Comment: Some commentors contended that it is not possible to evaluate the Collier-Hoover proposal because the plan has not been sufficiently developed.

Response: Each of the alternatives analyzed in the SEIS is at a different stage of definition. The SEIS uses the information provided by each alternative's proponent, supplemented with analytical assumptions based on various planning factors, as explained in Section 2.1.2 in Volume I. A new joint plan submitted by Collier Resources Company and Hoover Environmental Group is described and analyzed in the Final SEIS.

4.4.4 Comment: The Collier plan uses 162 acres that have already been transferred to Miami-Dade County for a regional park.

Response: The Collier-Hoover plan, like the original Collier plan, proposes to exchange property that is currently part of the county park for other property. The plan's proponents assume an acceptable

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exchange could be made. If not, the county would retain the property it has already acquired, and the Collier-Hoover plan would have to be modified to incorporate this change.

4.4.5 Comment: There was a parcel at former Homestead AFB set aside by Miami-Dade County to be used by the School Board. However, the Collier plan took part of this portion of the school property for financial gain. This jeopardizes federal and state funding for the county school.

Response: The Miami-Dade County Public Schools have requested the transfer of approximately 26 acres at the former base. The Collier-Hoover proposal seeks to buy that property as part of the land exchange and use it in their plans for economic redevelopment. The Air Force has not made any final decision concerning to whom that parcel will be conveyed.

4.4.6 Comment: There is no evidence that there is a demand for the residential land use and luxury RV park and golf course included in the Collier plan.

Response: The new joint plan submitted by Collier Resources Company and Hoover Environmental Group no longer includes housing. It still includes a luxury RV park and golf courses. If that alternative is selected, the proponent will be responsible for implementing the plan. Presumably, Collier Resources Company would not have submitted the proposal if it did not believe there is a market for the proposed uses.

4.4.7 Comment: Full buildout of the Collier Resources Company plan seems to be 40 years away.

Response: Collier Resources Company estimated that their original plan would reach full buildout around 2020. The combined Collier-Hoover proposal is estimated by the proponents to reach full buildout by about the same time. Market-Driven development, one of the Mixed Use scenarios, is estimated to take up to 50 years to reach full buildout.

4.4.8 Comment: The Collier plan involves trenching millions of tons of soil, but there is no indication of what will be done with it.

Response: The Final SEIS has been expanded to address a joint Collier-Hoover proposal. It is expected that excavated soil would be used on site, to the extent feasible. Soil that could not be used on site (e.g., contaminated soil) would be disposed of in accordance with applicable regulations.

4.4.9 Comment: The private sector investment of the Collier-Hoover proposal poses the least financial burden.

Response: While the financing structure of the reuse alternatives is beyond the scope of the SEIS, it is believed that all alternatives would involve some level of public and private investment. The Proposed Action also includes proposed private investment on the part of Homestead Air Base Developers, Inc.

4.4.10 Comment: The Collier Plan is nothing more than a form of federal “red-lining” in the 21st Century as a way to prevent African American, Hispanic, and poor people in the Homestead-Florida City area the opportunity for employment and elementary sustenance.

Response: The Air Force and the FAA do not agree.

4.4.11 Comment: The Collier-Hoover plan will make the base a public place held by private interests beholden to other private interests and accountable to no one but themselves.

Response: If the surplus federal land is sold to Collier Resources Company, the land will be privately owned. However, the company's use of the land, and use by others such as the Hoover Environmental Group, will be accountable to the public in the same way that other businesses and organizations are accountable, including required compliance with federal, state, and local laws.

4.5 Independent Land Use Concepts

4.5.1 Comment: Another alternative with less impacts than the Proposed Action should be fully analyzed in the SEIS, even if it will not generate more employment opportunities than the Proposed Action. A more thorough analysis should be completed of the independent land use concepts.

Response: Four reuse scenarios were analyzed in the Draft SEIS in addition to the Proposed Action. In the Final SEIS, a fifth scenario comprising a joint proposal by Collier Resources Company and the Hoover Environmental Group has been added. As Section 2.6 in Volume I indicates, the Independent Land Use Concepts are potential uses for portions of the available land, not for the entire surplus property. Section 2.6 indicates which of these uses could become part of each of the comprehensive land use alternatives. As such, their environmental impacts are generally included in the analysis of the reuse alternatives. For example, reuse of former Homestead AFB as a commercial airport would include aviation support, industrial, commercial, institutional and other uses. Several of the Independent Land Use Concepts, such as an aircraft maintenance facility, back office operations, mail distribution center, insulated panel manufacturing, education complex, research facilities, film production studies, and teleconference center, would be compatible with several alternatives and might well be developed as part of any one of the alternatives. The discussion of the Independent Land Use Concepts within each resource section of Chapter 4 in Volume I focuses on identifying any impacts that might be different from those described for each of the alternatives. Finally, any of the alternatives can be selected in whole, in part, or in combination.

4.6 Other Alternatives

This section addresses comments that included suggestions for uses of the surplus property at former Homestead AFB, other than those included in the Proposed Action and alternatives.

4.6.1 Comment: The property at former Homestead AFB should be put to other uses, such as biomedical and electronics, entertainment complexes for film or music production, information technology companies, vocational school, park, or conservation area.

Response: No proposals for these suggested alternative uses have been received, so the Air Force has no reasonable expectation that they would be developed on the property. They might, however, be incorporated into one of the alternatives addressed in the SEIS, like other Independent Land Use Concepts listed in Section 2.6 of Volume I.

4.6.2 Comment: The range of alternatives is insufficient. It should include an alternative to restore the area or connect the adjacent parks.

Response: The underlying Air Force need is to dispose of surplus federal property. Alternatives that did not meet that need were not evaluated. Although in principle someone could acquire the surplus property simply to restore it, the Air Force has seen no realistic expression of interest in that from anyone and does not consider it a reasonable alternative.

4.6.3 Comment: Former Homestead AFB should be maintained as a federal protection area and converted to a park like the Presidio in California.

Response: The Department of the Interior, which would be the agency to implement such a proposal, has not requested any property at former Homestead AFB for this purpose.

4.7 Preferred Alternative

Council on Environmental Quality regulations require final EISs to identify the lead agency's preferred alternative, if that information is not included in the Draft EIS. The regulations require the Record of Decision (but not the EIS) to identify the environmentally preferred alternative, which may be different from the agency's preferred alternative.

4.7.1 Comment: The U.S. Environmental Protection Agency believes that the Collier Mixed Use proposal, with some important modifications and assurances, is the environmentally preferred alternative and should be pursued further in the Final SEIS.

Response: The Final SEIS has been expanded to include a discussion of recommendations by USEPA and other cooperating federal agencies. They will be carefully considered by the Air Force and the FAA during decision making.

The Final SEIS identifies both the commercial airport (Proposed Action) and the Mixed Use alternative as the lead agencies' preferred alternatives (see Section 2.12 in Volume I). However, no final decision has been made, and all alternatives are treated equally in the Final SEIS.

4.7.2 Comment: The Department of the Interior (DOI) believes that the Mixed Use alternative is the preferred approach to achieve the stated goal for the disposal of former Homestead AFB property and urges the Air Force to adopt the Mixed Use alternative in its Record of Decision.

Response: The Final SEIS has been expanded to include a discussion of recommendations by DOI and other cooperating federal agencies. They will be carefully considered by the Air Force and the FAA during decision making.

4.8 Alternative Airport Locations

4.8.1 Comment: Alternative sites for the development of the commercial airport have been poorly defined and should be addressed. Development of a commercial airport at former Homestead AFB is completely unnecessary. Existing infrastructure (i.e., existing airports) should be maximized.

Response: The purpose of the SEIS is to assess the alternatives for disposal and reuse of portions of former Homestead AFB. One of these alternatives, the Proposed Action, is to develop the former base into a commercial service airport. It is not the purpose of the SEIS to investigate alternative airport sites, because an alternative location for an airport does not address how to dispose of surplus property at the former base. However, the SEIS does present information in Section 2.7 of Volume I, Chapter 4 of Appendix A in Volume II, and in the Addendum to Appendix A regarding the region's need for additional commercial airport capacity and the difficulty of finding a new airport site or achieving sufficient commercial service capacity at existing airports.

4.8.2 Comment: In the original EIS in 1994, Opa-Locka was not even mentioned as a possible alternative.

Response: The comment is correct. Opa-Locka is not a reasonable alternative to reuse of former Homestead AFB, for reasons provided in Section 2.7 of Volume I. It is among the alternatives eliminated

from detailed analysis in the SEIS. However, people have continued to put forward Opa-Locka as an alternative to Homestead, and the Air Force and FAA are responding to questions that have been raised.

4.8.3 Comment: If there is a future need for a reliever airport, expansion of Opa-Locka airport would be a more sound environmental solution. It is the understanding of the Florida Biodiversity Project that Miami-Dade County has already given preliminary approval for reliever cargo operations at Opa-Locka. Opa-Locka is in a more central location and better situated to serve as a reliever airport, as pointed out by a county study in 1995. Opa-Locka Airport would also provide jobs to an area more economically depressed than Homestead. Opa-Locka is within Miami-Dade County's enterprise zone, and developable land is located within the empowerment zone that gives businesses financial incentives.

Response: Section 2.7 in Volume I and Chapter 4 of Appendix A in Volume II of the Final SEIS include information on the capability of Opa-Locka to provide future commercial airport capacity and provide an update on Miami-Dade County's planning regarding Opa-Locka. Opa-Locka is not viewed as having sufficient capability to provide all of the relief anticipated to be needed for Miami International Airport. The FAA's reasoned judgment is that, even if expansion is proposed and achieved, Opa-Locka would not provide sufficient capacity and service capability to negate the need for Homestead. Opa-Locka has environmental issues, as well as Homestead.

4.8.4 Comment: The Draft SEIS noted that the runway system at Opa-Locka Airport (OPF) was inadequate for commercial service. This statement is incorrect and appears to have been made without due consideration or research. In terms of simultaneously useable commercial runways, the runway system at OPF is approximately 1,500 feet longer than that of Chicago Midway (more than 13 million passengers in 1999) and 1,000 feet longer than London Luton, which serviced 5.2 million passengers in 1999. Midway and London Luton are both important commercial airports with significant urban and residential components immediately adjacent. While OPF runways are not suitable for heavy long-haul aircraft, they are well suited to all other commercial jets, the newer of which can operate long-haul services. OPF runways are suitable not only for large modern conventional body aircraft (B757, A300, and A320), but also wide body aircraft (B747, 767) when not at Maximum Take Off Weight (MTOW). For example, Air Force One has utilized OPF on a number of occasions. This means that all non-MTOW (both wide- and conventional body) passenger services could utilize OPF. It also means that all maintenance activities on all aircraft types can be hosted at OPF.

Response: The comment misquotes the Draft SEIS. The Draft SEIS did not say that the runway system at Opa-Locka is inadequate for commercial service. The Draft SEIS said that Opa-Locka's longest runway is 8,002 feet, and that it does not appear to be feasible to develop at Opa-Locka the runway length that Homestead has for nonstop long-haul service. The existing runway system at OPF may be adequate for limited commercial service, but the existing runway lengths are not optimal. Other commercial airports with shorter runway lengths do exist, but this does not mean that the current runway system at OPF provides a desirable length. While an 8,002 foot runway (and less) can support operations by commercial service aircraft in some conditions, some weight limitations on aircraft would be expected at Opa-Locka, particularly in hot weather. The Draft 1996 Dade County Aviation System Plan recommended a 9,000 foot long runway (planning length) at OPF for commercial service operations. The comment is acknowledged that Midway and London Luton airports are immediately adjacent to significant urban and residential areas.

4.8.5 Comment: The Draft SEIS identified airspace as a limiting factor for Opa-Locka Airport because of conflicts with Miami International Airport and Fort Lauderdale-Hollywood International Airport (FLL) airspace. Further, the Draft SEIS says that operating commercial flights at OPF would be dangerous because of the congestion and "cross-over." While the entire question of south Florida airspace is a technical issue to be addressed by the FAA on an ongoing basis, it is absolutely incorrect to make the

statements that are made in the Draft SEIS. There are existing flight paths into and out of OPF today. These co-exist with FLL and MIA. In 1999, these flight paths serviced not less than 117,626 OPF aircraft movements—light, medium, and heavy propeller fixed-wing aircraft as well as rotary wing (U.S. Coast Guard and others) and light, medium, and heavy jet aircraft.

FAA personnel have indicated that an additional 25 commercial flights per hour, or 300 additional commercial flights per day, can be accommodated without any need for airspace planning. This means almost 110,000 additional commercial operations annually. Moreover, there is strong evidence that even more additional flights could be accommodated—noting that these would require some airspace planning which might or might not require moving certain flight paths.

Response: To clarify, the Draft SEIS stated that if a substantial amount of additional commercial service operations were accommodated at OPF, there would be significant impacts on the region's airspace due to Opa-Locka's central location between MIA and FLL (i.e., crossing flight tracks) and the related increase in commercial jet air traffic. Such airspace interactions might require the relocation of some existing flight tracks for MIA and FLL and, in some cases, may affect airport capacity. The potential for crossing flight tracks is not intended to denote a safety problem, but rather a requirement to coordinate operations on converging or intersecting flight paths between FLL, OPF, and MIA, which may affect airport capacity. Runway separation is not identified as a limiting factor. The potential limitations would result from the need to coordinate operations among airports to provide for sufficient separation between aircraft on intersecting or converging paths.

The conclusions drawn in the Draft SEIS regarding airspace limitations are based on available studies. More recent airport system and master planning conducted by Miami-Dade County suggests that potential airspace conflicts appear to be manageable so that they would not be a limiting factor on commercial use of OPF. The Final SEIS includes this recent information obtained from the county. However, it should be noted that the county's planning has not been completed, nor has the FAA reexamined the airspace. A revision of the airspace evaluation, if that occurs, does not substantially change the overall outlook for OPF as not providing a reasonable alternative that would substitute for the need for commercial airport capacity at Homestead, although OPF may be able to function in a commercial service capacity at a higher level than previously thought.

4.8.6 Comment: The Draft SEIS references the issue of noise at Opa-Locka Airport and states that additional noise is the third reason why OPF is not an acceptable location for a commercial runway. Such statements are subjective, inappropriate, and incorrect. OPF has been active for many years with varying levels of aircraft types and operations. At the end of World War II, OPF reportedly serviced the greatest number of annual aircraft movements in the U.S. More recently, aircraft movements have been increasing again. Ruling out a facility as a commercial service airport solely because of subjective perceptions of noise is contrary to various FAA documents that set out guidelines for noise levels, noise abatement and mitigation, and treats OPF on a different basis than Homestead. While it is true that no local community wants more noise, there are procedures for analyzing and mitigating airport noise. Many of the same noise mitigation measures that are suggested for Homestead are also relevant for Opa-Locka. OPF can become a commercial service reliever airport without detracting from the present quality of life or harming property values in Opa-Locka, Miami Lakes, or Hialeah.

Response: The Draft SEIS did not say that Opa-Locka is not an acceptable location for a commercial runway. The Draft SEIS noted that Miami-Dade County is pursuing opportunities for limited commercial service at Opa-Locka. The Final SEIS recognizes that the county is exploring expansion prospects of Opa-Locka for more commercial service. However, the area surrounding the airport has become much more densely populated since World War II, and OPF has residential and business development adjacent to it which pose developmental and environmental issues. There are acknowledged environmental

concerns, including noise, about the prospect of airport expansion to accommodate more commercial service. If the county submits an airport expansion proposal to the FAA, FAA will assess noise and other potential environmental impacts of the proposal under FAA procedures for implementing the National Environmental Policy Act and would apply appropriate analyses and mitigation. Community noise mitigation measures similar to those suggested at Homestead would be considered.

4.8.7 Comment: The SEIS should be corrected to remove the “either/or” linkage of Opa-Locka and Homestead, to correct facts regarding the OPF runway infrastructure and airspace capacities, and to correct statements made regarding noise and other matters at OPF.

Response: The SEIS has been reviewed and modified where appropriate to ensure that every statement referring to Opa-Locka Airport is accurate and clear regarding technical issues, potential commercial service role and expansion, and Miami-Dade County’s current planning effort. The FAA agrees that the situation with respect to commercial air service in Miami-Dade County is not appropriately described as “either/or” relative to OPF and Homestead. Each airport could fulfill a certain commercial service role. The updated and revised information in the Final SEIS on OPF does not substantially change the evaluation in the Draft SEIS that OPF is not a reasonable alternative for Homestead. OPF could be a complementary commercial service airport, but not a substitute for an airport such as Homestead could provide.

4.8.8 Comment: In the absence of a commercial airport at former Homestead AFB, other existing commercial airports in the region may instead become reliever airports, and their safety, capacity limitations, and environmental issues need to be considered as well by decision makers and in the overall sustainable development of south Florida. The U.S. Environmental Protection Agency looks to state and county officials to oversee such development to ensure that it is managed, sustainable, and appropriately zoned.

Response: These are not reasonable alternatives within the scope of the SEIS. Appendix A in Volume II does describe the difficulties of finding sufficient commercial service capacity within the existing system of airports. The Air Force and FAA agree with USEPA that safety, capacity, environmental issues, and sustainable development are key considerations in any reliever airport proposal.

5.0 CONTENT AND METHODOLOGY

This category addresses a series of comments on the content of the SEIS and the overall methodology. Comments on the methodology used to address a specific resource (e.g., Noise, Air Quality, Water Resources) are addressed under those resources.

Several comments questioned the type of information used or the level of detail included in the SEIS. The approach to and level of analysis presented in the SEIS was selected to provide information related to the decisions that need to be made by the Air Force and FAA. This led to an emphasis on identifying the incremental changes attributable to each of the alternatives, and comparing the alternatives to one another. Most of the changes estimated to occur over the next 15 years are primarily attributable to overall growth in south Florida, independent of the reuse of former Homestead AFB. The SEIS includes a cumulative impact analysis, as required by Council on Environmental Quality Regulations, but the emphasis is on identifying the contributions that base redevelopment would make to those cumulative impacts, which is in most cases relatively small (see category 23).

5.1 Format of the SEIS

5.1.1 Comment: The discussion of the alternatives and their impacts in the Draft SEIS Summary is superficial. The text did not always provide comparable data about the alternatives.

Response: The purpose of the Summary is to give a general overview of the findings of the SEIS and highlight the major points. The Summary of Environmental Consequences table provides more uniform data across the reuse alternatives and between the alternatives and the projected baseline. For more thorough discussion, readers should consult the full SEIS document. By its nature, the Summary cannot provide as thorough information or discussion as the main body of the SEIS.

5.1.2 Comment: The discussion of the stormwater plan is scattered throughout the document.

Response: The SEIS follows the standard outline for an environmental impact statement as delineated in Council on Environmental Quality regulations for implementing the National Environmental Policy Act. The Surface Water Management Master Plan prepared by Miami-Dade County for the Proposed Action is described in Chapter 2 of Volume I, which describes the Alternatives Including the Proposed Action. Existing stormwater conditions are described in Chapter 3, Affected Environment. The impacts of the proposed plan are described in Chapter 4, Environmental Consequences, principally in Section 4.10, Water Resources. Because changes in surface water flows can affect biological resources, potential impacts from the stormwater plan are also addressed in Section 4.11. This format is used for all resources in the SEIS.

5.2 Geographic Areas Addressed in the SEIS

5.2.1 Comment: The SEIS does not consider unincorporated lands in south Miami-Dade County that are near former Homestead AFB.

Response: The region of influence for most of the resource analyses in the SEIS is defined in Chapter 3 of Volume I as the portion of Miami-Dade County south of Eureka Drive, where most of the impacts from reuse of former Homestead AFB are expected to occur. The Socioeconomics sections in Volume I (3.1 and 4.1) specifically address the unincorporated portions of the county, along with incorporated communities within the region of influence like the City of Homestead and Florida City. The Land Use and Aesthetics sections (3.6 and 4.6) also address south Miami-Dade County in general (which includes the unincorporated areas) as well as the two cities. The section on Agriculture in particular pertains to unincorporated areas, where most agricultural land uses occur. In addition, Sections 3.5 and 4.5 present noise information for both incorporated and unincorporated areas surrounding the former base.

5.2.2 Comment: There is no reference to Kendall in the Draft SEIS.

Response: Most impacts from the Proposed Action and alternatives are anticipated to occur in south Miami-Dade County, south of Eureka Drive.

5.2.3 Comment: The Draft SEIS does not consider impacts from reuse of former Homestead AFB on Monroe County and the Florida Keys or consider the Keys' designation as an Area of Critical State Concern.

Response: The SEIS discusses impacts on Monroe County in the Socioeconomics, Noise, Land Use and Aesthetics, and Biological Resources sections of Volume I. These are the resource areas in which potential impacts on Monroe County have been identified. For other resources, the Florida Keys are outside the area where the vast majority of impacts are anticipated to occur.

5.2.4 *Comment:* The Draft SEIS does not mention/address Florida Keys National Marine Sanctuary, John Pennekamp State Park, or North Key Largo Hardwood Hammock.

Response: Florida Keys National Marine Sanctuary and John Pennekamp State Park are shown on the General Location Map in Figure 1.1-1 and discussed in Sections 3.6 and 4.6 of Volume I. The Final SEIS has been expanded to include information on the Key Largo Hammocks Botanical Site.

5.2.5 *Comment:* Noise and pollution from the Proposed Action will destroy the environment of the Miccosukee and Seminole reservations and their means of getting medical attention from their medicine people.

Response: The Miccosukee and Seminole reservations are relatively far away from former Homestead AFB and the impacts of base reuse. It is not anticipated that the Proposed Action or any of the reuse alternatives would prevent residents at these reservations from continuing their practices.

5.2.6 *Comment:* The Draft SEIS did not address environmental impacts from the Proposed Action and alternatives on lands owned by South Florida Water Management District (SFWMD). Virtually no reference is made to the Southern Glades Wildlife and Environmental Area or the jointly held SFWMD/Miami-Dade County Model Lands located south of former Homestead AFB.

Response: The Final SEIS has been expanded to more specifically address SFWMD lands. Additional discussion has been added to Sections 3.6, 3.11, 4.5, 4.6, 4.11, and 4.14 in Volume I and Appendix E in Volume II.

5.3 Analysis Not Included in the Draft SEIS

5.3.1 *Comment:* The impacts of the Proposed Action and alternatives on quality of life were not addressed in the Draft SEIS.

Response: Quality of life can be affected by a wide range of factors, and the importance assigned to each of those factors varies from person to person depending on their personal circumstances and values. The SEIS describes impacts on the range of environmental and socioeconomic conditions and describes how the area can be expected to change, so that readers can determine for themselves how each alternative is likely to affect their quality of life according to their personal values and priorities.

5.3.2 *Comment:* The Draft SEIS did not address the intangible natural experience.

Response: The SEIS describes potential changes in the natural environment that may occur under each of the alternatives analyzed. These include potential changes in land use, population density, noise, aesthetics, and other factors that could affect the natural environment. To the extent that those experiences are intangible and personal, readers may use the information provided to reach their own conclusions about how their experiences may be affected.

5.3.3 *Comment:* Aviation experts do not believe that the Air Force will remain at Homestead if a significant airport is developed. No significant Air Force training facility co-exists with significant commercial aviation. The missions of commercial aviation and military training are incompatible. It is thus reasonably foreseeable that at some point in the next 10 to 15 years there will no longer be an Air Force contingent at the Homestead facility. This contingency should have been analyzed in the SEIS. Among other things, it significantly affects noise impact analyses and would possibly result in accelerated growth of the commercial airport because of the additional available land and airspace.

RESPONSES TO COMMENTS

Response: The Air Force disagrees with the assertion that it is reasonably foreseeable that the Air Force Reserve unit will no longer be at Homestead in the near future.

First, the Air Force will not realign or close bases except in accordance with a comprehensive base closure process authorized by Congress, as was done for the base closures from 1988 through 1995. Such authority does not presently exist. Despite repeated requests to Congress by the Secretary of Defense for additional base closure authority, Congress has not provided it. When Congress might agree to do so is uncertain. What goals or constraints Congress might impose on such a process is speculative. How such a process could affect Homestead Air Reserve Station (ARS) is simply unknown.

Second, there is no reason to believe that the flying activities of the Reserve unit would be incompatible with civil operations in the next 10 to 15 years. Although the comment did not define what was meant by “significant Air Force training facility” or “significant commercial aviation,” the projected number of airport operations by 2015 would at most be only half the capacity of the airport. The maximum use was analyzed in the SEIS, not because it was forecast based on demand, but to provide an indication of the maximum credible impact of establishing a commercial airport at Homestead.

Third, the statement that training and commercial aviation do not mix anywhere is also incorrect. As an example, the Albuquerque International Sunport is collocated with Kirtland AFB in New Mexico. In 1999, there were 228,933 takeoffs and landings at the airport. Of these, 84,345 were by major airlines; 28,135 by commuter airlines; 43,761 by military aircraft; and 72,692 by general aviation aircraft.

The majority of the military flying activity at Albuquerque is by the 150th Fighter Wing, an Air National Guard unit stationed at Kirtland AFB. The wing flies F-16s. The airport is served by nine major commercial carriers: American, America West, Continental, Delta, Frontier, Northwest, Southwest, TWA, and United. It also receives regular service from commuter airlines (Mesa, Rio Grande Air, and Skywest) and from air freight carriers (Airborne, Burlington Air, Emory/Purolator Express, Federal Express, Integrated Airline Services, Reliant Airlines, and UPS).

Fourth, the commentator’s consultant provided a list of specific activities that allegedly “would not be acceptable to a civilian air carrier operation.” Some of those activities, like tow target operations, drag chute deployments, and military air traffic control procedures, do not apply to the Reserve’s operations at Homestead ARS. Other allegedly incompatible activities, like military priority operations or reduced separation criteria, are also off the mark. Active scrambles by alert aircraft happen only about once every two days and could be easily accommodated by airport controllers. Reduced separation is something permitted only military aircraft, not civilian. (The separation of military aircraft from civilian, either in front or behind, would not be changed.) Even activities like carrying live ammunition occur at commercial airports elsewhere in the country. Not one of the activities identified by the commentator’s consultant is considered by the Reserve wing to be incompatible.

Finally, this comment is based on the unwarranted assumption that the aircraft flown by the Reserve unit at Homestead must permanently be fighters. The Air Force changes the equipment of flying units from time to time. Airlift wings transporting passengers and cargo can turn into fighter wings, and vice versa. Were serious incompatibilities ever to develop between military and civil operations, one way to address the issue would be to change the wing’s aircraft.

Thus, there is no reasonable basis for assuming any change in the Reserve wing’s status at Homestead. Even if it were to change, it would not be expected to result in accelerated growth of the airport. The potential growth of the airport is limited by runway capacity, not facility capacity, and the projections made for the SEIS about the potential speed of airport development are already ambitious (i.e., an airport might grow a lot more slowly than projected, but it would not be expected to grow a lot more quickly).

Appendix A in Volume II describes the basis for projected levels of aircraft operations used in the analysis.

5.3.4 Comment: The Draft SEIS did not compare the Proposed Action to similar facilities such as Miami International Airport (MIA).

Response: The proposed commercial airport at former Homestead AFB would differ from MIA in many respects, including being a substantially smaller airport. The level of aircraft operations is much higher at MIA, the surrounding development is different, and the environment differs. Other airports were used as a frame of reference to identify many of the components of the Proposed Action, such as the type of hazardous materials that might be used, typical associated development, and other factors. The environmental effects are not considered comparable, however.

5.3.5 Comment: The Draft SEIS did not study damage to the canals around Miami International Airport. How can the impacts of the proposed airport on canals near former Homestead AFB be analyzed without that information?

Response: There are two main reasons why studies of canals around MIA were not considered relevant for the Homestead SEIS. First, while it may appear on the surface that there are many similarities between the canals at MIA and the canals at Homestead, there are many factors that affect MIA canals that are not anticipated to affect Homestead canals, particularly the level of development that surrounds MIA. The large roadways surrounding MIA are not anticipated to be developed around the former base (although some roadways would be developed), and the level of traffic currently served by these roadways are contributing factors to the deterioration of canals near MIA. Second, the nature of the stormwater management system at the former base is substantially different from the stormwater management system at MIA. The self-contained nature of the drainage from the former base would limit impacts primarily to canals on the former base itself. Such is not the case for MIA.

5.3.6 Comment: The development adjacent to the base has not been adequately analyzed for hurricane damage and flood potential and associated costs.

Response: The potential for hurricane damage and flooding exists independent of the reuse of former Homestead AFB and is not considered germane to the selection of a reuse alternative. Sections 4.10 and 4.11 in Volume I address the potential for a hurricane to create spills of fuel and hazardous materials.

5.3.7 Comment: The Draft SEIS does not include the Agriculture and Rural Area Retention Plan and Biscayne Bay Watershed Management Plan required by the Florida Administration Commission but not yet completed by Miami-Dade County.

Response: If those studies had been available, they would have been included in the SEIS analysis. However, they were not available. The studies were required for compliance with state statute (Chapter 288), not a federal requirement. The SEIS has been prepared in compliance with the National Environmental Policy Act. There is no legal requirement for those studies to be prerequisites to the Air Force and FAA's compliance with NEPA. While they would have undoubtedly been helpful if they had been available, they were not necessary to complete the SEIS analysis or for the Air Force and FAA to make an informed federal decision. The state's decision making and approval is a separate process.

5.3.8 Comment: The Draft SEIS did not take into consideration the environmental impacts associated with the increased employment.

RESPONSES TO COMMENTS

Response: Each section of Chapter 4 in Volume I addresses impacts from both direct and “secondary” development associated with the Proposed Action and alternatives. Each reuse alternative is anticipated to generate secondary employment and population in-migration—the people who move to the area to take jobs at the former base. The impacts of this secondary development are addressed in the SEIS.

5.3.9 Comment: The hazards posed by aircraft noise and unburned fuel on Model Lands, Florida Keys National Marine Sanctuary, and John Pennekamp Coral Reef State Park were not addressed in the Draft SEIS.

Response: The Final SEIS has been expanded to further address impacts on the Model Lands. Noise impacts in the Florida Keys National Marine Sanctuary and John Pennekamp Coral Reef State Park are addressed in Section 4.5 of Volume I. Aircraft flying over those locations would be at relatively high altitudes where any unburned aviation fuel would evaporate before reaching the surface. Therefore, they are not expected to be affected by unburned aviation fuel.

5.3.10 Comment: The SEIS addresses all the physical security issues of all the proposals within the applicable laws and codes, but the issues of crime and growth and the changing demographic within Dade County is not accurately accounted for, creating a flaw that will impact the national security of our country as well as all real and intangible resources of the community. This in turn will affect the health, safety, and welfare of all residents in the community.

Response: No evidence has been presented to indicate that future security issues would be different in Miami-Dade County as a result of reuse of Homestead AFB. The increased need for police protection (number of sworn officers) due to growth is addressed in Section 4.1.5 of Volume I.

5.3.11 Comment: The SEIS should review issues associated with county landfills, nearby sewage injection wells, and reuse of former Homestead AFB as a whole.

Response: These activities do not interact with reuse of former base property, except as part of the total discharges to Biscayne Bay and to groundwater. Contamination from sources outside the former base is incorporated as part of the existing environment, to which discharges associated with the Proposed Action and alternatives are added in the analysis.

5.4 Period of Analysis

5.4.1 Comment: The SEIS should analyze the alternative plans for longer than 15 years.

Response: The SEIS addresses each alternative in three time frames (2000, 2005, and 2015), and at full buildout. Full buildout is defined as that alternative’s full potential for development. It varies among alternatives and in some cases extends almost 40 years out.

5.5 Requests for Additional Information

5.5.1 Comment: A number of commentors have requested that the SEIS include analyses that are beyond the document’s scope. Some of these topics include the significance of unemployment conditions in south Florida, the quality of jobs created by each proposal, the economic viability of each proposal, cost-benefit analysis, implementation costs and funding/financing, detailed mitigation plans, the best location for an airport in south Florida, the environmental record of the Miami-Dade County Aviation Department, and others.

Response: It is beyond the scope of the SEIS to also evaluate the many topics that people would like to see discussed. None of these additional analyses are required by the National Environmental Policy Act. The goal of the SEIS is to analyze potential environmental impacts. Commentors may seek information about these other issues, where available, from project proponents, state and local agencies, and other sources.

5.6 Definition of the Baseline

The baseline constitutes the basis of comparison for identifying impacts from the Proposed Action and alternatives. The SEIS uses a projected baseline, projected to 2000, 2005, and 2015. This section addresses questions about the selection of the baseline.

5.6.1 *Comment:* Why were existing operations at former Homestead AFB taken as the baseline?

Response: The purpose of the SEIS is to compare the projected changes in environmental conditions generated by alternative proposals for reuse of former Homestead AFB property to existing conditions and future no action conditions, in order that the Air Force can make an informed decision concerning property disposal. The existing conditions include ongoing operations at Homestead ARS.

5.6.2 *Comment:* The level of aviation activity at Homestead AFB and the impacts of those activities should be the standard of comparison for the Proposed Action and alternatives. Today's limited Air Force activities are not a valid comparison standard.

Response: The Air Force and FAA received similar comments during the scoping process. Interest was expressed in a comparison of future impacts to pre-hurricane conditions. For reasons explained below, such a comparison is not the proper standard for National Environmental Policy Act analysis, but information on some of those conditions is presented in the SEIS.

As explained in the beginning of Chapter 3 in Volume I, information about existing environmental and socioeconomic conditions is presented for each resource. That information provides a frame of reference about conditions that prevail currently or existed in the recent past. In some cases, that information includes conditions that existed prior to Hurricane Andrew when Homestead AFB was active. For example, Appendix E in Volume II provides pre-realignment noise contours and grid point analysis.

However, to understand how the Proposed Action or the alternatives could change the environment, it is also necessary to depict conditions as they are estimated to be in the future, both with and without reuse of the base property. Therefore, each resource presents a projected baseline environment that describes conditions as they could be expected to be without reuse of the former base.

It is the comparison of the Proposed Action and each alternative against the projected baseline (same as the No Action alternative) that constitutes the comparison standard for NEPA analysis. To understand why, one must consider the possible decisions that could be made. The Air Force could choose the Proposed Action, one of the other reuse alternatives, or the No Action alternative. It is the purpose of the SEIS to analyze the potential environmental impacts of each and compare them to each other. But the Air Force cannot ever choose to return to a "pre-Hurricane Andrew" environmental condition. So while the previous military conditions (or the even earlier, more pristine environmental conditions) may be of interest to some and may be viewed by others as having relevance to decision making, those conditions cannot form the basis of comparison for the technical impact analysis of the choices actually facing the Air Force and FAA.

5.6.3 *Comment:* Section 3.10.2.2 of the Draft SEIS indicates that it is not clear how and where projected baseline growth in south Miami-Dade County will occur, but other sections of the Draft SEIS indicate that it will occur south and east of the former base.

Response: The analysis in the SEIS surmises that the location of future growth would generally be within the Urban Development Boundary (UDB), with some development likely to occur outside of the UDB. Generally, this means that growth would occur primarily north and west of the former base, with some development east and south. On a gross level, it is possible to estimate how much development there will be, based on general observations of development patterns, but it is not possible to determine what specific parcels might be developed.

5.7 Assumptions Incorporated in the Analysis

5.7.1 *Comment:* Some commentators did not believe the SEIS should accept the information furnished by reuse proponents.

Response: Reuse of former Homestead AFB property will be accomplished by entities who receive the property. Neither the Air Force nor FAA will be implementing any of the reuse plans. It is reasonable, therefore, to use the plans as defined by the reuse proponents as the basis of the Proposed Action and alternatives.

5.7.2 *Comment:* The Air Force estimated the level and timing of employment associated with each alternative analyzed. The Air Force cannot guarantee that these levels of employment will be achieved.

Response: The Air Force relied upon proponents of each of the alternatives to provide information about anticipated development and operations, and in some cases employment. Standard multipliers and economic models were then used to estimate resulting direct and indirect employment for the purposes of analysis in the SEIS. The Air Force does not guarantee the projected employment levels will be achieved, but they represent a reasonable best estimate based on the information available.

5.7.3 *Comment:* The employment projections for the Proposed Action should be revised to reflect, not the optimistic traffic projections of the Airport Planning Data Technical Report, but the most realistic scenario for the proposed airport, or a range of possible numbers from the most optimistic to the most pessimistic.

Response: The analysis in the SEIS of all the alternatives is based on the development plans submitted by the proponents of each alternative. They represent the best estimates of what could occur for the purposes of assessing environmental impacts and comparing the alternatives. Although there is uncertainty associated with any projections into the future, the information is sufficient to allow the Air Force and FAA to make informed decisions about the disposal of surplus property at former Homestead AFB.

5.7.4 *Comment:* The SEIS relies upon state processes as being sufficient to cover certain environmental issues. Those processes were a failure.

Response: The SEIS relies on state processes to the degree they provide evidence of governmental intentions about matters relevant to the analysis of impacts or reflect regulatory requirements. The SEIS does take into account such things as minimum regulatory requirements for stormwater management and assumes they will be met, but the SEIS does not evaluate whether those processes are sufficient (or insufficient) to protect environmental values.

5.7.5 Comment: It is naïve to believe that noise, pollution, and safety of a commercial airport at former Homestead AFB can be managed or restrained.

Response: The noise, safety, and other impacts of the Proposed Action were analyzed using accepted models and methodologies. The results of the analyses are reported in the SEIS, which also identifies potential mitigation measures that could be used to reduce adverse impacts.

5.7.6 Comment: The basis for the assumption that 4,000 acres of agricultural land and 4,500 acres of unprotected vacant land could be developed by 2015 is not given. It is not discussed whether these estimates include redevelopment of former Homestead AFB.

Response: The basis for the estimates of projected baseline growth is explained in Section 2.1.3 in Volume I. It does not include development of the disposal property at former Homestead AFB.

5.7.7 Comment: Details regarding projected future growth and density patterns in areas currently zoned for agriculture or open land use could be refined and more clearly substantiated or referenced.

Response: As explained in Section 2.1.3 in Volume I, the SEIS analysis relied primarily on planning and projections developed by the Miami-Dade County Planning Department. No other agency has conducted detailed studies or made detailed forecasts of future growth and development at the sub-county level. The county's projections assumed a high level of future population growth and were adjusted to a more moderate growth level for use in the SEIS.

5.8 Thoroughness of the Analysis

5.8.1 Comment: The Draft SEIS focused primarily on noise impacts and treated other pollution lightly.

Response: The SEIS addresses 14 resource topics, including noise, air quality, water quality, and impacts on biological resources.

6.0 SOCIOECONOMICS

A large number of comments were received on the socioeconomic effects of the Proposed Action and alternatives, particularly concerning employment and earnings. This section addresses those comments and comments on population, housing, community services, and financial impacts on government entities.

6.1 Employment and Earnings

Because of the volume of comments on this topic, this section is subdivided into comments on existing economic conditions, the proposed commercial airport, and the Mixed Use alternative.

Economic Conditions in South Florida

6.1.1 Comment: According to 1990 population data, south Miami-Dade County (defined as south of Kendall Drive) held only 7.94 percent of the county's residents and 11.5 percent of the county's jobs, which equates to higher job opportunity for the percentage of south county residents. A population density map published by the South Florida Water Management District in 1997 illustrates the inequity in population density between northern and southern Miami-Dade County. The pattern of employment opportunities follows the distribution of residents throughout the county.

RESPONSES TO COMMENTS

Response: The data furnished by the commentor was for 1990, when Homestead AFB was still active. In 1995, the area of Miami-Dade County south of Kendall Drive contained 18.0 percent of the population of the entire county and 10.8 percent of the employment. For the area south of Eureka Drive, used in the SEIS analysis, the respective figures are 7.9 percent and 3.5 percent. This reflects an imbalance between population and jobs. South Miami-Dade County functions essentially as a bedroom community with a low number of jobs relative to residential population.

6.1.2 Comment: There is inconsistency in the sources of information to gather statistics regarding the percentage of jobs and population dispersed over north and south Miami-Dade County. The job dispersal statistics on page 3.1-5 of the Draft SEIS use figures based on Kendall Drive (SW 88th Street) as the dividing line between north and south county. On page 3.1-16, Eureka Drive (SW 184th Street) is used as the dividing line for population dispersal. These two comparisons are made using different geographic regions.

Response: The information presented for the area of Miami-Dade County south of Kendall Drive was derived from a study undertaken by the Planning Department of Miami-Dade County. It was provided for information only. For purposes of the analysis in the SEIS, the definition of south Miami-Dade County is the area located south of Eureka Drive. This is used as the geographic basis of comparison for all of the SEIS analysis.

6.1.3 Comment: The Draft SEIS overstates current unemployment in Homestead, which has declined and is lower than that for Miami-Dade County. The greater Homestead area now has the same number of small businesses and jobs as it had prior to Hurricane Andrew.

Response: The average unemployment rate in the City of Homestead for 1999 was 5.8 percent, having fallen from a level of 10.0 in 1992. The average rate in Miami-Dade County in 1999 was 6.1 percent. The county unemployment rate was 10.5 in 1992. These declines reflect a nationwide trend. Unemployment in 1992 was 7.5 percent in the nation and 8.3 percent in the state of Florida. In 1999, these rates declined to 4.2 percent for the nation and 3.9 percent for the state. Homestead's unemployment rate in 1999 was still higher than the national and state averages. Also, much of the area surrounding former Homestead AFB is unincorporated Miami-Dade County; it is not just the City of Homestead.

6.1.4 Comment: Statistics show that Miami-Dade County lags behind in the creation of jobs and has a higher unemployment rate the nation and the state.

Response: Unemployment in the county averaged 6.1 percent in 1999, compared to 4.2 percent for the nation and 3.9 percent for the state.

6.1.5 Comment: Unemployment in Florida City is 15 percent or higher.

Response: Unemployment rates were not available for Florida City. Unemployment in 1999 was 6.1 percent in Miami-Dade County and 5.8 percent in the City of Homestead.

6.1.6 Comment: The SEIS should address the poverty rates and "poverty designation" for Homestead and Florida City.

Response: Portions of Homestead and Florida City (selected census tracts) have been identified by the U.S. Department of Housing and Urban Development as an Empowerment Zone based on poverty rates reported in the 1990 U.S. Census. Targeted grants, tax incentives and loans, public/private investment, and other activities have been implemented as part of a strategic plan to support people looking for work with job training, childcare, transportation, and other measures designed to reduce poverty. In 1990, the

reported poverty rate for the City of Homestead was 29.9 percent and 36.8 percent for Florida City. By comparison, Miami-Dade County had a poverty rate of 17.9 percent and the state of Florida had a poverty rate of 12.7 percent.

6.1.7 Comment: The SEIS distorts the importance of the Air Force Reserve Command presence at Homestead Air Reserve Station by not recognizing that most of the personnel are only there part time.

Response: The socioeconomic analysis is based on full-time equivalent jobs, in order to provide a common measure of employment and earnings. To calculate the full-time equivalent jobs for part-time Reservists and National Guard personnel, it was assumed that each individual works 300 hours per year. There are a total of 2,080 working hours in a year, so each part-time employee is equivalent to 0.144 full-time employee, and 6.93 part-time personnel represent one full-time equivalent job.

Employment and Earnings for the Proposed Commercial Airport

6.1.8 Comment: The Draft SEIS estimate of approximately 38,000 jobs that would be created by the Proposed Action is unsubstantiated. Airports do not dictate the number of employees each airline will employ.

Response: First, it is important to understand that the estimate of 38,000 jobs for the Proposed Action is (1) at full buildout and maximum capacity use of a single-runway airport at Homestead, and (2) includes all direct (on-site) and secondary (off-site) employment generated by the proposal. It is not known when or if full buildout will be reached at Homestead. Further, the total employment includes not only airport employees but also on-site employees at commercial and industrial facilities that might be developed, as well as off-site employees that support related and unrelated activities, including jobs at supermarkets and other businesses that would serve the increased population.

The second important consideration is that there is currently no detailed plan for full buildout. Therefore, the SEIS analysis for full buildout is essentially a capacity analysis. The maximum capacity of the airport and the other disposal lands was estimated based on a number of factors: the reasonable maximum number of aircraft operations that can be accommodated by a single runway, the maximum floor-area ratio permitted for various land uses by zoning regulations, and standard average industry ratios of employees per square foot of facility (by land use) and per aircraft operations or number of passengers. The assumptions used to generate the resulting employment estimates are described in Section 2.2 of Volume I.

6.1.9 Comment: Miami International Airport has 35,000 on-site jobs, but Homestead is projected to provide 38,000 jobs.

Response: The estimate of 38,000 potential jobs for the Proposed Action assumes the airport reaches full capacity. This number includes both on-site and secondary off-site jobs. On-site jobs would include not only employment associated with the airport itself, but also employment in industrial and commercial facilities on former base property. The off-site employment, which comprises about 21,000 of the 38,000 total employment, could be located in various areas of Miami-Dade County.

6.1.10 Comment: The Proposed Action promises 38,000 jobs. How can it promise that? Will people have to relocate because the area becomes overcrowded, noisy, and polluted?

Response: There is no promise or guarantee that a given number of jobs would be generated under any of the reuse alternatives. The job numbers in the SEIS are reasonable estimates of anticipated employment under different alternatives. In general, these employment figures are based on similar projects elsewhere

and use reasonable planning factors. The timing of the implementation of any alternative is subject to many variables and has decreasing certainty as one projects farther into the future. The SEIS identifies the potential changes in the environment, including estimated increases in population, noise, and pollution.

6.1.11 Comment: The Draft SEIS is based on erroneous assumptions and is flawed in its employment projections for the Proposed Action. The employment projections are vitally important because most of the local political and grass roots support for the Proposed Action is based on the belief that the jobs created would be significantly more than the jobs created by the alternatives. Further, the ultimate decision regarding the disposition of the property will take into account the economic impact as well as the environmental impact. If the Draft SEIS misstates the economic impact, that decision would be made based on false information. This decision will impact life in south Miami-Dade County for the foreseeable future. It must be made based on accurate information about the benefits and consequences of both the Proposed Action and the alternatives.

Response: The information and conclusions in the SEIS are based on the best available data, methodologies, and assumptions. Individual readers may differ as to their interpretation of the information provided and whether it meets their specific goals and objectives for use of the property.

6.1.12 Comment: The number of jobs estimated for the Proposed Action appears to be inflated, when compared to other existing airports that were converted from Air Force bases.

Response: It is difficult to directly compare the outcomes of reuse of former Air Force installations because of the varied conditions associated with the areas within which they are located and the time at which they were transferred. The Proposed Action for former Homestead AFB estimates 2,211 direct jobs (i.e., total on-site reuse employment) five years after implementation of the plan. Such a level of activity appears to be well within the range of actual experiences at other installations that have been reused.

6.1.13 Comment: The Draft SEIS Summary estimates on-site jobs for the Proposed Action will be 13,200. The total off-site jobs for south Miami-Dade County was predicted to be 14,000, but the table on page 32 states this number will be 10,000. If the two are averaged, the estimate of the number of off-site jobs brought by the Proposed Action is 12,000. The total jobs created by the Proposed Action by 2015 are 25,200. Combining the predicted job numbers for the Collier plan and the Hoover plan described in the Draft SEIS results in 9,500 on-site and 12,700 off-site jobs by 2015.

Response: The difference in the estimates of off-site jobs under the Proposed Action is between jobs countywide and jobs in the south county (south of Eureka Drive). The number of off-site jobs in south Miami-Dade County is estimated to be 10,004 in 2015 for the Proposed Action, whereas the off-site employment for Miami-Dade County as a whole would be 14,359 in 2015. The Collier and Hoover plans have been combined into a joint proposal, which is addressed in the Final SEIS. Off-site employment for that proposal in 2015 is estimated to be 8,278 in the south county and 6,871 in the county as a whole. The larger number for the south county reflects relocation of some tourism-related jobs. Section 4.1 in Volume I provides more detailed information on employment for the reuse alternatives.

6.1.14 Comment: The Draft SEIS does not provide the income associated with the 38,000 jobs attributed to the Proposed Action.

Response: The SEIS estimates total employment and earnings for each alternative. These include a wide variety of on-site and off-site jobs. Although the specific jobs and their incomes are not known at this time, based on the estimated mix of employment types, average annual wages are estimated at about \$29,000 in 1995 dollars.

6.1.15 Comment: More than one-third of the employment in the aviation industry is composed of skilled workers, defined as those with degrees beyond high school, such as engineers, mechanics, and supervisory personnel.

Response: Relative to many other industries, employment in the aviation industry requires high skill levels.

6.1.16 Comment: The commercial airport will bring to the community very good high paying jobs, compared to Collier-Hoover. The relative pay for aviation jobs is typically higher than for recreation jobs.

Response: Average earnings per job for direct employment in 2015 is estimated to be approximately \$29,109 for the Proposed Action, including aviation and non-aviation jobs, and \$27,797 for the Mixed Use Alternative, including recreational and other jobs. The average aviation job generates \$36,960, which is 31 percent greater than the average recreation job, which generates \$28,151. These values are expressed in 1995 dollars.

6.1.17 Comment: Airport-related jobs are estimated to generate over \$1 billion dollars in revenue by 2015.

Response: The \$1 billion in revenue estimated for the Proposed Action is at full buildout/maximum capacity, which may not occur until the middle of the century. This includes on-site jobs at the proposed airport and jobs associated with other land uses (industrial and commercial uses), as well as secondary jobs off site. Proposed Action earnings for 2015 are estimated to be about \$800 million.

6.1.18 Comment: The Draft SEIS does not mention the percentage of jobs that would be union represented jobs, and many airport and airline jobs are union jobs. Union guidelines generally mandate that union positions are not only distributed on basis of qualification, but also on the basis of seniority, meaning that existing airport and airline employees (union members) will have the first opportunity at these new positions. Once they have absorbed all of the most desirable positions, the residents of the surrounding areas will be left with the remaining lower end jobs.

Response: The analysis in the SEIS provides a general overview of employment at a county and sub-county level, not at the individual job level. Information is not currently available on the percentage of jobs that would be held by union members. That would depend on the specific characteristics of employers, such as airlines, whose identities are not yet known.

6.1.19 Comment: In-migration in the SEIS denotes the attraction of workers into Miami-Dade County to fill specialized jobs and specific labor requirements. The Draft SEIS states that most direct and indirect jobs created by development of the commercial airport will be filled by Miami-Dade County residents. It would appear that specialized workers are going to be brought in to fill the managerial and supervision positions. This would leave the residents of Homestead and the surrounding areas with lower end jobs. All residents must benefit from opportunities afforded by any project to induce an economic upswing in the area.

Response: The assumption that there are relatively fewer skilled workers living in south Miami-Dade County is based on data provided in the South Dade Labor Profile Study, 1997, prepared by Prange and O'Hearn, Inc. for the South Dade Chamber of Commerce. Training could be provided to enable local residents to qualify for employment opportunities.

6.1.20 Comment: A breakdown of the job opportunities to be generated by salary, union, and skill level should be estimated to fully articulate the types of jobs and opportunities that will exist, rather than an estimated number.

Response: The projected number of jobs is based on employment ratios associated with various sectors of the economy (e.g., retail) and is not identified according to specific skills, union status, or salary levels associated with specific skills. The purpose of the SEIS is to assess the relative employment and earnings of the alternatives. Not enough detailed information is available about any of the reuse alternatives to identify specific jobs and income levels.

6.1.21 Comment: There was insufficient effort to categorize the types of jobs provided or to measure the labor pool in need of and available for such jobs. A large part of the Homestead area labor population, for example, is seasonal agricultural workers. Some other jobless are unwilling or unable to take employment. How many will need training and who will provide such training?

Response: The SEIS looks at the relative effects of the Proposed Action and other alternatives and provides data on employment and earnings effects that can be used to compare the aggregate effects of the alternatives. The SEIS also includes background data on existing and future economic conditions to provide a context within which to measure these effects. The determination as to which plans might best meet various goals and priorities is left to the decision makers and readers. Employment training would not be expected to change the overall findings of the environmental analysis. However, it is included in the Final SEIS as a potential mitigation measure that could improve employment opportunities for the local labor force.

6.1.22 Comment: Won't most of the new jobs be at Miami International Airport (MIA) and won't the jobs in Homestead already be filled?

Response: Airport operations and activity at MIA are projected to grow in the future with or without a commercial airport at Homestead. A commercial airport at Homestead could potentially serve a portion of the existing or new demand (e.g., for commercial passenger, general aviation, aircraft maintenance, and air cargo activity) that might otherwise be met by MIA, assuming that MIA has available capacity. The Homestead airport would, however, increase the total new capacity in the region. Although it is possible that some activities at MIA may be diverted to the proposed Homestead airport, especially initially, the majority of jobs in Homestead are likely to be new jobs in south Miami-Dade County because of the overall increase in demand for aviation services in the future and the fact that MIA is currently near capacity.

6.1.23 Comment: Provide more justification for the methodology used in the Draft SEIS to allocate reuse-related jobs among the various sources of persons who might potentially fill these jobs.

Response: The factors that influence the individual decisions of residents of south Florida regarding where they work and their personal preferences are complex and diverse. It is not feasible to identify and factor them all into the economic modeling performed for the SEIS, and their relevance to projections well into the future (i.e., 2015 and full buildout) would be questionable. The SEIS takes a more macroscopic approach to the employment analysis, using aggregate data on labor availability.

A number of assumptions were made based on observed characteristics of the areas from which workers might be derived. The allocation of reuse-related jobs to various pools of available workers was accomplished for the purpose of deriving a reasonable estimate of the number of in-migrants. It was not intended to specifically allocate jobs to individuals, which was not essential to understanding the impacts of property disposal decisions. The following potential labor pools were considered in the analysis:

(1) new entrants into the labor pool over the next 15 years and beyond; (2) unemployed persons residing in south Miami-Dade County; (3) employed persons residing in south Miami-Dade County and working in north Miami-Dade County and currently assumed to be commuting to jobs in the northern portion of the county and who would change their place of work; (4) workers in-migrating to Miami-Dade County to fill specialized jobs or hoping to find employment at the project site and who would take up residence in the south; (5) persons (employed and unemployed) currently residing (and working) in north Miami-Dade County, who would relocate their place of residence and take a job in south Miami-Dade County.

As of 1997, the unemployment rate in Miami-Dade County had not fallen below 5 percent in well over a decade. At that time it stood at about 7 percent. The estimated number of unemployed workers who could fill jobs created by a major project was based on the 1997 unemployment level. It was assumed that the then-current unemployment rate of 7 percent could fall as low as 5 percent if more jobs were available. This led to an estimated 2 percent of the workers in the labor force of south Miami-Dade County available to fill jobs created by reuse of former Homestead AFB. The parameters were not varied over time. The projected baseline number of persons in the labor force in south Miami-Dade County was based on a moderate level of growth for Miami Dade County which yielded a conservatively low estimate of available workers.

Since 1997, the unemployment rates for both the county and the City of Homestead have declined. As of December 1999, the number of unemployed persons residing in the City of Homestead alone, with an unemployment rate of 5.8 percent, was 608. The number of unemployed in Miami-Dade County was 51,651. The numbers of unemployed persons used in the SEIS analysis (between 1,095 and 1,550) still represents about 2 percent of the labor force, which is considered to be a reasonable estimate of the number of workers that would be available from the unemployed labor pool. Even if the number of available workers is reduced to 1 percent of the labor force, the number of additional in-migrants would increase by a maximum of about 1,776 in 2015. Total reuse-related in-migration would still represent about 0.2 percent of baseline population in Miami-Dade County.

As the population of Miami-Dade County has grown, an increasing portion of the growth has been absorbed by residential development in the southern portion of the county, since this is the area of the county that still contains non-urban land in substantial quantities. Employment has not, however, followed this same geographical trend. The result has been an imbalance in the ratio of jobs to housing units. For the county as a whole in 1995, it is estimated (from information developed by the Miami-Dade County Department of Planning Development and Regulation) that the countywide average number of jobs per housing unit was 1.38 and was projected to drop to 1.23 by 2015. For the portion of the county north of Eureka Drive, the ratio in 1995 was 1.43, while south of Eureka Drive it was 0.74. On average in 1995 there were 1.83 persons for every job in the county. In the northern portion, this value was 1.75 while in the south it was 3.92. This suggests two things: (1) the population in the county is rising faster than employment and (2) there is an imbalance between the northern and southern portions of the county.

Independent data indicate that the labor force participation rate shows little variation within the county. Thus, working persons who do not hold a job close to their home will commute, in this case predominantly from the southern portion to the northern portion of the county. Reuse of Homestead AFB would generate a considerable number of employment opportunities in the south, and the probability is high that some persons currently commuting to jobs in the north would choose (in order to reduce their transportation costs) to take these jobs. In addition, it is reasonable to assume that new entrants into the labor force in the south would prefer (all other things being equal) to take employment close to their place of residence rather than commute long distances. The SEIS assumes a modest shift in the jobs-to-housing balance in the south county of 0.20 workers per household. This would still leave a lower jobs-to-housing ratio in the south county than in the north. Such a shift would generate a potential pool of workers who could fill the direct and secondary jobs related to reuse of the former base.

It is realistic to surmise that some number (assumed to be 5 percent) of the jobs created by each of the reuse alternatives would be specialized and require skilled persons not available in the local labor force. These workers would comprise a portion of the reuse-induced in-migration and are assumed to take up residence in the south county.

This sequence of analysis leads to two findings: (1) the projected available labor pool in Miami-Dade County as a whole would be sufficient to fill all the estimated reuse-related jobs, but (2) the available labor pool in the south county would not be sufficient to fill all the jobs estimated to be in the south county. This suggested that persons currently residing in the northern portion of the county would be attracted to these jobs and might relocate to be close to their jobs in the south.

6.1.24 Comment: The Draft SEIS assumes that approximately 20,000 residents of south Miami-Dade County may be working in the north county in 2015. Even assuming that approximately 3,000 unemployed take jobs at the airport (Homestead currently has between 500 and 1,000 unemployed), there is no support for assuming that three-quarters of the commuting south Miami-Dade County residents would leave their jobs to work at the airport. The Draft SEIS assumes that there will be approximately 27,000 jobs from other sources in the south county by 2015. Is the SEIS assuming that only residents will take airport jobs and only in-migrants will take the other new jobs?

Response: The number of baseline jobs (excluding reuse of the disposal property at former Homestead AFB) in south Miami-Dade County is projected to increase by 26,500 between 1995 and 2015. At the same time the population is projected to increase by 76,357 under moderate growth forecasts. Thus, the increase in jobs would employ about one person in three of the projected increase in population. By 2015, the Proposed Action is estimated to generate 23,191 jobs in the portion of Miami-Dade County south of Eureka Drive. This area includes unincorporated areas of the county in addition to the cities of Homestead and Florida City. The number of unemployed persons assumed to take reuse-related jobs is 1,550 in 2015, which represents about 2 percent of projected south county employment and about 0.1 percent of employment in the county as a whole. The SEIS also estimates that 4,624 of the jobs in the south county would be filled by new south county residents, whether they migrate from the northern part of the county or from outside the county. It is assumed, therefore, that about 17,000 of the reuse-related jobs in the south county in 2015 would be filled by persons projected to be residents of the south county. These may include some current residents but also include projected future residents. The projected employment in the south county in 2015, including the Proposed Action, is about 92,000 jobs. Divided by the projected south county population of about 240,000 results in employment of one out of every 2.6 residents. For comparison, there was a job for one in every 1.8 residents of Miami-Dade County in 1995, when unemployment was over 7 percent. Thus, the assumptions made in the SEIS analysis are reasonable. The population projections, even assuming a moderate rate of growth, are adequate to support both the projected baseline jobs and the Proposed Action employment.

6.1.25 Comment: The Draft SEIS concludes that the majority of the new jobs created by the airport will be filled by current residents of the communities around the base. These residents are currently either working in the north part of the county or are unemployed.

Response: The population in south Florida is expected to grow over the next 15 years, which will generate new workers able to take reuse-related jobs. Most of the new jobs are anticipated to be taken by new residents or current residents who will enter the workforce in the future. Some would be new entrants to the labor force who are not currently of working age. As Section 2.1.3 in Volume I explains, new jobs at former Homestead AFB are projected to be filled by workers from a combination of sources, including a portion of unemployed workers in south Miami-Dade County, workers preferring to work in south Miami-Dade County who would otherwise commute to the northern section of the county, workers who would relocate from outside the county, and workers who would relocate from north to south Miami-

Dade County. The SEIS describes the assumptions that led to these estimates. No alternative assumptions with supporting justification have been presented.

6.1.26 Comment: The SEIS does not assess the economic impact of the environmental damage from increased air, noise, and water pollution caused by the proposed commercial airport on the tourism industry, including recreational fishing, snorkeling, sightseeing in Everglades and Biscayne National Parks, Dry Tortugas, the Florida Keys, and the National Marine Sanctuary. The national parks receive more than 1 million visitors a year. Further investigation should be made with the state's tourism bureau regarding the economic losses that are expected with the loss of the natural habitat and disturbances to visitors from airplane noise. Florida has invested extensively in promoting and marketing its natural beauty and attracts 50 million visitors a year.

Response: Many factors influence how tourists and tourism businesses act. Any attempt to quantify the effect of the Proposed Action on the tourism industry would be highly speculative. It is reasonable to consider that, as population density increases, the national parks will continue to be valued. There is no evidence that a commercial airport at former Homestead AFB would measurably affect tourism in south Florida.

6.1.27 Comment: The SEIS does not evaluate the economic impact of the proposed commercial airport on agriculture.

Response: It is not possible to accurately estimate any loss of earnings in agriculture. Secondary development in connection with the Proposed Action (and alternatives) would likely result in conversion of agricultural land to development, but without knowing which properties would be converted and what their crops would be at the time of conversion, it is not possible to place a dollar value on this impact. As the SEIS indicates, conversion of agricultural lands can be expected with or without the redevelopment of former Homestead AFB.

6.1.28 Comment: What existing industries in the Upper Keys and south Miami-Dade County are going to be hurt by the Proposed Action?

Response: There are many factors that affect economic conditions. There is no evidence that an airport at Homestead would hurt any industries in south Florida. It is possible that occupancy rates in some existing hotel properties could be affected if hotel rooms were developed on the former base and there were no corresponding increases in demand. There is a possibility that tourism and recreation could be affected by changes in the local environment, but these impacts are highly speculative and cannot be quantified. They depend on individuals' perceptions of environmental changes, including to what degree these changes might affect the nature or quality of the visitor or recreation experience, and in turn, whether a change in choice of location, type, or duration of recreation or leisure would be made.

Employment and Earnings for the Mixed Use Alternative

6.1.29 Comment: The Mixed Use alternative could immediately begin to generate 23,000 jobs and \$670 million annual earnings for south Miami-Dade County.

Response: The number of jobs and earnings generated by the Mixed Use alternative would depend on which of the four scenarios analyzed was implemented. The Collier-Hoover proposal, for example, is estimated to generate about 8,400 jobs in the south county by 2005, increasing to about 12,400 by 2015 and about 22,000 at full buildout. Earnings in the south county are estimated at \$399 million in 2015 and \$641 million at full buildout.

RESPONSES TO COMMENTS

6.1.30 Comment: The Collier and Hoover plans have merged. The combined plan is expected to generate more jobs than each plan separately. The number of jobs cannot be a sum of the two plans, however, because each plan envisioned different land uses.

Response: Collier Resources Company and the Hoover Environmental Group submitted a new joint proposal, which is analyzed in the Final SEIS. Estimated employment generated by the combined Collier-Hoover proposal is discussed in Section 4.1 of Volume I. These estimates are based on an analysis of the new plan and are not a simple addition of the two original plans.

6.1.31 Comment: The Collier proposal offers fewer jobs than the Proposed Action.

Response: Collier Resources Company and Hoover Environmental Group have submitted a new joint plan. Estimated employment generated by the combined Collier-Hoover proposal is discussed in the Final SEIS. The employment level, about 22,000 at full buildout, is less than that projected for the commercial airport.

6.1.32 Comment: The Mixed Use alternative would generate more jobs and earnings by 2005 than the Proposed Action.

Response: Some scenarios of the Mixed Use alternative envision more rapid initial growth than the Proposed Action. The Collier-Hoover proposal is estimated to generate about 6,300 jobs countywide in 2005, compared to about 4,500 for the Proposed Action.

6.1.33 Comment: The jobs created by the Collier-Hoover plan would more than replace the number of jobs lost due to Hurricane Andrew.

Response: The joint Collier-Hoover proposal is estimated to generate about 22,000 jobs at full buildout. In 1990, Homestead AFB had an estimated employment effect of 10,039, which had decreased to 1,582 in 1997.

6.1.34 Comment: Leisure employment does not require the same highly developed skills that are found in multi-faceted activities of a modern commercial airport.

Response: Skill levels associated with the service sector (including recreation and tourism-related employment) are lower than those in aviation employment. See also response to comment 6.1.15.

6.1.35 Comment: Won't most of the jobs under the Collier-Hoover plan be construction jobs and be filled by existing construction workers?

Response: Section 2.4 in Volume I shows that the majority of the direct jobs are projected for operations and not construction jobs. Because development is expected to occur over a number of years, it has been assumed that there will be some construction throughout the project life. There will also likely be renovation periodically as the facilities age. The construction jobs for the Proposed Action and alternatives would be new jobs that would not exist without the redevelopment of former Homestead AFB property.

6.1.36 Comment: The range of employment presented for the Mixed Use alternative in the Draft SEIS implies uncertainty in the actual employment that can be expected under that alternative.

Response: The range of employment and other data presented for the Mixed Use alternative in the Draft SEIS was not intended to reflect uncertainty but differences in the employment estimated for the three

reuse scenarios considered under this alternative. The Market-Driven scenario, Collier Resources Company proposal, and Hoover Environmental Group plan all estimated different levels of development and employment, and the ranges reflected the range of numbers among the three scenarios. The Final SEIS includes the joint Collier-Hoover proposal and breaks out data for the different scenarios.

6.1.37 Comment: If other assumptions and factors are considered, the economic benefits of the Mixed Use alternative are greater than for the Proposed Action.

Response: Collier Resources Company and Hoover Environmental Group have submitted a new joint plan, which is analyzed in the Final SEIS. Considering south Miami-Dade County only, 12,594 jobs generated by the Proposed Action in 2015 are anticipated to be filled by existing residents. For the joint Collier-Hoover proposal it is 13,145.

6.1.38 Comment: The net economic impact of the Mixed Use alternative will be smaller than the gross impacts calculated in the Draft SEIS. The more the Collier development diverts demand from existing properties, the smaller the net economic benefits. The issue of business diversion as a result of the proposed Collier development is also relevant with respect to the proposed RV park.

Response: It is possible that the hotel development proposed in the Collier-Hoover plan could affect occupancy levels at other hotels in the area, depending on the level of demand for hotel rooms. If there were little or no unmet hotel demand, hotel developers would not be expected to build additional properties. From an environmental analysis standpoint, evaluation of gross effects rather than net effects is a more conservative approach because it has the effect of overestimating the environmental impacts.

6.1.39 Comment: The SEIS does not confirm whether or not the assumption on the number of visitors attracted by an aquarium is reasonable or supported by data from similar aquariums in other regions; it treats these attendance projections as an assumption.

Response: The Hoover Environmental Group estimated that the aquarium would generate 1.5 million visitors annually. The attendance numbers associated with the aquarium proposal are accepted as an assumption in the SEIS and are comparable to the experience of other aquariums in the country. For analysis purposes, the assumptions presented in Section 4.1.2.3 of Volume I regarding the percentage of visitors from outside the county and other related assumptions were used. The assumption that roughly 7 percent of the annual visitors (105,000 visitors) would come from outside the county and would not have otherwise visited Miami-Dade County is based on the experience of other aquariums in the country. This 7 percent is based on the assumption that 70 percent of the visitors to the aquarium would be from outside the county and that 10 percent of these out-of-county visitors would visit Miami-Dade County because of the aquarium.

6.1.40 Comment: The Draft SEIS indicates that development of an aquarium at former Homestead AFB could lead to redistribution of tourist dollars spent in the county even though tourist spending countywide may not increase substantially. This should be considered a benefit, as one of the largest arguments in favor of the Proposed Action is the need for an economic generator in the southern end of the county. A redistribution of income to an economic generator in the southern end of the county in the form of an aquarium directly addresses some of these economic arguments. There should be a more thorough economic analysis of the impacts of redistribution of income generated from the Mixed Use alternative.

Response: The SEIS indicates each of the reuse alternatives would increase earnings in south Miami-Dade County. The development of an aquarium could, as stated in the SEIS, result in a redistribution of tourist-related spending within the county (from north to south) even though tourist spending countywide

might not increase substantially. This would support the economic revitalization of south Miami-Dade County.

The SEIS describes the employment and earnings associated with the Mixed Use alternative on a gross rather than a net basis. In other words, it analyzes the total employment associated with the alternative, as presented in the project description (i.e., the gross effect), and does not reduce this number or the resulting secondary employment and earnings effects by the portion of jobs that might be distributed from the north county to the south county (i.e., the net effect). The discussion of the Mixed Use alternative describes the assumptions about where the estimated 1.5 million annual aquarium visitors would come from, including the percentage of visitors from inside and outside the county, the number of new visitors versus those who would have visited the county anyway, and the number of visitors from within the county coming from the north county and the south county.

The total annual visitor expenditures in south Miami-Dade County associated with the aquarium were projected at approximately \$197 million. Of that amount, \$28 million is attributed to north Miami-Dade County residents who would visit the aquarium and \$154 million is attributed to out-of-county visitors who would have visited the north county but, with the aquarium, could spend a portion of their visit in the Homestead area. The combined \$182 million annual visitor expenditure represents the portion of the visitor expenditures redistributed from north to south Miami-Dade County.

6.2 Population

6.2.1 *Comment:* Miami-Dade County has reduced its population projections.

Response: Miami-Dade County has proposed an amendment to its Comprehensive Development Master Plan that includes revisions to the basic countywide population projections first published in 1994 and adopted by the Board of County Commissioners in March 1996. The amendment application had not been approved by the County Commissioners as of May 1, 2000, and therefore does not constitute an adopted change in the county's projection. The Department of Planning and Zoning's estimates of population for the past few years show growth at lower levels than the county anticipated, which is the reason for the amendment. The proposed change will bring county forecasts closer to the federal and state forecasts used as the basis of the analysis in the SEIS.

6.2.2 *Comment:* The assumption that projected baseline population will grow at the same rate as the total population in south Miami-Dade County is flawed because it does not include growth associated with reuse of former Homestead AFB.

Response: The projected baseline levels purposely do not include any development of the disposal property at former Homestead AFB. This is to provide a basis of comparison for each of the reuse alternatives, including the No Action alternative. The analysis of each alternative adds reuse-related growth to the projected baseline to derive the reuse-related impacts.

6.2.3 *Comment:* The information and statements in the Draft SEIS do not seem to support the in-migration assumption. The Draft SEIS assumes that the ratio of jobs per housing unit in south Miami-Dade County would increase from 0.8 jobs per unit to 1.0 jobs per unit by 2015, but the document does not include information about existing housing units in the south county or explain whether this is an accurate assumption. From the information provided, this increase in jobs per housing unit only seems to provide a relatively small increase in available employees from south Miami-Dade County to take airport-related jobs. Assuming that there are 20,000 housing units in the county south of Eureka Drive, then the increase in employees able to take airport-related jobs would be only about 4,000. This still leaves a significant amount of jobs needed to be filled by an in-migrating workforce.

Response: Miami-Dade County has projected that the number of housing units in the south county will increase to almost 100,000 by 2015. For the SEIS, this number was adjusted to reflect a more moderate rate of growth, to approximately 85,000 housing units in south Miami-Dade County. Assuming one additional worker in every five households is available to work locally, this would amount to over 17,000 workers.

6.2.4 Comment: The faulty assumption about in-migration in the Draft SEIS leads to minimization of environmental impacts, including minimum need for additional housing units, little new impermeable surface off-site to cause increased runoff, minimal habitat loss, limited new air pollution, limited use of resources such as groundwater, and others.

Response: The assumptions used to estimate reuse-induced in-migration were developed based upon the best available information, using agency data, estimates, and projections as input whenever possible, with the goal of representing the dynamic and complex nature of individual choices and economic and demographic trends in future years. The estimates of potential in-migration are believed to be reasonable and, therefore, the resulting impacts are also believed to be reasonable and, in some cases, conservatively high estimates.

6.2.5 Comment: The dramatic increase that will accompany the development of an urban population center in South Dade may well push it beyond the survival stage. The projections of population increase cited in the SEIS depend on an economic engine such as the airport; alternative uses should have much less effect.

Response: Most of the projected increase in population in south Miami-Dade County from the present to 2015 is expected to be baseline growth that would occur even without the reuse of the disposal property at former Homestead AFB. The baseline population is projected to increase in south Miami-Dade County from 182,324 to 239,592 between 2000 and 2015, an increase of 57,268 persons. Over the same time period, the Proposed Action is estimated to add 10,597 persons. The other alternatives are estimated to add less than 1,682 persons.

6.3 Housing

6.3.1 Comment: Although property values may be increased, if local residents can no longer afford to live in the area, this could have a detrimental effect on low-income populations. There should be sensitivity to these issues no matter what alternative is implemented, but the Mixed Use alternative seems to encompass a larger residential component.

Response: There is a potential for housing costs to increase if economic development, employment, and population growth increase in south Miami-Dade County, but the new job opportunities would also increase household earnings. The majority of the new jobs are projected to be filled by south Miami-Dade County residents who would otherwise be forced to commute to the north, and the additional demands for housing generated by reuse of former Homestead AFB would be relatively modest and presumably have limited effect on housing costs as compared to baseline population growth.

6.3.2 Comment: A linkage should be established between the types of workers to be employed and the mix of housing that will be necessary to accommodate new workers in the area. Not all workers will purchase homes, and there should be a determination of single family units versus rental units to be generated.

Response: For environmental analysis purposes, an estimate of the number of housing units associated with the project workers is sufficient to analyze the related environmental effects such as land

disturbance, traffic, infrastructure, and air quality. The specific mix of housing types (e.g., owner versus renter) would not alter the environmental analysis in any substantial way. In the long term, the private housing market would be expected to respond to the mix of demands in the local housing market, based on the eventual demands that occur.

6.3.3 Comment: A table should be added to the SEIS to convey the differences of types of jobs generated related to income level and what types of homes will be necessary to accommodate those income levels for all alternatives.

Response: The salary levels are implicit in the analysis. The range of salary levels associated with the Proposed Action, based on industrial sectors, varies between \$18,341 and \$38,308. Not enough detailed information is available about any of the reuse alternatives to identify specific jobs and income levels, nor is it needed for the SEIS.

6.3.4 Comment: The Proposed Action will not increase the ratio of jobs to housing units in south Miami-Dade County more than the Mixed Use alternative, as the Draft SEIS indicates, because of the increase in housing units that would be needed to house in-migrating population, which would be approximately four times that of the Mixed Use alternative, without a fourfold increase in the number of jobs.

Response: The Mixed Use alternative in the Draft SEIS included two scenarios (Market-Driven and Hoover plan) that contained on-site housing. The total new housing under those scenarios could be as high as 1,912 units. Collier Resources Company and Hoover Environmental Group have submitted a new joint plan that does not include housing. It is analyzed in the Final SEIS.

6.3.5 Comment: No basis was provided for concluding that employment and housing would double with the addition of a second runway at Homestead. There is no determination that all people working at jobs at the airport would have the overall capacity to buy new homes and no mix of rental or ownership has been discussed.

Response: As Section 1.3 in Volume I indicates, no decision on a second runway will be made pursuant to the SEIS. Its probability and timing are too uncertain and too little is known about its characteristics to perform a thorough analysis at this time. However, the possibility of airport expansion is acknowledged, and a general discussion of possible impact is provided. An approximation of the potential effects was based on the estimates furnished in Section 2.2.7 of Volume I and the difference between site-related employment estimated for the Proposed Action at full buildout and that estimated for a two-runway airport. The effects of the Proposed Action at full buildout were simply scaled up based on the relationships between employment, population, and housing.

6.4 Community Services

6.4.1 Comment: A newly formed community would place a burden on already overworked police and fire departments and overcrowded schools.

Response: The potential impacts of the Proposed Action and alternatives on police and fire departments and schools are addressed in Volume I, Section 4.1.5 Public Services.

6.5 Financial Impact on Government Entities

6.5.1 Comment: The financial impact on the local support structure is neither compared nor measured in sufficient detail. For the City of Homestead, for example, what are the costs of infrastructure improvements and who will finance them?

Response: The SEIS estimates the additional demand for public services such as police protection, fire services, schools, utilities such as potable water and wastewater, and changes in vehicle trips. It also provides data on sources of revenues, categories of expenditures, and budgets for local governments. Section 4.1 in Volume I indicates that there would be relatively small increases in public service demands associated with reuse-induced population increases and that there would be an offsetting increase in the tax base and public revenues available for operations and government services. The service capacity of utilities and roads could be exceeded in some specific cases, as described in Sections 4.2 and 4.3. This could require the service providers to analyze their expansion plans and sources of financing, but this is beyond the scope of the SEIS. A qualitative analysis of public finance was considered to be adequate for a comparison of the alternatives to assist the Air Force and FAA in their decision making.

7.0 TRANSPORTATION

7.1 Traffic Analysis

7.1.1 Comment: The Draft SEIS does not address the infrastructure required to support reuse of former Homestead AFB.

Response: Section 4.2 in Volume I describes the anticipated effects of estimated traffic increases on roadways in the area and identifies roadway improvements that would be needed to maintain acceptable level of service. As it shows, the increase in traffic would be gradual, as redevelopment activities progressed. Section 3.2 also indicates that projected baseline population increases would drive many of the infrastructure improvement requirements.

7.1.2 Comment: The traffic analysis was not based on the most recent and best available data (e.g., on-base traffic volumes date from 1988), and it did not include one-way peak hour directional trip volumes. It is not clear how roadway improvements can be planned. The SEIS estimates that the only incremental traffic in the area will be that going to and from the airport. Traffic-defeating measures such as high parking fees and intelligent traffic signals, were assumed to be in place, and it is naïve to believe that they would affect airport traffic.

Response: The traffic analysis was based on the most recent data obtained from local and state agencies. The discussion of on-base traffic was included to provide an historical perspective from when the base was fully active; 1988 was the most recent year available. The traffic model used included current traffic patterns and those that are likely to occur at various intervals in the future. The Florida Level of Service Guidelines were used for this analysis, and they specify minimum requirements in terms of two-direction traffic volumes. The Institute of Transportation Engineers Trip Generation Manual was used to estimate trips. It is based on studies performed at similar facilities. The SEIS identifies the total estimated increase in trips, but only trips to and from the site could be modeled because those are the only trips that could be assigned to specific roadways. No traffic-defeating measures were assumed for this project; however, high parking costs and other measures can help encourage the use of other available modes of transportation and are possible mitigations.

RESPONSES TO COMMENTS

7.1.3 Comment: Roadway access to the Homestead area is limited, and several roadway expansion recommendations are listed in the SEIS. How will the system accommodate the increases in traffic, and when will the additional lanes be constructed?

Response: The SEIS identifies possible roadway expansions that would allow the infrastructure to meet the minimum Level of Service Guidelines for Florida and alleviate traffic congestion. The final decisions on whether to implement the improvements and, if so, when are up to state and local government entities responsible for planning roadway improvements.

7.1.4 Comment: The roads in this area were not designed to handle the substantial truck traffic that would result from the commercial airport (e.g., cargo going to other shipping terminals in Miami). Roadway improvements are needed to accommodate the exponential increase in truck traffic. The Draft SEIS does not address pavement degradation. Delays caused by truck traffic were not addressed.

Response: The Average Daily Trips used in the SEIS analysis have been factored to include a percentage of trucks. The model provides a good estimate of overall traffic effects. Freight that has to connect to terminals in Miami would probably fly into Miami International Airport rather than Homestead. Pavement degradation will be affected more by baseline growth in the area than by reuse of former Homestead AFB.

7.1.5 Comment: There is no discussion of a rail system being extended to service former Homestead AFB.

Response: No current plans for reuse of former Homestead AFB include railway service.

7.1.6 Comment: The SEIS should provide a plan to develop mass transit opportunities to relieve traffic congestion.

Response: The SEIS analyzes actions that are proposed by proponents of reuse of former Homestead AFB. None of the proposals includes mass transit. However, mass transit is identified as a possible mitigation measure that could be implemented by appropriate transportation organizations to reduce impacts from increased traffic. As Section 4.1 in Volume I indicates, traffic increases in association with redevelopment of the former base are anticipated to grow relatively slowly, and it could be some time before they reach sufficient levels to require mass transit.

7.2 Emergency Evacuation

7.2.1 Comment: The Draft SEIS did not consider the impact of reuse of former Homestead AFB and associated secondary development on hurricane evacuation. The Draft SEIS does not thoroughly analyze impacts to evacuation due to an incident at Turkey Point.

Response: Section 4.2 in Volume I estimates the increase in evacuation time associated with each reuse alternative during a hurricane and in event of an incident at Turkey Point Nuclear Power Plant. These estimates include population increases attributed to secondary development. No alternative is anticipated to increase evacuation time by more than 5 percent.

7.2.2 Comment: The emergency evacuation analysis is not sufficient since it does not include queuing delay time. Some alternatives are projected to have a negligible impact on emergency evacuation time, while the projected vehicle trips are higher than other alternatives. It would seem that increased vehicle movements, including large increases in truck traffic, would be directly related to evacuation time. Which alternative best accommodates evacuation criteria?

Response: The model used in the evacuation analysis was designed to be a macroscopic representation of future traffic patterns, and it assumes vertical queuing. The roadway capacity values were factored down to account for the delay associated with evacuation. The evacuation analysis examined the areas affected by the reuse alternatives. It assumes that traffic operations will not be normal during a warning period, such as a hurricane warning. In other words, normal working traffic (e.g., people commuting to work or visitors to the site) would probably be suspended, and the evacuation traffic would be focused on where people live rather than where they work. Therefore, the estimated increase in evacuation time for each alternative was based on population increase rather than the number of trips projected for each alternative, which includes employees, passengers, and visitors. Projected baseline increases in population have more effect on evacuation times and travel delays than population increases projected for any reuse alternative. As Section 4.2 in Volume I shows, all of the alternatives are projected to have little effect on evacuation times.

8.0 UTILITIES

8.0.1 Comment: Project impacts on utilities were not provided in sufficient detail to allow planning, scheduling, and funding of improvements.

Response: Section 4.3 in Volume I estimates the increase in demand for utilities for the Proposed Action and alternatives, based on available information. Not enough is known about the details of implementing each of the alternatives to provide information suitable for developing specific plans, schedules, and funding. It is assumed the developer of the selected alternative will work with appropriate purveyors and authorities to generate that information.

8.0.2 Comment: Impacts stemming from the demand for utilities will be significantly greater for the Proposed Action, including water consumption, wastewater generation, solid waste generation and demand for electricity.

Response: Section 4.3 in Volume I estimates the increased demand that would be generated by each of the reuse alternatives. It identifies no capacity issues for solid waste disposal or electricity but does indicate that demand will exceed the capacity of some water and wastewater systems, largely due to projected baseline population growth with or without the reuse of former Homestead AFB.

8.0.3 Comment: The Miami-Dade Water and Sewer Department, the City of Homestead, and Florida City may have to modify their water use permits to account for changes in population and water use associated with reuse of former Homestead AFB.

Response: Based on the estimates of projected baseline population growth in south Miami-Dade County, the county and the cities may need to modify their permits whether or not the property at former Homestead AFB is redeveloped.

8.0.4 Comment: Concern was expressed about new on-site water withdrawal facilities in light of the contaminated sites on the former base.

Response: None of reuse alternatives includes plans for new water wells/withdrawal facilities on former base property.

8.0.5 Comment: Can anyone guarantee that the sewer system needed to support the proposed airport will not leak into Biscayne Bay or surrounding canals?

RESPONSES TO COMMENTS

Response: The sewer system that would be required to service reuse at the former base would be relatively modest (it would be required to handle on the order of 1 million gallons per day) and similar to sewer systems throughout the area. Section 4.3 in Volume I shows the relative volume of reuse-related sewage compared to existing volumes in the region of influence. Any new construction would be done according to Miami-Dade County's standard practices.

All activities have some associated risk, and construction of a sewer to handle wastewater from a commercial airport would be no different. There is always the possibility that the sewer could be built improperly, resulting in leaks that could affect Biscayne Bay. This could happen anywhere, not just at the former base. It is likely, however, that if leaks developed, they would be detected and repaired.

9.0 AIRSPACE AND SAFETY

9.1 Airports and Airspace

9.1.1 Comment: The Dade Collier airport, offered in trade for former Homestead AFB land by Miami-Dade County, has little value and almost no use.

Response: The Dade-Collier Training and Transition Airport currently serves as a flight training facility, supporting almost 14,000 annual operations. Determination of the value of this facility is beyond the scope of the SEIS. Its value to the government would be considered were the county to offer it.

9.1.2 Comment: There are already many airports in the area creating plenty of air traffic—Miami International, Tamiami, Marathon. Congestion of air traffic can bring confusion and complications in the air. Is this necessary?

Response: The primary purpose of the FAA's Air Traffic Control (ATC) system is to ensure safety of aircraft operations while providing for an organized and efficient flow of traffic. Standard ATC rules and procedures developed by the FAA are used by pilots and air traffic controllers so that flights operate safely and without confusion under a wide range of conditions. Air traffic congestion does occur throughout the national airspace system and is a result of many factors, including air traffic volume, density of air traffic, and airspace/airport capacity. Multiple airports are often needed to serve the aviation needs in a given region, since airports have finite capacities and often serve different roles (i.e., general aviation, commercial). This is also the case in Miami-Dade County. It is a primary purpose of ATC to manage air traffic congestion under varied conditions without compromising the safety of operations.

9.1.3 Comment: Why is the flight path over the Keys, over Monroe County?

Response: The flight tracks for the proposed commercial airport at Homestead are a function of several factors, including the location of the airport and other airports in the region, the geographic origin and destination of flights, the structure and operating procedures of the Miami airspace, the performance of commercial aircraft, and the need to prevent potential conflicts and preserve safety. Flight tracks over Key Largo are mostly southbound departures and arrivals from the southeast.

9.1.4 Comment: Because of conflicts with Miami International Airport's airspace to the north, planes must be routed over the national parks and the Florida Keys National Marine Sanctuary and remain at lower altitudes longer than might otherwise be the case.

Response: The comment is correct that the complexity of the airspace usage in southern Florida would have effects on the routing and altitude of aircraft using Homestead, as explained in the SEIS. However, airspace complexity alone does not cause airplanes to be routed over the national parks. The amount of

geographic area included within the national parks, refuge, preserve, and sanctuary is so extensive that it is virtually impossible to avoid flying over them, regardless of where commercial airports in this part of Florida are located.

9.1.5 Comment: Implementation of greater flight pattern restrictions consistent with aviation safety are appropriate.

Response: The flight patterns anticipated for use by civilian traffic operating at Homestead have been developed in cooperation with FAA Air Traffic Control personnel with safety and operational parameters as the guiding elements. Alternative noise abatement flight paths are evaluated in the SEIS to mitigate aircraft noise over areas of the national parks, consistent with safety. The FAA rejected several other flight patterns for safety reasons and conflicts with Miami International airspace.

9.2 Airport/Aircraft Safety

9.2.1 Comment: The risks and dangers from the proposed airport have been understated and downplayed in the Draft SEIS.

Response: Flight and ground safety issues associated with the Proposed Action and alternatives are addressed in Section 4.4 of Volume I. Additional information on safety issues associated with the Turkey Point Nuclear Power Plant has been added to the Final SEIS. To the extent possible, statistical estimates have been furnished to characterize the level of risk associated with various potential hazards. No specific data have been presented to indicate that the risks have been understated.

9.2.2 Comment: A flight path from former Homestead AFB runs through the Channel 6 tower, which is within one mile of the community's elementary and secondary schools.

Response: There are safety regulations that address man-made obstructions (e.g., towers) to aircraft flight. Above certain heights, flashing strobe lighting is required. All obstructions are clearly shown on aeronautical charts, and, in the airport environment, air traffic controllers ensure that flights are routed at safe distances from such structures.

9.2.3 Comment: If the proximity of flight paths from the proposed airport prohibits prescribed burning in the area, this could adversely affect the environment and increase safety hazards in the surrounding communities.

Response: There is nothing that prohibits controlled, prescribed burning in the vicinity of airports when they are an integral part of natural resource management. Coordination between the responsible natural resource management agency, airport managers, and air traffic controllers pertaining to the burning would minimize potential risks. If burns are conducted on days when prevailing meteorological conditions are expected to carry smoke away from the runway and in directions that do not interfere with air traffic routing, there should be little or no impact. Should the runway or critical flight paths become unexpectedly obscured by smoke, air traffic controllers would react just as if meteorological conditions (e.g., fog, severe thunder storms) created a situation in which visibility fell below minimum safe operating levels. The response could range from keeping aircraft in a holding pattern, to temporarily closing the runway, to closing the airport and diverting traffic to an alternate airport.

9.2.4 Comment: It is not a question of if a cargo aircraft will crash into Homestead Senior High, but when.

Response: As Section 4.4 in Volume I indicates, the incidents of commercial aircraft accidents are extremely rare. Only 24 major and serious accidents were reported by FAA nationwide over a 5 year period that involved over 63 million flight hours. The statistical risk of a crash at Homestead Senior High School is incalculably small.

9.2.5 Comment: It would only take one or two aircraft crashes into the water of Biscayne National Park to destroy its value.

Response: Commercial aircraft accidents are rare. Section 4.4 in Volume I estimates the risk of an accident involving a commercial aircraft to be about one in 5 million. The effects of an accident, if one occurred, are primarily described in Section 4.11 of Volume I. As that section indicates, the impacts of an aircraft crash would depend on the circumstances and the response actions. The impacts of aircraft crash can be severe. Any human activity carries an element of risk. That is also true of existing air traffic flying over Biscayne National Park, as well as ship traffic along the inland waterway or off shore.

9.2.6 Comment: The Draft SEIS did not address the increased safety that a second runway at Homestead Regional Airport would provide by separating disparate aircraft operations.

Response: A second runway is not needed for safety reasons. Disparate aircraft can safely operate on a single runway. Adequate aircraft separation is maintained.

9.3 Bird-Aircraft Strike Hazard

9.3.1 Comment: The numbers of bird-aircraft strikes per year reported in the Draft SEIS Summary for the Proposed Action (45) and the Commercial Spaceport alternative (141) appear to be reversed.

Response: There was a typographical error in the Draft SEIS Summary. The 141 bird-aircraft strikes per year reported for the Commercial Spaceport alternative should have read “14 bird-aircraft strikes per year.” This has been corrected in the Final SEIS.

9.3.2 Comment: Some comments overstated the number of aircraft accidents that might be expected due to bird-aircraft strike hazard. Some commentors indicated the area has a bird-aircraft strike risk that appears to be four or five times the national average. Others referred to the possibility of two to three aircraft accidents per year caused by collisions with birds.

Response: No data presented in the SEIS indicate or imply that there would be two to three aircraft accidents per year caused by collisions with birds. Air Force data indicate the risk of bird-aircraft strikes at Homestead is not substantially greater than at many other locations. Section 4.4.3.1 in Volume I assesses the risks of a serious accident resulting from a bird-aircraft strike at various levels of operations. It also addresses management actions used to reduce the risk. As stated in the SEIS, the probability of a catastrophic accident resulting from a bird-aircraft strike during any given operation is less than one chance in 5 million.

9.3.3 Comment: How does the Air Force quantify the increased crash hazard for commercial operations from birds at Biscayne and Everglades National Parks and Mount Trashmore?

Response: Section 4.4 in Volume I describes how bird-aircraft strike hazards were calculated for the Proposed Action. The Air Force’s Bird Avoidance Model does not identify any extraordinary risks in the Homestead area. Homestead Air Reserve Station currently has two personnel to manage bird-aircraft strike risks, one of which is located at the county landfill (Mount Trashmore).

9.3.4 Comment: Safety requirements for reducing hazards from bird-aircraft strikes make a commercial airport incompatible with Biscayne National Park.

Response: The Air Force's Bird Avoidance Model has determined that conditions in Florida present a moderate level of risk of bird-aircraft strikes. Although management actions would be needed at the airfield to reduce bird-aircraft strike hazard, it is not anticipated that any measures would need to extend to Biscayne National Park.

9.3.5 Comment: Pre-Hurricane Andrew bird-aircraft strike data is needed for the safety analysis. Reduced levels of operation at the base since 1992 have allowed bird populations at the base to expand from pre-hurricane levels and do not serve as a valid standard to project to a period when significantly more human activity will be in the area.

Response: Information is not available for either the rate of pre-hurricane bird-aircraft strikes or the previous bird densities around Homestead. It is possible that less activity since the hurricane has encouraged some birds to encroach on the airfield. Similarly, future urbanization of the area may encourage some birds to retreat from the airfield.

9.3.6 Comment: How does the FAA quantify the increased air crash hazard for commercial operations from birds associated with Everglades National Park, Biscayne National Park, and Mount Trashmore?

Response: To determine the probability of mishap, FAA uses the number of commercial and general aviation operational hours during a specific period and compares them to the number of major and serious mishaps occurring over that period. This information is in Section 4.4.3.1 of Volume I. In addition, to determine the estimated number of aircraft-bird strikes, Volume I presents a table (Table 4.4-2) that is based on strike rates for Air Force F-16 operations at Homestead. Since the Air Force data are the only quantified data available for Homestead operations, it is appropriate to use the data to estimate the statistical potential for an accident.

9.3.7 Comment: The Draft SEIS did not consider the impact of FAA Advisory Circular (AC No. 150/5200-33) that provides guidance on the placement of new airport facilities and clearly states that no new airports should be built within close proximity to wetlands that attract birds that pose a safety hazard to aircraft. The proposed airport is between two national parks where the area's largest population of wading birds lives. In addition, the entire water management and mitigation measures depend on the creation of additional wetlands. Therefore, the Homestead commercial airport would be in violation of the FAA's standard.

Response: FAA Advisory Circular 150/5200-33, *Hazardous Wildlife Attractants On Or Near Airports*, is being applied to the proposed commercial airport at Homestead. The provisions of the Advisory Circular were specifically discussed in Section 4.4.3.1, *Bird-Aircraft Strike Hazard*, of Volume I of the Draft SEIS and remain in the same section in the Final SEIS. The Advisory Circular does not prohibit civil airports in the vicinity of wetlands. Many existing airports were built on land containing wetlands or are near wetlands. In regions where wetlands are extensive, such as south Florida, close proximities between airports and wetlands are difficult to avoid. In February 1998, the FAA asked a team of experts to visit the Homestead site and evaluate whether Homestead's use for commercial aviation should be discouraged by the FAA on safety grounds because of potential bird strike and wildlife attractant concerns. This team was comprised of an FAA wildlife biologist (who specializes in aviation bird strike and wildlife attractant problems and who wrote the FAA Advisory Circular), two U.S. Department of Agriculture animal hazard specialists, and an FAA environmental protection specialist. There are wildlife habitats on the former base and in the general vicinity that are attractive to birds and other wildlife potentially hazardous to aircraft

operations. These were viewed and evaluated. The team concluded that wildlife problems cannot be eliminated, but that with proper wildlife hazard management practices in place, wildlife problems can be managed so that Homestead would be equivalent to other airports in Florida with similar surrounding habitat.

The analysis of the potential for aircraft accidents does not suggest a significant risk. However, the SEIS states that FAA will require Miami-Dade County Aviation Department to conduct an ecological study addressing hazardous wildlife safety concerns as part of the requirement to hold an Airport Operating Certificate to permit scheduled air carrier service at Homestead. The county fully recognizes this critical issue and has included a commitment to conduct a study in its Wildlife Hazard Management Plan.

9.3.8 Comment: The Miami-Dade County Department of Aviation considered bird strikes a significant enough problem last year that they applied for a permit to kill White Ibis at the former airbase. Bird strikes are projected to increase under the Proposed Action and Commercial Spaceport alternatives. White Ibis are a species of special concern. If Department of Aviation concerns are correct that Ibis are already a problem for flight safety, then any increase in airport traffic would be inappropriate because it would increase the potential for bird strikes which are already considered too high. Increased flights and potentially a second runway would be in direct conflict with a protected species of special concern. Bird strikes could be elevated even higher when lands are restored to provide natural habitat in the area through the Conservation and Recreation Lands or Environmentally Endangered Lands programs. More species will utilize the area. Such projects as the stormwater treatment and distribution area (STDA) could serve as an attraction for species, thus exacerbating the problem relative to the Proposed Action. More information on bird strikes needs to be included in the SEIS relative to the effects of the STDA, other habitat enhancement projects, and impacts of a second runway.

Response: The SEIS contains an analysis and discussion on flight safety and the probability of aircraft-bird strikes in Section 4.4.3.1, *Bird-Aircraft Strike Hazard*. The analysis is based on FAA safety data for commercial and general aviation activities and Air Force mishap information. The SEIS relates this accident information to land uses in the airport area, including the STDA and “habitat enhancement projects.” Based on this information, the document fully discusses the need to develop the airport, STDA, and habitats in accordance with guidance in FAA’s Advisory Circular 150/5200-33, *Hazardous Wildlife Attractants On Or Near Airports*, to minimize their contributions to any increase in aircraft-bird collisions. The analysis of the potential for aircraft accidents does not suggest a significant risk.

The Air Force, rather than the county, initially sought to kill White Ibis. However, alternative arrangements were made to remove and relocate the Ibis.

9.3.9 Comment: Considering that, of the 21,257 bird strikes reported during 1990–1998, almost 10 percent of strikes were reported in Florida, it is likely that the FAA will make safety concerns a priority issue over stormwater reduction. The Draft SEIS does not address adequately the conflict between stormwater management at the site and bird populations. The Natural Resources Defense Council is concerned that the stormwater management plan will not be fully implemented as planned because of the likelihood that its retention ponds will create significant standing water. Such retention ponds may not comply with FAA safety regulations and agency policy to minimize the risks of wildlife-aircraft strikes. (See FAA Advisory Circular, *Hazardous Wildlife Attractants On Or Near Airports*, AC 150/5200-33: “Human-made or natural areas, such as...retention ponds...may be used by wildlife.... Wildlife use of areas within an airport’s approach or departure airspace, aircraft moving areas, loading ramps, or aircraft parking areas may cause conditions hazardous to aircraft safety.”) This guidance also suggests that retention ponds and other wildlife attractants should be placed at least 10,000 feet away from airports serving turboprop engines.

Response: The Draft SEIS did discuss the need to design stormwater management measures to minimize attracting birds and other wildlife to aircraft operational areas. The county's proposal to use properly designed detention ponds, in lieu of retention ponds, complies with storm water management recommendations in FAA's Advisory Circular 150/5200-33, *Hazardous Wildlife Attractants On Or Near Airports*. FAA will require the Miami-Dade County Aviation Department to monitor these ponds and, if necessary, develop measures to alleviate any unforeseen wildlife hazards these ponds may cause.

9.3.10 Comment: The Draft SEIS notes an irreconcilable tension between the two goals of maximizing water retention and minimizing wildlife attractants. But the report does not address this conflict. Without explanation, the Draft SEIS assumes that both goals can and will be met. Such an assumption does not conform with the reality that safety issues will likely affect the implementation of the stormwater management plan and reduce its ability to hold maximum amounts of water on-site.

Response: The FAA believes that both goals can be met. Homestead is not a unique situation. As noted in Section 4.4.3.1 of Volume I, the Miami-Dade County Aviation Department is proposing to build properly designed detention ponds in accordance with FAA guidance (see section 3.7 of FAA Advisory Circular 150/5200-33, *Hazardous Wildlife Attractants On Or Near Airports*).

9.3.11 Comment: South Florida Water Management District has previously requested comments from FAA regarding the applicability of the FAA Advisory Circular to the stormwater treatment and distribution area project and is still waiting for a response from the FAA on this issue.

Response: The Advisory Circular would apply to a commercial airport at Homestead. The provisions of the Advisory Circular include evaluating the potential wildlife hazard to aviation of the proposed STDA. Volume I of the Final SEIS reports in Section 4.4.3.1 that Miami-Dade County has evaluated the proposed STDA under the guidance in the Advisory Circular and concluded that the STDA is not expected to pose additional risk to aircraft operations. More information is provided in Section 4.4.3.1 of Volume I.

9.4 Risks at Turkey Point Nuclear Power Plant

The Draft SEIS discussed the safety issues associated with the Turkey Point Nuclear Power Plant, which is located about two miles from former Homestead AFB, but did not include a risk assessment. The Final SEIS summarizes the results of a risk assessment of the proposed commercial airport performed by Florida Power and Light Company and approved by the Nuclear Regulatory Commission.

9.4.1 Comment: There is concern about reuse alternatives, specifically the operation of a major airport, that pose risks of an accident involving the Turkey Point Nuclear Power Plant operated by Florida Power and Light Company. The concern centers on the potential for an aircraft accident involving the plant that would result in the uncontrolled release of hazardous radioactive materials. The additional aircraft operations at Homestead would increase the risk at the Turkey Point Nuclear Power Plant.

Response: The Draft SEIS described the process and criteria for assessing risks involving the Turkey Point Nuclear Power Plant. As directed by the Nuclear Regulatory Commission (NRC), Florida Power and Light Company has conducted a risk assessment addressing the risk of an aircraft accident. This assessment was conducted in accordance with NUREG-0800, "U.S. NRC Standard Review Plan (SRP) 2.2.3," using the NRC-approved risk assessment analytical protocols. The assessment considers the types and levels of aircraft operation defined in the SEIS for the Proposed Action. The assessment was not available for the Draft SEIS, but applicable data from the assessment have been incorporated into the Final SEIS. The assessment, which has been approved by NRC, concluded that the risk of an aircraft accident preventing safe shutdown of Units 3 and 4 or resulting in radiological consequences above

regulatory limits to be $3.63\text{--}4.43 \times 10^{-7}$. See Section 4.4 in Volume I and Appendix I in Volume II for more information.

9.4.2 Comment: What would be the consequences of an aircraft crashing into the Turkey Point control building or spent fuel storage area? What would be the cost of making structures at Turkey Point strong enough to withstand a direct crash by an airliner?

Response: The risk assessment does not focus on damage to structures per se, but on damage to structures that results in an uncontrolled release of radioactive materials in sufficient quantity that the exposed population would receive a dose level that exceeds established standards (see Section 3.4.4.1 in Volume I). If risk of occurrence or estimated exposure thresholds are exceeded, mitigation action is required to bring them below established thresholds. The risk assessment recently performed by Florida Power and Light Company indicates those thresholds are not expected to be exceeded.

9.4.3 Comment: What is the Air Force's statistical probability of an airplane crash at Turkey Point from the Homestead airport?

Response: The Air Force relied on the Nuclear Regulatory Commission to evaluate safety issues associated with proposed commercial airport operations at former Homestead AFB and the Turkey Point Nuclear Power Plant. The results of their required safety analyses are summarized in Section 4.4 (Volume I) and Appendix I (Volume II) of the Final SEIS.

9.4.4 Comment: Could a terrorist use Homestead to attack Turkey Point before anyone would have time to react?

Response: Commercial airports have security in place to guard against terrorism. Homestead would have that security.

9.4.5 Comment: How many flight paths, holding patterns, and landing patterns cross over Turkey Point?

Response: Flight paths, particularly for departing aircraft, are not narrowly defined "railroad tracks" in the sky, but rather are dispersed corridors that gradually increase in width with distance from the lift-off point. Arrivals are closely defined only in the final stages of approach as aircraft line up with the runway for landing. The Turkey Point Nuclear Power Plant is located approximately four to five miles from the runway at Homestead Airport, in close proximity to a number of departure and approach paths. Flight paths are described by the projected centerline of the dispersed traffic pattern that fly along the each path leading to or from airspace fixes in south Florida, or along predefined routes of military and government traffic. Aircraft that conduct training flights at Homestead would fly along generally defined practice patterns. In response to this comment, the number of "backbone" or centerline flight paths passing over and within the vicinity of the power plant structure itself, rather than the extensive area of cooling ponds south of the facility, were determined. Based on the material provided in Appendix E (Volume II), Exhibits II-5 through II-11, a total of five departure and four arrival paths would cross nearly directly over the plant at altitudes between approximately 1,000 and 12,000 feet. No local practice patterns pass directly over the site.

9.4.6 Comment: How many flight paths, holding patterns, and landing patterns are within two miles of Turkey Point? Within five miles? Within five to ten miles?

Response: In addition to the paths that pass directly over the plant, two arrival and seven departure paths pass within two miles of the site. Four closed military pattern routes also fall within two miles of the site.

Because the power plant and airport are located within five miles of each other, all flight paths would pass within five miles of Turkey Point at some point. This obviously also holds true for five to ten miles.

9.4.7 Comment: What is the FAA's statistical probability of an airplane crash at Turkey Point from the proposed airport at former Homestead AFB? How does the FAA quantify the air crash probabilities for Turkey Point for air carriers from the Caribbean, Central America, and South America?

Response: The FAA maintains statistical safety data for civil aviation, including accident rates, as described in Section 4.4.3.1 in Volume I. However, the Nuclear Regulatory Commission, rather than the FAA, has the responsibility for nuclear plant safety risk analysis, including analysis relative to the risk from an aircraft accident. The FAA does not do this type of analysis and has relied on NRC's analytical requirements and expertise. The Final SEIS, in Section 4.4.4.1 of Volume I, includes information on the consideration of accident rates for aircraft from Latin America.

9.4.8 Comment: What are the safety risks associated with a commercial spaceport at former Homestead AFB with the Turkey Point Nuclear Power Plant?

Response: As Sections 2.3 and 4.4 in Volume I indicate, commercial spaceports and commercial launch operations are required to go through a licensing process with FAA that includes safety analyses and adherence to specific safety criteria. If a spaceport were developed at Homestead AFB, it would have to comply with the FAA licensing process. Planning for a commercial spaceport at former Homestead AFB has not proceeded to the level of detail necessary to allow the required safety analysis.

9.4.9 Comment: What is the Air Force's statistical probability of a spaceport crash occurring at Turkey Point?

Response: The Air Force has not calculated a statistical probability of a spaceport crash occurring at Turkey Point. The SEIS states that assessing the possible risks to the Turkey Point facility is not possible at this time. See Section 4.4.4.2 in Volume I. The staff of the Nuclear Regulatory Commission has also concluded that there is insufficient information at this time to quantify the potential risk of a spaceport to the Turkey Point Nuclear Power Plant. See Appendix I in Volume II.

10.0 NOISE

A large number of comments were received on aircraft noise and its effects on various community locations, the national parks, and other areas. Many commentors expressed concerns about the noise of aircraft overflights of the Proposed Action on places that are important to them in communities and the national parks. Clearly the operation of a commercial airport would increase aircraft noise in the vicinity of Homestead. The Air Force and FAA acknowledge and respect these comments. The SEIS noise analysis is unprecedented in its extent and detail because of such noise concerns about reuse of former Homestead AFB.

For purposes of organizing responses, the comments are grouped into seven sections. Section 10.1 addresses comments on aircraft and airport data relevant to assessing noise. Section 10.2 addresses comments on noise methodology. These two sections are presented first in order to address comments on the basic elements of noise assessment in the SEIS. Following the first two sections, Section 10.3 on general noise effects addresses noise comments that are general in nature and may encompass both community and national park noise issues. Sections 10.4 through 10.7 are specific to community noise effects, national park and refuge noise effects, the commercial spaceport alternative, and noise mitigation measures.

The National Park Service (NPS) is a cooperating agency on the SEIS, including involvement in the noise analysis. However, it is clear from portions of the SEIS text and Appendix H, as well as from several comments on the Draft SEIS, that NPS has certain methodological differences of approach and would reach different conclusions in some respects. The FAA is the lead agency with primary responsibility for the SEIS noise analysis, and final decisions on methodology and judgments on noise effects in the SEIS text and responses to comments are the FAA's.

10.1 Aircraft/Airport Noise Data

10.1.1 Comment: The largest number of comments on noise focused on how noisy it would be in community locations or the national parks with a commercial airport, based on various mathematical estimations of the number of aircraft overflights (e.g., every minute, every 90 seconds, every 2 minutes, continuous for 16 hours a day, every 7 minutes over the center of Everglades National Park, so frequent that very little "ambient" time would be available, an aircraft noise interruption 1 minute out of every 12, a flight every 5 minutes).

Response: Understanding the noise effects of the Proposed Action is more complex than simply taking aircraft operations numbers and dividing by days, hours, or minutes to figure out how many aircraft of which size would be over a particular point on the ground and would produce noise levels high enough to be annoying or even noticeable to people at that location. That is why the SEIS noise analysis is complex.

Many commentors' calculations result in an inaccurate conclusion that there would be large, low-flying, noisy aircraft over their heads, whether in the community setting or in the national parks, every 2 minutes, or every 1 minute, or continuously, and so on. There are several reasons why simple calculations like these do not provide an accurate portrayal of aircraft overflight noise at any particular location. Each takeoff and each landing counts as an aircraft operation. Therefore, the number of aircraft operations should be divided by 2 to arrive at the number of aircraft using Homestead, since each individual aircraft is counted twice, once as it lands and again as it takes off. A person on the ground would not be located under both the arrival and departure paths of aircraft, which would be on different sides of the airport. Civil aircraft would use a variety of flight tracks, as shown in the SEIS, depending on aircraft performance and origin/destination. Not every aircraft would fly over the same point on the ground, except in close proximity to the runway. Homestead as a civil airport would serve a broad mix of aircraft from small single engine piston to large commercial and cargo jets. Large and small aircraft have different performance characteristics and different noise emissions levels. Noise dissipates rapidly with distance. Aircraft altitudes abate noise as distance from the runway increases. Noise also dissipates with lateral distance from directly beneath flight tracks (i.e., the slant distance).

The best way to judge noise effects of a commercial airport is to look at the noise contours and grid point analysis data in the SEIS for particular locations. In response to concerns about numbers of aircraft, tables in Appendix E of the SEIS that report daily average civil aircraft numbers by type of aircraft on each flight track have been summarized and added to Section 2.2.2 of the Final SEIS. The detailed tables remain in Appendix E (Tables II-7 through II-16).

10.1.2 Comment: Several commentors stated noise concerns related to having 500 to 600 large commercial jets flying in and out every day at Homestead.

Response: It is correct that sizeable numbers of commercial jets are projected to use a commercial airport. However, the number of large commercial jets that are projected to operate at Homestead is significantly lower than some commentors believe. Some people are mistakenly assuming that all civil aircraft operations at Homestead would be large commercial jets and are further confusing operations numbers with aircraft numbers. Response 10.1.1 provides an explanation of operations versus aircraft numbers. As

shown in Table 4.5-1 of the SEIS, a commercial airport at Homestead in the year 2015 is predicted to result in about 203 daily commercial aircraft operations (a little over 100 individual aircraft, including both passenger service and cargo) and 156 daily general aviation aircraft operations (78 individual aircraft). At maximum use, the number of commercial aircraft operations could increase to about 424 per day (212 individual aircraft), with no increase predicted in general aviation operations. Military/government aircraft operations that currently occur at Homestead are projected to continue in the future.

10.1.3 Comment: The proposed commercial airport would be drastically busier and noisier than the Air Force Base ever was.

Response: This is not a correct perception. When Homestead AFB was an active military air base before Hurricane Andrew, it had about 525 military aircraft operations a day, five days a week. The predicted numbers of daily civil aircraft operations related to a commercial airport at Homestead are given above in the response to comment 10.1.2. Civil aircraft operate on a seven-day week schedule.

Homestead AFB included substantial numbers of high-performance, very noisy military aircraft, including F-4, B-52, and F-15 aircraft, that were noisier than the F-16 military aircraft presently operating at the former base. High-performance military aircraft currently using Homestead ARS remain noisier than large, high-performance civil aircraft, whose noise has been reduced by federal law and regulation. Low-performance general aviation propeller aircraft are much quieter.

At maximum use, the Proposed Action would still not generate as high a level of aircraft noise exposure on community areas near the airport or over the nearby areas of the national parks as the military base generated during its highly active years. Appendix E, Chapter VIII, of the SEIS contains information on pre-realignment base noise.

10.1.4 Comment: According to FAA records, annual government operations at Homestead are now approximately 20 percent less than projected in the SEIS, which decreases the relative contribution to noise of military flights.

Response: It is assumed the comment is referring to the National Plan of Integrated Airport Systems (NPIAS). This is not as good a source of information as the detailed review undertaken by the Air Force during the SEIS technical analysis to assure an aircraft count with the highest possible accuracy.

10.1.5 Comment: Cargo aircraft are noisier than comparable commercial passenger aircraft.

Response: No, they are not. Under Federal Aviation Regulations Part 36 and Part 91, there is no difference between the noise levels that passenger and cargo aircraft of identical type are allowed to make. As of January 2000, all large commercial aircraft operating in the U.S., both passenger and cargo, are required to meet quieter Stage 3 noise levels.

10.1.6 Comment: Are regional jets subject to Stage 3 noise standards? They appear to be less than 75,000 pounds.

Response: Most regional jets exceed a 75,000 pound takeoff weight threshold and, therefore, are subject to Stage 3 noise standards. Aircraft below this weight are not subject to Stage 3 standards. The National Business Aviation Association passed a resolution in January 1998 that is a first step in the voluntary elimination of the noisier business aircraft under 75,000 pounds.

10.1.7 Comment: Although it is beyond the scope of this SEIS, it is possible that if a commercial airport were to be expanded at a later date, increased noise levels could result, despite any future changes in technology that could mitigate such impact, if such technology were to be developed. It is unclear at this time if that will be the case.

Response: The Air Force and FAA acknowledge the concern about possible future noise increases if Homestead were to be expanded with an additional runway at a later date. With respect to technological development, the record of aircraft source noise reduction in the U.S. is a good one. In 1976, there were an estimated 6–7 million Americans exposed to significant levels of aircraft noise near airports (i.e., Day-Night Average Sound Level of 65 decibels and above). That number has been dramatically reduced to the neighborhood of 500,000–600,000 Americans in the year 2000 because of the federal promulgation of aircraft noise certification standards and the successive national phaseouts of large Stage 1 and Stage 2 aircraft. In 1992, FAA and NASA began co-sponsoring a research program to achieve significant additional advances in noise reduction technology. Based on the progress in this research program, FAA plans to set new Stage 4 standards early in this century. New standards will result in a future transition to a generation of airplanes quieter than Stage 3, similar to source noise reduction transitions that have been implemented since 1976.

10.1.8 Comment: Even if U.S. airplanes are quieter in the future, it is likely that foreign airlines and cargo aircraft that would use Homestead would retain noisier aircraft far beyond 2015. In the Airport Planning Technical Report, Landrum & Brown state the use of the noisiest plane, the Boeing 727, and of the MD-80 will remain essentially constant for cargo flights through 2038.

Response: Cargo aircraft must adhere to the same federal noise regulations as passenger aircraft. Foreign aircraft, regardless of origin, are required to meet the same noise standards as domestic aircraft in order to operate into the U.S.

Regarding future cargo operations at Homestead with B-727 and MD-80 aircraft, the SEIS assumes the continued use of MD-80 aircraft for cargo operations to 2038, but the removal of the B-727 from the cargo fleet by that time. By 2038, the newest B-727 would be more than 55 years old, and the newest MD-80 would be 40 years old. In all probability, both of these aircraft are likely to be replaced by newer and quieter aircraft earlier than assumed in the SEIS. The aircraft fleet planning assumptions in the SEIS are considered by FAA to be conservative, by using older, noisier models than will probably make up the U.S. fleet for the long-range time period.

10.1.9 Comment: The SEIS ignores increases in aircraft noise. One example is the B-727-200, whose Sound Exposure Level contour at approximately 80 decibels goes over Ocean Reef. The 727 is one of the more popular planes likely to be in high use at the proposed civilian airport.

Response: The SEIS does acknowledge that a commercial airport would increase noise in the Homestead vicinity and provides detailed quantitative data on potential increases. The B-727 has been a popular airplane, but is an older airplane that has been hushkitted to meet Stage 3 noise standards. It is unlikely that the B-727 will remain in the active U.S. fleet by 2015, owing to the cost of its operation compared to new aircraft having similar lift capacity. Its replacement by newer aircraft models is also being encouraged because it is noisier than newer models. Projections of aircraft activity at Homestead show fewer, rather than more, B-727s in future years.

10.1.10 Comment: There is no indication that small general aviation airplanes will become quieter in the future. Many of the flights from the proposed airport will be in single-engine general aviation aircraft, which although having quieter engines, fly at lower altitudes and, therefore, have equal noise impacts to

people on the ground. Furthermore, the duration of noise from these aircraft will be greater since they move at much lower speeds.

Response: Small general aviation aircraft do make noise and do fly lower than larger high-performance aircraft. Their noise may be annoying to some people; although as a general matter, small general aviation propeller airplanes do not tend to be the type of aircraft that generate community concerns or complaints. Altitude differences between large jet and small propeller aircraft do not provide a reliable basis for noise prediction. Large jets at higher altitudes (e.g., 2,000, 4,000, 8,000 feet) typically produce more noise than small propeller aircraft at lower altitudes. FAA and the National Aeronautics and Space Administration have initiated a research program to identify and develop propeller-driven aircraft noise reduction technologies to reduce the noise footprint of small general aviation aircraft.

10.1.11 Comment: Aircraft noise levels in the study are based on speculation that future aircraft types will be quieter. Projections that aircraft noise levels in the future will be quieter than today are speculative and should not be the basis for a decision.

Response: As indicated in the response to comment 10.1.7, FAA does have a credible basis for expecting future aircraft types to be quieter than today's fleet. However, as indicated in the SEIS, we cannot currently predict the aircraft models that will be in the fleet in the long-range or what their specific noise characteristics will be. Therefore, for the SEIS noise analysis, only current aircraft types with known noise characteristics were used. FAA considers this to be a conservative noise analysis because it does not quantitatively take into account future expectations of aircraft source noise reduction.

10.1.12 Comment: The proximity of Homestead to Miami International Airport (MIA) increases the severity of the Proposed Action's noise impacts. The SEIS admits that airspace restrictions caused by MIA will cause aircraft using Homestead to fly at lower altitudes at greater distances from the airport than would be the case for unrestricted airspace, resulting in higher noise levels at greater distances from the airport.

Response: The comment is correct that the complexity of the Miami airspace in south Florida would cause departures from Homestead on Runway 5 to turn to the south and climb before turning back to the north to overfly aircraft arriving at or departing from MIA. In several cases, climbs must be restricted to altitudes between 4,000 and 6,000 feet in order to pass inbound or outbound traffic from MIA or Homestead itself. The SEIS uses these lower altitudes in its calculations of noise.

10.2 Noise Methodology

10.2.1 Comment: The SEIS methodology for estimating the noise impact is inadequate and biased by FAA methodology. It underestimates the noise impact.

Response: The FAA gave a lot of weight to the importance of accuracy and thoroughness in the early planning of the noise analysis. The SEIS includes an extremely large geographic area within the region of influence and evaluates noise down to very low levels at great distances from Homestead. Aircraft noise from other airports in the area is included in the analysis. A special field measurement program was undertaken to evaluate ambient sound levels in the national parks and refuge, and specially tailored Time Above Ambient calculations were done based on the variable levels of measured ambient values. FAA made enhancements to the Integrated Noise Model to account for noise propagation over water (an acoustically hard surface) and increased noise effects in areas of open water and swampland. Five noise metrics were used in the analysis to describe different aspects of aircraft noise effects. FAA has a high degree of confidence in the noise methodology and results because of the sizeable scope of the work, the

adherence to accepted scientific practices, and an analysis that was varied and tailored to the characteristics of the regional sound environment.

10.2.2 Comment: The SEIS relies too heavily on the Day-Night Average Sound Level (DNL) metric to evaluate the noise impact on communities. By using this metric, the SEIS mistakenly concludes that noise increases will not be significant because the average noise will be below 60 decibels. This conclusion ignores that the DNL for Ocean Reef will increase from 35 to 39 decibels. Under the Proposed Action, Ocean Reef would experience substantial increases in the timing, duration, frequency, and level of adverse noise.

Response: DNL is the widely accepted noise metric used to evaluate community noise impacts. DNL was developed by the U.S. Environmental Protection Agency (USEPA) and was adopted by FAA about twenty years ago. A Federal Interagency Committee on Noise (FICON), including USEPA, Air Force, FAA, Department of Housing and Urban Development, and Department of Veterans Affairs, examined aircraft noise assessment methodologies in the early 1990s. FICON concluded that the methodology employing DNL as the noise exposure metric and appropriate dose-response relationships (primarily the Schultz curve for the percentage of people highly annoyed at various DNL levels) to determine noise impacts on populations is considered the proper one for civil and military aviation assessments in the general vicinity of airports.

FAA's threshold of a significant impact on noise sensitive community land uses (e.g., residential, schools, hospitals, churches) is a 1.5 decibel (dB) increase at DNL 65 dB and higher. At DNL 65 dB, the updated Schultz curve (Figure 3.5-2 in Section 3.5 of Volume I) shows that, statistically, about 13 percent of the population would be highly annoyed by noise. That percentage rises sharply as DNL levels increase above 65 dB. It also decreases as DNL levels decrease below 65 dB. DNL levels of 35–39 dB are very low—so low that they are not charted on the Schultz curve, which ends at DNL 40 dB. At DNL 40 dB, only about 0.5 percent of the population would be expected to be highly annoyed by aircraft noise.

10.2.3 Comment: The Maximum Sound Level (L_{Amax}) metric does not adequately account for aircraft noise impacts on Ocean Reef because military aircraft would not be the most frequent noisy aircraft flying over the community and because the L_{Amax} metric does not include duration and frequency.

Response: Day-Night Average Sound Level is the basic metric used to evaluate community noise impacts. DNL includes duration and frequency. L_{Amax} does not include duration and frequency. Its use is intended to supplement DNL and to provide additional information on the loudest single event aircraft noise. At Ocean Reef, military aircraft would produce the highest L_{Amax}. Time Above information for Ocean Reef is also in the SEIS.

10.2.4 Comment: The Time Above Ambient is a useful measure of noise in Biscayne National Park, provided ambient is properly defined and measured, because the fundamental threat of the Proposed Action is impairment of the natural soundscape for future generations. Time Above Ambient provides a quantitative measure of the temporal aspect of the impairment.

Response: Time Above (TA), one of five noise metrics used to assess noise in the SEIS, is an A-weighted estimate of the time that aircraft noise would be above a specified level. Time Above Ambient (TA_{amb}) estimates the average daily time that aircraft noise would be above the average level of other non-aircraft noises in the national parks. TA_{amb} is useful for comparing the relative effects of aircraft noise of the alternatives in the SEIS. In examining the absolute values for TA_{amb}, however, it is important to understand the technical limitations of TA. TA is a time-based descriptor. It does not reflect the noise energy or loudness of aircraft, factors that have been shown to correlate closely with human annoyance.

Unlike sound energy levels, the correlation between TA and human annoyance, especially in low ambient sound environments, is highly uncertain.

In general, people notice aircraft noise when it becomes an intrusion at some point above the ambient sound level. U.S. Forest Service backcountry visitor research with the National Park Service in 1992 concluded that "...comparing overflights reported by visitors with actual overflights identified by acoustic recorders, it appears that many visitors do not notice aircraft even when they are present." More recent FAA park visitor research indicates that noticeability of aircraft noise varies widely and that annoyance varies with visitor activity, group size, gender, and the number of children in a party. All noise that is heard, particularly at relatively low levels, does not necessarily annoy people or interfere with their enjoyment of a park. TAamb does not report how loud aircraft sounds are in comparison to other sounds; whether aircraft are a lot louder, or only a little louder, than other sounds. FAA research at Bryce Canyon in July 1998 found that park visitors were three times more likely to be annoyed by the level of aircraft sound than by the amount of time they heard aircraft. In summary, there is not currently a solid technical basis for relating TAamb to "impairment," and the TAamb data in the SEIS should not be regarded as a measure of impairment to the national parks.

10.2.5 Comment: The Draft SEIS understates aircraft noise impacts by using the traditional ambient sound level to describe background noise levels in the national parks, instead of using the lower natural ambient sound level. The only intruding sounds excluded from the traditional ambient baseline are aircraft sounds. Other human intruding sounds are included, even if they are unwelcome intrusions upon the natural ambient of the parks. The use of traditional ambient, instead of natural ambient, circumvents the National Park Service's mandate to regulate its own soundscape.

Response: The traditional ambient sound level was employed for the noise analysis as explained in some detail in Section 3.5 of the SEIS. Data for the other three ambient categories (existing, natural plus visitor self-noise, and natural) were gathered and were included in the SEIS for purposes of comparison. Where natural sounds dominate, such as in Everglades National Park, the values for traditional and natural ambient levels are very close. Where there are more frequent and louder human activities, such as recreational and commercial boating in Biscayne National Park, traditional ambient sound levels are higher than natural sound levels.

The purpose of the SEIS is to comply with the National Environmental Policy Act and disclose to decision makers and to the public how the affected environment in the vicinity of Homestead would be estimated to change under various reuse alternatives. In the SEIS, the affected sound environment in the national parks and refuge simply reflects the sounds that are heard, whether they are sounds of nature or sounds occurring because of human use. The natural ambient alone does not fully describe all sounds heard in the national properties, especially in Biscayne National Park. All Homestead reuse alternatives are analyzed on the same basis—that is, how much aircraft noise there would be above the average level of other sounds in the parks if there were no action to reuse Homestead, if a commercial airport was established, if the Collier-Hoover proposal were selected, if a commercial spaceport were developed, or if other mixed uses occurred. Aircraft noise levels would remain the same as calculated in the SEIS if a different ambient were used. It is the ambient level that would change, which would affect Time Above Ambient calculations equally for all alternatives. Any additional minutes per day that might be added to the Time Above Ambient, were a lower ambient threshold to be used, would be from aircraft noise that is below the average level of other sounds (the traditional ambient) in the national parks. The FAA has explained in more detail the reasons for evaluating aircraft noise in comparison to the traditional ambient, rather than the natural ambient, in the Department of Transportation Act Section 4(f) evaluation in Section 4.14 of Volume I of the Final SEIS

The selection of methodological approaches to noise assessment may vary with differing statutory mandates, policy perspectives, and decisions to be made. The SEIS is structured to assist the Air Force and FAA in decision making about property disposal and airport-related issues, and the SEIS uses assessment approaches and methodologies most appropriate for these purposes. The SEIS recognizes that NPS has a specific purpose in preparing national park soundscape plans, which leads the NPS to assess sounds in national parks in comparison to a baseline affected environment of the natural ambient sound level. NPS is still in the process of developing a draft of its soundscape analysis for Biscayne National Park. That analysis will be different in several respects from the SEIS analysis. There is discussion of analytical similarities and differences in Section 3.5.2.4 of Volume I of the Final SEIS. The draft soundscape Environmental Assessment (EA) analysis will not change the SEIS analysis. As of the time of the Final SEIS, NPS soundscape planning has not progressed enough to provide a basis for predicting the achievement of different quantifiable sound levels in the south Florida national parks than the levels that can currently be measured. The SEIS correctly quantifies additional incremental aircraft noise that would be added to existing noise in the national parks and refuge and explicitly states that the addition of aircraft noise is contrary to NPS soundscape goals.

10.2.6 Comment: The Draft SEIS noise analysis in the national parks is flawed since Wyle Laboratories found far lower ambient noise levels in both national parks than the FAA methodology. The draft report by Wyle Laboratories entitled “The Soundscape in South Florida National Parks” was prepared for the National Park Service and was included in an appendix to the Draft SEIS. The report was prepared to assist NPS in its efforts to resolve methodological issues associated with defining the natural soundscape. The report reviewed the data from earlier studies that were used as the basis for the noise analysis in the Draft SEIS. In various places, the Wyle report points out where the methodology and assumptions in the earlier studies appear to be inconsistent with an accurate assessment of the natural soundscape. For example, the ambient noise level ascribed to the parks by the FAA’s short-term measurements is far higher than the levels measured over a longer period of time by Wyle Laboratories. In addition, the Wyle findings do not validate the vegetation-based extrapolation of data that was done by the FAA. The Department of the Interior accepts the Draft SEIS’ finding that the airport alternative would lead to increases in the amount of time that there would be elevated noise levels in the parks. However, the re-analysis by Wyle Labs indicates that the analysis reflected in the text of the Draft SEIS may underestimate the amount of time each day that noise levels would be elevated.

Response: The FAA has evaluated and considered the NPS/Wyle report, does not agree with it, and did not use it for the SEIS analysis. The NPS/Wyle study did not simply re-check the ambient data used in the SEIS. Wyle took some of the data and applied an entirely new methodological approach that had not been previously used in any national park noise study. The draft NPS/Wyle report was provided to the Air Force and FAA on September 1, 1999, after both FAA/Volpe and NPS/SID had completed the ambient work for the SEIS using observer-based measurement procedures that have been employed to date for ambient studies in national parks. Before the Draft SEIS was issued, FAA reviewed the draft NPS/Wyle report to determine whether the SEIS noise measurement work remained valid or should be revisited based on the suggested new methodology. FAA concluded that the methodology used to date for national park studies (and also used for the Homestead SEIS) was superior to the new methodology, and that the NPS/Wyle methodology would not result in a more accurate assessment of the natural ambient. FAA provided detailed written comments on the draft Wyle report to NPS (included in Appendix H of the Final SEIS). NPS/Wyle have since finalized the report. The final report replaces the draft report in Appendix H of the Final SEIS. Additional FAA comments on the final report are also in Appendix H.

It is important to note that the NPS/Wyle report is limited to Wyle’s analysis of the natural ambient sound level. Despite varying methodology, NPS/Wyle reports relatively small differences between FAA and NPS average natural ambient results. (Larger differences result from NPS/Wyle’s added analysis of the data using the L₉₀ percentile descriptor, which filters out all noise data except for the quietest 10 percent.

The use of this statistic eliminates many sounds that are heard in the environment, including many natural sounds.) The NPS/Wyle report does not examine the collection or accuracy of traditional ambient sound data. While natural ambient levels offer useful information in the SEIS for comparative purposes and are important to NPS for soundscape planning, these levels were not used as the baseline ambient levels for the SEIS noise analysis. The SEIS uses the traditional ambient levels (see response to comment 10.2.5). FAA continues to have confidence in the objectivity and reasonableness of the ambient mapping methodology. This methodology is described in detail in the technical report prepared by the Volpe National Transportation Systems Center entitled "Ambient Sound Levels at Four Department of Interior Conservation Units" (June 1999).

10.2.7 Comment: The SEIS inaccurately separated out current aircraft sounds in determining traditional ambient. This flaw, which is the subject of a report by Wyle Research Laboratories, assumes that aircraft noise events begin long before and end long after the aircraft affect the measured sound level. This methodological error makes the ambient measurement higher than it should be.

Response: Aircraft sounds were separated out from other sounds in the SEIS analysis using the most accurate and scientifically accepted standards available. This comment is essentially based on the commentator's review of the draft NPS/Wyle report (see response to comment 10.2.6 on the NPS/Wyle report). With specific respect to the accuracy of the identification of aircraft sounds, FAA's evaluation is that the methodology used in the FAA/Volpe and NPS/SID measurement work for the SEIS is technically superior to the NPS/Wyle methodology. NPS/Wyle's generalized methodology mixes aircraft sounds in with natural ambient sounds, so long as the aircraft sounds are less than 3 decibels over calculated average background levels. Using the NPS/Wyle methodology results in natural ambient calculations that contain aircraft noise and other human-made sounds.

10.2.8 Comment: It appears that the FAA methodology is more appropriate for urban settings than national parks. The Final SEIS should use the Wyle methodology for measuring noise levels in national parks.

Response: In Appendix H of Volume II and in responses to comments 10.2.6 and 10.2.7 above, FAA has explained why it did not find the NPS/Wyle methodology desirable to use. With respect to the methodology used in the SEIS, FAA spent over a year developing a specially tailored and detailed noise analysis specifically for the south Florida national parks and refuge. Details on the uniqueness of this analysis are described in the SEIS and summarized briefly in the response to comment 10.2.1. This analysis is very different from the methodology normally used for urban settings.

10.2.9 Comment: The Draft SEIS' assertion that the sum result of dozens, frequently hundreds, of airplanes overhead will be just a few minutes of "new" aircraft noise is flawed and is the result of using "background" levels that are too high. The combination of Biscayne National Park's close proximity to Homestead and the significant increase in Homestead's aircraft operations would be expected to result in a significant noise impact in the park; yet the SEIS predicts no such significant noise impact. The SEIS' analysis is flawed and its conclusion is incorrect. Most significantly, the baseline or "ambient" noise levels used in the SEIS are far too high and, accordingly, impacts from the massive influx of aircraft are greatly underestimated. If proper baseline noise measurements had been used, the noise impact would be more severe.

Response: The basis indicated in this comment for doubting the SEIS' analysis of aircraft noise impact is that the baseline or "ambient" levels used in the SEIS analysis are too high. A number of the above responses address the SEIS' use of the traditional ambient and the NPS/Wyle report, both of which have a bearing on this comment.

The background or “ambient” noise levels used for the national parks in the SEIS noise analysis are based on extensive field measurements. FAA/Volpe collected 160 hours of acoustical and meteorological data at 29 sites throughout four national properties in the region. Measurement sites were selected on the basis of geography, representative land cover, NPS recommendations, and accessibility. Additional measurement data from NPS/SID were also gathered and used for the SEIS noise analysis. NPS/SID data covered 20 sites, 12 that were the same as FAA/Volpe’s sites and 8 that were unique. FAA/Volpe and NPS/SID measurements were conducted similarly. The FAA ambient methodology is described in the FAA report, “Draft Guidelines for the Measurement and Assessment of Low-Level Ambient Noise.”

The majority of measured traditional ambient sound levels in southern Florida parks were between 45 decibels and 55 decibels. Sound levels ranged from a low of 31.2 decibels at the Eastern Sparrow site in Everglades National Park (FAA/Volpe measured) to a high of 64.0 decibels at the Halfway Creek site in Big Cypress National Preserve (NPS/SID measured). Traditional ambient sound levels at Biscayne National Park are somewhat higher in comparison with Everglades National Park, Crocodile Lake National Wildlife Refuge, or Big Cypress National Preserve. This is due primarily to the coastal location of Biscayne National Park, which is 95 percent water (an acoustically hard surface that propagates sound) and the level of recreational and commercial boating activity in the park. At Biscayne National Park, traditional ambient levels ranged between 45 and 56 decibels.

FAA/Volpe and NPS/SID ambient measurements were observer-based using full-time trained listeners to identify sources of sound. These observer-based measurements offer greater precision than unmanned noise monitoring. Listener information was time-integrated with sound level and meteorological data. Audio recordings were used for additional reference. Using this array of information, four ambient sound levels were recorded: existing, traditional, natural plus visitor self-noise, and natural.

Complete details on the baseline ambient measurement program are presented in the 300 page technical report, “Ambient Sound Levels at Four Department of Interior Conservation Units” (June 1999). Based on the careful and extensive process used to collect ambient data for this study and the general agreement of FAA/Volpe and NPS/SID data at most of the common measurement sites, FAA has a good level of confidence in the ambient data used for the SEIS noise analysis.

10.2.10 Comment: The SEIS’ characterization of ambient sound levels is flawed because it does not account for daily and seasonal variations in sound levels which would affect the ambient. The SEIS neglects variations in natural sounds during the 24 hour day, and from season to season. In order reliably to capture such variations, long-term sound monitoring is needed in national parks.

Response: While there are limited seasonal data (two seasons), the SEIS noise measurement program did account for daily variances and some seasonal variances. Typically, a morning and an afternoon measurement session were scheduled at each site to control for daytime differences. If the results between these sessions varied by more than a few decibels, a third measurement session was scheduled to provide additional data and added confidence in repeatability. FAA/Volpe also conducted sample nighttime measurements. These data, consistent with nighttime data collected by NPS/SID, indicate that ambient sound levels are generally higher at night due to the nocturnal activity of insects, amphibians, reptiles, and other wildlife.

The use of both FAA/Volpe and NPS/SID measurements in the noise analysis helped to control for seasonal variations. The FAA/Volpe measurements were conducted in the summer (August) and the NPS/SID measurements were conducted in the fall (October and November). FAA/Volpe selected late summer for ambient measurements because this is the quietest time of the year for the region, and it offered the most conservative basis (i.e., lowest measured ambient) for the analysis. In August, high temperatures and humidity reduce visitation. Late summer is also generally the calmest time of the year.

when the effects of wind-related noise are lowest. For these reasons, FAA would expect seasonal measurements in winter to result in higher ambient levels than in the summer.

10.2.11 Comment: The SEIS inappropriately uses energy averaging to characterize “traditional ambient” levels. Because of how the averaging process was done in the Draft SEIS, the supposed average ambient sound level is far higher than the majority of the sounds recorded at a site, particularly when aircraft noise is excluded. Disproportionate weighting makes the energy average close to the highest sound levels during the measurement period. Energy averaging, in effect, uses brief, loud natural sounds to deny protection to quieter natural sounds over long time intervals.

Response: “Energy averaging” refers to the use of the Equivalent Sound Energy Level (Leq), an acoustics-based energy descriptor that is the log of the average value of sound occurring for a given period of time. Leq (by measurement time periods) was used for analysis of ambient data, and a peak Leq metric (Leq(h)) was used to estimate the cumulative noise energy of all aircraft operations over parks during the peak period of forecast activity. Leq is the traditional descriptor used for sound level measurements and offers comparability with other studies. Leq is widely used because it is sensitive to cumulative noise energy, which closely correlates with human response. Its major virtue is that it captures the wide variation in types of environmental sounds and time patterns, reflecting the number, duration, and magnitude of sound events.

Like the mean versus the mathematical average, the comment suggests that it is better to use statistical rather than acoustics-based descriptors for developing average ambient sound levels. Unlike straight percentile descriptors (L_n), the acoustic-based Leq is influenced by impulsive sounds, including those in nature. Leq and L_n averages tend to converge in a steady-state noise environment. Where they tend to vary, it is important to know the sources of the sound, a factor that was given meticulous care in the SEIS analysis.

Some commentors suggested the use of L_{90} for the ambient noise analysis. The L_{90} is the sound level exceeded 90 percent of the time and represents the quietest 10 percent of the data. FAA believes that L_{90} underestimates the natural ambient. While Leq is sensitive to noise level, L_n descriptors can underestimate noise levels by discounting or eliminating periods of time when higher sounds are heard, whether natural or mechanical. L_n descriptors are insensitive to the types of audible sounds in the environment, some of which are more likely to be heard and to be more intrusive than others. For these reasons and consistency with the preponderance of research using Leq as the standard, FAA believes that Leq offers the best approach to the development of average ambient sound levels.

10.2.12 Comment: The Natural Resources Defense Council (NRDC) submitted calculations to support their comment that the FAA erred in calculating the ambient sound level, which NRDC claims results in Time Above Ambient calculations in the Draft SEIS that are flawed because too high ambient sound levels are used in the calculations for about 69 percent of the sites. If corrected, the time of aircraft noise above ambient levels would be much higher.

Response: The subject of NRDC’s analysis is the development of the average values for the traditional ambient sound levels that are used in the SEIS. The NRDC’s analysis compares the noise measurement time histories at selected sites with the averages obtained at those sites from the measured data. Based on its analysis, NRDC claims that FAA/Volpe errors result in average traditional sound levels that are too high. The FAA reviewed NRDC’s analysis and found it to be flawed. NRDC analyzed only 11 of the 29 FAA/Volpe measurement sites. Using this set of data, NRDC inappropriately truncated measurement time histories in comparison with average values. The truncation of measured data occurs at 10 of the 11 sites analyzed by NRDC. For example, at the Biscayne National Park Stiltsville (8/12/98) measurement site, NRDC superimposed the average traditional ambient level of 54.9 decibels onto only 30 minutes of sound

level time history. This 30 minute period represents less than 1/18th of the total 9 hour measurement period for this site. In order to accurately analyze the average traditional ambient sound level, the entire 9 hour time history must be used, because this was the basis for the average value at this site. In summary, NRDC did not appropriately base its evaluation of average ambient sound levels on complete and representative measured data.

10.2.13 Comment: FAA used too high a baseline (45–50 decibels) for critical noise analyses for many park areas. According to FAA’s own scale, this is equivalent to the noise made by a dishwasher. Sound measurements in the Draft SEIS clearly show that much of the backcountry is two to three times less noisy. The SEIS does not account for truly quiet moments—one of the most singular pleasures of visiting the national parks.

Response: To establish the baseline, traditional ambient sound levels were measured at 18 sites in Everglades National Park and 11 sites in Biscayne National Park. In Everglades National Park, the results in traditional ambient ranges were: two sites (50–55 dB), seven sites (45–49 dB), four sites (40–44 dB), four sites (35–39 dB), and one site (30–34 dB). In Biscayne National Park, the resulting traditional ambient ranges were: five sites (50–55 dB) and six sites (45–49 dB).

An increase in sound pressure level (physical intensity) of 3 dB represents a doubling of sound energy. However, the human ear perceives (subjective loudness) a doubling of sound on the order of 10 dB. In either context, some measurement sites were two or three times quieter than others, and the traditional ambient data used in the SEIS noise analysis recognizes these differences. It is important to note the finding of varying ambient sound levels across different backcountry regions. These differences are due primarily to wind effects related to the density of vegetation and the local presence of wildlife. The results also suggest that differences between frontcountry and backcountry in the south Florida parks are not as large as in other regions of the country. This appears to be because of the amount of insect, bird, and wildlife activity during the day—activity which sample FAA/Volpe and NPS/SID measurements found to increase at night, producing somewhat higher nocturnal sound levels.

A number of commentors appear to consider the SEIS traditional ambient baseline too high because the numbers appear high to them. As a commonly understood reference point, the sound of normal speech at a distance of 3 feet from the speaker is 60–65 dB. The measured ambient levels in the national parks are lower than this—some are a lot lower, given the logarithmic nature of sound measurement. The commentor’s cited noise level of a dishwasher is, more precisely, of a dishwasher heard from the next room.

10.2.14 Comment: The SEIS’ use of the metric Time Above 65 decibels discounts the noise impact on Ocean Reef. Time Above Ambient, corrected to be lower than that used in the Draft SEIS, should have been used for Ocean Reef. Time Above Ambient calculations for grids in Biscayne National Park and Crocodile Lake National Wildlife Refuge that are closest to Ocean Reef show that Ocean Reef would be significantly adversely affected by Time Above Ambient increases. Analysis of the closest grid shows increases of at least 10 to 30 minutes. There are also increases of 30–62 minutes, 14 minutes, and 47 minutes in other grids that would also affect Ocean Reef.

Response: Day-Night Average Sound Level, not Time Above, is the basic noise metric used to evaluate community noise impacts. See the response to comment 10.2.2 that addresses DNL in general and DNL values in Ocean Reef in particular. Time Above provides additional supplemental information to enhance readers’ understanding of noise changes.

Table 4.5-5 in Volume I shows that, at maximum one-runway use, Ocean Reef could receive less than 1 minute in an average day of Time Above 65 decibels (speech-disturbance and wake-up levels). The

same Time Above 65 decibels is also projected to occur under the projected baseline and No Action alternative. Time Above Ambient is not used by FAA for residential communities. Residential communities, even quiet residential communities, are different in nature and use from national parks and are more highly exposed to human and mechanical activity that increases ambient sound levels.

10.2.15 Comment: Noise measurements should be taken both in front of and behind a landing jet to recognize the maximum impact. The noise levels were minimized to avoid planning for noise abatement techniques.

Response: Measurements were taken of the ambient noise levels in the national parks and refuge. No noise measurements were made to determine the levels of noise associated specifically with aircraft operations at Homestead. Aircraft noise was assessed through computer simulation using the FAA's Integrated Noise Model (INM). Aircraft noise and performance data used in the INM have been developed over many years from formal aircraft noise certification tests. These tests include numerous measurements at many locations relative to an aircraft's position in both landing and takeoff modes of flight.

10.2.16 Comment: The Draft SEIS points out that military aircraft are louder than civil aircraft, and most of the metrics focus on the loudest events. However, military aircraft will operate less frequently than civil aircraft—three per day over Everglades National Park and eleven per day over Biscayne National Park. What is the rest of the day like?

Response: It is not correct that most metrics focus on the loudest events. Five noise metrics were used in the SEIS noise analysis. Two metrics (L_{Amax} and SEL) do focus on the loudest single event aircraft noise. Two metrics (DNL and Leq) evaluate cumulative amounts of noise in a typical day. The fifth metric (TA) is a time-based metric that calculates the length of time in an average day that aircraft noise would be above a pre-determined level—speech interference for community areas and traditional ambient for national parks. The lower frequency of military operations compared to civil, as a civil airport would grow in future years, is accounted for by the cumulative and time-based metrics.

10.2.17 Comment: I suggest the Air Force and FAA provide an acoustical simulation (ISIS/ANDS) of the anticipated conditions created by the Proposed Action.

Response: The FAA Integrated Sound Information System (ISIS), formerly called ANDS, is an information and educational tool that demonstrates the relative sound characteristics of individual aircraft types during takeoff and landing. It also provides useful information about different noise descriptors and how they work. ISIS is a controlled audio-visual system used to illustrate and compare typical sound levels of individual aircraft. It is not a dynamic assessment tool for evaluating multiple flights or making acoustic predictions of the noise environment during a day's time or other periods of time.

10.2.18 Comment: The day/night split of operations appears to be crude. If cargo is expected to make up 12 percent of operations, is a 90/10 percent day/night operations split reasonable?

Response: Not all cargo operations occur during nighttime hours (i.e., between 10:00 p.m. and 7:00 a.m. for purposes of Day-Night Average Sound Level nighttime weighting of noise calculations). Some cargo operations occur in daytime. Appendix E, Section II.C.1, explains that the assumed day/night allocation of operations for the Homestead noise analysis is based on the existing day/night split at the nearest representative commercial airport, which is Fort Lauderdale-Hollywood International Airport.

10.2.19 Comment: What is the Day-Night Average Sound Level without military flights, particularly the F-16s? This would provide a more accurate estimation of the impact of commercial activity.

Response: The purpose of the SEIS noise analysis is to describe how much additional noise there would be, in addition to the projected baseline noise, if Homestead is reused for a commercial airport or another alternative use (e.g., Collier-Hoover proposal, Commercial Spaceport alternative). The projected baseline noise includes the military flights. Different kinds of metrics and maps describe at length the difference between this baseline and proposed commercial activity. It would not be more accurate to estimate noise as the comment suggests.

10.2.20 Comment: Noise is presented in an overly technical manner. The noise analysis should include a measurement that is closer to the human experience of sound, such as frequency of disturbance, and should more clearly present other noise data. An explanation of the decibel measurement (a table of common sounds and their decibels and illustration that it is a logarithmic scale) should be added. The measurement of Time Above Ambient should be expressed as 1 out of every 12 minutes, for example, rather than 2 hours a day. The information on frequency of flights found in the Land Use section should be repeated in the Noise section of the SEIS.

Response: FAA understands that noise is difficult to understand, especially when a variety of noise metrics are used which result in different numbers. FAA has tried to simplify the noise analysis results as much as possible by the use of mapping and clear narration. It probably cannot be simplified more. The table of common sounds on a decibel scale was provided in the Draft SEIS in Figure 3.5-1 and is likewise in the Final SEIS. FAA disagrees with the suggestion for a different portrayal of Time Above Ambient. It would be more inaccurate because the Time Above Ambient is not consecutive minutes, nor does it occur with such standard spacing throughout the day. The commentor apparently located and reviewed the frequency of flight information in the Land Use section of the Draft SEIS. Repetition of information in several places of the SEIS is avoided to the extent possible because it could greatly increase the length of the document. Additional summary of average daily civil aircraft on different flight tracks has been added in Section 2.2.2 of the Final SEIS. Detailed tables are in Appendix E (Tables II-7 through II-16).

10.2.21 Comment: The noise graphics do not report the altitude of aircraft and do not include such factors as whether noise is reflected off of buildings.

Response: Exhibits 1-9 and 1-10 in Appendix A (Volume II) show aircraft altitudes at certain points superimposed over flight track graphics. This is obviously a dynamic situation, with aircraft at increasingly higher altitudes as distance from Homestead increases. Appendix A also includes narrative descriptions of aircraft altitudes on various flight tracks as aircraft would arrive at and depart from Homestead.

The SEIS noise analysis does not assess acoustic effects involving reflection or shielding of noise by buildings. Reflection or shielding of noise by buildings is sensitive to many variables, such as the height and density of buildings (i.e., how closely spaced), the geometry and angles of reflection, and ground surface properties. Most aircraft noise tends to reach the ground at relatively high angles, unlike ground-level sources of noise, thereby reducing potential ground structural reflection or shielding effects.

10.3 General Noise Effects

10.3.1 Comment: The U.S. Environmental Protection Agency commented that, as commercial aircraft flights increase over time, the frequency of the overflight effects on Everglades and Biscayne National Parks and nearby communities would surpass current overflight effects of the existing military/government flight operations, and would increase the overall noise level of the area as measured by noise contours. The frequency of operations would dramatically increase at the single runway maximum of 231,000 operations. The frequencies of off-site aircraft noise impacts would be almost

continuous in some areas during peak arrival/departure periods. Noise impacts are among the most important separating the Proposed Action from the Mixed Use alternative.

Response: USEPA's comment is acknowledged. The data do not support a conclusion that off-site noise impacts would be continuous (see response to comment 10.1.1).

10.3.2 Comment: The Draft SEIS did not analyze aircraft noise impacts on the Southern Glades Wildlife and Environmental Area owned by the South Florida Water Management District (SFWMD) or on the Model Lands area jointly held by SFWMD and Miami-Dade County. These environmentally sensitive areas are located south of and in close proximity to Homestead between the two national parks. The proposed departure and arrival flight paths show significant overflights over these areas. Increased noise levels can affect wildlife, wetland dependent species, and the public's enjoyment of these lands. The areas will experience increased TAamb, although noise abatement flight paths appear to help mitigate TAamb. A noise survey, comparable to that prepared for the national parks, the refuge, and the surrounding community, should be undertaken for the Southern Glades and the Model Lands area. In particular, more noise analysis needs to be done to assess the impact of the Cape Sable seaside sparrow population in the Southern Glades.

Response: A grid point analysis for the Southern Glades and Model Lands areas, using LMax and Peak Hour Leq, is included in an Addendum to Appendix E of the Final SEIS. The lack of ambient measurements and mapping did not allow Time Above Ambient calculations for each grid. The grid analysis essentially shows that military aircraft using Homestead would continue to be the loudest aircraft in these areas and that cumulative levels of aircraft noise would not significantly change the current noise environment or be high enough to substantially diminish or interfere with existing or planned public recreational uses of these areas. Section 4.14 in Volume I of the Final SEIS includes an evaluation of the grid point analysis. Effects of noise on the Cape Sable seaside sparrow are addressed in Section 4.11 of Volume I.

10.3.3 Comment: Noise from the Proposed Action would be intolerable for residential areas and for the national parks and would greatly jeopardize the environment.

Response: The SEIS noise analysis identifies significant and moderate noise increases on residential areas closest to Homestead within the Day-Night Average Sound Level 65 decibel contour (classified by FAA as significant) and the DNL 60 dB contour (moderate). These would be the areas of greatest noise impact. It is recognized that people are concerned about noise at lower levels in both residential areas and national parks, and that some people consider the noise increases described in the SEIS to be intolerable and to jeopardize the environment. According to FAA's evaluation, the quantification of noise increases projected for the Proposed Action and the comparison of projected increases to studies of human and animal reactions to noise do not support such a conclusion, especially at the lower levels predicted by the SEIS evaluation away from the airport.

10.3.4 Comment: The noise metrics performed in connection with the impacts to the surrounding national parks and refuges and the community abutting former Homestead AFB suggest that noise impacts will not significantly increase over current baseline levels and should remain within the range of Day-Night Average Sound Level of 65 decibels.

Response: This is a considerable oversimplification of the extensive noise analysis in the SEIS. It implies that most average noise levels would be within the range of DNL 65 dB, when in fact average noise levels would be lower than that everywhere except immediately adjacent to the airfield. A few residential areas closest to the airfield would experience significant noise increases over current baseline levels, according

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to FAA's definition of significance (1.5 dB increases at DNL 65 dB and above). These areas are identified in the SEIS.

10.3.5 Comment: Noise impacts on both national parks and the local community are so small that a noise management and mitigation plan will not be required.

Response: FAA does not regard the impacts to be as small as the comment appears to suggest. Noise mitigation considerations for community areas nearest the airport and for the national parks are included in the SEIS. The comment may be referring to whether a state noise management and mitigation plan will continue to be required. Federal agencies would defer to the State of Florida for such a determination.

10.3.6 Comment: Miami-Dade County's leading independent experts concluded that a commercial airport will have environmentally compatible noise impacts. It is important to note that the expected impacts in the environmental study do not even include the implementation of a noise management plan which is required by the State of Florida for use of the base as a commercial airport.

Response: There is no conclusion in the SEIS that "a commercial airport will have environmentally compatible noise impacts." Responses to other noise comments address the conclusions drawn from the SEIS noise analysis by FAA relative to the extent of noise impacts on the community and national parks. The SEIS analysis was done independently by FAA, assisted by contractors, and did not include Miami-Dade County experts. It is correct that the expected impacts reported in the SEIS do not include the consideration of a noise management plan, which would be a state requirement placed on Miami-Dade County and has not yet been done.

10.3.7 Comment: The noise of massive daily flights would negatively affect the quality of life.

Response: As responses to similar comments on other environmental resource areas indicate, the quality of life is a very subjective judgment that will differ from person to person. The SEIS does not attempt to reach conclusions about the quality of life. See responses 10.1.1 and 10.1.2 for more information on the anticipated number of daily flights.

10.3.8 Comment: A flight every 5 minutes would make it impossible to conduct a reasonable conversation in much of the Homestead area.

Response: This comment vastly overstates potential speech interference effects from proposed aircraft operations. The sound of normal speech at a distance of 3 feet from the speaker is 60–65 decibels. The Day-Night Average Sound Level metric accounts for various factors that make noise highly annoying to people, including speech interference. The higher the DNL, the greater the speech interference. Community areas at DNL 65 dB and higher, where noise is a significant impact according to FAA guidelines, would be expected to complain of speech interference. Speech interference can also be considered adverse between DNL 60 and 65 dB. In community areas below DNL 60 dB, speech interference would range from less frequent to none as distance from the airport increases. Response 10.1.1 addresses the concern about a flight every 5 minutes.

10.3.9 Comment: The noise will adversely affect children's hearing and cause them to be deaf.

Response: Noise levels at and beyond the boundary of Homestead airport would not be high enough to present any risk of hearing loss. There are three studies, one by FAA and two by independent labs, that specifically address the question of community hearing loss around airports. These studies found no correlation between hearing acuity and length of residency near an airport, nor any danger of permanent

hearing loss from exposure to aircraft noise, even when exposure was at relatively high levels (111 decibels for 40 flights per hour over a 6 hour period).

Several agencies and interagency groups have issued various guidelines for hearing protection. In terms of continuous exposure, the Occupational, Safety and Health Administration (OSHA) issued regulations in 1971 for the protection of industrial workers. These standards set forth a permissible noise exposure limit of 90 dB on a continuous basis for an 8 hour day. In 1974, the U.S. Environmental Protection Agency recommended a standard of $Leq_{(24)}$ not exceeding 70 dB over a 40 year period. This criterion is extremely conservative and provides a large margin of safety. It is based on the probability of negligible hearing loss (less than 5 dB in 100 percent of the exposed population) at the human ear's most damage-sensitive frequency (4,000 hertz) after a 40 year exposure. On the basis of cumulative exposure and Day-Night Average Sound Level, the Federal Interagency Committee on Urban Noise in 1980 issued guidelines for residential land use which stated that risk of hearing loss from noise is not a factor until at least DNL 75 dB. Taken individually and together, the research and guidelines indicate no potential risk of hearing loss for the Proposed Action at maximum use.

10.3.10 Comment: The noise of massive daily flights would lower property values.

Response: Refer to responses to comments 10.1.1 and 10.1.2 that address numbers of daily flights. With respect to property values, studies of facilities such as airports, highways, and transmission lines have not been conclusive about the impact that proximity to those facilities has on property values. Property values respond to a complex variety of factors, and experience in one location is not necessarily indicative of what will occur in another location. All ranges of property values can be found near commercial airports, from extremely expensive to low cost.

10.3.11 Comment: The noise levels that many people complain about is the difference of 10 decibels, shown in red on the grid maps in the SEIS. In actuality, 10 decibels is nothing more than a soft whisper in a quiet room or office.

Response: The comment appears to be referring to areas that would experience a maximum sound level (L_{Amax}) increase of 10 decibels or more with the Proposed Action. These areas are shown in red on L_{Amax} grid maps in Section 4.5 and Appendix E. (There are no comparable increases on Leq grid maps, and Time Above Ambient differences are in terms of time rather than decibels.) The comment is confusing absolute levels of decibels with amounts of decibel increases. An absolute level of 10 decibels is extremely low and would be found in a broadcast or recording studio. A change of 10 decibels may or may not generate complaints, depending on the level at which the change occurs (i.e., complaints increase at higher absolute noise levels).

10.3.12 Comment: The FAA's conclusion is that there is no noise problem from the commercial airport. That is a questionable conclusion.

Response: Like quality of life judgments, the judgment of the extent to which a commercial airport would pose a noise problem is a subjective one, and people may differ in such judgments. The SEIS does not make such a judgment.

10.3.13 Comment: The Draft SEIS text mistakenly states that the Time Above Ambient increase in grids near Ocean Reef in Biscayne National Park and Crocodile Lake National Wildlife Refuge is 1 to 10 minutes. Comparing Figure 4.5-17 with Figure 3.5-16, the Time Above Ambient increases are 10 to 30 minutes within a few miles of Ocean Reef.

Response: Figure 4.5-16 in Volume I is the appropriate map for the depiction of predicted Time Above Ambient increase differences between the No Action alternative and Proposed Action at maximum use of one runway. Both the map and the accompanying text indicate TAamb increases of 10 to 30 minutes in some grids, with lower increases and higher increases in other grids. The error reported in the comment has not been identified.

10.3.14 Comment: It appears that some tables were left out of Chapter IV of the Appendices. Table IV-12 follows Table IV-2. The grid point data tables for Exhibit IV-5 in Chapter IV of the Appendices could not be located. Recommend that either the information be included in the appendix or, where appropriate, the reader be directed to where it can be found.

Response: Tables IV-3 through IV-11 were not inadvertently left out. They are detailed tables of the results of the grid point analysis, point by point, and were too voluminous for the SEIS appendices. This is also true for the grid point data tables related to Exhibit IV-5. The complete tables are in the Landrum & Brown Technical Memorandum that was incorporated in the SEIS by reference and made available for review at local libraries. On the first page of the Noise appendix in the Draft SEIS (Appendix E) was the statement that the detailed grid point analysis is in the Technical Memorandum.

10.4 Community Noise Effects

10.4.1 Comment: The U.S. Environmental Protection Agency has commented that, in general, the Draft SEIS provides both a good description and analysis of the potential community noise impacts of the various alternatives.

Response: USEPA comment is noted. No further response required.

10.4.2 Comment: The U.S. Environmental Protection Agency has commented that, without noise mitigation, all alternatives will have residential units located in the DNL 65 dB noise contour. In general, residential housing in the Day-Night Average Sound Level 65 decibel contour and higher is considered to be a noncompatible land use. Current Homestead Air Reserve Station operations create a DNL 65 dB contour that includes 95 residential units, with approximately 656 people, located southwest of the airport as part of a low-income housing development. This impacted population is projected to remain the same for both the Mixed Use and No Action alternatives. It would increase with the Proposed Action and Commercial Spaceport alternative. Concentrating housing and other noise-sensitive receptors in the vicinity of Homestead was and is ill-advised from a noise and land use compatibility perspective.

Response: The Air Force and FAA agree with USEPA's comment.

10.4.3 Comment: The Draft SEIS discounts community noise impacts by concluding that, since these surrounding areas are already impacted by military aircraft operations, it would be acceptable to make it worse by increasing operations with a commercial airport. It is not a sound justification to increase a community's noise simply because the area already experiences some aircraft noise.

Response: The SEIS does not discount community noise impacts. According to FAA's established threshold of significant impact for noise, there would be significant community noise impacts on residences within the Day-Night Average Sound Level 65 decibel contour with the Proposed Action. The comment is more specifically referring to the Ocean Reef community, which is projected to experience a small DNL increase in noise with the Proposed Action at low level (i.e., in the DNL 30s). This increase is far below the level of significant community impact.

The SEIS does not say that it is acceptable to increase noise in areas already experiencing aircraft noise. The purpose of the noise analysis is to provide a comparison of the noise effects of potential reuse alternatives against a projected baseline and the No Action alternative. In the case of Homestead, the projected baseline and No Action alternative include military and other government aircraft noise. The assessment of how much additional noise would be experienced with the various alternatives does not mean that additional noise is either acceptable or unacceptable.

10.4.4 Comment: Schools would be adversely affected by noise from a commercial airport. There would be a loss of class attention and degradation of instruction.

Response: According to federal compatible land use guidelines included in Federal Aviation Regulations Part 150, Airport Noise Compatibility Planning, schools are compatible with aircraft noise levels if they are below Day-Night Average Sound Level 65 decibels. No schools are within the DNL 65 dB contour projected for Homestead. FAA has also dealt on a case-by-case basis with several schools that experienced adverse noise effects because of locations within the DNL 60–65 dB contour, near the 65 level and also under the extended runway centerline of an airport. There are no schools within or even close to the Homestead DNL 60 dB contour at maximum one-runway use. A map of schools in relation to the Homestead noise contours has been added in Section 4.5 of the Final SEIS. In summary, schools are not expected to be adversely affected by noise from a commercial airport.

10.4.5 Comment: The current military operations at Homestead Air Reserve Station, necessary for national defense, have a minimal impact on the Ocean Reef community and are tolerable. However, a tenfold increase in flights in the name of commerce would be intolerable. Noise impacts on Ocean Reef would be severe. The introduction of a large number of commercial aircraft overflights into the area would destroy the tranquility of the Ocean Reef community and greatly diminish the quality of life. Noise impacts include the addition of night and weekend aircraft operations, the addition of high use flight paths directly over Ocean Reef, an increase in the average sound level, an increase of Time Above Ambient noise levels and increases in noise above the level at which speech is impaired. These noise impacts are particularly troubling to a community that values peace and tranquility and wants to preserve the natural quiet of the area.

Response: The Air Force and FAA understand the noise concerns expressed by the Ocean Reef community. Because of these concerns, Ocean Reef was one of the community locations for which a special noise assessment was done. The results are included in Appendix E, Section IV.C, of the SEIS. The evaluation of noise using three noise metrics—DNL, LMax, and Time Above—does not support a conclusion that noise impacts would be severe on Ocean Reef. At maximum use of the existing runway, the LMax would be the same as the No Action alternative, the Time Above 65 decibels (speech interference) would be the same as the No Action alternative (i.e., less than one minute on an average daily basis), and the DNL would increase from 35 to 39 decibels. These are very low DNL levels—far below levels that are adverse for community land uses. Also see response 10.2.2 that addresses DNL as the appropriate metric to evaluate community noise impacts.

10.4.6 Comment: The SEIS discounts the increase in Day-Night Average Sound Level in Ocean Reef as insignificant, yet this community would experience substantial increases in the timing, duration, frequency, and level of aircraft noise under the Proposed Action. The residents of Ocean Reef should not have to suffer noise levels high enough to impair speech in order for the impact to be considered “significant.” The question is not how much noise people can tolerate, but how much change a commercial airport would bring.

Response: The DNL metric includes timing, duration, frequency, and level of aircraft noise and is the appropriate metric to evaluate community noise impacts, as addressed in greater detail in response 10.2.2.

The SEIS does report changes in noise over the projected baseline/No Action alternative that would be anticipated with a commercial airport. The FAA agrees that the difference in noise among the potential reuse alternatives is the critical factor in assessing noise impacts. While the quantification of differences in noise does not indicate significant noise impacts on the Ocean Reef community, FAA acknowledges that people may make different subjective judgments, including how much noise is tolerable or acceptable.

10.4.7 Comment: The Draft SEIS' conclusion regarding Maximum Sound Level effects on Ocean Reef contradicts a later statement that "L_{Amax} increases, on the whole, would occur in areas farther from the airport where civilian and military flight tracks would diverge..."—areas such as Ocean Reef where commercial aircraft will travel directly overhead.

Response: Ocean Reef is within the area where military and civil aircraft traffic would not yet have diverged. As indicated in Table IV-25 in Appendix E, the L_{Amax} is not expected to increase in Ocean Reef with the Proposed Action. The L_{Amax} is calculated to remain at 77 decibels under either the Proposed Action or the No Action alternative; it is made by a military F-16 aircraft. This supports, rather than contradicts, the statement about the general locations of L_{Amax} increases.

10.4.8 Comment: Table 4.6-1, which contains predictions of noise impacts at specific locations in Biscayne National Park, further illustrates the adverse impacts likely to be experienced by Ocean Reef. Three of the study locations (MH, ME, and MW) are within a few miles of Ocean Reef. The impacts at these points show noise levels up to 81 dB. All the decibel levels for the few planes contained in Table 4.6-1 range from at least 44 to 81 dB, well above the 35 dB level currently experienced in Ocean Reef. All the high-end decibel levels provided in this table exceed 65 decibels.

Response: Table 4.6-1 in Volume I includes representative information on several aircraft types, rather than a complete prediction of noise effects at these locations. The noise levels, calculated in Sound Exposure Level, for representative aircraft at the seven locations in Table 4.6-1 range from 35.3 decibels for a single-engine general aviation aircraft to 103.6 decibels for an F-16 military aircraft.

The park locations cited in the comment are several miles from Ocean Reef and are not accurate to use in predicting noise effects on Ocean Reef. The SEIS noise assessment that was specifically done for Ocean Reef uses the same aircraft input information that was used for other community locations and the national parks.

In addition, the comment is confusing single event (SEL) and cumulative (DNL) metrics. The 35 decibels referenced is the existing DNL at Ocean Reef. Table 4.6-1 reports SEL levels of specific aircraft types at specific park locations. The calculation of the DNL metric includes individual aircraft noise events that have SELs both noisier and quieter than the cumulative DNL value.

10.4.9 Comment: Another example of the adverse impact of aircraft noise is in the Draft SEIS statement that the likelihood of detecting the presence of aircraft is expected to increase proportionately with the increase in civil aircraft operations in areas where ambient levels are already low. The increase in civil aircraft operations will be detected more easily and frequently in Ocean Reef because of its tranquility and remoteness.

Response: The ability to detect the presence of an aircraft does not equate to an adverse noise impact. The Day-Night Average Sound Level metric used together with the Schultz curve on community annoyance has been recognized by the FAA, USEPA, and Air Force as the appropriate methodology for predicting noise impacts on communities. Supplemental noise metrics have also been used in the SEIS noise

analysis to provide additional information on noise changes. The FAA's evaluation is that the Proposed Action would not result in noise increases of a magnitude to adversely affect Ocean Reef.

10.4.10 Comment: Close examination of the flight path information further illustrates the noise impacts to Ocean Reef. Flight paths which are predicted to be used 90 percent of the time will cross over or near Ocean Reef in many instances. The departure outer fixes for the paths over Ocean Reef are WINCO, EEONS, and MNATE. The Draft SEIS appendix shows that these fixes will receive a tremendous amount of civilian air traffic. The Draft SEIS projects increases in Time Above Ambient under the flight paths as traffic increases. High Sound Exposure Levels (from 69 to 81 decibels) by the principal aircraft to fly over the MW site near Ocean Reef show that Ocean Reef will suffer daily noise impacts over the level that awakens a sleeping person. Data in the Draft SEIS on noise in future years for areas near Ocean Reef contradict the Draft SEIS' conclusion that the Time Above 65 dB for Ocean Reef will be less than one minute.

Response: Aircraft noise predictions have been correctly computed for Ocean Reef based on flight track locations, as well as aircraft numbers and operational and noise characteristics. Similar predictions have been computed for location MW, to which the comment refers. Data for location MW are accurate for that location, but are not accurate for Ocean Reef and should not be used to make judgments about noise effects on Ocean Reef. Day-Night Average Sound Level, with its nighttime weighting, is the metric that accounts for sleep disturbance. According to SEIS DNL calculations, neither Ocean Reef nor location MW is predicted to experience noise levels sufficient to cause sleep disturbance. Time Above Ambient calculations in the national parks and refuges, to which the comment refers, do not contradict the SEIS' conclusion with respect to Time Above 65 decibels at Ocean Reef. The SEIS explains that Time Above 65 is used for community locations, rather than Time Above Ambient.

10.4.11 Comment: Page 55 of the Draft SEIS Summary states that noise in the Keys Gate community could increase from 43 to 51 decibels. However, at one of the hearings, the representative in charge of the noise analysis checked a table or chart on page 2.9-23 of a large volume and said that the noise would be 90 decibels in Keys Gate because it is only 4 miles from the airport and in almost direct alignment with the runway. That same page of the Draft SEIS also says that, for most of the representative community points, aircraft noise would still be below ambient noise levels at maximum one-runway use. This would not be true based on the above information at the hearing and according to the definition of ambient noise level.

Response: The comment is referring to different noise metrics. The projected Day-Night Average Sound Level increase at Keys Gate with the Proposed Action (commercial airport) at maximum use is from DNL 43 to 51 dB. The projected L_Amax is 97 dB with both the No Action and Proposed Action alternatives. It is correct that Keys Gate would not be expected to have DNL levels below ambient at maximum one-runway use. However, the highest projected DNL level of 51 dB is below FAA guidelines for both significant and moderate levels of DNL exposure and is also below a USEPA-recommended guideline of DNL 55 dB to provide an extra margin of noise protection below DNL 60 dB.

10.4.12 Comment: There would be 124 flights a day in a 10 hour period over Key Largo. Those flights would produce a 40 percent increase in the noise level in Key Largo.

Response: This comment overestimates the number of flights over Key Largo. Jet departures on a MNATE fix in Homestead east flow conditions would be over Key Largo, but not other civilian flight tracks. Average daily MNATE civil jet departures in east flow are forecast to number (in round numbers) zero in 2000 and 2005, 11 in 2015, and 29 at maximum use (estimated around 2038). Military flight tracks currently pass over Key Largo and would continue to do so under any alternative, adding another three average daily operations in each year.

Potential noise changes with the Proposed Action were specifically calculated in the SEIS for Key Largo. The maximum sound level (L_{Amax}) of 69 decibels would not be experienced every day and is not predicted to change. The predicted amount of Time Above 65 decibels is zero. The Day-Night Average Sound Level is predicted to increase from 22–23 decibels under the projected baseline to 31 decibels in 2015 and at maximum use of the Proposed Action. This level of DNL is well below any level considered to be adverse and is even below most ambient noise levels.

10.4.13 Comment: The Draft SEIS does not address noise impacts on the residents of the Upper Keys, a great many of whose jobs depend on eco-tourism such as fishing, boating, snorkeling, diving, and sailing.

Response: The Upper Keys are not near the areas of predicted significant and moderate noise exposure for the Proposed Action. There are little substantive noise level differences among the SEIS alternatives in the Upper Keys. Within the larger south Florida region, recreational activities that attract tourists are not expected to be disrupted because of aircraft noise. Additional evaluation of aircraft noise on public recreational areas has been added to the Final SEIS in Section 4.14 of Volume I.

10.4.14 Comment: The noise from constant commercial overflights of the Redland area would drive people away and stymie efforts to promote eco-tourism there.

Response: The SEIS includes a grid point noise analysis of a representative location in the Redland area, the Redland Fruit and Spice Park. The grid point data in Appendix E, Table IV-25, indicates that aircraft noise exposure is currently low in this area and would experience little change with the Proposed Action.

10.4.15 Comment: One might argue that all residential areas experience ambient noise which can approach the decibel levels associated with the aircraft operations of the commercial airport. However, local noises such as lawn mowers, boats, and air conditioners can be readily mitigated and avoided, but aircraft noise would not be avoidable.

Response: Most people take for granted the noise of everyday common sounds in neighborhoods, including people and domesticated animals, household equipment, power tools, automobiles, air conditioners, etc. These noises are generally not regarded as excessive and are not identified for reduction or avoidance. Normal residential ambient noise levels tend to remain fairly stable for particular types of neighborhoods (e.g., busy urban, suburban). As a reference point, the maximum aircraft sound level (L_{Amax}) in Ocean Reef has been calculated at 77 decibels (an F-16 military aircraft), which would be quieter than the noise made by a lawnmower.

10.4.16 Comment: The Draft SEIS addresses noise impacts on a few existing homes, but ignores the impact on the additional homes the study projects.

Response: The SEIS does not ignore the potential for additional homes. Section 4.5 of the SEIS includes estimates of significant noise impact (DNL 65 dB) and moderate noise impact (DNL 60 dB) on existing homes and on estimates of homes that could be built in these areas if no land use controls are implemented.

10.5 National Parks and Refuge Noise Effects

10.5.1 Comment: The concern that a commercial airport would significantly increase noise in Biscayne and Everglades National Parks and Crocodile Lake National Wildlife Refuge and would thereby significantly impair park resources has been raised by the U.S. Department of the Interior (DOI), national and local environmental organizations, and concerned citizens. The U.S. Environmental Protection

Agency has also commented that a commercial airport would adversely affect park resources and their public recreational use. DOI's comments point out that the natural ambient soundscape, those sound conditions that exist in the absence of human-caused sounds, is among the important natural conditions and resources of national parks. DOI's letter says that aircraft operations of a commercial airport, whether at one runway or two runways, could significantly increase human-made noise levels in Biscayne and Everglades National Parks, and represent a significant impairment and use of park resources, including natural sounds and a sense of tranquility.

Response: The Air Force and FAA respect the views of those who regard aircraft noise in general and the Homestead airport proposal in particular as undesirable for the national parks. A commercial airport at Homestead would incrementally add to existing aircraft noise in portions of the national parks and refuge, as evaluated in Section 4.5. Reasonable people will probably continue to disagree on how much noise is too much based on various expressed or implicit noise tolerances. The FAA (the joint lead agency with primary responsibility for the SEIS noise analysis) does not predict that the reuse of Homestead for a one-runway commercial airport would significantly increase aircraft noise levels in the national parks and refuge. Neither does FAA believe that the incremental additional aircraft noise from the one-runway airport would substantially impair or use park resources, based on the extensive SEIS analysis done with a variety of metrics to examine different aspects of noise and on information accumulated to date on human and animal reactions to noise. The FAA's evaluation in this respect is included in Sections 4.5 and 4.14 of Volume I of the Final SEIS. Concern about aircraft noise in the national parks and refuge remains an important consideration in the decision on reuse of former Homestead AFB. Aircraft noise mitigation would be a key component of any decision in favor of a commercial airport.

10.5.2 Comment: DOI further commented on the natural soundscape with the following concerns. As with many resources the NPS is charged to preserve, the natural soundscapes of Everglades and Biscayne National Parks are not currently pristine, and all factors affecting those soundscapes are not controlled by NPS. However, NPS will restore degraded soundscapes to the natural ambient condition wherever possible and will protect natural soundscapes from degradation due to human-caused noise. To that end, NPS is currently preparing a draft Soundscape Management Plan for Biscayne National Park. Soundscape preservation will also be addressed in the upcoming General Management Plan for Everglades National Park. DOI is concerned that the development of a commercial airport in such close proximity to Biscayne and Everglades National Parks will frustrate soundscape management efforts, as well as contribute to the further degradation of the resource.

Response: The FAA and Air Force acknowledge DOI's concerns. The SEIS explicitly states that the Proposed Action would add more aircraft noise to the south Florida national parks, which is contrary to NPS soundscape goals to reduce human-made sounds.

National park soundscape evaluation and management are in a very early phase. A draft Director's Order on Soundscape Preservation and Noise Management was published by NPS in the *Federal Register* in April 2000 for public comment. FAA comments expressed general agreement with NPS efforts to promote a quieter environment through such means as soundscape planning, noise management zones, and the use of noise data collection systems. FAA comments also included a number of reservations with respect to the draft Order, including the reasonableness of assuming a natural quiet baseline for NEPA analysis of aircraft noise relative to national parks. FAA believes that such a broad assumption is unrealistic and blurs reasonable distinctions that should be made among national park areas that are truly quiet and pristine, or are projected to be so through reasonably foreseeable park management practices (e.g., elimination of roads in an area to return it to back country hiking only), and other national park areas that will continue to be dominated by human-made sounds.

No soundscape plan has yet been developed for any national park. As a practical matter, soundscape plans will have to accommodate sounds in national parks other than the sounds of nature. Otherwise, visitors could never enter national parks, and all mechanical equipment and motorized transportation would be excluded. The extent to which soundscape planning and management may actually change the existing sound environment in various areas of Biscayne and Everglades National Parks remains to be seen. Biscayne National Park is generally noisier than Everglades National Park in terms of both natural sound levels and the overall sound environment. Biscayne National Park is louder naturally because it is 95 percent water, an acoustically hard surface that accentuates noise from wildlife, wind, and waves. In addition, Biscayne National Park's Intracoastal Waterway, water recreation and boating, relative position with respect to Miami and Homestead, and amount of visitor use in a much smaller geographic area than Everglades National Park all add to overall existing ambient sound levels.

The FAA and Air Force have been advised that NPS is planning to issue an Environmental Assessment (EA) for the Biscayne National Park Soundscape Preservation and Noise Management Plan. It is the FAA's and Air Force's understanding that the EA will present several alternatives and that NPS anticipates that, at the end of the environmental process, an alternative will be adopted that will result in traditional ambient sound level reductions. However, as of the completion of the Final SEIS, NPS soundscape planning has not progressed to the point of issuing an EA for public review. As discussed in Section 3.5.2.4 of Volume I of the Final SEIS and in response to noise comment 10.2.5, there will be differences in methodological approaches and analyses between the SEIS and the draft soundscape EA. These differences do not cause the approach and analyses in the SEIS to change. Given the current status of the soundscape planning effort and uncertainty about the eventual outcome, there is not a basis at the present time for predicting the achievement of different quantifiable traditional ambient sound levels in the national parks than levels that can currently be measured. As a qualitative matter, the SEIS recognizes that any additional aircraft noise over the national parks is a potential frustration from the perspective of NPS efforts to reduce human-made sounds. Regardless of the future outcome of soundscape planning, the sound environment in the national parks and refuge is recognized as an important concern that merits considerable attention in the decision on the reuse of former Homestead AFB, as well as in the development of mitigation measures to reduce aircraft noise to the extent possible, should a commercial airport be selected as the reuse option.

10.5.3 Comment: The Draft SEIS does not meaningfully analyze what the proposed airport will do to the natural soundscape of the two parks. Tranquility and peace are fundamental to the enjoyment of the parks, and natural quiet is part of the natural conditions that would be affected. The SEIS does not place an adequate value on the truly quiet moments that can be found in Biscayne and Everglades National Parks.

Response: The SEIS includes an extensive analysis of noise in the national parks, including aircraft noise at extremely low levels, because of the value placed on the parks. As explained in more detail in responses on noise methodology (10.2 above), the SEIS noise analysis predicts the potential change in the affected noise environment for various reuse alternatives for Homestead. The sounds of nature are not the only sounds that comprise the affected noise environment in the national parks. The traditional ambient (all sounds except aircraft) used in the SEIS to quantitatively describe the affected noise environment is essentially the same as the natural ambient (sounds of nature only) in those portions of the national parks that are truly quiet and little affected by human-made noise. As discussed in response to comment 10.5.2 above, soundscape planning has not progressed to the extent of providing a basis on which to predict that particular park areas where the traditional ambient is higher than the natural ambient (because of visitor use and other human-made sounds) would quantitatively be lower in the future by virtue of eliminating those sounds. The FAA's use in the SEIS noise analysis of an affected noise environment that reflects all components of noise that are heard in particular locations, rather than the sounds of nature only, is more fully explained in Section 4.14 of the Final SEIS, in Volume I.

10.5.4 Comment: The development of a commercial airport would violate the National Park Service Organic Act because it would impair natural quiet. There would no longer be a significant quiet natural resource left in the two national parks.

Response: The development of a commercial airport at Homestead would not violate the National Park Service Organic Act. The Organic Act applies to activities of NPS in managing the national parks; it does not govern Air Force and FAA actions on Homestead reuse. Responses to comments 10.5.1 and 10.5.2 above provide FAA's responses on issues of the significance of aircraft noise effects in the national parks and impairment.

10.5.5 Comment: The proposed commercial airport will not comply with the National Park System's standards for airplane noise in national parks.

Response: There are no NPS noise standards for arriving, departing, or enroute commercial airplanes over national parks.

10.5.6 Comment: A portion of Everglades National Park is designated as a Wilderness Area and, therefore, has strict noise restrictions. The Draft SEIS did not address this.

Response: The Wilderness Act does not impose aircraft overflight noise restrictions for wilderness areas in national parks. The Draft SEIS did describe the designated wilderness areas in Everglades National Park in Section 3.6. In addition, Section 4.6 of the Draft SEIS briefly reported the results of a 1992 study by the U.S. Forest Service on the effects of aircraft overflights on visitor enjoyment in remote wilderness areas. The study essentially concluded that the majority of wilderness visitors interviewed were not annoyed by overflights and that aircraft noise intrusions did not appreciably impair the surveyed wilderness users' overall enjoyment of their visits. It should be noted that the National Park Service does not agree that this study should be relied upon.

10.5.7 Comment: Increased noise levels in the national parks have the potential to disrupt park employees and visitors, park interpretative programs, and park natural resources. Different methodologies and assumptions can result in different analytical results. Knowledge of the effect of increased noise levels on the resources in Biscayne and Everglades National Parks is evolving.

Response: The FAA agrees that knowledge is evolving and is very interested in completing more research to develop broadly recognized methodology and criteria comparable to the tools currently available for community noise analysis. In the meantime, FAA must use currently available methodologies and studies. Studies that have been done, including the National Park Service and U.S. Forest Service studies with no FAA involvement, do not support the conclusion that the levels and extent of aircraft noise increases projected in the SEIS analysis have the kind of disruptive potential described in the comment. A number of existing studies are briefly described in Section 4.6 of Volume I.

10.5.8 Comment: Educational experiences in Everglades National Park, such as teaching children to listen for sounds of nature, could be compromised, if not completely altered by the projected air traffic and noise associated with the proposed airport.

Responses: Noise differences between the existing situation in Everglades National Park and the potential future situation with a commercial airport are not sweeping or large enough to substantially compromise or alter educational programs. Exhibits IV-7, 8, and 9 in Appendix E of the SEIS show existing L_Amax, L_{eq}(h), and T_Aamb, respectively, in Everglades National Park. Exhibits IV-25, 26, and 27 show the potential noise effects in the corresponding metrics of maximum use of the existing runway. At maximum

use of the existing runway, the cumulative exposure to aircraft noise (considering number of aircraft, loudness, and duration) would still remain below traditional ambient levels in most of the park.

10.5.9 Comment: In Section 3.5, the SEIS tries to discount the adverse effects of aircraft by noting the high level of some natural sounds. Natural sounds, such as insect noise with decibel levels on the order of 45 that may approach the decibel levels of overhead aircraft noise, are no justification to allow aircraft noise. Natural sounds, although loud, are unavoidable, not as pervasive, and are preferable to aircraft noise.

Response: It is understood that most people would respond that they like natural sounds and do not like aircraft sounds. That does not change the fact that when sounds are being measured for analysis, natural sounds measure at certain levels. Natural sounds up close may be equal to or even higher than aircraft sounds at lower levels and greater distances and may effectively “mask” aircraft and other sounds so that they are unheard. When other sounds, whatever their source, are about the same as or higher than aircraft sounds, most surveyed people will tend to respond that aircraft noise is not highly annoying or disruptive to their environmental experience.

10.5.10 Comment: Biscayne National Park would be particularly adversely affected by noise of a commercial airport because of its proximity to Homestead. For example, there would be an estimated 105 flights a day, most at altitudes between 2,000 to 4,000 feet, over the Biscayne National Park Visitors Center. According to the SEIS, at this distance the commercial jets will sound like a lawn mower 3 feet away or like a New York City subway train. Even as far out in the park as Elliot Key, the jet noise would be the equivalent of a garbage disposal or being shouted at from a distance of three feet.

Response: The data provided in Table 4.6-1 of the SEIS summarizes the estimated number of operations by the five largest aircraft type groups in 2015. Of the 105 operations cited by the commentor, 15 would be military jets, 19 would be commercial jets, and the remaining operations would be quieter business jets or propeller aircraft. With respect to the lawn mower or subway train comparison, the comment is inaccurately comparing the loudness of individual aircraft, as calculated in Sound Exposure Level, with a figure in the SEIS that presents noise in A-weighted decibels (dBA). The SEL metric calculates both loudness and duration of single-event noise. SEL values are typically 6–8 dBA higher than recorded peak decibel levels. Consequently, the noise created by commercial jets (68 to 87 SEL) would equate to decibel levels of 62 to 81 dBA or less. A comparison of these levels to the equivalencies in Figure 3.5-1 of the SEIS indicates that the comment has overstated the noise levels by 20 to 30 decibels, or by a factor of 4 to 8 times as much perceived loudness. The comment’s estimation of noise at Elliot Key is likewise in error. At Elliot Key, jets produce SELs of 43–77, or 37–71 decibels of peak dBA. The comment has overstated the noise at Elliot Key by 10 to 40 dB, or by a perceived factor of 2 to 16 times.

10.5.11 Comment: Sound levels in Biscayne National Park would approach 70 decibels with a commercial airport.

Response: The comment is apparently referring to either the L_{Amax} (Maximum Sound Level) or SEL (Sound Exposure Level) of individual aircraft, since no other noise calculations approach 70 decibels. Military aircraft currently make and exceed a level of 70 decibels in Biscayne National Park and would continue to be the loudest aircraft using Homestead. There would be little or no change in loud single event aircraft noise exposure within Biscayne National Park with a commercial airport.

10.5.12 Comment: A number of commentors stated that a commercial airport is unacceptable just 2 miles from Biscayne National Park and 10 miles from Everglades National Park because of the high numbers of aircraft operations which will create high noise impacts. Biscayne National Park is considered to have more unacceptable noise impacts than Everglades because of its close proximity to Homestead.

Response: It is understood that this is the position of a number of commentors. Other commentors do not find the predicted noise levels unacceptable. Reasonable people, reviewing the same data, apparently disagree over what is "acceptable" or "unacceptable."

10.6 Commercial Spaceport Alternative

10.6.1 Comment: The U.S. Environmental Protection Agency has stated that noise impact is also a concern with the Commercial Spaceport alternative and noted that the DNL 65 dB contour from the spaceport would extend into Biscayne National Park (greater DNL noise impact than predicted for a commercial airport). USEPA further noted that spacecraft launches would be individually much noisier than conventional aircraft, but also less frequent. USEPA considers a commercial spaceport alternative to be marginally more compatible with the national parks than a commercial airport because of the limited frequency of noise events.

Response: USEPA's general estimation of noise effects is consistent with that of the SEIS. USEPA's comment on this alternative's marginal compatible edge over a commercial airport is noted.

10.6.2 Comment: USEPA has commented that a commercial spaceport combined with a mixed use option would still include significant single event noise levels, but it would be incrementally more compatible with the national parks than a commercial airport.

Response: USEPA's comment is noted.

10.7 Noise Mitigation Measures

10.7.1 Comment: USEPA's major concern is the lack of specific commitments to mitigate the potential community noise impacts of any of the alternatives. The Final SEIS must commit to specific community noise mitigation.

Response: Air Force and FAA agree that specific commitments are important. However, the content of mitigation commitments depends on the reuse alternative that is selected. A selection will not be made in the Final SEIS; it will be made in the subsequent Record of Decision (ROD). Mitigation commitments appropriate to the alternative selected will be included in the ROD. Detailed, firm commitments will not be needed for alternatives that are not selected.

10.7.2 Comment: USEPA strongly recommends that mitigation for the commercial airport alternative include a requirement that Miami-Dade County Aviation Department relocate all residential housing located in the existing and future DNL 65 dB contours. Since there are only 311 residential units in total, USEPA recommends that all 311 units be relocated, not just the 95 units within the DNL 65 dB contour. In addition, USEPA recommends that local zoning be modified to prevent residential or other noncompatible land uses from occurring within the existing and future DNL 65 dB contour.

Response: If the Proposed Action is selected, mitigation details that include the above considerations would be worked through with Miami-Dade County. Presently, it is undetermined whether residential housing would be acquired or sound insulated, how many units would be mitigated, and what kind of mitigation schedule would be followed. (Since noise contours would increase only gradually over time and may not increase as much as currently projected because of quieter aircraft in the future, there could be a graduated approach to mitigation that reflects noise contour increases.) FAA would require adequate compatible land use commitments from the county to prevent additional noncompatible development around a commercial airport.

10.7.3 Comment: Page 87 of the Draft SEIS Summary says that noise mitigation could include relocating residents in high noise areas and sound attenuation of homes. Would the government pay for relocation and sound attenuation? Would the homes be bought at the owners' prices? Would families be relocated to houses of their choice, in cities other than Homestead? If these types of mitigation measures are being considered, it must mean that noise will be higher than the ambient level, contradicting the statement on page 54, paragraph 4, of the Draft SEIS Summary.

Response: Miami-Dade County, as airport proprietor, would be responsible for noise mitigation projects such as acquisition/relocation or sound insulation. FAA administers a federal grant program that could provide a share of the mitigation costs for either acquisition/relocation or sound insulation. If federal funds are used for acquisition/relocation, federal guidelines require fair market value for acquisitions and assistance to people being relocated. People would not be told where to move and would have discretion to move to other cities. Payments are established by federal regulation based on available comparable housing.

Acquisition/relocation or sound insulation is normally used to mitigate noise sensitive areas within the Day-Night Average Sound Level 65 decibel contour. It may extend to the DNL 60 dB contour. These contours are identified in the SEIS. It does not include residential areas where the DNL is lower than 60 dB, and certainly not areas where the predicted DNL values are near or less than the normal ambient for community land uses.

10.7.4 Comment: The implementation of noise abatement flight tracks consistent with aviation safety is appropriate.

Response: The implementation of noise abatement flight tracks would be considered as part of any decision on a commercial airport. Aviation safety is always the primary criterion that must be met.

10.7.5 Comment: The Draft SEIS discusses noise mitigation for the parks and refuges as "noise sensitive areas." The same mitigation protections should be afforded to people in southern Miami-Dade County, Ocean Reef, and other areas of northern Monroe County. People have chosen to live in these areas because they are quiet.

Response: Noise mitigation is discussed in the SEIS for community residential areas in southern Miami-Dade County that would be exposed to Day-Night Average Sound Level 60 decibels and above. Ocean Reef and northern Monroe County are not anticipated to have their noise environment adversely affected by commercial airport operation.

10.7.6 Comment: Which airports have successfully implemented noise abatement flight procedures?

Response: The use of noise abatement flight procedures is very common. FAA does not keep an official count of airports, but does have some information indicative of frequency of use. Forty-four of the fifty busiest U.S. commercial airports have reported the use of preferred flight paths for noise abatement.

10.7.7 Comment: Flight track mitigation may not be practicable because of the proximity of other airports and resistance by airlines to taking flight paths that will cost them time and money.

Response: The noise abatement flight tracks in the SEIS could be implemented. In early technical analysis, FAA excluded from further consideration any flight tracks that could not be implemented due to the proximity of other airports. Airlines use noise abatement flight procedures at many airports and would do so at Homestead. Since airspace is federally preempted, FAA is the entity responsible for establishing flight paths.

10.7.8 Comment: The Draft SEIS did not adequately address the effects of the noise mitigation flight paths over the upper Keys (Islamorada area to North Key Largo area). Noise abatement flight track mitigation measures to lessen noise over the parks would increase noise in Ocean Reef and other communities.

Response: The community grid point analysis in the SEIS includes Ocean Reef and Angler's Club residential areas on the north end of Key Largo and the town of Key Largo. The effects of potential noise mitigation flight paths were calculated for each of these locations and included in the Technical Memorandum on Noise that was excerpted for Appendix E in Volume II. The flight track analysis was particularly voluminous and was not included in Appendix E. It was in the Technical Memorandum, which was available for review at identified locations, including the library in Key Largo. According to Table V-34 in the Technical Memorandum, Ocean Reef, Angler's Club, and Key Largo would receive a 1 decibel increase in Day-Night Average Sound Level if any of the three noise abatement flight track alternatives was implemented. This is an unnoticeable increase in DNL, particularly at the low DNL levels in these areas. None of these locations would experience an increase in either Maximum Sound Level or Time Above due to a noise abatement flight alternative. This table has been included in the body of the Final SEIS in Section 4.5 of Volume I.

10.7.9 Comment: It is no comfort to state as a mitigating factor that the noisiest planes are likely to be out of service by 2015. Even if true, fifteen years of aircraft noise is a high burden.

Response: Based on historical experience with the normal retirement of older aircraft and on the federal approach to gradually phasing in quieter generations of aircraft, FAA would expect older, noisier aircraft to be replaced by newer, quieter models on a phased schedule over time, with a higher percentage of replacements each year (rather than no action for 15 years, as the comment suggests) followed by a total fleet turnover.

10.7.10 Comment: There is no direct federal process that would require aircraft noise mitigation if a mixed use concept is selected. The U.S. Environmental Protection Agency recommends that the Final SEIS at least discuss the option that either the Mixed Use alternative sponsor and/or the county could voluntarily relocate the residential housing units that are located in the Day-Night Average Sound Level 65 decibel contour. USEPA also believes that, in order to prevent any future noncompatible residential development in the DNL 65 dB contour, the existing zoning should be modified to not allow residential development or other noncompatible land uses.

Response: The measures being proposed would respond to an existing noise condition, not noise impacts predicted to be caused by the Mixed Use alternative. FAA funds would not be available to assist with this mitigation. USEPA recommendations are noted, and they have been included among the potential mitigation measures. Additional discussions among the lead and cooperating agencies of federal policy objectives and recommended mitigation measures will precede any final decision making by the Air Force and FAA.

10.7.11 Comment: It is likely that FAA's Office of Commercial Space could require, through the licensing process, that the spaceport sponsor provide appropriate residential noise mitigation, particularly to the northeast where noise contours will increase. USEPA believes that the existing zoning in this area should be modified to not allow residential development or other noncompatible land uses.

Response: This has greater uncertainties than mitigation for a commercial airport and would have to be addressed in a future environmental impact statement for licensing a spaceport operation.

11.0 LAND USE AND AESTHETICS

This category addresses comments on the topics presented in the Land Use and Aesthetics sections of the SEIS, including community land use, special use areas, agriculture, and aesthetics. It also addresses consistency under the Coastal Zone Management Act.

11.1 Community Land Use

11.1.1 Comment: Discussions with City of Homestead staff do not support the statement in the Draft SEIS that 487 acres of previously undeveloped land have been developed.

Response: This information is contained on page 5 of the Homestead Comprehensive Plan dated July 6, 1995.

11.1.2 Comment: Section 3.6 of the Draft SEIS does not discuss the secondary and cumulative impacts of the conversion of almost 8,500 acres to residential development on natural resources. It is not linked to any of the redevelopment alternatives.

Response: As explained at the beginning of Chapter 3 in Volume I, Section 3.6 and all the sections in this chapter only present baseline conditions—that is, conditions without the reuse of the disposal property at former Homestead AFB. The purpose of the projected baseline is to provide a basis of comparison to the reuse alternatives in Chapter 4, not to assess the impacts of growth unrelated to Homestead AFB.

11.1.3 Comment: The Draft SEIS assumes that the Urban Development Boundary (UDB) in Miami-Dade County will not change.

Response: The SEIS does not make this assumption. Section 2.1.3 in Volume I indicates that most future baseline development is anticipated to occur within the UDB, but it is likely that some development will occur outside the UDB. Sections 3.6.3.1 and 4.6.2.1 describe the Urban Expansion Area that is expected to be opened to development. The SEIS indicates that areas within the UDB are more likely to be developed because of fewer impediments to development, but it does not preclude some development occurring outside the UDB.

11.1.4 Comment: The Draft SEIS estimates that 10–20,000 acres of vacant land will be lost to development over the next 15 years. Pressure will build to move the Urban Development Boundary if an airport is developed at Homestead.

Response: The SEIS estimates that about 8,500 acres of undeveloped land in south Miami-Dade County will be developed over the next 15 years under moderate population growth projections, without reuse of the remaining surplus property at former Homestead AFB. Under high-growth population projections, that estimate increases to 20,000 acres. The highest estimate of reuse-related secondary development is about 2,000 acres by 2015. As of 1995, there were approximately 9,000 acres of developable (i.e., unprotected) vacant land within the UDB south of Eureka Drive. It is also probable that some agricultural land within the UDB would become developed as population increases. There were an estimated 10,000 acres of agricultural land within the UDB in 1995. This suggests that any pressure to move the UDB would be likely to occur with or without reuse of former base property.

11.1.5 Comment: Reuse of former Homestead AFB as a commercial airport would change land use patterns in south Miami-Dade County, which would ultimately create adverse pressures on land use and comprehensive plans in the Upper Keys. Some of these pressures include increased development in

Monroe County, increase in land owner expectations, and the exacerbation of the hurricane evacuation bottleneck.

Response: It is estimated that the Proposed Action could increase the population in south Miami-Dade County (south of Eureka Drive) by about 4 percent by 2015. At the same time, general population growth unrelated to reuse of former Homestead AFB is projected to increase by over 30 percent between 2000 and 2015, assuming a moderate level of growth. Population growth and development in south Miami-Dade County has the potential to affect Monroe County land use whether or not a commercial airport is developed at the former base.

The estimated effects of reuse-related growth on hurricane evacuation are addressed in Section 4.2 of Volume I. See also responses to comments in category 7.2 above.

11.1.6 Comment: The statement that the development of a second runway “could” affect land uses near the airport would be more accurately stated as “will likely” affect uses around the airport.

Response: Any discussion of the potential impacts of a second runway at Homestead must be considered speculative at this time. It is not known whether, and if so when, a second runway might ever be constructed at Homestead. The SEIS addresses this possibility only to provide readers with a general idea of what such an expansion might entail. It is not known at this juncture what the land uses near the airport will be at the time a second runway might be contemplated.

11.1.7 Comment: The Land Use section of the Draft SEIS does not discuss the effects of the construction of a second runway on Monroe County. Other sections of the document address impacts of a second runway, and this section discusses the possibility that a buffer could interfere with the expansion.

Response: As Section 1.3 in Volume I indicates, a second runway is not part of the action under consideration and will not be part of the decision to be made. The ability to analyze environmental impacts of a possible second runway so far into the future is highly speculative. Even so, the SEIS attempted to speculate to some degree about the possible future consequences of a second runway, were one ever sought. Not enough information is known about the potential addition of a second runway or how it could be operated to do more.

11.1.8 Comment: Section 4.6.2.1 of the Draft SEIS did not identify mitigation measures for offsetting noise and other impacts from industrial uses on the Homeless Trust Center.

Response: Possible mitigation measures have been added to the Final SEIS to address these potential impacts.

11.1.9 Comment: It has been shown that property values in the vicinity of airports decline precipitously. Will a fund be established to compensate people for decreases in property value due to the proposed airport?

Response: Property values respond to a complex variety of factors such that the experience in one location is not necessarily indicative of what will occur in another location. Studies of facilities like highways, transmission lines, and airports have not been conclusive about the impact that proximity to those facilities have on property value.

11.1.10 Comment: Would the Collier Resources Company proposal be compatible with surrounding land uses on the former base? Would the homeless housing remain, and would it be compatible with the Collier plan?

Response: The Final SEIS has been expanded to include a new joint proposal from Collier Resources Company and Hoover Environmental Group. Section 4.6 in Volume I addresses the compatibility of each alternative with surrounding land uses. There is no plan to alter the Homeless Trust Center or any other existing use on land previously conveyed, except the Collier-Hoover proposal does include a possible land exchange with Miami-Dade County of a portion of the proposed regional park for comparable land elsewhere, possibly on site. The Collier-Hoover plan includes a parcel of adjacent surplus property that could be used for this exchange.

11.2 Special Use Areas

11.2.1 Comment: The Final SEIS has to take in full consideration the national interest in the national parks.

Response: The Air Force has stated its goal to transfer property at former Homestead AFB in a manner that supports local plans for economic revitalization and protects Biscayne Bay and the nearby national parks. Consequently, the SEIS includes extensive consideration of Biscayne and Everglades National Parks. Section 2.9 in Volume I and the Summary include a specific section on impacts from the Proposed Action and alternatives on the national parks. Sections 3.6.4 and 4.6.3 in Volume I describe the parks and their resources, as well as the national laws, mandates, and policies that govern their protection. Other sections in Volume I, including Noise, Water Resources, and Biological Resources, address impacts on resources in the national parks.

11.2.2 Comment: The description of the National Parks Service's interpretation of resources to remain unimpaired does not include all elements of the natural environment.

Response: The discussion of the National Park Service's interpretation of its mandate quotes directly from the Organic Act and indicates that natural soundscape, air quality, water quality, and wilderness are resources to be preserved, "among others." The list is not intended to be all inclusive.

11.2.3 Comment: Section 3.6.4.1 of the Draft SEIS does not discuss if determinations of whether or not a resource is essential and impaired are relevant to the national parks surrounding former Homestead AFB or whether those determinations will be adequately addressed.

Response: Section 3.6.4.1 in Volume I begins with a general discussion of the management of national park lands and the mandate to avoid impairment of their resources. This is followed by a description of the relevant resources at Biscayne and Everglades National Parks. The issue of whether reuse of former Homestead AFB would impair resources at those parks is addressed in Section 4.6.

11.2.4 Comment: The Summary discussion of Biscayne National Park should reflect that Biscayne National Monument was established in 1968, and Biscayne National Park in 1980, after a fully operational air base at Homestead was already in place. The National Park Service had to find the impact of the air base on the park at least tolerable, if not desirable.

Response: Section 3.6 in Volume I contains historical information concerning the creation of Biscayne National Park. Some information has also been added to the Summary of the Final SEIS. Appendix E in Volume II includes a discussion of the noise effects on Biscayne National Park of a fully operational base prior to realignment.

11.2.5 Comment: It is not appropriate for the National Park Service to try to impose natural quiet and solitude at Biscayne National Park that did not exist at the time the park was established and is unrealistic adjacent to a major urban area.

Response: Management of National Park Service resources is guided by laws, policies, and plans. There is no known law or policy that makes it inappropriate for National Park Service managers to try to restore natural conditions in park lands. Conditions of park resources at the time of establishment do not preclude park managers from taking action to improve the condition of impaired resources.

11.2.6 Comment: The Draft SEIS says that studies performed by the Air Force and FAA showed no correlation between increasing noise levels and visitors in national parks.

Response: Section 4.6.3.1 in Volume I reviews several studies of the effect of aircraft overflight and noise on visitors to parks and wilderness areas. Studies have been conducted by the National Park Service, U.S. Forest Service, and jointly by the National Park Service and the Federal Aviation Administration. None of the studies reviewed were conducted by the Air Force. The SEIS indicates that all the studies reported some correlation between aircraft noise and visitor experiences, although the impacts varied widely depending on circumstances and visitor expectations.

11.2.7 Comment: The maps in the Draft SEIS do not show Florida Keys National Marine Sanctuary.

Response: Several maps in Volume I depict Florida Keys National Marine Sanctuary, including Figures 1.1-1, 3.6-1, and 3.14-1.

11.2.8 Comment: The South Florida Water Management District's Southern Glades area is incorrectly labeled as the C-111 wetlands in the Draft SEIS. This area has an active and expanding public use program that includes a greenway trail for hiking, biking, and horseback riding.

Response: Figure 3.6-10 in Volume I, which identifies the "C-111 Wetlands," was taken from the Miami-Dade County Comprehensive Development Master Plan. Section 3.6 of the Final SEIS has been expanded to provide more discussion of South Florida Water Management District lands, including the Southern Glades Wildlife and Environmental Area.

11.2.9 Comment: The Draft SEIS does not indicate whether there are any Native lands or properties other than those declared as reservations.

Response: Native American reservations are generally outside the region of influence of expected impacts from the Proposed Action and alternatives. No non-reservation Native lands have been identified.

11.3 Agriculture

11.3.1 Comment: The conclusion in the Draft SEIS that "reuse of the former Homestead AFB property is not expected to directly affect agriculture" cannot be determined without data from the agricultural retention study that has not been completed.

Response: This statement in the SEIS refers to on-site development of former Homestead AFB property, which currently does not include agricultural uses. Section 4.6.4 in Volume I indicates that off-site secondary development could affect agriculture.

11.3.2 Comment: The Draft SEIS contains an inconsistency on page 4.6-2, which first states that secondary development is not expected to affect agricultural lands and later states that secondary development could occur on agricultural lands.

Response: There is no inconsistency in this paragraph. It states that development of the disposal property, that is, the surplus property on former Homestead AFB itself, is not expected to affect agricultural lands.

RESPONSES TO COMMENTS

There is currently no agricultural use of this property. The SEIS acknowledges that secondary development could affect agricultural property.

11.3.3 Comment: If the former base is developed, all agricultural land surrounding the base (approximately 7,260 acres) will be developed.

Response: Section 3.6.5.1 in Volume I indicates that there were about 64,000 acres of agricultural land in south Miami-Dade County in 1994, about 11,600 acres in the five Transportation Analysis Districts (TADs) surrounding former Homestead AFB. As indicated in Section 2.2.5 of Volume I, reuse of former Homestead AFB property could result in development of an additional 2,000 acres of land outside the base property by 2015 and almost 3,000 acres at full buildout, including both agricultural and vacant land. Even assuming all the secondary development occurred on agricultural land within the five TADs surrounding the former base, it would only convert about a quarter of the agricultural land within those TADs and about 5 percent of the agricultural land in south Miami-Dade County.

11.3.4 Comment: The Proposed Action would force the conversion of agricultural land surrounding former Homestead AFB and jeopardize thousands of acres of active agricultural lands west and northwest of the former base.

Response: Section 4.6.4.1 in Volume I addresses impacts from the Proposed Action on agriculture. As it indicates, the Proposed Action is anticipated to result in the conversion of some agricultural lands to support secondary development. It is not known where those lands would be located. It is also possible that a commercial airport at Homestead could increase the risks from agricultural pests. No other impacts to agricultural have been identified from the Proposed Action.

11.3.5 Comment: Contaminated runoff from the airport may impact agricultural land adjacent to the airport.

Response: All runoff from the former base would drain into the Boundary Canal system and then be pumped to Military Canal. A small fraction of it would be discharged into Biscayne Bay; most would be retained on site and evaporate or percolate into groundwater. Because of this system, runoff from the former base would bypass the agricultural areas to the east. Barring the construction of a stormwater treatment and distribution area (STDA), no contamination would be expected to limit agricultural use east of the former base.

If Miami-Dade County, South Florida Water Management District, or the U.S. Army Corps of Engineers constructed an STDA east of the former base, water from Military Canal could be pumped onto the STDA, and pollutants from the former base would then enter the STDA, increasing contaminant levels in soils and plants. Agriculture would not be possible in the STDA for a variety of reasons, including a very high water table that would limit the kind of crops that could be grown there. It is not anticipated that any contaminants in the STDA would affect other agricultural land in the area.

11.3.6 Comment: The Draft SEIS accepts that an impact of the Proposed Action could be to bring agricultural pests (citrus canker) to the area.

Response: The Draft SEIS reported the potential that a commercial airport at former Homestead AFB could increase the spread of citrus canker to south Miami-Dade County. There is no implication that this is “acceptable.” The purpose of the SEIS is to report all impacts, including adverse and beneficial impacts. The Florida Department of Community Affairs subsequently reported that the citrus canker quarantine area has already spread to large areas of south Miami-Dade County. The Animal and Plant Health Inspection Service at commercial airports reduces the risk of importing pests.

11.3.7 Comment: Since the Draft SEIS was completed, the status of the citrus canker quarantine area has significantly changed and has now affected large areas of south Miami-Dade County.

Response: The Final SEIS has been updated to include this information.

11.3.8 Comment: The Air Force and FAA are encouraged to recommend policies to prevent conversion of agricultural land and promote continuation of a viable agricultural economy.

Response: Section 4.6.4 in Volume I identifies impacts from the Proposed Action and alternatives on agriculture, including potential conversion of agricultural land to development. The section also identifies possible mitigation measures that might be employed to protect agricultural resources in south Florida. The adoption of policies and implementation of protective measures is within the purview of local planning and regulatory agencies, not the Air Force and FAA.

11.4 Aesthetics

11.4.1 Comment: Section 3.6.6.2 of the Draft SEIS omits the 4,500 acres of vacant land projected to be developed by 2015, bringing into question the statement that the overall visual context of open, rural, and agricultural landscapes can be expected to continue.

Response: As Table 3.6-1 in Volume I shows, vacant and agricultural lands comprised over 80 percent of non-water lands in south Miami-Dade County in 1994. Together, they amounted to over 162,000 acres. The projected 8,500 acres that could be developed by 2015 would comprise about 5 percent of these lands. This is not expected to change the overall visual context of the area.

11.4.2 Comment: The Draft SEIS does not address light pollution at night for the noise abatement flight path alternatives.

Response: The visual impacts along the noise abatement flight paths would be similar to those described for the proposed flight paths. The locations where aircraft lights would be visible would change.

11.5 Coastal Zone Management Act

11.5.1 Comment: The Department of Community Affairs, the state's designated lead agency pursuant to the Coastal Zone Management Act, notifies the Air Force that the proposed transfer of former Homestead AFB land is consistent with the enforceable policies of the Florida Coastal Management Program. Insufficient information is available for South Florida Water Management District staff to evaluate the consistency of the Proposed Action and alternatives with the Florida Coastal Management Program.

Response: The Department of Community Affairs' determination concerning consistency with the Florida Coastal Management Program satisfies the requirements of the Coastal Zone Management Act.

12.0 HAZARDOUS MATERIALS AND WASTE AND PETROLEUM PRODUCTS

Comments were received on existing contamination from past base activities both on former base property and in Military Canal. Those comments are addressed in this category, along with comments on reuse-related hazardous materials and waste management and risks of fuel spills. Impacts from contaminants on water quality are addressed below in the Water Resources category (15.0).

12.1 Contamination from Past Use

12.1.1 Comment: Contaminants from the base have been incompletely characterized and incompletely analyzed.

Response: The contaminants arising from prior activities at former Homestead AFB have been widely studied and analyzed and are subject to a Federal Facilities Agreement between the Air Force and regulatory agencies. Under this agreement, contaminated sites that have resulted from Air Force activity have been characterized and evaluated for risks to human health and the environment. These sites, and their status in the Installation Restoration Program (IRP), are described in Section 3.7 of Volume I.

The active IRP is in the process of remediating the remaining contamination at the former base. Since this will be done irrespective of the land disposal action that is the subject of the SEIS, more information on existing contamination is not needed for the decision on what entity receives the land.

12.1.2 Comment: The pre-Hurricane Andrew operations at the former Homestead AFB left behind a concentration of heavy metals in the canals and on the grounds. These are not mentioned in the Draft SEIS.

Response: Past contamination of the grounds and canals on the former base is described in Section 3.7 of Volume I. The concentration of pollutants in base canals is presented in Section 3.10.

12.1.3 Comment: The Base Realignment and Closure Commission determined MacDill AFB was one of several military airbase facilities to be closed. Environmental surveys indicated hazardous materials remained following years of operating as an airfield and would require mitigation. MacDill AFB was being considered for Superfund cleanup funds. The implication is that former Homestead AFB could become a Superfund site also.

Response: Former Homestead AFB is a Superfund site and has an active Installation Restoration Program that is dealing with soil and groundwater contamination under a Federal Facilities Agreement with regulatory authorities. A comprehensive Environmental Baseline Survey was conducted in 1993 (with an update in 1997) to identify any potentially contaminated sites that could not be transferred to another owner under the Community Environmental Response Facilitation Act. Some of the sites identified in these surveys are regulated under the Comprehensive Environmental, Response, Compensation and Liability Act, and others are petroleum sites regulated under Florida Department of Environmental Protection requirements. The status of individual sites varies. Actions are underway to remediate some sites, while others are undergoing further study to determine the most appropriate form of remediation. Some sites have been identified for long-term monitoring, and others require no further action. The current status of the sites and the IRP program are summarized in Section 3.7.4 of Volume I. Remediation under the IRP will continue until regulatory agencies have signed off on the effectiveness of all remediation undertaken. In addition, it is Air Force policy to continue remediation efforts until regulatory approval is received, whether or not land is to be transferred.

12.1.4 Comment: Cleanup targets for Installation Restoration Program sites at former Homestead AFB have been selected and approved by regulatory authorities. Many sites that have already been closed were cleaned to levels consistent with industrial use. Any changes in land use or features that would lead to increased human or wildlife exposure to contaminants could require additional assessment and remediation.

Response: It is anticipated that existing cleanup levels would be compatible with land uses under the Proposed Action and Commercial Spaceport alternative. Section 4.7 in Volume I has been expanded to further evaluate land use compatibility for the Mixed Use alternative.

12.1.5 Comment: Those parts of the property that have been cleaned up for restricted reuse will have land use control restrictions which will limit their future uses. It is important for decision makers to understand that if an alternative other than the commercial airport is eventually selected, additional areas may need to be remediated to higher standards than is currently the case. The responsible party in this regard will also have to be determined.

Response: The Air Force agrees with this comment and is aware that a consequence of some disposal decisions may be to revisit previous decisions about remediation. The issues raised by the comment are acknowledged in Section 4.7 of Volume I.

12.1.6 Comment: The SEIS does not provide the cost of cleanup of Military Canal or indicate who will pay for it. No further development should be permitted on the base property until the cleanup is completed both on the base and in the canal.

Response: The Air Force is responsible for paying for any required remediation of property at former Homestead AFB that was contaminated due to Air Force operations. Through 1999, the Air Force had spent approximately \$25.5 million for remediation activities at the former base. (These numbers include remediation for the cantonment area as well as the surplus property.) The estimated additional cost for the years 2000–2005 is \$6.9 million.

The remediation options being investigated for Military Canal range from approximately \$2.7 million to \$4.7 million. Although the water quality in the canal is excellent—it meets Class III drinking water criteria—contaminated sediments lie beneath the vegetative mat in the canal. The remediation options being considered would be designed to prevent the sediments in the canal from being released to Biscayne Bay.

It would not be necessary, or even helpful, to defer redevelopment of the former base until remediation of the canal is complete. The contamination beneath the vegetative mat is not affected by development elsewhere, whether for an airport or one of the other alternatives.

12.1.7 Comment: Section 3.7 of the Draft SEIS indicates that large quantities of hazardous wastes were generated from the cleanup of hurricane damage. This section refers to site contamination due to a past hurricane-induced spill of 2,000 gallons of jet fuel.

Response: Post-hurricane cleanup included the extensive use of solvents and other cleaning materials that were generally disposed of according to federal, state, and local regulations following use. Building 730 on the former base sustained a 2,000 gallon fuel spill during Hurricane Andrew. The fuel was apparently retained in the soils immediately around the hangar. This location is part of the base's remediation program and is designated Operable Unit 17 (see Section 3.7 in Volume I). The current status of the site is "No Further Action," and the site is expected to be closed out. There is no evidence or suspicion that any of the spilled fuel migrated off the former base. None of the hazardous waste generated during the cleanup following Hurricane Andrew led to further contamination of soils or groundwater on the former base.

12.1.8 Comment: Some previously closed or realigned bases were eligible to apply for U.S. Environmental Protection Agency (USEPA) Superfund assistance in cleaning up prior to developing the land.

Response: It is not clear to what the comment refers. It is possible that USEPA financial assistance of some kind has been available for environmentally related purposes during the redevelopment of closed or realigned bases. However, it is the Air Force that is responsible for remediating contamination at the bases affected by the base closure laws. No one has had to request money from USEPA to pay for remediation of the Air Force's contamination. The Air Force pays for all required cleanup.

12.2 Management of Hazardous Materials and Waste

12.2.1 Comment: Environmental studies completed for base closings provide a baseline for the environmental impacts of airport facilities at former Homestead AFB.

Response: While Base Realignment and Closure (BRAC) environmental studies often report substantial and extensive contamination, it rarely comes from recent activities and more typically stems from spills or dumping that occurred decades ago, prior to or shortly after regulatory controls were adopted. Because of these controls, the risk of large spills has been greatly reduced, and the number of spills that result in environmental contamination has also been greatly reduced. BRAC environmental studies are not a good indicator of the upland environmental impacts of airport facilities in the future.

12.2.2 Comment: The Draft SEIS assumes that pollutants in the area will not change, while recognizing that the airport development will result in hazardous materials increasing twelve times current levels.

Response: The SEIS estimates that the amount of hazardous materials and petroleum products used on the former base would increase twelvefold by full buildout under the Proposed Action. The great majority of these materials would be aircraft fuel. An increase in use does not equate to a comparable increase in releases of pollutants into the environment, however. Regulations require hazardous materials and waste to be handled, stored, and managed in a manner that minimizes the risks of releases. Nevertheless, some increase in pollutants can be expected. The SEIS reports the estimated changes in pollutant generation and puts those changes in the context of existing generation rates for hazardous wastes.

12.2.3 Comment: The Draft SEIS indicates that, under the Proposed Action, aircraft operations could increase hazardous material use an estimated fourfold over the projected baseline in 2005, eightfold by 2015, and twelvefold at full buildout. An increase of hazardous material use and storage at the scale an airport would require is unacceptable within the immediate drainage basin of a national park.

Response: The estimated increase in use of fuels and hazardous materials is proportional to the estimated increase in aircraft operations at Homestead under the Proposed Action. Most of the increase would be the jet fuel used at the airport. To accommodate the additional fuel required, the airport may have to build an aboveground storage tank, containing perhaps as much as 1,000,000 gallons. As with the existing aboveground tanks on the former base, regulations require all tanks to be bermed to contain 110 percent of the tank volume. These tanks typically would have foam-based fire suppression systems. This would prevent fuel from entering surface water or groundwater. Use of other hazardous materials is also regulated and required to be handled in a manner that minimizes risks to the environment.

12.2.4 Comment: The SEIS should include a discussion of materials that will likely be stored on site for each reuse alternative, associated risk factors, and proposals for spill containment and cleanup.

Response: Hazardous materials and petroleum products anticipated to be used at the former base are described in Section 4.7 of Volume I. No detailed spill prevention, control, and countermeasures plan has been developed as yet, but the SEIS indicates that such plans are required by regulation and therefore would be developed. Typically, these plans are developed when facilities are farther along in design.

12.2.5 Comment: How will the proposed airport prevent pollutants and hazardous chemicals from entering the air and waters of the Everglades National Park and Biscayne Bay?

Response: Major facilities, including airports, routinely deal with a wide variety of hazardous materials and hazardous wastes. Use of materials that are hazardous under the Resource Conservation and Recovery Act (RCRA) must be stored, transported, and used according to specific protocols designed to prevent, to the extent possible, environmental release (to air, water, or land) of these materials. Similarly, hazardous wastes must be stored, transported, and disposed of according to specific protocols designed to prevent environmental releases. Compliance with RCRA and Occupational Safety and Health Act regulations would help to minimize the risk of releases to the environment.

12.2.6 Comment: Miami-Dade Aviation Department has an abysmal environmental record. A recent report by the Department of Environmental Resources Management listed numerous recent violations by the Miami-Dade Aviation Department for significant fuel and petroleum-based spills throughout the airports it manages, including Homestead AFB. The violations show no sign of abating—almost as many violations occurred last year and the year before. Even under a consent decree, deadlines and milestones appeared to be routinely not met. The county has ignored other directives concerning Homestead, such as directives to develop noise and wildlife mitigation plans in connection with the airport proposal.

Response: The cited report does not support the comment's allegations. The report indicates the status of all identified contaminated sites on government facilities in Miami-Dade County, including those operated by the Aviation Department. It shows numerous contaminated sites on facilities operated by the Aviation Department but indicates that the great majority of them are being remediated or investigated according to the 1998 Consent Agreement.

Miami-Dade County has prepared a Wildlife/Habitat Management and Mitigation Plan for the proposed airport at Homestead, as described in Section 2.2.6 of Volume I. The county is awaiting the completion of the SEIS to develop the noise mitigation plan.

12.2.7 Comment: The Collier-Hoover proposal does not discuss chemicals that would be used on the golf course. What are the impacts from pesticides and fertilizers from golf courses on the surrounding water?

Response: The Final SEIS has been expanded to incorporate a new joint Collier-Hoover proposal. The proposal includes integrated pest management, which uses short-lived pesticides in small, controlled doses when pests are present. Such applications effectively limit the potential transport of pesticides outside of the area where they are applied, including into groundwater. In addition, the Collier-Hoover proposal specifies that reclaimed wastewater would be used to irrigate golf courses, and because of the nutrients contained in the wastewater, the need for additional fertilizer would be reduced. Any additional fertilizer applied would be in controlled, small applications. While there would be some percolation of nutrients from the reclaimed wastewater and fertilizers to groundwater, the majority would likely be taken up by grasses and other plants, reducing the amount that could reach groundwater.

12.3 Risk of Fuel Spills

12.3.1 Comment: No study has been included in the Draft SEIS regarding fuel spills and their effects on the environment.

Response: The potential effects of spills from activities on the former base are discussed as parts of Sections 3.7, 3.10, 3.11, 4.7, 4.10, and 4.11 in Volume I.

12.3.2 Comment: How would fuel be transported from the Fort Lauderdale Port Everglades oil offloading facility to Homestead? Will it be transported by truck, through the existing pipeline, or will a new pipeline be built? What are the hazards associated with transporting the fuel to the former base?

Response: The existing pipeline from Port Everglades to former Homestead AFB would be used to supply fuels to an airport facility. The pipeline, owned and operated by Defense Fuels, Inc., was in operation in the early 1970s and supplied Homestead AFB when it was flying B-52s. Currently, fuel is pumped to the former base twice each month, and there is more than enough capacity to supply the proposed commercial airport.

The pipeline is generally a single-walled pipe that has been double walled in areas where vibration could be extensive (near major roadways, for example). When fuel is pumped, precise measurements are taken at several locations to ensure that any leaks would be detected. Should a leak be detected, pumping would immediately cease so that leaked fuel could be contained and/or remediated and the pipeline repaired. The last leak was detected in 1978.

12.3.3 Comment: If aircraft fuel is stored in underground fuel storage, it could increase risks of groundwater pollution.

Response: Fuel is currently stored in aboveground tanks in a tank farm on Homestead Air Reserve Station. If a commercial airport is developed on the former base, additional storage capacity would need to be built, and this storage would almost certainly be in the form of aboveground tanks (not underground tanks) for a number of reasons. First, aboveground tanks are more easily inspected for leaks than underground tanks, and leak control is required under federal, state, and local laws, regulations, and ordinances. Second, the water table underneath former Homestead AFB is very shallow, making construction of new underground tanks problematic and providing a hostile environment for steel tanks. Third, containment of any leaks or spills in a berm surrounding an aboveground tank simplifies cleanup and substantially reduces the risk of uncontrolled leaks contaminating groundwater. Thus, it is very unlikely that fuel would be stored underground at the proposed airport.

12.3.4 Comment: The proposed commercial airport would be a source of fuel and waste dumping.

Response: Uncontrolled dumping of fuel and solid or hazardous waste is illegal. The SEIS acknowledges that accidental spills can occur (see Sections 4.10 and 4.11 in Volume I) and there are occasional emergency situations in which aircraft will need to jettison fuel. Procedures would be in place to respond to these situations, minimize environmental damage to the extent possible, and restore areas that have been damaged. Emergency fuel jettisoning, if necessary, is normally conducted at high altitude, and the fuel evaporates before reaching the ground.

12.3.5 Comment: The Draft SEIS' reliance upon spill contingency and stormwater treatment plans is not supported by any analysis determining whether existing spill contingency plans and the Surface Water Management Master Plan are actually adequate to identify, address, and contain all fuel spills and leaks. Nor is such reliance consistent with the history of fuel spills and leaks at numerous airports nationwide and at Homestead AFB. Therefore, the Draft SEIS' analysis is not an accurate prediction of what is expected to occur, but more of a "best case scenario" that assumes that all fuel spills will be identified and remediated before significant contamination occurs.

Response: The majority of the existing contamination at airports and airbases, including former Homestead AFB, occurred prior to environmental regulations that require controls on leaks and spills to prevent contamination. Historically, before the potential effects of spills and leaks were known, inadequate or no controls were placed in areas where leaks and spills were likely to occur (at transfer

points from one container to another, or where toxic chemicals were used in an open, unconfined environment), and toxic chemicals were often simply dumped on the ground in convenient areas. While spills still do occur, the areas where spills are likely to occur are required to be designed and built such that the spills are contained, and they are likely to be small (on the order of a few gallons). In cases where the spills are not contained, cleanup and containment actions would be required and specified to minimize the extent of potential contamination. At former Homestead AFB, no new contamination is known to have resulted from recent leaks or spills.

No entity can guarantee that no spill or leak will ever occur or that it will be small, but all reasonable and prudent actions are required to be taken to prevent contamination by new leaks and spills. The exact nature of these actions and controls would not be established until late in the design stage of an airport, when the physical layout and the control structures have been defined.

12.3.6 Comment: During scoping for the SEIS, the Natural Resources Defense Council (NRDC) identified fuel spills and leaks as a significant issue of concern to be analyzed in the Draft SEIS to determine potential effects on water quality. NRDC recommended the Air Force conduct a six-step process to determine the frequency and severity of spills, based on data from other airports, airport chemical inventories, a risk analysis, and the likely pathways of migration. NRDC further recommended the Air Force conduct a full examination of the efficacy of containment methods, historic failure rates, and the residual amount of chemicals that would enter the environment. This was not done in the Draft SEIS.

Response: The NRDC recommendations were not ignored. They were considered, but the Air Force and FAA concluded such studies were not necessary for the SEIS. The SEIS discusses the possibility of fuel spills and leaks and explains that on-site spills are expected to be contained in the surface water management system where they could be removed before leaving the site. The document also discusses potential environmental consequences if a fuel spill occurred off site. The Air Force and FAA believe the analysis in the SEIS is sufficient to make an informed decision about property disposal at former Homestead AFB.

Other federal and state agencies are responsible for regulating the use, storage, and disposal of hazardous materials, and they have promulgated regulations to address these concerns. There is nothing unique about former Homestead AFB that would suggest different regulatory requirements are needed than at other facilities. Every environmental impact statement cannot revisit fundamental health and safety issues that are the purview of agencies like the U.S. Environmental Protection Agency but must be able to rely on the efficacy of those agencies' regulations to adequately protect the public from identified hazards. If those regulations are not adequate, that is a national, not a Homestead-specific issue. The National Environmental Policy Act does not require original research of this type.

12.3.7 Comment: The Draft SEIS assumes Miami-Dade County will mitigate any spills on the site.

Response: The SEIS assumes that spill prevention, control, and countermeasures procedures that are required by law and regulation will be implemented. It does not assume there will be no accidental spills of fuels or chemicals. The potential impacts of spills on the site, as well as the potential for migrating off site, are addressed in Sections 4.10 and 4.11 of Volume I.

13.0 AIR QUALITY

Comments were received concerning the increase in air pollutant emissions under the Proposed Action and alternatives and the health effects of those emission increases. This category addresses comments concerning emissions of criteria pollutants in 13.1. The criteria pollutants are carbon monoxide (CO),

nitrogen dioxide (NO₂), ozone (O₃), sulfur dioxide (SO₂), and particulate matter. Comments were only received on the first three. Nitrogen oxides (NO_x) and volatile organic compound (VOC) emissions lead to formation of ozone and are also addressed under this section. Emissions of NO_x and resulting deposition of airborne nitrogen is of particular concern to the water quality of Biscayne Bay, so this issue is addressed in 13.2. Consequential water quality effects are addressed in the Water Resources comment category (15.0).

Comments concerning air emissions other than the criteria pollutants are addressed in 13.3. Several comments were received concerning emissions of unburned fuel, which is addressed in 13.4. The final section (13.5) addresses comments concerning impacts on Everglades National Park, which is a Class I Prevention of Significant Deterioration area under the Clean Air Act.

13.1 Emissions of Criteria Pollutants

13.1.1 Comment: The air and earth quality north of Biscayne Bay is biologically different from the southern end of the bay. This is not considered when countywide air quality impacts are analyzed.

Response: The air quality calculations in the SEIS do focus on the southern part of Miami-Dade County. Therefore, the concentrations reported are in fact for the south county. These concentrations are not expected to exceed ambient air quality standards.

13.1.2 Comment: The Proposed Action presented in the Draft SEIS indicates that increases in air emissions would exceed federal levels.

Response: Section 4.8 in Volume I reports estimated increases in the emissions of five air pollutants at various time intervals under the Proposed Action and other reuse alternatives. None are anticipated to exceed federal air quality standards.

13.1.3 Comment: The Draft SEIS estimates that, in 2015, the proposed airport-related activities will release 12,000 pounds of carbon monoxide each day. This equates to three pounds of CO for every passenger traveling through the proposed airport. Similar ratios apply to at least five other noxious gases.

Response: The estimates of air pollutant emissions in the SEIS are based on emission factors approved by the U.S. Environmental Protection Agency (USEPA), which are incorporated into the Emissions and Dispersion Modeling System model used to estimate the Proposed Action's contributions to ambient air quality. Mobile source emissions are based primarily on the number of aircraft operations, the type of aircraft, and the number of trips by motor vehicles. Emissions from ground-based equipment used to support aircraft are also estimated based on the number of aircraft operations. The results of the modeling indicate that carbon monoxide would have the largest emissions, and other pollutant emission levels are less than a quarter as much. About 40 percent of the estimated CO emissions would be from ground equipment.

The quantity of CO emissions per passenger needs to be viewed in context of the magnitude of emissions associated with every day activities. For example, three pounds of CO is roughly equivalent to driving a personal automobile for 130 miles. The Final SEIS includes a possible mitigation measure to use electrically powered ground equipment, which could reduce CO emissions.

13.1.4 Comment: The Draft SEIS concludes that the Proposed Action would have potentially significant impact on ozone levels but does not discuss what the implications of these increases would be on the residents of south Miami-Dade County to any meaningful degree. The report dismisses the risks on the basis that they will be mitigated.

Response: The SEIS did not conclude that the Proposed Action will significantly affect ozone levels. Nor does it assume any mitigation of reuse-related emissions. The SEIS shows that, although the Proposed Action would increase emissions of NO_x and VOCs from increased operations at former Homestead AFB, the increase would be small relative to existing emissions in Miami-Dade County and is not expected to result in exceedances of the National Ambient Air Quality Standards (NAAQS). For example, the estimated concentration of nitrogen dioxide resulting from the proposed Action in 2015 is 27.6 micrograms per cubic meter, compared to the current NAAQS of 100 micrograms per cubic meter. Decreases in countywide emissions of these gaseous pollutants are expected from cleaner-operating mobile sources (cars and trucks) in future years. The county is expected to continue to meet the NO_x and VOC emissions budgets, and ozone concentrations are not expected to exceed NAAQS. Based on the latest projections made by the Metropolitan Planning Organization of Miami-Dade County, the county should meet the VOC and NO_x emission budgets in 2000, 2005, and 2015, even when the emissions of the Proposed Action are included.

Table 3.8-7 in Volume I contains estimates of emissions of Miami-Dade County on-road and non-road mobile sources (which include most of the projected sources in the Proposed Action) of about 58,000 tons/year of VOCs and approximately 57,600 tons/year of NO_x in 1997. For comparison, the projected emissions of VOCs and NO_x for the Proposed Action by 2015 would be 130 and 392 tons per year, respectively. The Proposed Action would result in relatively small emissions increases in Miami-Dade County.

13.1.5 Comment: Elevated ozone levels inhibit plant growth and can cause widespread damage to crops and forests. This is an issue of concern for farming, an important component of the south Miami-Dade County economy. It is also a concern for visitors to Everglades National Park.

Response: The National Ambient Air Quality Standards for ozone are based primarily on risks to human health. The U.S. Environmental Protection Agency recently set an 8 hour standard for ozone, but the district court has ruled that the standard is unenforceable. The 1 hour standard that existed prior to the promulgation of the 8 hour standard is being re-promulgated until legal issues associated with the 8 hour standard are resolved. The 8 hour standard would be somewhat more restrictive than the 1 hour standard.

Currently, Miami-Dade County is a maintenance area for the 1 hour ozone standard, (i.e., the county complies with the standard). The county is anticipated to continue to comply if the NO_x and VOC emissions budgets for mobile sources in the State Implementation Plan for Florida are met. Miami-Dade County anticipates compliance with the 1 hour standard well into the future, and the Proposed Action and other alternatives would not appear to cause the standard to be exceeded. If the standard is not exceeded, ozone concentrations are not anticipated to cause damage to crops and forests and should not be a concern to farmers or visitors to Everglades National Park.

13.1.6 Comment: The Proposed Action would generate 7 tons per day of toxic air pollutants.

Response: Nitrogen oxide and volatile organic compound emissions from the Proposed Action are estimated to, combined, amount to about 1.4 tons per day. Carbon monoxide, by itself, is estimated to amount to about 6 tons per day. The combined total emissions of these three gases would be about 7.5 tons per day in 2015.

At low concentrations (concentrations generally found in the environment), most gases have no biological effects and thus are not toxic, although they can become toxic at high concentrations. The concentrations calculated for the Proposed Action and alternatives would comply with National Ambient Air Quality Standards, which are set at levels to prevent biological (toxic) effects.

The term “toxic” has been misapplied in this situation. Nitrogen oxides generally are eye irritants and are not classified as toxic. They do interact with VOCs to create ozone, a more potent irritant. VOCs are composed of a wide variety of organic compounds, some of which can be toxic at high concentrations, and others of which are relatively benign. Carbon monoxide is a respiratory poison and is clearly toxic. However, the concentrations would have to be much greater than those associated with reuse of former Homestead AFB to be toxic.

13.1.7 Comment: Estimates for the emissions of noxious gases do not include emissions from aircraft that would be replacing flights from Miami International Airport.

Response: The SEIS includes analysis of all flights expected to originate or terminate at former Homestead AFB, regardless of whether or not they replace flights that currently originate or terminate at Miami International Airport. See also response to comment 13.1.1.

13.1.8 Comment: If new roads are critical to the Proposed Action or alternatives, appropriate transportation planning authorities should consider them in the next Long Range Transportation Plan, which must demonstrate transportation conformity with the Clean Air Act.

Response: For the Proposed Action, five actions have been identified to create a connection north of the former base to Florida’s Turnpike extension and to improve traffic flow along this connection. These projects are listed in the Miami-Dade Long Range Transportation Plan and the 1999 Miami-Dade Transportation Improvement Program. An environmental assessment is currently being prepared for these improvements by the Florida Department of Transportation, and transportation conformity would presumably be demonstrated as part of this assessment. The improvements would be expected to improve traffic flow and therefore reduce per mile emissions of traffic generated by the airport.

13.1.9 Comment: Commercial airports rank as high as smokestack industries in the amount of pollution they release into the environment, yet are excluded from many of the pollution controls and disclosure requirements that equally polluting industries must follow.

Response: This is a misperception. Commercial aviation is a highly regulated industry. While there are some areas where federal standards have not been established for airports, most federal air, water, and other environmental regulations and standards currently apply to airports. The FAA specifically regulates aircraft source noise. State and local environmental requirements and permits also apply.

13.1.10 Comment: Tables 2.2-8 and 4.2-1 in the Draft SEIS provide different numbers for trips generated. The Final SEIS should clarify the differences. If they are two distinct categories, traffic volumes associated with the proposed airport could be more significant, which could affect air quality.

Response: The numbers in Table 4.2-1 are the sum of the Proposed Action and the Retained and Conveyed Property Average Daily On-site Trips from Table 2.2-8. These numbers were not used to determine the motor vehicle contribution to air emissions for the Proposed Action and alternatives. Increased motor vehicle emissions were assumed to result from the population increase in Miami-Dade County as a result of reuse of former Homestead AFB. The primary input variable in determining increased emissions was the increase in vehicle miles traveled (VMT). VMT was estimated by multiplying the expected population increase due to the Proposed Action and alternatives by a VMT/person factor, derived from a transportation modeling study conducted by the Miami-Dade County Metropolitan Planning Organization. It was assumed that all of the estimated increase in VMT was due to airport-related trips, as a worst-case analysis. Additional trips to the airport from the existing population were assumed to be redirected trips from other destinations, such as Miami International Airport. Because

all vehicle travel by the existing and projected baseline population is already accounted for in the county's projected emissions, only the reuse-related increase in population would result in an increase in VMT.

13.2 Airborne Deposition of Nitrogen Oxides

13.2.1 Comment: A number of commentors used the values in Table 4.8-17 of the Draft SEIS to indicate that nitrogen concentrations would increase by more than 40 times or that nitrogen deposition would increase by more than 40 times in Biscayne National Park or both Biscayne National Park and Everglades National Park.

Response: Nitrogen concentrations were not estimated to increase by more than fortyfold. Table 4.8-17 in Volume I presents the changes in atmospheric concentrations of NO_x (not the absolute value of atmospheric concentrations of NO_x) estimated to occur in Biscayne and Everglades National Parks with the Proposed Action. The changes reported in this table were used to estimate changes in nitrogen deposition in the two parks. While the Proposed Action's contribution to NO_x concentrations would be more than 40 times greater in 2015 than in 2000, this translates to a change in atmospheric nitrogen deposition inputs of about 6 percent in Everglades National Park and 23 percent in Biscayne National Park compared to 1994–1998 levels.

Atmospheric nitrogen deposition is only one source (and a relatively small source compared to surface water discharges) of total nitrogen inputs. The SEIS indicates that nitrogen inputs to Biscayne National Park from atmospheric deposition could increase by 23 percent over existing atmospheric deposition, an amount that represents approximately 1.6 percent of the combined projected baseline nitrogen inputs of Princeton, Mowry, and Military Canals. The resulting nitrogen concentrations in Biscayne Bay could not be estimated because of a lack of information on nitrogen conversion processes that occur in the bay. It is thought the change is likely to be closer to 1.6 percent than to 23 percent. See also responses in comment category 15.10.

13.3 Emissions Not Regulated Under National Ambient Air Quality Standards

13.3.1 Comment: There are a large number of air pollutants generated by aircraft that are not subject to the National Ambient Air Quality Standards (aldehydes, for example). The SEIS should include an analysis of jet emissions in relation to that deposited within the national parks, South Florida Water Management District lands, Conservation and Recreation Lands projects, and lands owned by Indian tribes.

Response: A variety of pollutants are generated as emissions from internal combustion engines. Available models predict emissions for only a few pollutants, generally those for which there are NAAQS or which contribute to the formation of NAAQS gases such as ozone. Emissions from all sources, including aircraft, are quantified for all reuse alternatives in Section 4.8 of Volume I. Emissions from aircraft were estimated based on USEPA-approved emission factors built into the Emissions and Dispersion Modeling System, the model used to estimate the Proposed Action's contribution to ambient air quality from aircraft operations. The model accounts for emissions during taxiing, takeoff, landing, and idling at the gate, including the different efficiencies that would be experienced during those operations. The effects of these emissions are discussed in the SEIS in relation to the NAAQS, conformity with the Clean Air Act, atmospheric deposition of nitrogen, and potential effects of nitrogen deposition on Biscayne Bay. While there are some USEPA reports that deal with aircraft emissions of pollutants other than NAAQS pollutants, the emissions have not been studied for a wide variety of aircraft, nor is their behavior in the atmosphere sufficiently well understood to estimate where individual chemicals might be deposited, if at all, or what the resulting effects might be on underlying lands.

13.3.2 Comment: The Draft SEIS did not analyze potential health risks from toxic air emissions associated with the Proposed Action. Rudimentary risk calculations performed for the Natural Resources Defense Council (NRDC) determined that the proposed airport would likely cause cancer risks to increase 10 to 100 fold and to exceed levels considered significant.

Response: The population risk is expected to be at levels that are at least 10 to 100 times lower than those calculated for the rudimentary risk assessment presented in the NRDC comment. That assessment assumed the entire population would reside at the location of greatest air quality impacts at the proposed airport. The population that would be exposed to toxic air pollutants is a major factor in determining future risk. When conducting a risk assessment, it is overly conservative to assume that all of the population would be exposed to toxic air pollutants at the location of estimated maximum impact, and that such exposure would occur 100 percent of the time over 70 years. The area of maximum impact would be near the main activity at the airport, but no people live there. A small number of people live near the airfield, but most people are some distance away. In either case, the residents would have substantially lower exposures to toxic air pollutants than the concentrations predicted at the location of maximum impact.

The screening level risk assessment for aircraft emissions for the Proposed Action in 2015, as presented in the NRDC comments, has an estimated increase in cancer risk of 4.1×10^{-6} . This means that there would be the potential of approximately four additional cancer cases per million people. This is not an increase of 10 to 100 fold in the cancer risk, since the background cancer risk is approximately 250,000 in a million (that is, about one person in four will contract cancer during his/her lifetime). An estimate of four additional cancer cases would be a nominal increase.

The increased VOC emissions estimated for the Proposed Action are due to expected increases in motor vehicle traffic and aircraft flights associated with the airport. There would be increased VOC emissions under all alternatives except No Action due to increases in motor vehicle traffic. Although the comment assumes that the toxic air pollutant emission fractions for non-aircraft emissions from the airport would be the same as for aircraft, there is no basis for this assumption. As noted in the SEIS, these increases in VOC emissions from the Proposed Action have not taken into account the likely reduction in aircraft emissions as more efficient engines and aircraft are built in the 2015 time frame.

13.3.3 Comment: NRDC conducted a preliminary risk assessment on five chemicals identified as a potential concern in aircraft emissions: benzene, 1,3-butadiene, formaldehyde, acetaldehyde, and benzo(a)pyrene (as a surrogate for polycyclic aromatic hydrocarbons, PAH). Emissions of these compounds in local communities would significantly increase under the Proposed Action.

Response: It is reasonable to conclude that the Proposed Action would not result in a substantial increase in ambient levels of these chemicals. The NRDC's analysis, which estimated that the ambient air compounds would increase about ten times from present levels, assumed that the Proposed Action would be the only source of benzene, 1,3-butadiene, formaldehyde, acetaldehyde, and PAH emissions. This is not a valid assumption. As presented in the SEIS, the estimated VOC emissions from the Proposed Action in 2015 are about 130 tons per year, compared to the estimated VOC emissions from just on-road mobile sources in Miami-Dade County in 2015 of 30,000 tons per year. This does not include non-road mobile or stationary sources of VOCs in the county.

13.3.4 Comment: The Draft SEIS finds that increased activity of aircraft and other mobile sources associated with the Proposed Action would increase the generation of PAHs in the vicinity of former Homestead AFB, and releases from the aircraft during flight would be widely distributed at extremely low concentrations before reaching the earth. The Department of the Interior is concerned that distribution of

PAHs may not be so widely dispersed, and extremely low levels of total PAHs may be enough to cause a biological impact.

Response: Information furnished by the National Park Service was used to estimate the settling of PAHs in the SEIS. This information indicates that PAH particles would fall at rate of about 0.01 meters per second. If a particle were emitted at an altitude of 100 feet, it would take over three-quarters of an hour for it to reach the ground. At a nominal wind velocity of 10 miles per hour, this particle would be carried 8.5 miles before it reached the ground. Since most commercial aircraft taking off from the Homestead airfield would approach an altitude of 500 feet by the end of the runway, particles emitted at that point could travel over 42 miles before hitting the ground. At 2,000 feet altitude, particles could be carried over 160 miles. These distances suggest that PAH deposition in the nearshore areas of Biscayne Bay would result in very low concentrations. While PAH deposition could occur as far away as the western edge of Everglades National Park, concentrations there would be very low because of dispersion.

As the SEIS indicates, aircraft operations are not the only source of PAHs. PAHs are emitted by automobiles, other vehicles, and all petroleum-burning engines. The activities at former Homestead AFB are expected to be a small portion of the PAH generated in the region.

13.4 Unburned Fuel Emissions

13.4.1 Comment: The Draft SEIS does not address the health and environmental impacts of unburned aviation fuel. People who live under the flight path of Miami International Airport see residues from aircraft deposited on their vehicles. Some commentators referred to these emissions as PAHs (polycyclic aromatic hydrocarbons) or volatile organic compounds.

Response: Concern about the potential for the deposition of soot and oily films from aircraft engine exhausts near airports has been raised at a number of locations. The soot that is alleged to come from jet engine emissions is apparently more related to ground vehicles than aircraft. Recent studies have looked at this issue at Chicago's O'Hare Airport; at Boston's Logan Airport; at the Charlotte, North Carolina Airport; and at the Fort Lauderdale Airport. The most comprehensive of these studies compared the "chemical fingerprint" of ambient air samples taken near the airport with wipe samples from the exhaust of jet aircraft engines and with jet fuel. The deposited particles collected in ambient air samples near the airport bore little chemical resemblance to jet engine fuel or soot from the jet engine exhaust. It was concluded in all of these studies that the soot and oily deposits were chemically more closely related to motor vehicle exhaust and other urban sources than to aircraft emissions or fuels.

These deposits are not composed of PAHs, although PAHs are a component of the unburned hydrocarbons emitted from jet engines. Section 4.8 in Volume I estimates increases in VOCs in connection with the proposed airport and discusses PAHs.

13.4.2 Comment: The almost constant fine rain of unburned jet fuel would quickly coat the sensitive vegetation and foul the shallow warm bay with its weak tidal exchange.

Response: While emissions from aircraft engines do contain minute amounts of uncombusted fuel, a "rain" of unburned does not occur. Airborne emissions from aircraft operations are quickly dissipated. The FAA receives a number of concerns regarding unburned fuel and deposition of soot or oily films from the exhaust of aircraft engines near airports. Recent studies that looked at this issue indicated that the deposited particles collected in ambient air quality samples near the airport bore little chemical resemblance to jet engine fuel or soot from jet engine exhausts. The deposits were chemically more closely related to motor vehicle exhaust and other urban sources than to aircraft emissions or fuels. See also response to comment 13.4.1.

13.5 Air Quality Impacts on National Parks

13.5.1 Comment: Everglades National Park is a Class I Prevention of Significant Deterioration (PSD) area under the Clean Air Act. Any appreciable deterioration in air quality is considered significant. Federal agencies are under an affirmative responsibility to protect air quality-related values of these areas. The Draft SEIS contains insufficient discussion concerning impacts of the Proposed Action on visibility and other air quality-related values in both Everglades and Biscayne National Parks. The Draft SEIS focused principally on the fact that PSD regulations only apply to stationary sources and not to mobile sources. The document failed to take a hard look at the environmental impacts of increased ozone, as required by the National Environmental Policy Act.

Response: The SEIS did take a hard look at the environmental impacts of increased ozone. Ozone and other haze-producing chemicals are secondary pollutants that take a considerable amount of time to form. Emissions must combine, and then photochemical reactions in the presence of sunlight must occur to form these pollutants. This process typically occurs over a several-hour period, as the emissions are transported downwind.

For the Proposed Action, the emissions would be spread over a considerable horizontal and vertical distance from aircraft takeoffs, landings, and taxiing; motor vehicles driving to and from the airport; and other emissions sources at the airport. Because the emissions would be dispersed, any formation of ozone and other haze-producing chemicals is likely to occur many miles downwind, with a minimal effect on the two national parks. The Proposed Action at full buildout is estimated to contribute less than 1 percent to the ambient concentration of NO_x at the eastern edge of Everglades National Park, where aircraft emissions would be the most concentrated. The contribution to VOC concentrations would be less. Therefore, ozone concentrations in the park would increase by at most 1 percent as a result of the Proposed Action.

In addition, it is difficult to determine increases in ozone concentrations from a single project. The U.S. Environmental Protection Agency uses a photochemical grid model, called the Urban Airshed Model (UAM), to estimate ozone concentrations on a regional basis. It is not appropriate to use the model to determine if a single source will increase concentrations of ozone. The most appropriate use of the UAM model is for regional long-term planning purposes by regulatory agencies.

In Florida, compliance with the ozone standard is based on an emissions cap: a countywide emissions inventory for VOCs and NO_x taken in 1990, when there were no violations of the ozone standard. It was assumed that if Miami-Dade County could limit VOC and NO_x emissions to the 1990 levels, then the ozone standard would be met.

The analysis for the Proposed Action estimated the emissions increase due to the Proposed Action for 2000, 2005, and 2015 and added it to the projected baseline Miami-Dade County mobile source emissions for the same years. It was found that countywide emissions, including the Proposed Action, would still meet the emissions limits. Therefore, it was expected that the ozone standards in Miami-Dade County would continue to be met, and visibility and other air quality related values (AQRV) in Everglades National Park are not expected to change discernibly as a result of the Proposed Action.

As Section 3.8.4 in Volume I indicates, the Clean Air Act provides for only minor increases in pollutants in Class I PSD areas like Everglades National Park from stationary emissions sources. No stationary sources have been identified in connection with the Proposed Action that are likely to increase pollutants in Everglades National Park. The Clean Air Act charges federal land managers (which, in the case of Everglades National Park, is the National Park Service) with an affirmative responsibility to protect

AQRVs of these areas. The National Park Service has conducted an AQRV analysis for Everglades National Park and monitors a number of air quality parameters to protect sensitive resources in the park.

14.0 EARTH RESOURCES

There were no comments specifically related to earth resources. Some comments raised questions about topographic, geologic, or soils conditions, but they were in the context of another resource, such as water resources, and are addressed in connection with those resource topics.

15.0 WATER RESOURCES

Water resources issues received the largest number of comments. They ranged from water quality in Military Canal, to changes in the volume of surface and groundwater flows, to changes in water quality in Biscayne Bay, and comments on water quality standards. Dividing up the large number of comments into topical groups was challenging because of the interrelationships between surface water and groundwater flows and their impacts on water quality in Biscayne Bay. For purposes of organizing responses, the comments are grouped into ten sections.

The first section (15.1) addresses comments specific to Military Canal. This is followed by sections addressing stormwater management plans (15.2), surface water discharges (15.3), and storms and flooding (15.4). Following the discussions pertaining to the surface water analysis is a section addressing comments pertaining to the analysis of groundwater flows (15.5).

It was felt that water quality issues are inextricably related to the net effects of surface water and groundwater together. Therefore, comments on water quality (i.e., chemical pollutants) are addressed separately from surface and groundwater flow considerations. Section 15.6 addresses water quality standards and is followed by 15.7 addressing changes in water quality. Separate sections are provided on fuel and chemical spills (15.8), drinking water sources (15.9), and increases in nitrogen loads (15.10).

Water quality changes can affect biological resources. Comments concerning the effects of these changes on biota are addressed in the Biological Resources category (16.0).

15.1 Military Canal

15.1.1 Comment: There is a discussion in Section 3.10 of the Draft SEIS regarding a Task Force's evaluation of whether to redo a risk assessment for Military Canal. There is no discussion of what will be done with the work when completed.

Response: The Task Force recommended that a Feasibility Study be undertaken to identify methods that could be used to remediate Military Canal. The Air Force is proceeding with the Feasibility Study. A draft report was issued in August 2000.

15.1.2 Comment: The Draft SEIS indicates that there are more sources of stormwater runoff to Military Canal than the former base. What is the magnitude of the other sources?

Response: No studies have been conducted to estimate the relative contributions of different water sources to the flow in Military Canal. The fact that the base is drained by a series of canals into Military Canal, while the land east of the base primarily drains through small ditches and canals to L-31E, suggests that the predominant flow in Military Canal is more than likely from the former base.

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15.1.3 Comment: The Draft SEIS does not reference the U.S. Environmental Protection Agency (USEPA) Region 4 Military Canal Special Study, Homestead Air Force Base, Florida. Conclusions regarding water and sediment in Military Canal could be altered with the incorporation of these data.

Response: The final USEPA study was released too late to incorporate into the Draft SEIS, but data on which the report was based were available and incorporated into Section 3.10 of the Draft SEIS. The findings on water and sediment in Military Canal were based partly on these data. The study was obtained and reviewed to determine whether changes needed to be made in the data presented in Section 3.10 or in the findings. The Final SEIS has been updated to include the study.

15.1.4 Comment: Water quality data and sediment quality data in the vicinity of former Homestead AFB rely heavily on earlier studies performed by Air Force consultants in connection with remedial investigation of Military Canal. Miami-Dade County, state, and federal agencies have found those studies to be inadequate. More recent data and agency reports have been omitted or included only in a superficial manner in the Draft SEIS. Multiple studies using a variety of toxicity assessments have documented statistically significant ecological effects in the Boundary Canal system, Military Canal, and south Biscayne Bay. The USEPA has determined that the contamination in Military Canal is linked to sources associated with former base operations, and that the contamination represents an ecological risk to Biscayne Bay. The offshore coral reefs will be threatened by the airport's runoff.

Response: The Air Force has committed, as an action unrelated to the reuse of former Homestead AFB, to conduct a Feasibility Study for remediation of Military Canal. Remediation of Military Canal would reduce the loads of contaminants entering Biscayne Bay from the former base. This remediation is not considered part of the federal property disposal action and will occur irrespective of property disposal decisions.

The SEIS presents information from several studies on Military Canal, including studies by Miami-Dade County, the National Oceanic and Atmospheric Administration, and USEPA. Additional information on the USEPA study, which had not been completed at the time the Draft SEIS was prepared, has been added to the Final SEIS. This reinterpreted data does not alter conclusions about the disposal of former base property. Decisions on remediation will be made separately from the property disposal decision, with input from appropriate regulatory agencies and on these data sets.

15.1.5 Comment: The USEPA concluded the stormwater discharge canal draining from Homestead Air Reserve Station into Biscayne Bay is contaminated with radioactive materials.

Response: USEPA has not concluded that Homestead ARS stormwater discharge canal is contaminated with radioactive contaminants.

15.1.6 Comment: The Draft SEIS did not recognize that contaminant transport by sediment resuspension would occur both on site and off site. Data in the Draft SEIS noting variable contaminant levels in Military Canal, and existing contamination near the outfall canals, support arguments that sediments are transported and migrate. In fact, the Draft SEIS concluded that sediment resuspension in Military Canal can and does transport contaminants.

Response: Section 3.10 in Volume I acknowledges that elevated concentrations of some metals in the water column of Military Canal, probably caused by occasional resuspension of sediments during high flows or wind-induced mixing, suggest some transport of contaminants probably occurs over extended periods of time. However, there has not been sufficient sampling to identify how frequently this occurs. The fact that many of the remaining contaminants date from discharges that occurred a long time ago (e.g., chemicals that have not been used for decades) suggests that past sediment transport has been

limited, otherwise these contaminants would have been scoured out long ago. In any event, the Air Force is conducting a Feasibility Study to determine how best to remediate Military Canal.

15.1.7 Comment: Flows from Military Canal would increase and likely contain soluble pollutants and resuspended toxic-contaminated sediments.

Response: The analysis described in the SEIS indicates that flows and loads from Military Canal would decrease with the proposed Surface Water Management Master Plan.

15.2 Stormwater Management Plans Included in the Alternatives

This section addresses comments on the stormwater management system incorporated in the analysis of each reuse alternative.

15.2.1 Comment: Several comments focused on the Draft SEIS' reliance on the Proposed Action's Surface Water Management Master Plan, expressing concern that there was no evaluation of the plan. Commentors were concerned that the Draft SEIS assumed that reductions identified for the first stage of airport development were simply assumed to apply to all later stages of development.

Response: The Surface Water Management Master Plan was developed as part of the South Florida Water Management District (SFWMD) Environmental Resource Permit process and is a requirement for obtaining a permit from SFWMD. Although the elements were designed as part of Phase 1 development, the SEIS used the characteristics of the Surface Water Management Master Plan to determine what the consequences of further development would be, assuming no further changes to the plan. The analysis did not assume anything about additional stormwater management activities that might occur on the former base. Input parameters, such as increases in impervious surface and pollutant buildup for different land uses, were all incorporated into the model.

The SEIS acknowledges that elements of the Surface Water Management Master Plan could be changed prior to implementation. SFWMD has made it clear in comments on the Draft SEIS that a comprehensive stormwater management plan would be required, irrespective of what entity receives the disposal property. It is reasonable to assume that whatever plan would be required would be at least as effective as the plan currently proposed.

15.2.2 Comment: The Draft SEIS assumed the county's proposed Surface Water Management Master Plan would be highly effective, but little information about the plan is included in the Draft SEIS. The document did not contain an adequate discussion of the design standards of the stormwater plan. The Draft SEIS did not address the likelihood that the plan will be effective in achieving the proposed reductions or evaluate whether the plan is compatible with the proposed site.

Response: The SEIS does not make any assumptions about the effectiveness of the proposed Surface Water Management Master Plan. The estimated reductions that would be achieved by the Surface Water Management Master Plan were calculated, not "assumed." The actual proposed design elements of the plan, as presented in the "Homestead Regional Airport (HST) Surface Water Management Master Plan (Volumes 1-3)" and "Supplemental to April 1998 Homestead Regional Airport (HST) Surface Water Management Master Plan," both prepared in 1998 by Post, Buckley, Schuh & Jernigan, Inc., were used to model stormwater flows with the Surface Water Management Model (SWMM) to derive the results reported in the SEIS.

The SWMM is a state-of-the-art, USEPA-approved hydrologic model commonly used in Florida to evaluate the performance of stormwater management practices. It is a computer model that uses drainage

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system configurations and takes time-varying meteorological inputs to estimate total discharges and chemical loadings. The SWMM in effect did evaluate the performance of the county's proposed plan by calculating stormwater flows and loads based on the proposed development and the structural elements specified in the plan. No incompatibility with the proposed site was identified.

Persons wishing more detailed information about the plan are referred to the documents cited above, which are listed in the SEIS References (Chapter 5 in Volume I). Those documents were submitted to South Florida Water Management District.

15.2.3 Comment: The assumptions pertaining to the county's proposed Surface Water Management Master Plan used in the SEIS analysis are not explained or evaluated.

Response: The county has developed a number of scenarios in preparing its proposed Surface Water Management Master Plan. The scenario selected for analysis in the SEIS ("Scenario 2") was derived from the most recent supplement to the plan (October 1998), which forms the basis of the county's outstanding application for an Environmental Resource Permit from South Florida Water Management District.

15.2.4 Comment: The design standards for the Surface Water Management Master Plan are inadequate because they use conservative rainfall figures, high evaporation amounts, unreasonable base levels for the present and future, and do not use reasonable stormwater levels outside the catchment areas. Elevated regional groundwater levels following major rainfall events are not recognized.

Response: SWMM, the model that was used to estimate stormwater flows from the former base, is a time-varying model. It requires time-varying inputs in order to function accurately. While it may appear that a time-variant analysis was not used because only annual numbers are reported in the SEIS, annual averages were not used for any parameters in the model except impervious surface in the years analyzed and hydraulic heads at the boundary. The rainfall used in the model, as stated in Section 3.10 of Volume I, was the daily rainfall for 1988, the year that was determined to be most representative of rainfall for the years evaluated. The evaporation rates used were average monthly pan evaporation rates that vary with temperature and humidity. Over a year, evaporation is approximately 36.5 percent of rainfall, but both lower and higher evaporation rates were used in the model, depending on the time of year.

The model used fixed hydraulic heads as boundary conditions because the data needed to specify variable hydraulic heads are not available. In the absence of these data, using fixed hydraulic heads as boundary conditions is standard practice and reasonable.

It is true that the groundwater model did not account for the temporary high water tables and flow rates during storm events. It is estimated that groundwater from the former base will take more than 30 years to reach Biscayne Bay, and a steady state model is sufficiently accurate to model groundwater flows over this time scale.

15.2.5 Comment: Stormwater drainage plans for the proposed airport at former Homestead AFB have not been finalized. The possibility of replumbing to route stormwater through wetlands east of the former base has not been addressed.

Response: The SEIS used the Surface Water Management Master Plan prepared by PBS&J under contract to Miami-Dade County, which is assumed to reflect the county's most current intent. It is acknowledged that this plan has not been approved by South Florida Water Management District and is the subject of a lawsuit challenging the SFWMD's staff's recommendation to grant an Environmental Resource Permit to the county. The outcome of the lawsuit has not yet been determined.

Although details of the plan are yet to be finalized and could change as a result of the lawsuit and/or further deliberation by SFWMD, it is reasonable to assume that any plan that would be approved would perform at least as well as the current plan with regard to stormwater retention on the former base. If the amount of stormwater retained is at least as great as that achieved by the current plan, the flows and loads of surface water discharged from the former base would be no greater than those documented in the SEIS. If greater amounts of stormwater were retained on base, the potential for increased ammonia to enter Biscayne Bay through groundwater would be increased, unless specific additional stormwater treatment was also required.

Possible replumbing to route stormwater through wetlands east of the base property has not been designed past a conceptual stage by Miami-Dade County, SFWMD, or the U.S. Army Corps of Engineers. Stormwater treatment and distribution areas have been mentioned as possible actions in the cumulative impacts analysis (particularly in the Water Resources and Biological Resources sections), but the designs for such projects must be further along than they currently are in order to evaluate the impacts. The uncertainty associated with both the design and the probability and timing of implementation of any of these projects precludes more definitive statements on their impacts.

15.2.6 Comment: Stormwater management for development of the Proposed Action beyond Phase I would require a large amount of land and would affect biological resources. Perhaps the Draft SEIS intended that the stormwater treatment and distribution area (STDA) proposed by the county would be for these purposes.

Response: This comment is based on an unexplained and unsubstantiated assumption that the stormwater management system for the Proposed Action would require large amounts of land. The county currently has no plans for stormwater treatment beyond those contained in the proposed Surface Water Management Master Plan. The SEIS estimates changes in stormwater flows and loads in future years under the assumption that there would be no additional stormwater management activities associated with the Proposed Action other than that presented in the Surface Water Management Master Plan. Under that assumption, impacts on biological resources would be minimal. There was no assumption that any STDA would be used to treat stormwater from the former base. The SEIS assumes that South Florida Water Management District would determine the adequacy of the plan through its permit process. If an STDA were to be constructed, it could be located on former base property and have little impact on biological resources. There are also other measures that could be taken to increase stormwater retention. Even if an STDA were constructed off site, the effects on biological resources would be expected to be largely beneficial and consistent with ecosystem restoration.

15.2.7 Comment: The Draft SEIS skews the analysis in favor of the Proposed Action by assuming the Mixed Use alternative will not include a stormwater management system for the site.

Response: The Draft SEIS analyzed five reuse scenarios (not including the No Action alternative). Of those five, it was assumed that four would involve a stormwater management system similar to that developed for the Proposed Action, because such a plan is required by regulation. It was assumed that two scenarios under the Mixed Use alternative would require a comprehensive stormwater plan, the Collier Resources Company proposal and the Hoover Environmental Group plan. The only alternative that assumed no comprehensive stormwater plan was the Market-Driven scenario under which the surplus property would be disposed of incrementally in small parcels.

15.2.8 Comment: The section evaluating the Mixed Use alternative and impacts to water resources assumes that there will be no stormwater management system required for the proposed facilities. Permits are required for any work that reduces recharge of the aquifer or for the construction, installation, or alternation of any outfall or overflow system on, under, or upon any water body, including lakes and

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canals. Permits are also required for drainage systems in non-residential properties. Any surface water management plan should be designed to meet the Outstanding Florida Water requirements of Biscayne Bay. Water quality and quantity impacts associated with the Mixed Use proposal must be reevaluated.

Response: The Mixed Use alternative addressed in the Draft SEIS included three potential scenarios: a Market-Driven scenario, a proposal submitted by Collier Resources Company, and a plan developed by the Hoover Environmental Group. Of those three, only the Market-Driven scenario was assumed to have no sitewide stormwater management system. The other two were assumed to have systems comparable to the Proposed Action.

The Market-Driven scenario assumes that the disposal property would likely be broken up into a number of smaller properties, each of which would need to comply with existing Miami-Dade County permitting requirements. With the information available, it was not possible to determine how a number of property owners would join forces to develop a stormwater management program that would be comparable to the Surface Water Master Management Plan developed for the Proposed Action. It was therefore surmised that the quantity and quality of water discharged to Military Canal would be more like what has been described for the Market-Driven scenario than for the Proposed Action, the Commercial Spaceport alternative, or the other Mixed Use scenarios.

Under the new joint Collier-Hoover proposal, a single entity would presumably be responsible for stormwater management on the disposal property, although what that entity might entail has not yet been determined. Because of the focus of the proposal on water and stormwater management, it is expected the Collier-Hoover proposal would more nearly resemble the performance attained by the Surface Water Management Master Plan as described for the Proposed Action. The method of achieving this performance level, however, would be different from the methods used for the Proposed Action and has not yet been designed to the level of detail of the county's plan. The Environmental Resource Permit process is the appropriate mechanism for ensuring compliance with Outstanding Florida Waters requirements.

15.2.9 Comment: Runoff and mitigation issues are not being addressed in the Collier-Hoover plan in the Draft SEIS.

Response: The Collier proposal and Hoover plan both proposed use of on-site canals for water storage. Although the joint Collier-Hoover proposal added to the Final SEIS is somewhat different from either of the original plans presented in the Draft SEIS, on-site wetlands and canals in the revised plan are intended to provide several thousand acre-feet of storage.

15.2.10 Comment: The Draft SEIS did not address operations or maintenance responsibilities for different landowner/entities sharing stormwater management facilities on the former base or the integration of existing facilities into a master stormwater plan.

Response: The SEIS reports the information available from the Miami-Dade County Surface Water Management Master Plan for Homestead and the plans submitted by other reuse proponents. Many of these details have not yet been determined. The Air Force assumes that landowners will be responsible for complying with applicable regulations and requirements concerning stormwater management on their properties.

15.2.11 Comment: Surface water management plans should be required for the secondary development.

Response: Secondary development would be similar to and interspersed with ongoing residential, commercial, and other development in the region and could not be adequately separated out to develop a stormwater management plan specifically for this development.

15.2.12 Comment: Based on an analysis of the implementing rules administered by South Florida Water Management District, insufficient information is available for staff to evaluate the consistency of the Proposed Action and the other redevelopment alternatives with the District's Environmental Resource Permit rules and criteria.

Response: The recipients of the land at former Homestead AFB will need to comply with applicable Environmental Resource Permit requirements before the land is developed.

15.2.13 Comment: In some circumstances, the Draft SEIS attempts to conclude that the Proposed Action will improve the general quality of the water resources surrounding the base. At least in part, this conclusion appears driven by the Air Force's improper definition of the No Action alternative as the existing polluted site—not a remediated site. Comparison of the Proposed Action with a remediated site would better identify the significant environmental impacts of the Proposed Action.

Response: The commentor's point is unclear. The analysis indicates that certain aspects of water quality can be improved through a surface water management plan like that proposed by Miami-Dade County for the Proposed Action. The analysis does not predict water quality improvements based on remediation of existing contaminated sites on or off base, and it does not attribute any such improvements to the Proposed Action. There is no evidence that existing contamination at former Homestead AFB appreciably affects the concentration of pollutants in either surface water or in groundwater away from the immediate vicinity of the contaminated sites themselves. Therefore, remediating the sites is not expected to reduce baseline pollutant concentrations to the extent that it would change conclusions concerning the Proposed Action and alternatives. Thus, the only improvements in water quality identified for the Proposed Action and alternatives are attributable to the implementation of a comprehensive stormwater management system such as the Surface Water Management Master Plan incorporated in the Proposed Action. The No Action alternative does not include such a plan. The Air Force believes that the No Action alternative has been defined correctly.

15.2.14 Comment: The stormwater treatment and distribution area (STDA) proposed by Miami-Dade County is not intended to serve as the required water treatment area for former Homestead AFB. No Environmental Resource Permit application has been submitted for this STDA.

Response: The SEIS does not present the STDA proposed by Miami-Dade County as part of the reuse of former Homestead AFB but as an independent project considered in the cumulative impact analysis. The analysis of the Proposed Action and alternatives was not based on the implementation of the STDA.

Miami-Dade County has proposed the STDA as a method of improving water quality and the pattern of water discharge to Biscayne Bay. The notional area described in the SEIS only happens to lie near former Homestead AFB; it is not intended as a method of specifically dealing with Military Canal discharges.

Miami-Dade County has had a conceptual design developed for a trial area within the area shown in Figure 2.8-2 in Volume I, but it has not proceeded with further development of the concept nor has it submitted a permit application to SFWMD. The text in Section 2.8 has been revised to reflect these facts.

15.2.15 Comment: The Draft SEIS implies that the L-31E Flowway Redistribution Project will mitigate impacts from reuse of former Homestead AFB. The L-31E redistribution project is not related to reuse of former base property.

Response: For the purpose of conducting a cumulative impacts analysis, the L-31E Flowway Redistribution Project is described in Section 2.8 of Volume I as an independent project that may occur in the region of influence. The cumulative impacts analysis in an environmental impact statement is required by Council on Environmental Quality regulations to address the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. The SEIS discusses how this project may interact with the reuse of former Homestead AFB and reports estimated cumulative effects. It does not imply that the L-31E project is intended to mitigate impacts from reuse of the former base.

15.2.16 Comment: Regardless of which reuse alternative is selected, it must eliminate or significantly reduce reliance on Military Canal and discharges to Biscayne Bay, provide a master stormwater management plan for the former base, include a comprehensive water quality monitoring program, and develop an integrated area-wide land use and water management watershed plan.

Response: These actions have either been incorporated into the alternatives or been identified as possible mitigation measures in the Final SEIS. Any future development of the property would have to comply with applicable permitting requirements of SFWMD or Miami-Dade County.

15.3 Analysis of Surface Water Discharges

15.3.1 Comment: The Draft SEIS appears to be inconsistent in determining rates of stormwater generation per impervious acre.

Response: This comment is too vague to ascertain the nature of any inconsistencies or errors, or to correct them. The SEIS was reviewed and no inconsistencies were found. For development off base (for projected baseline, secondary, and cumulative growth), it was assumed that 5 acre-feet of runoff would be generated per impervious acre; that is, all rainfall that falls on an impervious acre would become stormwater. For impervious acres on the former base, the amount is somewhat less because losses associated with percolation to groundwater and evaporation are included in the model used to estimate discharges from the former base. Thus, the runoff figures presented in the SEIS for the former base would be lower per impervious acre than those presented for off-site growth, and probably more realistic because they account for some level of evaporation and infiltration. The net effect is a probable conservatively high estimation of stormwater discharges in the SEIS.

15.3.2 Comment: Several comments indicated that the annual average evaporation rate used in the Draft SEIS is too high. The average evaporation rates would be lower because of a lack of vegetation in retention basins and the fact that lower evaporation rates occur during periods of high rainfall.

Response: The Surface Water Management Model approved by the U.S. Environmental Protection Agency, which was used in the SEIS analysis, takes variations in evapotranspiration rates into account. The evapotranspiration rates used in the SWMM were calculated by the model based on monthly data on temperature and humidity. The rates employed were monthly, not annual averages and accounted for both wet and dry seasons. A comparison of the model's monthly evapotranspiration rates with published measured monthly pan evaporation rates indicates that the model rates were about 10 percent lower than published rates. Pan evaporation rates do not incorporate vegetation. Therefore, it does not appear that the rates used were overestimates of actual evaporation rates.

15.3.3 Comment: In the past 70 years, sea level has risen about 0.7 feet. It is not apparent that continuing rises in sea level have been accounted for in assessing surface water and groundwater dynamics or the effectiveness of the proposed Surface Water Management Master Plan. It is also not clear what sea level was assumed in the evaluation of the Surface Water Management Master Plan.

Response: The sea levels used for groundwater modeling are those used by South Florida Water Management District in their analyses. The model outputs were consistent with available recent well water levels measured in the area and are believed to reasonably reflect existing conditions. Projected sea level rise of approximately 0.1 feet per decade has not been accounted for in the projections of surface water and groundwater discharges to Biscayne Bay from the former base. Over the time scale of the analysis (to 2015), sea level could rise by 0.15 feet, and this change is within the error margin of the predictions. A rise in sea level would have two counteracting effects on groundwater flows: (1) reducing the hydraulic gradient that determines the rate of groundwater flow, and (2) increasing the hydraulic gradient by retaining more water in the canals that discharge to Biscayne Bay. The complexities of these interactions are not sufficiently well known to predict what the net changes would be, particularly within the time frame of the analysis. In the longer term, sea level rise would increase the chances of storm surge flooding of the former base as well as all coastal areas worldwide.

Sea level rise is not germane to the amount of stormwater runoff that would be generated off site because of secondary development, because the estimates are based on the assumption that all rain falling on impervious surface would run off and discharge into the bay. A rise in sea level would not change these estimates.

15.3.4 Comment: Were projected baseline flows and loads in Table 3.10-19 of the Draft SEIS based on the 19,000 acres of development referenced in Table 2.8-2? Table 3.10-19 should be revised to show incremental flows and loads from Mowry, Princeton, and Military Canals to Biscayne Bay resulting from combined on-site and off-site development projected for the reuse alternatives.

Response: Table 3.10-19 in Volume I of the Draft SEIS presented increases in baseline flows and loads without additional reuse at former Homestead AFB. In the Final SEIS, the information in Table 3.10-19 has been revised, and the table number has been changed to 3.10-14. These increases are not based on Table 2.8-2, which presents the high-growth population forecasts, but on moderate growth forecasts presented in Tables 2.1-9 and 2.1-10, which projects about 8,475 acres of future baseline development. The analysis of impacts from high-growth forecasts is contained in Section 4.10.

15.3.5 Comment: The Draft SEIS significantly underestimates the amount of secondary development and therefore the amount of stormwater generated and discharged as a result of secondary development induced by the airport.

Response: No specific information has been provided to demonstrate that the estimated secondary development in the SEIS is inaccurate or unreasonable, nor has any substantiation been provided for other, higher estimates suggested by some commentors. The SEIS actually took a conservative approach (erring on the high side) to estimating stormwater discharges from secondary development by (1) assuming all secondary development would be concentrated in the Princeton and Mowry Canal watersheds, and (2) assuming all rainfall would become stormwater.

15.3.6 Comment: The Draft SEIS does not address the impact on water quality and stormwater flow of development closer to Biscayne Bay.

Response: The SEIS acknowledges that development could occur outside the Urban Development Boundary, but most of the land closer to Biscayne Bay is protected and cannot be developed. Even if it

were, there are no fundamental reasons why locations closer to the bay would have more (or less) impact on water quality or stormwater flows than locations farther away. Differences in water quality and stormwater flow would be determined more by stormwater management practices than location. If stormwater is retained near the site where it is generated, then surface water flows would be reduced and water quality would be improved. This is true whether the retention occurs 10 miles from Biscayne Bay or on its shores. The SEIS takes a conservative approach to estimating stormwater flows from off-site secondary development associated with reuse of former Homestead AFB and probably somewhat overestimates the increase in stormwater discharges and resulting water quality effects.

15.3.7 Comment: The Draft SEIS does not consider the impacts of secondary development on canals other than Princeton and Mowry Canals. Specifically, canals north and south of Princeton and Mowry Canals and C-111 were ignored.

Response: It was assumed that secondary development would occur only in the Princeton and Mowry Canal watersheds for two reasons: first, the greatest intensity of secondary development would probably occur near the former base, and second, concentrating secondary development in the two watersheds adjacent to the former base is a conservative approach that would tend to yield conservatively high estimates of the potential impacts. The estimated increases in water flows are also very conservative (err on the high side) because they assume all rain that falls on impervious surface would run off and none would evaporate or infiltrate to groundwater.

The C-111 canal was not included in the analysis because it is more distant from the former base than Princeton and Mowry Canals, the impacts on the flows of C-111 would probably be considerably less than impacts on flows of Princeton and Mowry Canals, and the amount of secondary development that might occur solely in the C-111 watershed could not be separately estimated.

15.3.8 Comment: Miami-Dade County Department of Environmental Resources Management (DERM) does not agree with the recommendation for a stormwater treatment and distribution area as potential mitigation for the Proposed Action. DERM supports the concept of on-site stormwater management systems and does not believe that an STDA is an effective means of treating toxic chemical contamination.

Response: The reason the STDA was mentioned as a possible mitigation is that, if stormwater were retained on site, some portion of the stormwater would percolate to groundwater and would flow eastward to Biscayne Bay. The nitrogen in this groundwater would essentially be converted to ammonia, and ammonia toxicity, particularly in sediments as groundwater mixes with bay water, was expressed as a concern in comments. The STDA would remove much of the nutrients in the water (through uptake by plants) prior to it percolating to groundwater, thus alleviating some of the concern about ammonia toxicity. There would be a tradeoff associated with the STDA—potential accumulation of metals and other pollutants that would be discharged from the former base through Military Canal.

The proposed Surface Water Management Master Plan, the type of plan most likely to be implemented if the former base becomes a commercial airport, would retain on base approximately 30 percent of the current flow to Military Canal. An STDA would help treat the nutrients and other pollutants in the water discharged to Military Canal, even with the plan. Without an STDA, the portion of the retained water that percolated to groundwater would not have nitrogen removed to any appreciable degree and would potentially contribute to nitrogen toxicity in nearshore Biscayne Bay water.

15.3.9 Comment: The U.S. Environmental Protection Agency commented that the development of a stormwater treatment and distribution area is essential. Routing the canal discharge into the STDA,

combined with remediation of Military Canal, appears to be an excellent way to address many of the environmental concerns about potential degradation of water quality in Biscayne National Park.

Response: USEPA recommendations are noted and will be carefully considered by the Air Force and FAA during decision making.

15.4 Effects of Storms and Flooding

15.4.1 Comment: Several commentors indicated that the consequences of the failure of the Surface Water Management Master Plan to handle large storm events were not analyzed. Pollutant loadings during large storms, particularly those with storm surges that would flood the base, would be significant.

Response: The Surface Water Management Master Plan as proposed by Miami-Dade County has been extensively tested through computer models developed by Miami-Dade County, and the model and results of the testing have been reviewed by South Florida Water Management District. The plan was designed to contain all of the runoff from a 25 year storm, the design criterion required by SFWMD. Both Miami-Dade County and SFWMD appear satisfied, to the extent possible by computer model runs, that the plan would operate as intended.

The analysis in the SEIS also took the information from the county's modeling efforts and evaluated changes that would occur on the former base under all of the alternatives. The results of these modeling efforts are presented in the SEIS. Using daily rainfall inputs from 1988, a representative year, the model output was similar to that obtained by the county for the site. While intense storm events would probably carry higher pollutant loadings than more average storm events, the Surface Water Management Model calculates loadings on a storm-by-storm basis, so annual loadings reported in the SEIS incorporate the range of storms that occurred in 1988. That year was considered to be most representative of average conditions in southern Florida. In years with fewer, less intense storms, loadings could be lower. In years with a larger number of more intense storms (or one very intense storm), loadings could be higher. Because stormwater discharges from all other areas in southern Florida would be subject to the same extreme storm events as the former base and would respond with higher discharges with more intense storms, however, the relative contribution of the former base to stormwater discharges and chemical loadings to Biscayne Bay would not change appreciably from those reported in the SEIS.

It is not possible in south Florida to retain all stormwater on a property during very large storms. During those storms, rain falls at a faster rate than the rate at which water can infiltrate to groundwater. So some surface water runoff has to occur. This is the reason that some discharge to Military Canal is predicted. The Surface Water Management Master Plan developed for the Proposed Action was designed to meet regulatory requirements and retain as much stormwater on site as possible without inundating the runway and taxiways and affecting airfield operations (including continued military and government missions).

During extreme storm surges, water on the former base and water from Biscayne Bay would commingle, and contamination of Biscayne Bay waters would result. The only measure that could be used to prevent this occurrence would be to construct a high berm along the southern and eastern border of the former base. The benefits of such a berm would likely be limited. While washoff of pollutants from the former base during storm surges might result in widespread contamination if a very large spill occurred during the storm, the area that would be flooded by storm surges (the southeastern part of the base) is not an area where large spills are likely to occur.

15.4.2 Comment: The Draft SEIS seems to underestimate the extent of potential rainfall Homestead could experience during extreme storms. Considering that Tropical Storm Irene, just last year, dropped

14.57 inches of rain within 24 hours, the statement in the Draft SEIS that the 100 year 72 hour storm will generate 14.9 inches of rain seems low.

Response: The data on the size of storms at various recurrence intervals were taken from the Surface Water Management Master Plan. The source of the figures in the Surface Water Management Master Plan was South Florida Water Management District's *Management and Storage of Surface Waters Permit Information Manual—Volume IV*. The source was checked, and the numbers presented in the SEIS are correct.

15.4.3 Comment: During extreme storm events (summer and winter) in south Florida, groundwater flow rates can be greater due to an increase in hydraulic head from fresh water infiltration. The Draft SEIS did not address and analyze these storm-induced flow rate changes.

Response: No data are available that allow the prediction of temporal variations in groundwater flow rates. Although groundwater flows would increase during storm events, this would not change average annual groundwater flow and contaminant transport to Biscayne Bay and is not an appropriate basis for modeling. Year-to-year variations in groundwater flow rates are probably larger than variations in flow rates caused by storms.

15.4.4 Comment: How can the Draft SEIS predict a no-impact conclusion from fuel or other chemical spills, particularly given the proximity of the base to Biscayne Bay and susceptibility to storm surge flooding?

Response: Section 4.10 in Volume I indicates that spills on the former base would generally be containable by the nature of the site and its surface water management system. This section acknowledges that spills associated with storm surges accompanying large hurricanes would have the capability of transporting spilled materials directly to Biscayne Bay. Should storm surges result in Biscayne Bay waters reaching the former base, the wind and wave energy would be sufficiently intense to distribute spilled pollutants over a wide area.

15.4.5 Comment: The Draft SEIS analysis dismisses the potential for significant contamination of Biscayne Bay National Park because of expected dilution during extreme weather events.

Response: The SEIS indicates that pollutants washed off the former base site during flooding would be widely dispersed over areas to the south and east and Biscayne Bay. Contamination could be widespread if a sufficiently large spill occurred during extreme weather events. The probability of such an event is small. Aircraft, particularly commercial aircraft, are evacuated as a matter of course from areas where extreme storms are expected.

During Hurricane Andrew, there was a spill of 2,000 gallons of aircraft fuel from an aircraft that was severely damaged just outside a hangar. There is no indication that any of this fuel was washed off of the base property. The fuel was apparently retained in the soils immediately around the hangar. Similar accidents could occur in the future, but the effects would also be expected to be similar. The possibility of an aircraft being in a position (e.g., at the south end of the runway) during a severe storm is unlikely. The SEIS does not imply that impacts are appropriate because they would be diluted, but if fuel were released under these circumstances, it would be widely dispersed, and biological impacts would not be extensive.

15.4.6 Comment: Flooding is a common occurrence in the region. What assurances are there that flood waters would not be contaminated by the airport?

Response: Drainage at former Homestead AFB is a separate, self-contained system that is isolated from surrounding areas. Any flooding that occurred (except during extreme weather events such as hurricanes) would drain into the on-site canals.

15.4.7 Comment: The Draft SEIS does not state what effect, if any, a 100 year flood would have on the alternatives for the reuse of the former base property.

Response: The potential effects of flooding, particularly with regard to fuel spills during floods, are discussed in Sections 4.10 and 4.11 of Volume I. During a 100 year flood, standing water on the runway could be expected to restrict its use for aircraft or spacecraft operations. Otherwise, South Florida Water Management District regulations specify the minimum heights above National Geodetic Vertical Datum that are required for roads and buildings. Providing those minimum heights are met, water levels during the 100 year flood should not limit use of the former base property.

15.5 Analysis of Groundwater Flows

15.5.1 Comment: The groundwater flow data used in the Draft SEIS are based on areas that have dissimilar drainage.

Response: The area east of the former base has drainage that is similar to that of other undeveloped parts of south Miami Dade County, so the parameters used in the groundwater model are considered reasonable.

15.5.2 Comment: The slow groundwater flow rates in Section 3.10 are based on data collected between 1974 and 1982. Why these years and were they typical years?

Response: These were years for which data were available. Except for 1977 and 1982, these years were drier than normal. Also, based on the average observed groundwater level data presented in Figure 3.10-3 in Volume I, the horizontal hydraulic gradient at former Homestead AFB is approximately 0.3 feet per mile. The gradient slowly increases eastwards towards Biscayne Bay. The groundwater flow model was calibrated to meet these conditions, and flow velocities were the result of these gradients.

15.5.3 Comment: Tidal pumping phenomenon is known to have an impact on groundwater movement into the marine environment. Tidal pumping could accelerate the movement of contamination plumes.

Response: The Air Force's Installation Restoration Program at former Homestead AFB has conducted a number of studies on contamination plumes under the former base. In every circumstance, there has been no evidence of migration of these plumes away from their original sources. While tidal pumping could accelerate the movement of contamination plumes, it apparently has not on the former base. This suggests that tidal pumping is also unlikely to accelerate movement of those contamination plumes in the future.

15.5.4 Comment: The time required for groundwater to travel from the former base to Biscayne Bay is shorter than claimed in the Draft SEIS because (1) there are historical records of freshwater springs in southern Biscayne Bay that indicate more rapid groundwater flow, (2) the estimate was based on "average" hydraulic parameters and ignored storm events, (3) it ignored the karstic nature of the geologic profile, and (4) it ignored the role of canals in groundwater flow.

Response: Based on several comments, the time estimated for groundwater to travel between former Homestead AFB and Biscayne Bay was reevaluated. Most comments suggested more rapid travel times because of the presumed presence of solution channels in the limestone underlying the former base. There are no data on the area of the former base and eastward that allow the direct determination of whether

such solution channels do or do not exist. One commentor, however, stated that there are solution channels beneath Turkey Point, a nearby area.

The basic groundwater flow rate was determined using the nearest available data on groundwater flow. In the absence of knowledge on underlying geology, it was assumed that the geological matrix was relatively homogeneous, and that groundwater flows were limited by this matrix. Available time-based information on concentrations of pollutants in groundwater under the former base suggest that groundwater movement is very slow. Pollutants that entered groundwater several years ago appear not to have appreciably migrated away from their source. Thus travel times appear to be longer than days or weeks. The depths to groundwater predicted by the groundwater model are consistent with measured depths, lending support to travel times measured in years rather than in days or weeks. In areas where solution channels develop, sink holes also tend to develop, and sink hole formation in the area of the former base appears to be limited.

Even if the travel times were shorter, even orders of magnitude shorter, this would not change the volume of groundwater that would enter the bay per time unit, nor would it change the loading of pollutants that would be carried by groundwater. It would, however, mean that changes in pollutant concentrations in groundwater would be experienced in Biscayne Bay in less time.

15.5.5 Comment: The Draft SEIS did not recognize the constant interchange between stormwater and groundwater flow of the unconfined Biscayne Aquifer. Considering the typical high level of groundwater in the area, such interchange is common. Therefore, during these events, the rate of contaminant flow in groundwater would be the same as the time it takes water in the canals to reach the bay.

Response: The SEIS considers the net effects of both surface water and groundwater changes. Therefore, assumptions on the length of time it takes for contaminants in groundwater to reach Biscayne Bay does not imply that there would be no increase in contaminants in the bay. Whether such effects occur now, next week, or 50 or 100 years from now does not change the fact that the effects would occur.

Section 3.10 in Volume I discusses the sources of recharge of the Biscayne Aquifer (the surficial aquifer in the vicinity of former Homestead AFB). It specifically mentions that recharge from canals occurs most often during the dry season, and the groundwater discharge to canals occurs most often during the wet season. Depending on the relative heads of groundwater and surface water, exchange in one direction or the other could occur at almost any time of year. In order for the rates of contaminant flow to Biscayne Bay to be the same as the time it takes water in the canals to reach the bay, canals would have to occur every few feet east of the former base. Such is not the case.

15.5.6 Comment: The Draft SEIS concludes that any decrease in volume of groundwater flow to Biscayne Bay from the Proposed Action will be insignificant.

Response: The SEIS characterizes the estimated decrease in groundwater flow and estimates that secondary development in the vicinity of former Homestead AFB could reduce groundwater flow into Biscayne Bay in the area of the former base by approximately 3,664 acre-feet per year by 2015. A decrease of that magnitude would be small relative to the groundwater flows south of Eureka Drive to Biscayne Bay, which are suspected to be on the order of 350,000 acre-feet per year.

15.5.7 Comment: The Proposed Action will result in an increase in polluted surface water discharges and a decrease in relatively clean groundwater flows to Biscayne Bay. Groundwater flow to Biscayne Bay is much less than historical levels, and is expected to continue to decrease as a result of development and restoration efforts in the Everglades.

Response: There are a variety of actions planned in south Florida to try to restore the amount of freshwater input to Biscayne Bay. These projects emphasize overland sheet flow and groundwater inputs. Some of these efforts are part of the overall program to decrease drainage out of the Everglades. Implementation of any or all of these actions is uncertain, but they are discussed in the SEIS as part of the cumulative impact analysis in both Water Resources and Biological Resources sections. (The actions are unrelated to the redevelopment of the former base.)

Should the majority of these projects be implemented, freshwater flows into Biscayne Bay would increase dramatically, irrespective of what happened on the former base or its immediate vicinity. The Proposed Action would have the net effect of reducing groundwater input to the bay because of the decline in groundwater flow created by secondary development. Increases in pollutant loading under the Proposed Action would also come primarily from secondary development. Surface water discharges from the former base itself are expected to decrease and groundwater flows to increase with implementation of a sitewide Surface Water Management Master Plan.

15.5.8 Comment: South Florida Water Management District and others are trying to increase groundwater flows to Biscayne Bay. Although estimates of the volume and quality of water that would enter the bay are not available, they will be greater than those used in the Draft SEIS projections.

Response: The additional groundwater that may enter Biscayne Bay as the result of actions taken by either Miami-Dade County or SFWMD would increase flows east of the former base but not from the former base itself. Any increases in contaminant loads associated with county or SFWMD proposals would be dependent on the source of the additional water and the effectiveness of a stormwater treatment and distribution area in removing contaminants.

15.6 Water Quality Standards

15.6.1 Comment: Several water quality standards were omitted, and Section 3.10 and other parts of the Draft SEIS contain inaccuracies regarding water quality standards. Miami-Dade County water quality standards were not reported even though they apply. Freshwater metals criteria are calculated based on ambient hardness, but the hardness values used were not reported. Marine or freshwater criteria may apply to different locations, but the Draft SEIS did not indicate which were appropriate and which were applied. The Florida turbidity water quality criterion was not indicated. The ammonia criterion listed in the document is for free ammonia, but the values reported appear to be total ammonia.

Response: The text and notes to tables in the SEIS have been reviewed and revised to incorporate additional and corrected standards as appropriate. This did not alter the findings concerning impacts.

15.6.2 Comment: As indicated in Section 3.10 of the Draft SEIS, Mowry and Princeton Canals are presently in exceedance of Florida Class III water quality standards.

Response: There were errors in the standards presented in Table 3.10-13 in the Draft SEIS. These have been corrected in the Final SEIS. Mowry and Princeton Canals comply with all numeric water quality criteria that apply, except for dissolved oxygen.

15.7 Changes in Water Quality

15.7.1 Comment: Discussions and summaries of Miami-Dade County Department of Environmental Resources Management water quality monitoring data contain errors, omissions, and apparent misinterpretations. These errors may have affected projections of impacts and loadings associated with reuse alternatives. A thorough review of the original source of the data and inclusion of more up-to-date

data would strengthen estimates of pollutant loading and ecological risk associated with nutrients and toxic contaminants.

Response: DERM data, obtained from DERM, were used in Section 3.10 to indicate, among other things, water quality in Military, Princeton, and Mowry Canals. These data were also used to determine current pollutant loadings to Biscayne Bay. In response to this comment, the data were reviewed again, and several changes were made. First, rather than use different time periods for the analysis, all available data were used. Second, the stations selected for Princeton and Mowry Canal in the Draft SEIS were stations where mixing with Biscayne Bay water had already occurred. This had the effect of reducing reported concentrations for these canals. For the Final SEIS, stations in the freshwater portions of these canals were used, and loads were recalculated based on these data. This had the effect of substantially increasing the existing load from these canals to Biscayne Bay, and all subsequent load estimates (for secondary growth and cumulative high growth) were also substantially increased. Third, the reinterpreted DERM data were presented as maximums, means, and medians, as requested by DERM. Sections 3.10 and 4.10 in Volume I have been revised, and Section 4.11 (Biological Resources) has also been edited and revised, as appropriate, to reflect the higher inputs.

15.7.2 Comment: Groundwater quality at and around the former base has been historically monitored. Sufficient data exist to determine present contaminant levels and provide estimates of increases from the Proposed Action. There are numerous sites on the former base where the Miami-Dade County DERM cleanup activities and enforcement actions are ongoing.

Response: The concentration of pollutants in groundwater at Installation Restoration Program sites/operable units is a matter of public record. The sites mentioned in the DERM Report are all sites that are currently part of the IRP. These sites are currently being remediated, undergoing a Feasibility Study to determine appropriate remediation technologies, are being monitored, or have been recommended for no further action (subject to review by regulatory agencies, including DERM). These sites, the great majority of which were caused by uncontrolled spills or inappropriate disposal practices in the past, are unlikely to increase in magnitude or result in additional contamination off site because of redevelopment of the former base.

15.7.3 Comment: The Draft SEIS assumes the Proposed Action's stormwater plan will reduce overall surface water loading of metals and pesticides to Military Canal. Relative to baseline conditions, nutrient loading is expected to decrease 34 percent in 2005 and 19 percent in 2015.

Response: The reductions in pollutant loadings reported in the SEIS are based on modeling results, not assumptions. The estimates of pollutant loadings are outputs of the Surface Water Management Model, the model used to estimate surface water flows and pollutant loadings, based on the configurations proposed in the Surface Water Management Master Plan. The model uses inputs such as pollutant accumulation based on land uses, and then simulates washoff of the pollutants during storm events. SWMM is a widely used and accepted model, and the estimated pollutant loadings are reasonable representations of changes that can be anticipated with implementation of the Surface Water Management Master Plan.

15.7.4 Comment: The Proposed Action's Surface Water Management Master Plan improves water quality by 28 percent and decreases direct discharges to the bay. The water quality of discharges into Biscayne Bay will improve 35 percent by the year 2005 under the Proposed Action.

Response: The SEIS indicates that surface water discharges from Military Canal to Biscayne Bay are estimated to decrease by 28 percent in 2015 compared to current discharges. This is not the complete

effect of the Proposed Action, however, because surface water discharges would increase from secondary development.

Implementation of the Surface Water Management Master Plan for the Proposed Action is estimated to result in a 19 percent reduction in nutrients discharged in surface water to Biscayne Bay by 2015, a 23 percent reduction in metals discharged, and a 23 percent reduction in pesticides. Soluble nutrients, metals, and pesticides, however, would still enter the bay through groundwater. These changes in loads do not mean there would be a 28 or 35 percent improvement in the water quality of discharges into the bay.

15.7.5 Comment: How can the SEIS come to conclusions based on the assumption that nutrient or pollutant loading to Biscayne Bay will be the same for on-site and off-site development?

Response: The SEIS does not assume that nutrient or other pollutant loadings would be the same for on-site and off-site development. Pollutant loadings for on-site development were calculated using SWMM, the computer model used to estimate flows for the Proposed Action and alternatives. This model simulates the accumulation of pollutants in areas at rates that depend on the land use of the area, and then simulates the washoff of the pollutants into the stormwater system during storms. Pollutant loadings for off-site development were not modeled. It was assumed that loadings from off-site development would increase proportionally with increases in flow, primarily because there were insufficient data to allow a SWMM model configuration to be developed for off-site areas.

15.7.6 Comment: The Draft SEIS underestimates the concentration of pollutants in stormwater generated by secondary development by assuming that chemical loadings would be proportional to flow. This is incorrect because stormwater flow and contaminant levels are two independent phenomena responding to different environmental factors. Stormwater flow is due to impervious acreage, and contaminant levels are due to the nature and intensity of development. The Draft SEIS assumption ignores the fact that increased development will result in increased pollutant loading. By assuming that chemical loading will be proportional to flow, the Draft SEIS assumes that secondary development will not increase the level of contaminant loading in the areas around Homestead. Similarly, the Draft SEIS assumption of proportionality ignores that secondary development will use undeveloped lands that are providing benefits to water quality in the region. Undeveloped lands capture and slow stormwater. By doing so, these areas trap sediment, trace metals, and soluble forms of nutrients.

Response: Assuming chemical loadings for secondary development would increase in proportion to stormwater is reasonable because the secondary development stimulated by the Proposed Action would be similar to existing development in the region. Contaminant loads for secondary development were not specifically calculated because the exact nature or location of this development is not known. Because the secondary development would be similar to other development in the area (including some industrial, commercial, and residential uses), the relative level of contaminants would also be about the same and increase proportionally.

Stormwater flows and pollutant loads are not necessarily independent parameters. As impervious area increases, stormwater generation increases, and stormwater loads increase. These relationships are implicit in the modeling used in south Florida to predict stormwater flows and loads. Thus, the SEIS assumes that increased development would in fact result in increased pollutant loadings. The loadings would increase as the flow increased.

Undeveloped lands capture rainwater, not stormwater. Stormwater is collected in canals. The filtering function that is provided by currently vacant land serves only to reduce the pollutants that are in rainwater. Pollutants generated by washoff of nearby developed areas would not flow onto vacant land, so there would be no opportunity for pollutants to be removed. While development could cause some loss in

capability to remove pollutants from rainfall, the amount would probably be minor in relation to the volume of runoff from impervious surfaces. Since runoff and washoff are both dependent on the amount of impervious surface, it is reasonable to assume that pollutant loadings would increase in proportion to the increase in stormwater volume.

A significant portion of the area drained by Princeton and Mowry Canals is agricultural, so nutrient concentrations in these canals tend to be high. Nitrogen concentrations in these canals are currently two to four times higher than in Military Canal. Some secondary development associated with reuse of former Homestead AFB would probably occur on agricultural land, so nutrient loads would probably decline as agricultural land was developed.

15.7.7 Comment: The Draft SEIS assumes the airport and associated secondary development will have no effect on the concentration of pollutants in stormwater. It assumes the airport, which will emit tons of pollutants daily into the air, will cause no additional loadings to surface water or groundwater.

Response: The SEIS does not assume that atmospheric emissions would have no effect on surface water. Section 4.10 in Volume I includes specific calculations of nitrogen deposition to Biscayne Bay due to air pollutant emissions. Even using a method that is believed to substantially overestimate nitrogen deposition, atmospheric nitrogen was not found to be a major source of nitrogen loadings (about 8 percent of surface water discharges from Princeton, Mowry, and Military Canals; estimated 5 percent of total surface water discharges to southern Biscayne Bay; and a smaller percentage if unknown quantities of groundwater are also considered).

15.7.8 Comment: The discussion of impacts on Biscayne Bay is inadequate because the Draft SEIS relies on a comparison of estimated increases in pollutant loadings to annual discharge volumes to Biscayne Bay, leading it to conclude that, because the increases amount to a small percentage of overall discharge volumes (1.6 percent), they will likely have little effect on the biota of Biscayne Bay. This approach dilutes the significance of the discharges associated with the Proposed Action which amount to 23 percent of expected increase in total volume discharges to the bay by 2015 from Princeton and Mowry Canals or 4,100 acre-feet per year.

Response: The increase in discharge from Princeton and Mowry Canals due to secondary development associated with the Proposed Action is estimated to be 6,545 acre-feet per year by 2015 (see revised estimate in Section 4.10 of Volume I—apparently the first digit of the flow was misentered in the Draft SEIS). Decreases in flows from Military Canal of about 1,437 acre-feet per year would offset some of the projected increase. The net increase in flows caused by the Proposed Action would amount to about 27 percent of the projected baseline increase in surface water flow between 1995 and 2015, which would be equivalent to about 2 percent of the combined projected baseline discharges from Princeton, Mowry, and Military Canals. Another way to look at this is as equivalent to about four years of baseline population growth. There is no evidence that this small percentage change would have large impacts on biota in Biscayne Bay.

15.7.9 Comment: The Draft SEIS assumed that most pesticides and metals are insoluble but did not determine whether or not this is an appropriate assumption for the Proposed Action.

Response: There is no reason to suspect that the solubility of pesticides and metals from an airport would be different than from other sources. The solubility of these contaminants is related to their composition and characteristics, not to their source.

15.7.10 Comment: The existing polycyclic aromatic hydrocarbons (PAHs) and heavy metals in groundwater under the base refute the Draft SEIS conclusion that these contaminants will sorb to sediments and not enter the groundwater.

Response: Although small areas of the former base have been contaminated with a variety of chemicals (and some of these chemicals are in groundwater), there are no large groundwater plumes emanating from these contamination sites, which provides strong evidence that the SEIS conclusion about PAHs and most heavy metals is valid.

15.7.11 Comment: The Draft SEIS concludes that there will be no increase in loadings of insoluble chemicals (metals, PAHs, pesticides) to groundwater because they will sorb to sediments and remain on site. This conclusion is based on the assumption that adsorption-desorption phenomena are important components of contaminant dynamics in aquatic systems around Homestead AFB. While adsorption-desorption phenomena are important components of contaminant dynamics in aquatic systems where terrigenous-clastic sediments (sediments with high clay content) dominate the suspended particulate pool and benthic sediments, adsorption is not as dominant in the limestone bedrock systems common to south Florida and around former Homestead AFB.

Response: While it is true that soils like those at former Homestead AFB would not adsorb metals and other contaminants to the extent that soils with higher clay contents would, they would adsorb sufficient pollutants to essentially eliminate the movement of most insoluble metals and PAHs off the former base.

The amount of specific organic pollutant that can be sorbed to a given soil depends on the nature of the pollutant and the nature of the soil. The ability of an organic chemical to sorb is largely determined by its sorption capacity, K_{oc} . The higher the sorption capacity, the greater the amount of chemical that can sorb per unit of soil sorption capacity. The ability of a soil to sorb organic chemicals is determined largely by its sorption capacity, f_{oc} . The greater the f_{oc} , the more of a specific organic chemical that can be sorbed to the soil per unit mass. The sorption coefficient of an organic chemical is defined by K_{oc} multiplied by f_{oc} , where K_{oc} is chemical specific and f_{oc} is soil specific. The K_{oc} of the heavy PAHs (e.g., benzo(a)pyrene, benzo(a)anthracene) and polychlorinated biphenyls varies from 3×10^5 to 2×10^6 L/kg. A very low f_{oc} value (representative of the soil type around Homestead AFB) of 0.0001 would produce a sorption coefficient greater than 20 L/kg, and increase the contaminant travel time to reach Biscayne Bay to greater than 1,000 years. Therefore, it is expected that before reaching the Biscayne Bay, organics would be completely degraded.

For metals, several factors (e.g., pH, competing cation effects, soil porewater concentrations, soil organic matter content, and soil texture) affect the sorption process. The sorption coefficient for specific soils for a specific chemical is usually determined through sorption tests. In the absence of such tests, the sorption coefficient can be estimated from literature values based on factors such as soil texture and pH. For example, the average sorption coefficient for cadmium is 80 L/kg in sandy soil and 560 L/kg in clay soil (reported by Shephard and Thibault in 1990), and while these coefficients are different by a factor of 7, the lower value does not mean that the soils near Homestead do not sorb metals. Observations indicate that even with the low-end values for metals for sandy soils, it would take on the order of thousands of years before they could reach Biscayne Bay. Were contaminants introduced onto the soils of former Homestead AFB in concentrations high enough to be of concern, the travel time required would essentially mean that they would never reach Biscayne Bay. The travel time certainly indicates that remediation could easily occur in that time frame. Existing regulations under a variety of environmental acts would require remediation if concentrations were above levels of concern.

15.7.12 Comment: Even if heavy metals and polycyclic aromatic hydrocarbons sorb to sediments, this can cause significant environmental impacts in retention ponds and wetlands. Although wetlands help

remove pollutants, some pollutants, such as metals, can accumulate and degrade the ecosystem functions and values affecting the organisms living there.

Response: Pollutants that sorb to sediments would accumulate on the disposal property, so any impacts would be limited to on-site canals and wetlands. At some time in the future, these pollutants might need to be removed if they can no longer be assimilated. The use of on-site retention areas by waterfowl and wildlife is expected to be limited by the level of human activity likely to occur in the area. Retaining as much of the pollutants on site as possible would still be better than allowing them to be discharged to other surface water bodies, including Biscayne Bay.

15.7.13 Comment: The Draft SEIS does not readily distinguish between ecological pollutants and heavy metals or organic chemical pollutants. Therefore, the variety of water quality impacts expected from nutrient runoff into Biscayne Bay is not sufficiently described. The Draft SEIS did present phosphorus data, but never any substantive discussion about implications of phosphate loading to Biscayne Bay. This is a major oversight because Biscayne Bay is a phosphorus-limited ecosystem and is extremely sensitive to phosphorus loading.

Response: The impacts of phosphorus discharges have been added to Section 4.11 Biological Resources in Volume I. The Water Resources section only reports changes related to the reuse alternatives; ecological impacts are discussed in Section 4.11. Phosphorus discharges from the disposal property are expected to decline with implementation of a stormwater management plan, so eutrophication is not expected from phosphorus discharges from the former base. Estimated changes in phosphorus loads in surface water due to the Proposed Action (including off-site secondary development) have been added to Section 4.10 in Volume I of the Final SEIS. These indicate that by 2015, Proposed Action phosphorus loads (including secondary development) would increase by approximately 1.7 percent over projected baseline phosphorus discharges from Princeton, Mowry, and Military Canals.

15.7.14 Comment: The Draft SEIS assumes that all heavy metals and toxics are insoluble and will not contaminate the groundwater. The Draft SEIS did not adequately address impacts on groundwater quality from soluble chemicals (other than nitrogen compounds).

Response: The SEIS does not assume that all heavy metals and toxics are insoluble and will not contaminate groundwater. It indicates that most metals, polycyclic aromatic hydrocarbons, and pesticides would probably sorb to soils and likely not increase groundwater concentrations. The analysis in the SEIS assumes there are soluble forms of toxic compounds that would enter groundwater. Soluble toxic chemicals in groundwater would be carried to Biscayne Bay, as would those in surface water. The SEIS predicts loads for toxics for which chemical constituent data are available. Unfortunately, there are few data available for soluble toxic contaminants in either surface water or groundwater.

15.7.15 Comment: The Draft SEIS did not adequately address the groundwater impacts of soluble chemicals, such as water-soluble toxic chemicals, claiming that there is “essentially no data that can be used to assess their present occurrence in groundwater or how they are likely to change with airport development” (Draft SEIS page 4.10-15). Such a cursory conclusion without discussion of efforts to identify what data are available fails to comply with the mandates of the National Environmental Policy Act. NEPA requires that action agencies not only analyze the impacts of proposed actions on the environment using readily available data, but also to obtain data when little data exists. This duty is especially appropriate in this case, where the Proposed Action is likely to use and generate significant amounts of conventional and non-conventional pollutants. An analysis of the potential effects of these pollutants on water resources is an important component of an adequate NEPA analysis and should not be ignored absent well-supported claims that no data exist to analyze such pollutants.

Response: The statement that the data are not available is well supported. Inquiries to federal, state, and local government agencies that would have data if any existed did not obtain any. The only data available at Homestead is that developed by the Air Force in connection with the Installation Restoration Program. A number of IRP sites have been designated operable units (OUs) and are undergoing remedial investigation in accordance with the Comprehensive Environmental Response, Compensation and Liability Act. Unfortunately, the data from the OUs are not generally representative of the groundwater under the base (OUs occupy a very small area on the former base), nor are they representative of the groundwater that would occur under the base should an airport be established. On the other hand, there is no presumptive evidence that there is more contamination on the former base than has already been identified. Moreover, the OUs have been monitored for several years, and data show essentially no migration of contaminants from any OU, let alone migration off the base. The SEIS meets all requirements by disclosing the information that is lacking, identifying its relevance, examining the evidence that is available, and evaluating the potential impacts based upon generally accepted scientific analysis.

15.7.16 Comment: The Draft SEIS recognizes that the commercial airport will create large quantities of polluted groundwater flowing into Biscayne Bay but discounts its impact by overestimating the time it would take for the groundwater to reach the bay.

Response: The SEIS does not conclude that the Proposed Action will create large quantities of polluted groundwater. It indicates that the net effect of the Proposed Action would be to reduce the amount of groundwater flowing into Biscayne Bay. This is because increases in groundwater flows created by the proposed Surface Water Management Master Plan would be offset by decreases associated with secondary development.

15.8 Fuel and Chemical Spills

15.8.1 Comment: The Draft SEIS addresses nitrogen oxides and polycyclic aromatic hydrocarbons but does not correlate impacts to long-term problems resulting from routine servicing of aircraft.

Response: Routine servicing of aircraft can lead to a number of small leaks and spills, often only a few quarts to gallons in magnitude, that generally are cleaned up in short order and do not lead to long-term environmental contamination. In the case of former Homestead AFB, the drainage system is such that the great majority of leaks and spills, even if they are not contained and enter the surface water management system on base, would probably be retained within the system and not be released to Biscayne Bay.

15.8.2 Comment: The Draft SEIS assumes that all fuel spills and leaks will be fully remediated (or diluted during extreme storms) and will not have a significant effect on groundwater quality.

Response: With the improvements in technology that have occurred over the last decade to control spills and leaks, it is not anticipated that significant environmental releases would occur. Spills and leaks that could occur would likely be contained on site except during extremely high water when pollutants could be washed off site. In those cases, any spills that contaminated groundwater would generally remain near the ground surface and would move very slowly, so there would be time to remediate the contamination before a plume could migrate appreciable distances off site.

15.8.3 Comment: Airport development and aerial fuel dumping will double aerial pollutant loadings in parts of the bay.

Response: Aerial fuel dumping is unlikely to result in any increase in airborne pollutant loadings because it would be done at an altitude where it would essentially evaporate, and the parts of the fuel that did not evaporate would be widely dispersed over the Atlantic Ocean considerably east of Biscayne Bay.

15.9 Impacts on Drinking Water

15.9.1 Comment: Concerns were expressed that contamination of groundwater from the former base would affect drinking water.

Response: Drinking water sources would not be expected to be affected by activities at the former base. It is not anticipated that any groundwater contamination that might occur under the Proposed Action would spread to drinking water sources. Existing contamination is localized under specific sites and has apparently not migrated over several years. The general pattern of groundwater flow is to the east from the former base towards Biscayne Bay. Areas north, west, and south of the former base essentially cannot be affected by the existing groundwater contamination under the former base or by any future contamination that might occur. Public water supply wells are north and west and several miles away from the former base, so they are also unlikely to be affected by contamination on the former base.

15.10 Increases in Nitrogen Loads

15.10.1 Comment: Some commentors indicated that they were confused by the way in which nitrogen loading data were presented in the Draft SEIS and requested clarification on the total increases in nitrogen that would become inputs to Biscayne Bay.

Response: The Proposed Action is estimated to add approximately 67,000 pounds of nitrogen a year to Biscayne Bay by 2015, which is about 3.6 percent of projected baseline surface water nitrogen inputs from Princeton, Mowry, and Military Canals. Sources of potential nitrogen inputs into Biscayne Bay from the Proposed Action and alternatives include surface water flows from the former base, groundwater from the former base, atmospheric deposition from aircraft overflights, and surface and groundwater flows from secondary development. The net increase of about 67,000 pounds per year would be comprised of the following:

- (1) Nitrogen inputs from surface water flows from the former base were estimated using the Surface Water Management Model, the model used to evaluate changes in surface water discharges associated with the Proposed Action. Nitrogen loads to Military Canal from the Proposed Action are estimated to be about 19 percent less than current loads to Military Canal. This would be a decrease of about 2,000 pounds per year.
- (2) There would be an increase in the nitrogen discharged in groundwater from the former base (see Section 4.10 in Volume I of the Final SEIS for the methodology used to estimate this increase). This is estimated to amount to approximately 24,000 pounds per year increase.
- (3) There would be an increase in atmospheric nitrogen deposition to Biscayne Bay of about 30,000 pounds per year over the Biscayne National Park portion of Biscayne Bay.
- (4) Secondary development is estimated to result in an increase of about 49,000 pounds per year in surface water nitrogen load by 2015. At the same time, there would be a decrease in nitrogen inputs from groundwater of approximately 34,000 pounds per year, resulting in a net increase of about 15,000 pounds per year.

Section 4.10 in Volume I of the Final SEIS has been revised to make the net effects clearer.

15.10.2 Comment: Airports are known to be significant sources of nitrogen pollution. Airplane and ground transportation exhaust contains significant amounts of nitrogen oxides that settle on the ground and can enter the groundwater in the form of ammonia.

Response: The model used to estimate emissions of nitrogen oxides is specifically designed for airport-related air quality analysis. The model outputs were considered in the water quality analysis.

15.10.3 Comment: Nitrates from the airport will increase up to fourfold.

Response: A distinction needs to be made between relative increases and absolute increases. Potential sources of nitrogen from the Proposed Action include surface water and groundwater discharges from the former base, surface and groundwater discharges from secondary development, and atmospheric nitrogen deposition. Although atmospheric sources would increase substantially relative to current aircraft operations at Homestead, that is because current deposition from operations at Homestead Air Reserve Station is very low. Taken together, the combined sources of nitrogen inputs to Biscayne Bay from the Proposed Action are estimated to be about a 3.6 percent increase over projected baseline inputs from Princeton, Mowry, and Military Canals.

15.10.4 Comment: Based on existing loads of ammonia, nitrate plus nitrite, and phosphorus for 1995 from Mowry and Princeton Canals, ammonia loadings will increase 397 pounds per year, nitrate plus nitrite by 45,621 pounds per year, and phosphorous by 397 pounds per year by 2015. These are significant increases in loading that the Draft SEIS did not adequately analyze.

Response: Using existing loadings from Princeton and Mowry Canals from Table 3.10-13 in Volume I of the Final SEIS, and multiplying by the estimated increase in flow from secondary development associated with the Proposed Action (6,545 acre-feet) divided by the combined annual flows of Princeton and Mowry Canals (231,420 acre-feet), the annual increase in loadings due only to secondary development would be about 2.7 percent greater than projected baseline loads to Biscayne Bay. This leads to estimates that phosphorus would increase by 104 pounds per year and nitrogen by 48,876 pounds per year. These numbers are reestimated based on data from different (freshwater only) stations in Princeton and Mowry Canals (see Table 4.10-5 in Volume I of the Final SEIS). Ammonia loadings are actually anticipated to decrease under the Proposed Action (see Table 4.10-11).

The increase in flows and loadings associated with the Proposed Action and alternatives, including secondary development, are on the order of 3.6 percent or less of combined baseline loadings from Princeton, Mowry, and Military Canals. The impacts of a 3.6 percent change in existing loadings are expected to be small, particularly since the flows are assumed to be concentrated in the Princeton and Mowry Canal watersheds, while secondary development is likely to be dispersed over a larger area. So a 3.6 percent increase is probably an overstatement of the likely changes.

15.10.5 Comment: The Draft SEIS assumption that the concentration of nitrogen in groundwater would remain the same with development on the former base is incorrect. There are methods that would allow estimation of the existing and future nitrogen concentrations in groundwater so that loading increases could be estimated.

Response: The assumption made in the Draft SEIS in estimating increases in ammonia discharges to Biscayne Bay through groundwater was that there would be no increases in nitrogen concentrations in groundwater. This assumption has been reexamined for the Final SEIS, and new calculations have been added.

In the Final SEIS, Surface Water Management Model outputs were used to estimate groundwater nitrogen loads. The SWMM model calculates the total amount of a pollutant that is washed off of impervious surfaces and the total amount of a pollutant that is discharged through surface water. The difference between the two numbers is an estimate of the load to groundwater. This estimate is conservative (high) because stormwater percolates through soils before reaching groundwater, and some of the pollutants would be removed by plant uptake or soil sorption in the process. However, no removal of pollutants has been assumed in the analysis.

15.10.6 Comment: The Draft SEIS suggests that the increase in flows of ammonia, which is toxic to organisms, could be 13 to 14 percent under the Proposed Action. The use of French drains, an important element in the Surface Water Management Master Plan for the proposed airport, may increase contaminants (including ammonia) flowing from groundwater into the bay, rather than reduce it as suggested in the Draft SEIS. This is especially likely when one considers the amount of ammonia flowing from nearby landfills. Ammonia in groundwater is a powerful solvent that will move metals and other contaminants out into the bay.

Response: South Florida Water Management District and Miami-Dade County Department of Environmental Resources Management have both stated that they require or advocate the retention of as much stormwater on site as possible, and French drains are one of the mechanisms proposed in the Proposed Action to achieve this. Retention of stormwater would cause an increase in the amount of ammonia discharged to Biscayne Bay through groundwater. There is no evidence that groundwater from nearby landfills would commingle with groundwater from under the former base; the ammonia concentrations in near-surface groundwater under the former base would be the result of rainfall and washoff primarily from the former base itself. At deeper levels, concentrations of ammonia would be determined by groundwater flows primarily from west, not north, of the former base. Thus, the former base's proximity to local landfills would not appear to influence groundwater ammonia concentrations.

Measurements of concentrations of contaminants at Installation Restoration Program sites on the former base over a number of years have indicated that previously existing contamination has not appreciably migrated from the original sites of the contamination. This suggests that any ammonia that is present in groundwater is not acting as a powerful solvent that moves metals and other contaminants in groundwater.

15.10.7 Comment: The Draft SEIS Summary indicates that ammonia is being transported to Biscayne Bay, but it also indicates that materials spilled at the airfield are contained in Boundary Canal. This appears to be an inconsistency.

Response: Most forms of nitrogen are soluble in water and would not sorb onto sediments in the stormwater management system or attach to soils as surface water percolates to groundwater. A number of other pollutants, on the other hand, are not highly soluble in water (many organic compounds, for example, would float) and sorb readily to sediments and soils. Floating materials would generally be contained in the reservoir above Military Canal (discharge to Military Canal is by means of pumps that have intakes near middle depths in the reservoir, so floating materials generally would not be discharged), and pollutants that sorb to sediments or soils would settle to the bottom of the canal and also would generally not be pumped into Military Canal. These pollutants would attach to soils as surface water percolated to groundwater. Soluble toxic compounds or soluble forms of toxic compounds, such as methyl mercury and some organic compounds, would not generally be retained on site and would be discharged in groundwater, as would soluble forms of nitrogen.

16.0 BIOLOGICAL RESOURCES

This category addresses comments on the biological resources discussed in the SEIS, including general wildlife (16.1), estuarine and marine environments (16.2), wetlands (16.3), and sensitive species (including those listed under the Endangered Species Act) in 16.4. Specific sections address issues related to noise (16.5), bird-aircraft strike hazard (16.6), and exotic species (16.7).

16.1 General Wildlife Comments

16.1.1 Comment: Except for consideration of some shorebirds that are federally or state listed, and mention of a couple wintering raptors, the Draft SEIS does not give sufficient consideration to the importance of the region of influence as wintering habitat for birds. Table 3.11-8 lists only migrant land birds. There is no comparable table for shorebirds or water birds that pass through or winter in the area.

Response: Section 3.11 in Volume I of the Final SEIS has been expanded to incorporate data from 13 winter Christmas Bird Counts at Biscayne National Park and 19 Christmas Bird Counts at Everglades National Park, to provide more information on wintering birds. Two tables are provided showing the species of water birds and birds of prey that have been recorded during these counts.

Construction associated with reuse of former Homestead AFB is not anticipated to affect waterbirds, raptors, and other birds at the national parks. Aircraft overflights and noise associated with the commercial airport alternative would occur at both national parks. However, based on the analysis in Section 4.11.3 in Volume I, there would likely be little impact to bird life at these two parks.

16.1.2 Comment: Once commercial airliners begin to arrive and depart, how long will the wildlife remain?

Response: Section 4.11 in Volume I discusses various impacts that reuse of former Homestead AFB could be expected to have on wildlife. This includes habitat destruction due to construction, potential for bird-aircraft strikes, and noise effects. While some wildlife may relocate, it is not expected that there would be a major change in wildlife in the region.

16.1.3 Comment: Birds can be strongly affected by mobile airborne objects such as balloons, kites, model airplanes, and low flying aircraft. Some species can be driven from an area by such objects.

Response: The SEIS relied on published information of bird responses to aircraft overflights, events that are more nearly representative of the conditions that would be expected with the Proposed Action than balloons, kites, or model airplanes. This information, in addition to observations of birds at Homestead Air Reserve Station, indicates that overflights under the Proposed Action would likely have minimal effects on wading birds and other bird species.

16.1.4 Comment: The SEIS says little concerning the effects of aircraft exhaust pollutants on bird rookeries, nesting areas, mangrove forests, and nursery areas for fish and invertebrates.

Response: Section 4.8 in Volume I addresses aircraft emissions and estimates that these emissions would be within regulatory standards. Therefore, they are not anticipated to adversely affect these resources. Sections 4.10 and 4.11 in Volume I of the Final SEIS specifically address the effects of airborne nitrogen deposition from aircraft emissions and its potential effects on water quality and biological resources.

16.1.5 Comment: Space Access would like to clarify that cryogenic fuels (such as liquid hydrogen and liquid oxygen) will either be consumed in a rapid flash and fireball or will vaporize rapidly and dissipate

into the atmosphere. This dissipation may or may not cause other burning in the presence of a flame or ignition source.

Response: The text in Section 4.11 of Volume I has been modified in the Final SEIS to incorporate this information.

16.2 Estuarine and Marine Environments

16.2.1 Comment: The Draft SEIS overlooks the Proposed Action's harmful impacts on Biscayne Bay and other environmental resources. The bay's ecology will be severely impacted with more than double the volume of polluted stormwater discharging into it than projected by the Draft SEIS. Seagrasses will die off, triggering other disturbances throughout the estuarine and marine environment and accelerating the decline of sensitive coral reefs.

Response: The Air Force and FAA do not agree that the Proposed Action would more than double the volume of polluted stormwater discharging into Biscayne Bay. No evidence has been presented to support this allegation. The analysis of stormwater discharges from this development took a conservative approach that tends to overestimate, not underestimate the effects. Available evidence on the water quality of Biscayne Bay indicates that current surface water discharges to the southern part of the bay (over 400,000 acre-feet per year) are not significantly affecting water quality at stations 2 to 3 miles from shore. The station nearest Mowry and Military Canals has a salinity of 1.3 parts per thousand less than the average salinity of all stations in Biscayne Bay, and Biscayne Bay as a whole has salinities approaching those of seawater, about 35 parts per thousand. Given these salinities, the estimated changes associated with reuse of former Homestead AFB would not be expected to have the effects alleged in the comment.

The basis of the estimates of secondary impacts from the Proposed Action on population in-migration is described in Section 4.1 of Volume I. This led to the estimated amount of secondary development that could be generated, which in turn led to estimates of increased impervious surface. The assumption used to estimate increased runoff caused by secondary development was that each impervious acre created by secondary development would result in 5 acre-feet of water being discharged into Biscayne Bay. In other words, the SEIS assumes that all rainfall that falls on impervious surface would be discharged to the bay. This overestimates the discharge because some would percolate to groundwater, and some rainfall would evaporate. Percolation to groundwater and evaporation were not incorporated into the estimates of stormwater runoff because it is not known what stormwater management practices would be employed for areas of secondary development, and the magnitude of the losses could not be calculated. Thus, the surface water discharges to Biscayne Bay as a result of secondary development are probably overestimates.

For the purposes of the stormwater analysis, it was also assumed that all secondary development would occur in the Princeton and Mowry Canal watersheds, the watersheds immediately adjacent to the former base. Secondary development would probably occur over a broader area than this. By assuming that it would be concentrated in the adjacent watersheds, the relative changes in surface water discharges are somewhat overstated because some of the surface water would probably be discharged into other canals, reducing the projected increases in Princeton and Mowry Canals. However, it was reasonable to assume that the great majority of the surface water runoff would eventually be discharged into Biscayne Bay. Even with this overstatement, the estimated increase of about 6,545 acre-feet per year by 2015 would be a relative increase of about 2.6 percent in surface water discharges through Princeton, Mowry, and Military Canals compared to the projected baseline. This increase represents about 1.5 percent of the current discharges to the southern part of the bay. (The total increase in surface water discharge would actually be somewhat less than that because approximately 1,437 acre-feet of stormwater would be retained on the former base).

Even if secondary development were double that estimated in the SEIS (and no evidence has been presented to indicate this would be the case), the increase would be about 3 percent of baseline discharge in the southern part of Biscayne Bay. It is not anticipated that this level of change would have discernable effects on the estuarine and marine environment.

16.2.2 Comment: The Draft SEIS concludes that stormwater flow, loss in groundwater flow, and increases in pollutant discharges due to the Proposed Action will have insignificant impacts on the water quality and biological resources of Biscayne Bay.

Response: The changes that would occur in surface water and groundwater flows associated with the Proposed Action would be small in comparison to existing surface water and groundwater flows to southern Biscayne Bay, and the impacts of the changes are also expected to be small.

16.2.3 Comment: Page 4.11-1 of the Draft SEIS indicates that changes in stormwater management practices may influence the nearshore salinity regime, but does not discuss the effects in any detail.

Response: The statement on page 4.11-1 in Volume I must be considered in the context it was presented. It is from the introduction to the section on potential impacts on estuarine and marine communities. Subsequent paragraphs of this section indicate that the proposed on-site stormwater management system would have generally beneficial effects on Biscayne Bay by reducing surface water nutrient and toxic chemical inputs to the nearshore area. On the other hand, secondary development would increase the surface water nutrient and toxic chemical inputs to the nearshore area, generally by a greater amount than would be reduced by the stormwater management program. The net effect would be more nutrients and toxic chemicals discharged in surface water to Biscayne Bay, but the increase would be relatively small in comparison to existing and projected baseline discharges.

16.2.4 Comment: According to the Bortone Report, polluted stormwater pulses to Biscayne Bay shock the biota of the bay by dramatically affecting salinity cycles and sharply increasing pollutant levels in a short period of time. Mangrove forests are sensitive to changes in surface water flow and quality (and once disturbed and degraded, are difficult to restore), and seagrasses, corals, and wetlands south of Homestead would also be disturbed by these irregular flows and changes in salinity regime.

Response: The arguments put forth in the Bortone report are based on the premise that changes in stormwater discharges would dramatically change the seasonality of freshwater inputs to Biscayne Bay. To change the seasonality of salinity regimes in the bay, stormwater would have to be stored on the former base (and in the nearby watersheds) in lined basins (to prevent percolation to groundwater) and then be released during the dry season. The Bortone report does not claim that pulses of stormwater (resulting from the periodic opening of control structures at the ends of canals, the "irregular, high-volume pulses") would have the impacts noted in this comment. It only references changes in seasonality.

The frequency of pulses of freshwater (and possibly the volumes of water discharged at each control structure opening) from Princeton and Mowry Canals would increase with secondary development associated with the Proposed Action. Pollutant loadings would also increase. While the magnitude of the flows may appear large (5,108 acre-feet/year by 2015), in relation to current flows into southern Biscayne Bay (over 400,000 acre-feet per year), 5,108 acre-feet is a relatively small contribution (1.3 percent). It is improbable that a change of 5,108 acre-feet would change the salinity regime in a 90 square mile bay with a volume of approximately 575,000 acre-feet and a salinity very close to that of offshore seawater (35 parts per thousand) to such a degree that discernible changes in the biota would result. The evidence more strongly suggests that Biscayne Bay waters essentially do not mix with freshwater inputs. Most freshwater inputs would be generally dispersed as shallow lenses of freshwater overlying deeper, higher salinity water (although very high freshwater flows resulting from very large storms apparently mix more

thoroughly). Therefore, the impacts of additional freshwater inputs are not likely to appreciably affect salinity regimes. If there are no appreciable changes in salinity or in the seasonality of the salinity regime, discernible changes to the bay biota would be unlikely.

The preponderance of evidence indicates that secondary development would create essentially no change in the seasonality of water inputs to wetlands. The water table east of the former base would generally be shallower because of the retention of stormwater on the former base and an increase in the hydraulic head associated with that retention. But the periodicity of water flow into wetlands east of the former base is driven primarily by rainfall, not canal discharges. The canals bypass this area and discharge directly into the bay. Water inputs to areas south and west of the former base are also driven primarily by rainfall, not overland flow from other sources. Thus the Proposed Action is unlikely to change the seasonality of water inputs to wetlands, and resultant impacts are also unlikely.

16.2.5 Comment: Reduction in overall groundwater flow could have significant effects on the nearshore environments in Biscayne Bay due to increased salinity stemming from interstitial saltwater intrusion.

Response: Very little is currently known of the amounts of groundwater that enter Biscayne Bay, but in the southern portion of the bay, it is expected they are very large. The amount of water that falls as rain on Miami-Dade County land south of Eureka Drive (not including national park lands) is about 1,750,000 acre-feet per year. Even if 36.5 percent of this water evaporates, at least 1,111,250 acre-feet per year must be discharged as surface water or groundwater to Biscayne Bay. If annual surface water discharges are about 400,000 acre-feet per year south of Eureka Drive, that leaves about 700,000 acre-feet of water discharged to the bay as groundwater. A portion of this water would drain to Florida Bay rather than Biscayne Bay, but the relative amount is not known. If as much as half of the groundwater discharges to Florida Bay, groundwater inputs to Biscayne Bay must be at least 350,000 acre-feet per year. By comparison, the reduction in groundwater inputs estimated to occur with the Proposed Action is about 3,700 acre-feet, or about 1 percent. This is not expected to substantially affect either depth to the water table or the hydraulic head of freshwater, and it is considered unlikely that saltwater intrusion would result.

16.2.6 Comment: The Draft SEIS did not recognize the already stressed condition of Biscayne Bay and the possibility that additional increases would be the “straw that broke the camel’s back,” particularly for seagrasses and corals in Biscayne Bay and the Florida Keys. The increased loadings from the Proposed Action would likely have significant effects on seagrass communities and offshore coral reef communities. Seagrass communities will likely experience further degradation due to increased nutrient concentrations which will enhance phytoplankton growth, macroalgae, and seagrass epiphytes.

Response: There is no evidence that Biscayne Bay is on the verge of dramatic ecological shifts that would be caused by small increases in nutrient or toxic chemical discharges. While there have been a number of changes to Biscayne Bay caused by canalization and development in south Florida, the majority of impacts appear to be fairly localized. The weight of evidence indicates that the changes in surface and groundwater discharges from the Proposed Action would be relatively small. The seagrasses and coral reefs currently exist in an environment that receives surface and groundwater discharges that are 100 times greater than those estimated for the Proposed Action. This suggests that the demise of seagrasses and corals in Biscayne Bay is unlikely. Canalization has caused more extensive changes in Florida Bay, but Florida Bay would not be affected by stormwater associated with the Proposed Action.

16.2.7 Comment: Increased runoff and associated pollution (resulting from development outlined in the Proposed Action) can alter and diminish plant communities and filter-feeding organisms in the bay.

Response: Given the small relative changes in inputs to Biscayne Bay from secondary development associated with the Proposed Action in 2015 (estimated to be less than 3 percent of existing inputs through Princeton and Mowry Canals), it is thought that significant alteration and diminishment of plant communities and filter feeding organisms in the bay would be unlikely.

16.2.8 Comment: An area of Biscayne Bay is identified as Essential Fish Habitat and is subject to specific requirements of the Magnuson-Stevens Fishery Conservation and Management Act as amended (1996).

Response: An Essential Fish Habitat Assessment has been prepared and is included as Appendix J in Volume II.

16.2.9 Comment: The statement in Section 4.11 of the Draft SEIS, "The total amount of nitrogen input would not change, but its path (groundwater versus surface water) would be different," ignores inputs from atmospheric deposition (a 23 percent increase) mentioned in Section 4.10.

Response: The context of this statement in the SEIS refers only to discharges from the former base, not all sources of nitrogen inputs associated with the Proposed Action. Sections 4.10 and 4.11 in Volume I of the Final SEIS have both been revised to clarify the effects of changes in nitrogen inputs.

16.2.10 Comment: Ammonia and nitrates are treated as equivalents in the Draft SEIS. As nutrients this is true, but ammonia is toxic and its toxicity is not examined in the document.

Response: The toxicity of some forms of ammonia is acknowledged in several sections of the SEIS. This is a concern particularly in groundwater because benthic organisms in Biscayne Bay would be exposed to ammonia as groundwater entered the bay (ammonia in surface water is rapidly taken up by plants or is converted to a more oxidized form under the aerobic conditions that would prevail during surface water transport). This would be true with any reuse alternative that reduced surface water discharges by implementing a stormwater management system. The increases in ammonia inputs caused by reuse of former Homestead AFB would be small compared to other sources of groundwater inputs and are not expected to, by themselves, have a discernible effect on biota in Biscayne Bay.

16.2.11 Comment: Chapter 3 of the Draft SEIS indicates that higher nutrient inputs would increase productivity in surface waters, possibly leading to the system being influenced more by phytoplankton than by seagrasses. This ignores the most important ecological role of seagrasses in substrate stabilization and habitat. The Final SEIS needs to (1) incorporate the increase in atmospheric deposition of nitrogen in its estimates of biological effects, (2) examine potential ammonia toxicity, and (3) consider the effects of seagrass decline or loss.

Response: The Final SEIS has been expanded to further discuss the biological effects of increased atmospheric nitrogen deposition and the effects of seagrass decline or loss. Although the SEIS acknowledges potential impacts from ammonia toxicity in groundwater, there are insufficient data on the biota and locations of groundwater input to Biscayne Bay to do more than acknowledge that ammonia toxicity could increase.

16.2.12 Comment: Coral reefs and non-reef corals require pristine conditions to thrive. The Proposed Action would impact these corals through additional nutrient inputs. The corals are already declining because of existing nutrient inputs to Biscayne Bay. The Draft SEIS addresses nitrogen oxides and polycyclic aromatic hydrocarbons but does not correlate direct impacts to threatened coral reefs. The SEIS does not mitigate impacts on coral reefs.

Response: It is not expected that there would be impacts on coral reefs that require mitigation, except in the event of an aircraft accident. Increases in nitrogen inputs are not expected to cause appreciable impacts because they are estimated to change by 3.6 percent of projected baseline loads from Princeton, Mowry, and Military Canals alone. This level of change in nitrogen inputs is not anticipated to have discernible biological effects on coral reefs or any other species.

Airborne PAHs would be widely dispersed and are not likely to be deposited at any location in Biscayne Bay in sufficient quantities to discernibly affect the biota of the bay. PAHs in stormwater runoff at the airport could be higher, but they are not likely to be transported to the bay because of the proposed stormwater management system. They are more likely to sorb to sediments and be retained on site.

16.2.13 Comment: The deposition of unburned jet fuel would destroy marine life in the shallow warm water of Biscayne Bay with its weak tidal exchange. Bird rookeries, nesting areas, and mangrove forests would also be affected, yet the Draft SEIS is silent on these impacts.

Response: Tidal exchange in Biscayne Bay actually appears to be very good. Generally, the near-open ocean salinity levels in the bay indicate it is more affected by marine waters than fresh waters, despite a large input of surface water and groundwater.

There is little evidence that large amounts of unburned fuel are emitted from aircraft. The unburned fuel that is emitted is generally widely dispersed and does not concentrate in specific areas. Marine life or wildlife is not expected to be adversely affected by unburned emissions from aircraft due to the Proposed Action. See also response to comment 13.4.2.

16.2.14 Comment: Any biology student knows that plankton floats on the surface of the water. Therefore, if oil from a plane crash is floating on the surface, the plankton will be destroyed. Heavier oils would pollute and destroy the bottom structure, plants, and animals.

Response: Plankton does not float on the surface of the water, but is suspended in the water column. Therefore, surface contamination by fuels, oils, and fluids would have little effect on plankton, except possibly by blocking sunlight. Heavier fractions of fuels, oils, and fluids that sink could harm bottom plants and animals if they were exposed over a period of time.

16.2.15 Comment: The Draft SEIS indicates that coral reefs would not be affected by an aircraft accident unless the aircraft directly impacted the reef. Coral reefs and associated algae need unpolluted saltwater and sunlight to survive. If the water around the reefs were polluted by oil or fuel from a plane crash or from fuel dumping, it would be lethal to the reefs.

Response: Section 4.11 in Volume I discusses why it is believed that most effects from an aircraft accident would not seriously impact coral reefs. This discussion has been expanded in the Final SEIS.

16.2.16 Comment: Impacts from a direct aircraft crash in a coral reef are minimized.

Response: The SEIS indicates that biota in the immediate vicinity of an aircraft impact would be immediately killed. Depending on the extent of the damage, recolonization of coral reefs could take as long as decades. If the area is contaminated by fuels, oils, or hydraulic fluids, recolonization could be delayed until these materials were substantially degraded and dispersed. This description does not seem to minimize the potential impacts on coral reefs.

16.2.17 Comment: The Draft SEIS does not mention the possibility, and resulting pollution, of commercial aircraft having to dump fuel into Florida Bay (Everglades National Park) or the Atlantic, adjacent to the Keys. This would result in significant damage to mangroves and seagrass.

Response: On the infrequent occasions that fuel dumping is required, it is generally carried out at a pre-specified altitude, generally over 10,000 feet, for as long as needed to attain minimum required fuel loads. At this altitude, essentially all of the fuel vaporizes and is widely dispersed by winds without ever hitting the ground. The small fraction of the fuel that is not vaporized falls as small droplets through almost 2 miles of atmosphere before reaching the ground. Since jet aircraft move at a rate between 4 and 5 miles per minute, or faster, the small fraction of fuel that does not vaporize is distributed over large areas. The droplets are further dispersed by winds.

Aircraft that must dump fuel are generally directed by air traffic control to areas over the deep ocean at locations southeast of Florida, not over the Everglades or Florida Bay. It is likely that fuel dumping by aircraft intending to land at Homestead would occur at least 50 miles east of the Florida Keys, preventing amounts that could cause harm to sensitive habitats such as coral reefs from reaching those habitats.

16.3 Wetlands

16.3.1 Comment: The Draft SEIS used outdated satellite imagery to characterize vegetation communities in the vicinity of former Homestead AFB. Reliance on older, less accurate data contributed to errors in the narrative description of the areal extent and ecological value of mangroves and other wetland communities.

Response: The land cover map in the SEIS (Figure 3.11-2 in Volume I) has been updated with the most recent satellite imagery available (imagery based on 1993/94 coverage). The plant community acreage estimates have been revised based on this new map. More recent mapping of the plant communities along the western shoreline of Biscayne Bay was limited in aerial extent and not used in the SEIS because a map showing a larger area was needed.

16.3.2 Comment: The Proposed Action anticipated filling nearby wetlands, which are the habitat for threatened and endangered species, in order to reduce bird-aircraft strike hazards.

Response: There are no plans under the Proposed Action or any of the alternatives to fill nearby wetlands off the former base property. At the southwest end of the runway, two areas will be studied to determine whether they pose sufficient bird-aircraft strike hazard under the Proposed Action to warrant filling. Currently, FAA does not think that such action would be necessary. These areas are used intermittently, during winter, by wading birds, occasionally wood stork, and as feeding and loafing areas when standing water appears there.

16.3.3 Comment: The Draft SEIS underestimates potential loss of wetlands. Historically, administration of Section 404 of the Clean Water Act has resulted in excessive and illegal destruction of wetlands.

Response: The SEIS assumes that applicable federal, state, and local laws and regulations will be enforced. It does acknowledge that small, unregulated wetlands could be lost to development.

16.3.4 Comment: The Proposed Action is likely to have impacts on the freshwater and mangrove wetlands associated with the L-31E Flowway Redistribution Project.

Response: The L-31E Flowway Redistribution Project has not yet been designed past the conceptual stage, and without a plan of what would be done, it is difficult to determine what the effects of that project would be or how it might be changed as a result of the Proposed Action. In general terms, it is estimated that discharges from Military Canal would carry the pollutants indicated in Table 4.10-5 in Volume I to a stormwater treatment and distribution area (STDA). The STDA would remove some or most of the pollutants in the water prior to reaching L-31E. The amount of pollutant removal would depend on a number of factors, including retention time, vegetation, and the rate at which water from Military Canal would be supplied to the STDA. Depending on the amount of pollutant removal and which pollutants were removed, effects on wetlands and mangroves could range from none (the water quality is essentially the same as other water entering L-31E) to some unquantifiable higher impact. Given that the amount of water entering this area from Military Canal would probably be considerably less than the amounts coming from other sources, the impacts on water quality are likely to be small. If the impacts on water quality are likely to be small, then the biological or ecological effects of the pollutant loads entering L-31E from Military Canal are also likely to be small.

16.4 Sensitive Species

This section addresses non-noise related comments concerning sensitive species. Noise-related comments are addressed in the subsequent section (16.5).

16.4.1 Comment: The South Florida Water Management District Southern Glades Wildlife and Environmental Area and the Model Lands area serve as a wildlife habitat corridor that connects the national parks, preserves, and state parks. The Southern Glades support breeding populations of the endangered Cape Sable seaside sparrow and contain designated critical habitat for this species.

Response: The designated critical habitat for Cape Sable seaside sparrow is displayed on Figure 3.11-5 in Volume I. The habitat area includes the Southern Glades Wildlife and Environmental Area, although the Southern Glades were not specifically identified on this figure in the Draft SEIS. The Final SEIS has been expanded to incorporate more information on the Southern Glades and Model Lands Basin.

16.4.2 Comment: There is no reference in the Draft SEIS to the resident population of bottlenose dolphin (a species protected under the Marine Mammal Protection Act) in Biscayne Bay.

Response: Information on the bottlenose dolphin has been incorporated into the Biological Resources sections of Volume I of the Final SEIS.

16.4.3 Comment: Key Largo Hammocks State Botanical Site and Crocodile Lake National Wildlife Refuge (NWR) both are habitat for four federally endangered species: American saltwater crocodile, Key Largo woodrat, Key Largo cotton mouse, and Schaus swallowtail butterfly.

Response: The redevelopment of former Homestead AFB would not affect these resources. The only aspect of reuse that they could be exposed to is aircraft overflight. The effects of aircraft noise on the American crocodile are addressed below in section 16.5.

The Key Largo woodrat and Key Largo cotton mouse occur on north Key Largo, including at Crocodile Lake NWR. They would not be affected by the Proposed Action. Commercial aircraft flying over Crocodile Lake NWR would be at an altitude of 6,000 feet or higher. Given this, it is expected that overflights would not affect these two rodents.

The Schaus swallowtail butterfly occurs on north Key Largo, Elliott Key, and other keys in Biscayne National Park and on the Deering Estate on the mainland north of the park. The increase in overflights

under the Proposed Action would likely not impact the butterfly, given that aircraft would be 3,000 to 5,000 feet or higher above Elliott Key.

The Final SEIS has been expanded to include more information on the crocodile population at Crocodile Lake NWR and an assessment of the potential impacts the Proposed Action and other alternatives could have on this population and on the other endangered species on Key Largo.

16.4.4 Comment: The saltwater crocodile has been breeding successfully in the Turkey Point area since Hurricane Andrew curtailed operations at the former base, possibly as a result of reduced noise levels since the realignment of Homestead AFB.

Response: The American crocodile began nesting at Turkey Point in 1978, and its numbers increased through the 1980s when Homestead AFB was in full operation. The number of adults at Turkey Point began to level off in the 1990s, and this site may be at carrying capacity (see Section G.2.3 in Appendix G, Volume II, for more details). There were an average of about 375 operations per day from Homestead AFB before Hurricane Andrew. This indicates that the American crocodile expanded into Turkey Point when there was substantially more aircraft activity in the area than currently.

16.4.5 Comment: What will happen to the Florida panthers that are occasionally seen near Keys Gate?

Response: It is not envisioned that the Proposed Action or any of the reuse alternatives would have any impacts on the Florida panther. As indicated in Section G.2.5 of Appendix G (Volume II), radiotelemetry data have documented the presence of Florida panther south of the former base, mostly in the Model Lands Basin. There is potential marginal habitat for this species north of Palm Drive that could be lost through secondary development. It is not thought that aircraft noise would affect occasional individuals that may occur north of Palm Drive (including the Keys Gate area) or in the Model Lands Basin.

16.4.6 Comment: The Dade County Manatee Protection Plan (versus personal communication) may provide more objective information for assessing the likelihood of impacts to manatees from proposed uses.

Response: The personal communication reference in the Draft SEIS has been removed from the Final SEIS, and information from the Manatee Protection Plan was used instead.

16.4.7 Comment: The discussion of impacts on endangered species resulting from conversion of vacant/agricultural lands to commercial/residential lands does not consider the relationship of animals to their extended environment. The long-term viability of species needs to consider impacts on prey species and their habitat.

Response: The Final SEIS has been expanded to add that secondary development would likely result in the loss and fragmentation of various components of some habitat, including the abundance of prey animals. The SEIS indicates that secondary development relating to reuse of former Homestead AFB could result in elimination and fragmentation of some indigo snake habitat.

16.4.8 Comment: The Department of the Interior notes the Mixed Use alternative offers the opportunity to preserve remaining pine rocklands and increase wading bird habitat. This may be possible under any scenario involving Mixed Use, particularly if deed restrictions are used to preserve rare and ecologically sensitive habitat.

RESPONSES TO COMMENTS

Response: The Final SEIS has been expanded to include recommendations of the Department of the Interior and other cooperating federal agencies. They will be carefully considered by the Air Force and the FAA during decision making.

16.4.9 Comment: The Draft SEIS implies that acreage on former Homestead AFB is already disturbed and not worth protecting. The remaining 16.7 acres of remnant pine rocklands, a vanishing habitat in south Florida, should be protected to the maximum extent possible given the large number of sensitive plants there.

Response: The Proposed Action includes a Wildlife/Habitat Management and Mitigation Plan that provides protection for 16.1 acres of pine rocklands on the former base. U.S. Fish and Wildlife Service has also requested that three of the four areas designated for protection (those containing the endangered Small's milkpea) be preserved through a deed covenant. Under the county's plan, an additional 14.1 acres of remnant pine rocklands south and southeast of the runway would be studied to determine whether they could contribute to bird-aircraft strike hazard, and decisions on their preservation would be made after the studies are completed. It is unlikely these areas would be lost. Therefore, under the Proposed Action, up to 30.2 acres of remnant pine rocklands would be preserved, and between 0.6 and 14.5 acres could be lost. Under the other alternatives, at least the pine rocklands containing Small's milkpea would be preserved. It is also unlikely that the 14.1 acres of remnant pine rocklands near the runway would be altered under any of the Mixed Use scenarios.

16.5 Noise Effects on Wildlife

16.5.1 Comment: Many studies have shown that animals are detrimentally affected by noise. One study has shown that mammals, including dolphins, will go miles and miles out of their way to avoid human being noise.

Response: Section 4.11.3 in Volume I addresses the potential effects of noise on sensitive species. Based on the studies reviewed for this analysis, noise levels generated by aircraft from the Proposed Action are expected to have little or no effect on most species of wildlife. Text concerning the bottlenose dolphin populations in Biscayne Bay was added to Section 3.11.2, and the effects of noise on this species is briefly addressed in Section 4.11.3 of Volume I. Based on the studies reviewed, it is thought that the bottlenose dolphin would continue to occur in Biscayne Bay if the Proposed Action were implemented.

16.5.2 Comment: The animals most detrimentally affected by noise are birds. Birds will be bothered by the noise. They might make a nest, and they might even lay an egg, but then they will abandon that egg. This will affect both the existing bird population and the baby bird population, which is the adult birds of the future.

Response: The potential impacts of noise on nesting birds is discussed in Section 4.11.3 of Volume I. Although information on the effects of noise on many bird species is limited, available information on wading birds and other aquatic birds that predominate in the area of former Homestead AFB indicates that the projected noise exposures, in terms of magnitude, duration, and frequency of occurrence, are unlikely to have any long-term effects on breeding populations. The western shoreline of Biscayne Bay and associated canals and freshwater wetlands, where changes in noise would be greatest, currently support a fairly low density of foraging wading birds that are typically seen as widely scattered solitary individuals or in small groups, and there are no rookeries in this area. Changes in noise associated with the Proposed Action at breeding locations for theses species, the rookeries at Arsenicker Key, for example, would be small.

Given the current level of human activity in these areas and the ongoing military air operations, noise generated from the Proposed Action is anticipated to have little effect on wading birds and other sensitive bird species in the area of former Homestead AFB or along the western shoreline of Biscayne Bay.

16.5.3 Comment: The effects of increased noise on birds are not well known, and it is possible that increased noise from the Proposed Action will disrupt nesting, foraging, and migration patterns of bird species in the area. The Cape Sable seaside sparrow is of particular concern.

Response: The Final SEIS has been expanded to provide more discussion of Cape Sable seaside sparrow habitat. The eastern population and critical habitat of the Cape Sable seaside sparrow occur in the western part of the Southern Glades Wildlife and Environmental Area. The noise modeling conducted for the SEIS showed no increase in the maximum noise exposure levels under the Proposed Action over current levels at and near these locations. In some areas, the amount of time that aircraft noise levels would be above ambient levels could increase more than two hours. It is considered unlikely that these increases would affect nesting, foraging, or migration, but they may result in slight masking effects.

16.5.4 Comment: If aircraft noise prevents singing birds from mating, will this noise be the cause of a drop in reproductive success?

Response: There is little information regarding noise preventing birds from hearing each other (referred to as masking). This issue is addressed in the SEIS for the Cape Sable seaside sparrow (see Section 4.11.3 in Volume I), and it is acknowledged that aircraft noise may mask breeding bird communication in portions of the eastern population of the Cape Sable seaside sparrow. This type of masking effect may also occur for other species in the area. The amount of time that this could occur is not expected to be sufficient to affect reproductive success. Aircraft noise events tend to be of short duration and spread out over the course of the day.

16.5.5 Comment: Birds that flush during feeding or resting two to eight times per hour will not have nesting success, defined by raising chicks to fledging, as often as those who are not stressed in this way, even if they do not abandon the nest.

Response: Wading birds and other species are not expected to flush two to eight times per hour as a result of the Proposed Action. Wading birds currently foraging on the former base in the area of the runway typically do not flush during aircraft operations, even though noise levels can exceed 110 decibels. Studies of wading birds elsewhere in Florida (see Section 4.11.3 in Volume I) have shown that they do not flush from their nests at noise levels from 60 to 75 decibels, and sometimes do not flush with noise levels as high as 100 decibels. Although the effects of noise on wading birds along the western shoreline of Biscayne Bay has not been specifically studied, it is reasonable to believe they would be similar to the findings of other published studies and to recent observations at Homestead Air Reserve Station.

16.5.6 Comment: The conclusions that aquatic bird life will adapt to expected noise levels ignores the fact that many wading and diving birds do not communicate vocally and therefore are relatively unaffected by noise.

Response: As indicated in Section 4.11.3 of Volume I, there is little information regarding the effects of noise in masking vocal communication by birds, including wading and diving birds. However, noise has a variety of effects on birds besides masking vocal communication, and these are discussed in the SEIS. Based on current noise levels and projected noise levels for the Proposed Action, information from the literature, and observations of wading birds on and near former Homestead AFB, there appears to be no basis for concluding that noise generated by the Proposed Action would have much effect on wading birds.

16.5.7 Comment: The Draft SEIS says that some birds may relocate to quieter areas with suitable habitat, but suitable habitat is limited in south Florida.

Response: As indicated in Section G.2.4 of Appendix G (Volume II), the western shoreline of Biscayne Bay and associated canals and freshwater wetlands currently support a fairly low density of foraging wading birds that are typically seen as widely scattered solitary individuals or in small groups. Under these circumstances, it is believed that suitable habitat is available for some of these birds to relocate to other areas.

16.5.8 Comment: Animals are going to respond to the frequency of noise more than to total noise levels over a 24 hour period.

Response: There is a high correlation between the amount of time noise levels from aircraft flights are above ambient levels and the frequency of flights. If a given species has a negative reaction to aircraft noise and/or visually seeing an aircraft, and the species does not become habituated to this activity, then an increase in frequency of flights will likely have more of an effect on this species. This has been observed with some species of waterfowl in fairly remote locations, as discussed in Section 4.11.3 of Volume I. Studies of noise effects on wildlife in less remote areas have shown that some species can habituate to aircraft noise and be much less affected; for example, wintering waterfowl near Piney Island, North Carolina. No studies of noise effects on birds and other wildlife have been conducted at or near former Homestead AFB or in Biscayne Bay. The level of human activity (including military aircraft flights) in these areas is fairly high, and birds have and will likely continue to be habituated to this activity level. The increased frequency of flights associated with the Proposed Action is likely to have little effect on these species.

16.5.9 Comment: The Draft SEIS indicates that the noise impacts at the western shore of Biscayne National Park and in the northern and eastern areas of Crocodile Lake National Wildlife Refuge are unknown for the American crocodile. If the effects are unknown, it would be better to err on the side of caution and not further stress this endangered species.

Response: As the SEIS indicates, no information was found on the American crocodile's response to noise. The American crocodile is repopulating the western shoreline of Biscayne Bay, and two related crocodilians (American alligator and spectacled caiman) now reside on former Homestead AFB. These species also occurred on the base when it was fully operational. This indicates that there is no presumptive evidence that the American crocodile is, or other crocodilians are, sensitive to aircraft noise. Based on available evidence, American crocodiles appear to be less sensitive to noise than some bird species.

The occurrence of these crocodilians at former Homestead AFB when it was fully operational suggests that these species can adapt to noise at airfields. An important step in the recovery of the American crocodile has been the establishment of a breeding population at Turkey Point Nuclear Power Plant beginning in 1978. This population continued to grow throughout the 1980s. Homestead AFB was fully operational at that time, with an estimated 375 aircraft average daily operations in 1987. The average Sound Exposure Level from an F-16 near Turkey Point is about 85 decibels (see Figure 3.5-6 in Volume I). This indicates that the American crocodile is either insensitive or able to adapt to elevated noise levels from aircraft. The discussion of potential impacts of noise on the American crocodile in Section 4.11 of Volume I has been expanded to include this information.

16.5.10 Comment: The Draft SEIS does not analyze the effects of 1,000 overflights per day on bird nesting and reproductive behavior in Florida Bay if the flight path mitigation alternatives are adopted. The

Draft SEIS does not analyze the effects of noise pollution on the nesting and reproductive behavior in Crocodile Lake National Wildlife Refuge, located in North Key Largo.

Response: Sections 3.11 and 4.11 in Volume I of the Final SEIS have been expanded to provide more information on sensitive species in Florida Bay and Crocodile Lake National Wildlife Refuge and aircraft noise effects in those areas. There is no location, however, that would be exposed to 1,000 flights per day from the Proposed Action. Wading bird rookeries and bald eagle nests occur in eastern Florida Bay. The maximum noise levels and time above ambient would change slightly under the Proposed Action. The small increases in noise levels in Florida Bay would not be expected to affect nesting wading birds or bald eagles in this area.

Although there is limited information on noise impacts on crocodilians, circumstantial evidence from the former base and from along the western shoreline of Biscayne Bay indicates that the crocodilians inhabiting this area would probably coexist with the increased noise that would result from the Proposed Action. The American crocodile currently inhabits areas close to the base (Turkey Point), and two crocodilians (the American alligator and spectacled caiman) currently reside in the wetlands and canals along the runway on the former base. Further, these species have resided at the base for decades. This indicates that these two crocodilians coexist with the current noise levels and resided on the base when it was under full operation in a much noisier environment.

16.6 Bird-Aircraft Strike Hazard

16.6.1 Comment: The Draft SEIS should include additional information related to species distribution associated with bird-aircraft strikes. Given the number of federal and state-listed endangered and threatened bird species in the vicinity of former Homestead AFB, the SEIS should address applicable regulations or agency policies of the U.S. Fish and Wildlife Service and Florida Fish and Wildlife Commission related to the inadvertent “taking” of birds.

Response: Bird-aircraft strike data for the last four years from Homestead Air Reserve Station indicate mostly small birds, such as swallows and killdeer, are struck by aircraft, along with occasional larger birds, such as gulls and vultures. Bird strikes currently occur about once every two months, as indicated in Section 3.4.3 of Volume I.

16.6.2 Comment: The recommended use of bioacoustics to disperse birds to avoid aircraft strikes could have adverse effects on migratory bird flight patterns and rookeries of breeding birds. If these techniques include noise that prevents birds from roosting, this will affect wildlife in and around the national parks. They could also disturb other wildlife in the area.

Response: Bioacoustics are identified as a potential means of reducing bird-aircraft strike hazards. The SEIS makes no recommendation about the use of this measure. Bioacoustics are currently used to disperse birds at Homestead Air Reserve Station. Efforts to scare birds away from flight paths to minimize the danger of bird-aircraft strikes are focused on birds that are feeding or loafing near the runway, not at roosting sites. There are two small nocturnal roost sites on the former base (no wading bird nest sites occur on the former base) that are used occasionally by birds. These sites do not pose the same concern as birds feeding along the runway and are typically not subject to control techniques that are used along the runway. The sound level from the bioacoustics would dissipate quickly and have little effect on wildlife beyond the area immediately around the airfield.

16.6.3 Comment: A more expansive analysis of the bird-aircraft strike issue needs to be completed with a focus on a plan to alleviate increased strikes from full buildout and/or a second runway. The aviation department requested authority to shoot white ibis on the former base last year, ostensibly for air

safety reasons. If the limited number of flights currently departing from the runway is already creating white ibis strike concerns, then increased flights from a commercial airport would logically increase those strike concerns.

Response: Homestead Air Reserve Station requested permission to shoot white ibis as a method of minimizing bird-aircraft strike hazard near the airfield, but the request was withdrawn in response to public opposition. The Air Reserve Wing at Homestead has two staff to deal with bird-aircraft strike hazards, one for the airfield, and one for the nearby Miami-Dade County landfill (Mount Trashmore). Data from 1996 to 2000 indicate that most bird-aircraft strikes at Homestead involve small birds, such as swallows and killdeer, with less frequent strikes of larger birds, such as gulls and vultures. No wading birds have been reported as being struck by aircraft. As reported in Section 3.4.3 in Volume I, bird-aircraft strikes occur about once every two months on the former base. Bird-aircraft strike hazard would increase with a greater number of flights under the Proposed Action, and methods similar to those currently employed to scare birds on and near the runway may be used. These methods include using noise and small pyrotechnics (see Section 3.4.3). The specific methods that would be used under the Proposed Action have not been finalized.

The possibility of a second runway at Homestead is perhaps decades away and too far in the future to plan for.

16.7 Exotic Species

16.7.1 Comment: The Draft SEIS did not consider the potential for cargo and passenger aircraft arriving from foreign countries to introduce nonindigenous species into south Miami-Dade County.

Response: Considerations of possible introduction of pest species are discussed in Sections 3.6.5 and 4.6.4 in Volume I.

16.7.2 Comment: The Draft SEIS indicates that changes to the stormwater management system at the former base could cause existing spectacled caiman to relocate to nearby wetlands. Control or eradication measures should be implemented under the Proposed Action or reuse alternatives to prevent this species from invading surrounding ecosystems.

Response: Available information indicates that caiman currently occur in many areas off the base and may occupy most available freshwater habitat from Black Point south to Palm Drive (see Section 3.11.2 in Volume I). A caiman removal program for the former base has been identified as a potential mitigation measure in the Final SEIS.

17.0 CULTURAL RESOURCES

No comments concerning the cultural resources analysis raised questions or concerns that needed response.

18.0 MINORITY AND LOW-INCOME POPULATIONS

This category addresses comments concerning compliance with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, and measures to mitigate impacts on minority and low-income populations.

18.0.1 Comment: The environmental justice analysis in the SEIS is superficial. It does not address the impacts of the process and resulting decisions upon low-income and minority populations.

Response: The goal of the analysis in the SEIS is to comply with Executive Order 12898, which directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

To accomplish that, potential resource impacts were reviewed to determine the location and level of those impacts and their potential for adverse environmental, safety, or health effects on nearby low-income or minority populations. The potential exposure of residents to increases in Day-Night Average Sound Level of 1.5 decibels (dB) or greater within the 65 dB contour and of 3 dB or greater within the 60–65 dB contour was the only potential health or environmental effect that warranted discussion. Although the comment labels the Draft SEIS analysis “superficial,” it does not identify any specific errors in the discussion nor identify any additional health or environmental issues that should have been addressed.

Another comment was that the discussion did not address impacts of the SEIS process and of the resulting decisions on low-income and minority populations. The impacts to which the comment refers are not clear, but they are interpreted to refer to economic issues, such as delays in redevelopment and differing job opportunities associated with each alternative. Such issues are not the human health or environmental effects that the Executive Order instructs federal agencies to identify and address.

18.0.2 Comment: The SEIS should evaluate the (negative) impact of acquiring residences exposed to airport-related Day-Night Average Sound Levels over 65 decibels on minority and low-income populations.

Response: The residences identified as potentially exposed to these elevated noise levels under the Proposed Action are within a housing area developed for farmworkers and inhabited by minority and low-income residents. Relocating these residents to an area that has less noise exposure would have the effect of reducing adverse impacts to these populations.

18.0.3 Comment: It is misleading to conclude that reuse-related secondary development will not have any disproportionately high and adverse impacts on minority or low-income populations when there is no solid proposal for the secondary development.

Response: The secondary development stimulated by reuse of former Homestead AFB property is expected to be spread over various portions of the region, principally in south Miami-Dade County. It could include some airport-related development (in the case of the Proposed Action), unrelated industrial and commercial development, and residential development to accommodate in-migrating population. It would be developed incrementally as demand warranted. As such, it is not likely there will ever be a specific proposal for secondary development as a whole. Given the available information, there is no reason to conclude that secondary development would have disproportionately high and adverse impacts on minority and low-income populations.

19.0 DEPARTMENT OF TRANSPORTATION (DOT) ACT SECTION 4(F) LANDS

19.0.1 Comment: The Department of the Interior (DOI) understands that a “Section 4(f) Determination” is underway in accordance with Section 4(f) of the Department of Transportation (DOT) Act. For reasons outlined in DOI’s letters, DOI believes the FAA should conclude under Section 4(f) that the Proposed Action would constitute a constructive use of National Park Service lands. Similarly, other comments received along the same lines relative to impacts on the national parks would reach the same conclusion as DOI.

Response: The FAA respects the views of agencies and individuals that regard the Proposed Action as inherently undesirable for the national parks. Reasonable people will probably continue to disagree about

the magnitude and impact of the potential environmental effects. The FAA has relied on information in the SEIS for its DOT Act Section 4(f) evaluation and has determined that potential impacts would not rise to the level of severity that would constitute a use of resources protected under DOT Act Section 4(f). The FAA's Section 4(f) review in Volume I, Section 4.14 of the Final SEIS fully explains the basis for the FAA's determination.

19.0.2 Comment: The Natural Resources Defense Council (NRDC) commented that the Draft SEIS does not include the complete discussion and analysis required under Section 4(f). NRDC noted that whether or not a reliever airport is needed in Miami-Dade County may impact upon the FAA's Section 4(f) determination and provided environmental information and a report on this issue to assist the FAA in its compliance with Section 4(f). NRDC reserved the right to augment its information, including after the FAA makes public further documentation concerning its compliance with Section 4(f).

Response: The FAA's Section 4(f) review is included in Volume I of the Final SEIS at Section 4.14. The FAA has relied on information in the SEIS for its Section 4(f) determination. Information relevant to the Section 4(f) determination has not substantially changed between the Draft and Final SEIS. The information provided by NRDC was reviewed and considered by the FAA. Although the specific Section 4(f) finding related to "no feasible and prudent alternative" is not applicable because the FAA has determined that there would be no Section 4(f) use, FAA continues to believe that more commercial airport capacity is needed in the future in south Florida to relieve Miami International Airport. Detail on the evaluation of the need for more commercial airport capacity is found in Appendix A in Volume II.

19.0.3 Comment: The National Parks Conservation Association believes that the proposed airport development of Homestead AFB violates Section 4(f) of the 1966 Department of Transportation Act. This act stipulates that the Secretary of Transportation shall not approve any project that "requires the use of any publicly owned land from a public park...unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park...." Case law indicates that "use" in this context includes indirect impacts such as noise, pollution, visual intrusion, and increased traffic. There are a number of feasible alternatives to the proposed airport that the SEIS fails to consider.

Response: The FAA's DOT Act Section 4(f) evaluation in Volume I, Section 4.14 of the Final SEIS includes the consideration of all environmental impacts and includes an assessment of constructive use as well as direct, physical taking of Section 4(f) lands. Since the FAA has determined that there would be no Section 4(f) use with the Proposed Action, the "feasible and prudent alternative" finding does not apply. The FAA believes that such a finding would be supported based on the aviation need addressed in detail in Appendix A in Volume II and the situation with respect to other alternatives. The FAA does not agree that the SEIS fails to consider feasible and prudent alternatives.

19.0.4 Comment: Section 4(f) of the Transportation Act requires that there exist no reasonable or prudent alternative to any proposed use of the national parks, such as by noise from overflights. As the proposed commercial airport at former Homestead AFB will almost certainly in fact adversely affect the adjacent national parks, the FAA should study whether there are alternative sites, such as Opa-Locka Airport, for Miami-Dade County's next reliever airport.

Response: The FAA's DOT Act Section 4(f) evaluation includes the consideration of all environmental impacts, giving the greatest amount of attention to noise from aircraft overflights. Volume I, Section 4.14 of the Final SEIS explains in detail why the FAA has determined that environmental effects of the Proposed Action would not rise to the level of constructive use under DOT Act Section 4(f). While the finding of "no feasible and prudent alternative" is not applicable absent Section 4(f) use, FAA has

reviewed the availability of other airport sites and the capacity of other airports, including Opa-Locka, to meet projected future aviation demand in south Florida. This review is in Volume II, Appendix A.

20.0 SECONDARY DEVELOPMENT

Reuse-related secondary development is an integral component of the SEIS analysis, and many resource-specific (e.g., Socioeconomics, Water Resources) comments concerning secondary development are addressed within those resource categories. This category addresses general comments on how the amount of secondary development was calculated for each alternative.

20.0.1 Comment: The Draft SEIS does not thoroughly investigate the impacts of secondary development.

Response: Each section of Chapter 4 in Volume I addresses impacts from both direct and secondary development associated with the Proposed Action and alternatives. Each reuse alternative is anticipated to generate secondary employment and population in-migration—the people who move to the area to take jobs at the former base. Chapter 2 in Volume I describes how secondary development was estimated for each reuse alternative. The impacts of this secondary development are addressed in the SEIS.

20.0.2 Comment: Consideration was not given to the rental car companies, warehouses, and other development that would be generated by a commercial airport.

Response: Section 2.2 in Volume I describes the types of adjunct airport-related development that could be expected to occur with the Proposed Action. Much of this development could be accommodated on former Homestead AFB property, but some of it could also occur in nearby areas as secondary development.

20.0.3 Comment: The SEIS underestimates the additional development that the Proposed Action would attract. Estimates of development from the Proposed Action could be as high as 20,000 acres.

Response: No specific information has been provided to indicate that the SEIS' estimates are inaccurate or unreasonable, nor has any substantiation been provided for other numbers that have been suggested by some commentors. Section 2.2.5 in Volume I indicates that a more reasonable estimate for secondary development from the Proposed Action is about 3,000 acres by full buildout.

20.0.4 Comment: The Proposed Action will result in perhaps 15,000 acres of agricultural land being taken out of production.

Response: The Proposed Action is estimated to result in secondary development of about 3,000 acres by full buildout, including both agricultural and non-agricultural land.

20.0.5 Comment: The analysis of the impacts of secondary development associated with reuse of former Homestead AFB is superficial. The area between the former base and Biscayne Bay is currently undeveloped and acts as a buffer between development and the bay. This area will be subject to development if a commercial airport is developed at Homestead.

Response: It is not possible to predict exactly what the secondary development would entail and which parcels would be developed. It is only possible to estimate the magnitude and general location of secondary development that may be stimulated by reuse of former Homestead AFB property. There are no specific plans for this development; it is likely to occur in scattered locations on an incremental basis. Therefore, it is not feasible to predict with greater precision the environmental effects or determine

stormwater management practices that would be applied. In general, it can be expected that projected growth in south Miami-Dade County will result in increased urbanization and development of lands that are currently undeveloped, including areas east of the former base that are not protected from development (e.g., agricultural lands).

20.0.6 Comment: The Draft SEIS did not analyze the potential secondary impacts from increased population growth to surrounding areas such as the Florida Keys.

Response: Each resource section in Chapter 4 in Volume I describes the impacts of both on-site development and secondary development. The SEIS discusses impacts on Monroe County in the Socioeconomics, Noise, Land Use and Aesthetics, and Biological Resources sections. These are the resource areas in which potential impacts on Monroe County have been identified. For other resources, the Florida Keys are outside the area where the vast majority of impacts are anticipated to occur.

20.0.7 Comment: The matter of controlling induced growth was addressed in the Final Environmental Impact Statement for the Replacement Airport for the Everglades Jetport prepared in the 1970s to analyze a proposed jetport in Big Cypress National Preserve. The last sentence on page S-25 of that document's Summary states: "Potential adverse environmental impacts that might result from induced development would be protected against through commitments specified in a grant agreement for land acquisition." Applying this to the Homestead project means requiring Miami-Dade County and the City of Homestead to commit to enforcing land use and development regulations. The FAA and the Air Force could provide the federal oversight as parties to the federal action.

Response: The mitigations that have been suggested for a commercial airport at former Homestead AFB are described in the Final SEIS. Though addressing induced growth appears to have been a common issue in both documents, how that might be accomplished for Homestead is affected greatly by its own particular location and by possible legal constraints on the commitments the county is permitted to make. At Homestead, the possibility of controlling growth by creating a buffer area, rather than by land use regulations, has achieved prominence among those concerned with controlling growth in areas outside the Urban Development Boundary. The approach suggested in the comment, however, is a possibility.

21.0 BUFFER AREA

This category addresses comments on a potential buffer area discussed in the SEIS that would be between former Homestead AFB and Biscayne National Park.

21.0.1 Comment: A buffer area between former Homestead AFB and Biscayne National Park has been recommended by numerous agencies and groups and should be part of any reuse alternative for former Homestead AFB. If a buffer between former Homestead AFB and Biscayne National Park is necessary to protect critical resources, it should be recommended as such.

Response: The buffer is a possible approach to implementing several measures that would reduce impacts from development near Biscayne National Park. There are also other existing and potential ways to achieve these objectives. A buffer area would be beneficial in controlling the effects of growth and development proximate to the park, including both unrelated (baseline) development and reuse-related secondary development. It could prevent development of noise-sensitive land uses, such as housing, in areas exposed to high noise levels from aircraft operations at Homestead. It could also facilitate the establishment of a stormwater treatment and distribution area, preservation of wetlands and habitat, and implementation of ecosystem restoration projects.

21.0.2 Comment: The Department of the Interior believes that a buffer to maintain existing agricultural and open spaces uses between Biscayne National Park and the urban areas of southeast Miami-Dade County is essential to protect the national and regionally significant resources and values of the park. Implementing the buffer may be more easily accomplished under the Mixed Use alternative in that it is projected to result in the use of fewer acres adjacent to former Homestead AFB property and the secondary development may be less.

Response: The Final SEIS has been expanded to include recommendations of the Department of the Interior and other cooperating federal agencies. They will be carefully considered by the Air Force and the FAA during decision making.

The strong interest in a buffer by federal agencies and the public has been recognized since work on the SEIS began. The topic of buffer lands is one of the special topics separately addressed in the Summary and Chapter 2 of Volume I.

It is not certain that a buffer would be more easily accomplished under the Mixed Use alternative. Miami-Dade County has committed to the concept of a buffer in connection with the proposed commercial airport. It is not clear who would sponsor a buffer if the Mixed Use alternative were selected.

21.0.3 Comment: The proposal for a buffer between former Homestead AFB and Biscayne National Park is unclear. The Draft SEIS did not provide sufficient information on how the buffer area would be implemented (e.g., which lands must be purchased) or how the buffer would affect water quality and flow from the former base.

Response: The SEIS includes as much information about the potential buffer as is available. No detailed plan for the buffer or its implementation has been developed.

21.0.4 Comment: Some sections of the Draft SEIS propose a buffer area as a measure to protect resources, while other sections identify adverse impacts from the buffer. The ecological value of providing a buffer between former Homestead AFB and the natural system should be weighed in determining whether the buffer zone is necessary. The inhibition of development of a second runway should be a secondary consideration.

Response: A buffer area between former Homestead AFB and Biscayne National Park has been proposed by a number of organizations and is discussed in the SEIS. Each resource topic in Chapter 4 of Volume I addresses the potential effects of such a buffer. As with other impacts, both beneficial and potential adverse effects are discussed.

21.0.5 Comment: Restricting property to agricultural use in the proposed buffer area between former Homestead AFB and Biscayne National Park would drive agriculture out.

Response: This issue was raised during scoping for the SEIS and is acknowledged in Section 4.6.4 in Volume I. As that section indicates, the impact of establishing a buffer would depend on how it was implemented and the extent to which potential adverse effects could be mitigated.

21.0.6 Comment: The conclusion in the Draft SEIS that a buffer between former Homestead AFB and Biscayne National Park would not provide appreciable benefits is apparently based on the assumption that existing land use would not change. This conclusion does not consider the benefits of the proposed Biscayne Bay Coastal Wetlands project.

RESPONSES TO COMMENTS

Response: There is no specific plan that defines what a buffer might encompass or how it might be implemented. Some of the proposals for a buffer have suggested that existing land use (primarily agriculture) would be maintained. The SEIS indicates that such a proposal would not be expected to create major changes. It also indicates that much of the land between the former base and Biscayne National Park is already protected. The Biscayne Bay Coastal Wetlands Project is addressed independently from the buffer as part of the ecosystem restoration initiatives in the cumulative impact analysis.

21.0.7 Comment: If a buffer between former Homestead AFB and Biscayne National Park is necessary to protect critical resources, a dedicated funding source for implementation should be identified.

Response: While a buffer would have beneficial environmental effects, it has not been found necessary to protect critical resources, principally because there are existing mechanisms for protecting resources such as threatened and endangered species and wetlands.

22.0 MITIGATION MEASURES

This section addresses issues related to mitigation measures in general. Mitigation measures suggested to reduce specific resource impacts are addressed in the categories for those resource topics (e.g., Noise, Transportation, Water Resources).

22.0.1 Comment: The Draft SEIS implies that the recommendations of the Homestead Air Force Base Issue Team and the Homestead Air Force Base Drafting Subcommittee were endorsed by the South Florida Ecosystem Restoration Working Group. This is not true, and the SEIS should be corrected to eliminate this implication.

Response: The SEIS simply states that the two committees submitted their recommendations to the Department of the Interior, which in turn forwarded them to the Air Force. It does not indicate whether or not the recommendations were endorsed by the Working Group.

22.0.2 Comment: The Draft SEIS does not indicate the cost of mitigation measures or identify which government agency would be responsible for implementing the mitigations.

Response: Calculating the cost of various potential mitigation measures was not within the scope of the SEIS. The SEIS does identify, to the extent known, who might be responsible for implementing the mitigations.

22.0.3 Comment: The Final SEIS must analyze all mitigation necessary, including the buffer between former Homestead AFB and Biscayne National Park, and examine the costs of implementing the mitigation measures.

Response: The SEIS identifies possible mitigation measures for reducing environmental impacts. The Air Force will identify which mitigation measures, if any, are a condition of the property conveyance in the Record of Decision after the Final SEIS has been completed. Funding responsibilities may also be addressed in the Record of Decision.

22.0.4 Comment: The Air Force hedges its answers on conditions, knowing that the implementers will never do half the things that must be done to mitigate the consequences to have the project fly. The implication of this comment appears to be that the analysis is misleading because it is based on mitigations that may not be implemented.

Response: The SEIS has analyzed the consequences of redeveloping the surplus property in a manner consistent with the stated intentions of each alternative's proponent. The SEIS has not assumed that the Air Force would impose any particular mitigations, and therefore the impact analysis does not depend on assuming compliance with any of the potential mitigations. Further, the SEIS does not assume that all mitigations would be fully effective, and it acknowledges that accidents could happen that would have adverse environmental effects.

22.0.5 Comment: The Florida Biodiversity Project recommends several modifications to the Mixed Use alternative. These include (1) increased open space and habitat restoration; (2) maximize a scientifically defensible buffer zone between former Homestead AFB and Biscayne National Park; and (3) the Air Force must demand compensation at fair market value for the base. The compensation offered in the Hoover-Collier proposal is inadequate.

Response: The Mixed Use alternative does not need specific modification to be able to include the mitigations suggested in this comment. The analysis provided throughout the SEIS would permit a buffer area or the other suggested mitigations to be selected as part of a property disposal, were that to be the Air Force's decision. The implication that fair market compensation is required for the Collier-Hoover proposal is correct (although fair market value would not be required for some of the other disposal possibilities). The value of the mineral rights being offered by the Collier Resources Company and the surplus property for which they would be exchanged are being appraised.

22.0.6 Comment: One assurance that is critical to the U.S. Environmental Protection Agency (USEPA) is a suitable environmental trade-off of Collier lands/mineral rights (particularly environmentally significant lands in south Florida that would enhance the federal/state restoration efforts) in exchange for the surplus lands at former Homestead AFB for the proposed mixed use development. In order for the Collier proposal to be considered further, it should be assured that (1) a suitable transfer of Collier lands and/or mineral rights is achievable; (2) the Air Force and National Park Service determine these assets have comparable (environmental and otherwise) value to the property being traded; (3) growth to full buildout is limited commensurate with the ecological sensitivity of the area; (4) construction is accomplished according to Best Management Practices monitored by a third party; (5) long-term operation incorporates environmentally sensitive practices (e.g., reduced pesticides and fertilizer use on golf courses) with monitoring for water quality and other parameters; (6) the complex is adequately buffered from the national parks by natural or planted greenway corridors; (7) site layout design for any new development conforms with presently agreed upon specific site remediation standards or additional remediation is completed commensurate with the proposed new land use where necessary; and (8) the state and county oversee appropriate land use controls/zoning restrictions which take into account both the associated local development and regional cumulative impacts in Miami-Dade County.

Response: USEPA recommendations are noted. Additional discussions among the lead and cooperating agencies concerning federal policy objectives and recommended mitigation measures will precede any final decision making by the Air Force and FAA.

22.0.7 Comment: The SEIS should include the following limitations in connection with approval of the proposed commercial airport: (1) acceptance of Mayor Penelas' offer to transfer the defunct "Jetport" in Big Cypress; (2) development of a buffer zone around the Homestead airport; (3) further study of the water runoff problems in conjunction with the National Park Service; (4) flight pattern restrictions that are consistent with aircraft safety; (5) zoning restrictions; (6) an environmental contingency fund of 3-5 percent (up to \$40 or 50 million), primarily from landing fees, to correct or ameliorate unforeseen ecological problems or to acquire additional park land; (7) an extensive environmental impact review of the proposed second runway, including public hearings; and (8) establishment of an ongoing ad hoc environmental review committee. The property transfer should be conditioned upon and have deed

restrictions (i.e., covenants running with the land) allowing the property to revert to the U.S. government in the event of non-compliance with these mitigations.

Response: The SEIS does not decide what mitigations will be required. That will occur in the Record of Decision. The Air Force and FAA will consider all feasible mitigation measures in the decision making.

23.0 CUMULATIVE IMPACTS

This category addresses comments pertaining to the cumulative impact analysis in the SEIS and to the projects and activities included in that analysis. Comments pertaining to south Florida ecosystem restoration initiatives, which are included in the cumulative impact analysis, are addressed in a separate category (24.0).

23.0.1 Comment: The Draft SEIS does not fully evaluate the cumulative impact of off-site development in conjunction with the Proposed Action and alternatives.

Response: Each resource section in Chapter 4 of Volume I describes the impacts of both on-site development and related off-site development. The impacts reported include the total effects, including on-site and off-site effects. Cumulative impacts are also described, which include the on-site and off-site effects of reuse of former Homestead AFB in combination with other proposed activities in the region.

23.0.2 Comment: Section 2.2.5 of the Draft SEIS indicates that the purpose of the cumulative impact analysis is to encompass additional secondary employment generated by the Proposed Action but not accounted for in the employment projections. Thus, some of the cumulative high-growth impacts should actually be attributed to the Proposed Action.

Response: Section 2.2.5 in Volume I indicates that a review of the experiences of a large number of airports across the country was inconclusive with regard to the potential for an airport to stimulate non-airport-related development in its proximity. This type of development occurs in some airport areas but not in others. The variety of factors that influence whether development will occur in any given location is too complex to determine how they may affect development at Homestead. Whether development occurs in an area is ultimately dependent on the demand for that development. In the absence of that demand, induced development at Homestead would probably be limited. The only circumstance that might stimulate this type of development could be a high-growth environment like that reflected in the cumulative impact analysis. In that situation, any development that occurred in the vicinity of the Homestead airport would be responding to the high-growth demand, not generating it.

23.0.3 Comment: The discussion of cumulative impacts of high growth is presented in the wrong context, which has the effect of diluting the impacts of the Proposed Action.

Response: The impacts of the Proposed Action are properly presented in the context of projected baseline conditions. This discussion is presented in greater detail and prior to any discussion of cumulative impacts. For this discussion, the high rate of population growth forecast by Miami-Dade County was modified to a more moderate rate of baseline population growth precisely to avoid potentially diluting the relative impacts of the Proposed Action. The higher growth rate was addressed as a potential cumulative impact in order to ascertain whether the Proposed Action could contribute to a larger cumulative impact. In general, the SEIS acknowledges that the Proposed Action could aggravate the adverse impacts of accelerated growth, although its contribution would be relatively small.

23.0.4 Comment: The Draft SEIS does not adequately address the cumulative environmental impacts on the biota of Biscayne and Everglades National Parks or the need to restore the surrounding ecosystem.

Response: The SEIS adequately addresses the cumulative impacts within the context required by Council on Environmental Quality regulations, which is to determine whether the Proposed Action or alternatives could contribute to larger cumulative impacts. Each section in Chapter 4 of Volume I assesses whether the reuse of former Homestead AFB is anticipated to contribute to an overall cumulative impact on the resource analyzed in that section.

23.0.5 Comment: The cumulative impact analysis should analyze the increase in traffic on U.S. Highway 1 with regard to level of service and impact on hurricane evacuation if the road becomes a largely commercial corridor as a result of its widening.

Response: As Section 4.2 in Volume I describes, the Proposed Action and alternatives are expected to have only minor impacts on hurricane evacuation times and would, thus, not be likely to appreciably contribute to any impact that development along U.S. Highway 1 might have. In addition, widening U.S. Highway 1 is expected to reduce evacuation times. Most of the area along U.S. Highway 1 between Florida City and Key Largo is protected from development, so the amount of commercial development that could occur is very limited.

24.0 SOUTH FLORIDA ECOSYSTEM RESTORATION

Several commentors expressed concern that redevelopment of former Homestead AFB, particularly as a commercial airport, could conflict with initiatives to restore the ecosystem of south Florida. This category addresses those comments.

24.0.1 Comment: There are extensive efforts by federal, state, and local agencies to restore the ecosystem in south Florida. By reducing groundwater flow to Biscayne Bay, the airport plan is in direct opposition to these efforts, and any redevelopment must be fully integrated and compatible with current Everglades restoration plans. Without explanation, the Air Force treats this issue as insignificant and proposes an action that will contravene the efforts of these agencies.

Response: The Air Force and FAA recognize the importance of groundwater flows to south Florida ecosystem restoration and devoted extensive discussion of this issue in the SEIS Water Resources analysis. The cumulative impact analysis in the SEIS describes how reuse of former Homestead AFB property could be expected to relate to other activities in the region, including south Florida ecosystem restoration initiatives. The analysis indicates whether the Proposed Action and alternatives could be expected to contribute to cumulative impacts or conflict with other initiatives.

The analysis concludes that the Proposed Action and alternatives would contribute, to varying degrees, to overall growth and development in south Florida. It is that growth that has the most potential for diminishing the success of ecosystem restoration efforts. However, south Florida is expected to grow whether or not the property at former Homestead AFB is redeveloped. The Proposed Action is estimated to add about 4 percent to the population of south Miami-Dade County (south of Eureka Drive) by 2015, assuming a moderate level of baseline growth. If Miami-Dade County's high-growth forecasts are realized, the additional effect of the Proposed Action would be less than 1 percent, but the cumulative impact would be higher.

The Proposed Action and other reuse alternatives (except for the Market-Driven scenario) incorporate stormwater management measures that have the effect of reducing on-site surface water discharges and increasing groundwater flows to Biscayne Bay. This is what would be required by the South Florida Water Management District (SFWMD) and Miami-Dade County and is thought to be generally consistent with ecosystem restoration goals.

RESPONSES TO COMMENTS

The management of stormwater generated by secondary development may not necessarily adhere to the same level of stormwater controls. If SFWMD and Miami-Dade County were to impose very strict stormwater controls, groundwater discharge to Biscayne Bay would increase. These controls would include requiring developers and individual landowners to actively retain as much stormwater on their land as possible and to ensure that the drainage from any roads, sidewalks, and other impervious surfaces is collected and retained to the extent feasible. Such requirements would not only minimize the adverse effects of secondary development, but would also minimize the adverse effects on surface and groundwater of all future growth in south Miami-Dade County.

24.0.2 Comment: The Air Force should be certain that the selected reuse alternative is in keeping with south Florida ecosystem restoration initiatives and that plans for reuse of the former base incorporate any changes that occur as ecosystem restoration plans and designs evolve.

Response: The Air Force and FAA believe that reuse of former Homestead AFB property can be accomplished without interfering with ecosystem restoration initiatives in the region. However, these initiatives are anticipated to take many years to develop and implement, and it is not possible to anticipate any and all changes that might be made to them in the future.

25.0 BASE REALIGNMENT PROCESS AND PROPERTY DISPOSAL

This category addresses comments on the base realignment and closure (BRAC) process as it pertains to the decision to realign Homestead AFB, the identification of reuse alternatives, and the conveyance of surplus property. Specific topics include the federal screening process whereby other federal agencies can obtain property no longer needed by the Air Force, the role of the Local Redevelopment Authority, and compensation for property that is disposed of under BRAC.

25.1 Realignment Decision

25.1.1 Comment: Bring back Homestead AFB. It is needed to defend the country. Other military units also could make use of the facilities.

Response: The purpose of the SEIS is to examine the potential impacts of disposing of the surplus property. The Air Force understands the public's continuing interest in making additional military use of Homestead, but there is no proposal to do so at this time. There are also significant political and legal obstacles that would have to be addressed.

Homestead AFB was realigned pursuant to a complex base closure process authorized by Congress. It is not reasonable to expect any significant reconsideration of those decisions except as part of a future base closure process that is also authorized by Congress. Although the Department of Defense has twice requested authority for new base closures and realignments, Congress so far has declined to provide it.

25.1.2 Comment: The Air Force did not promise a commercial airport. The community was promised that the base would be rebuilt as a military base.

Response: The recommendation of the 1993 Defense Base Closure and Realignment Commission did not support rebuilding the base. The commission's recommendations were approved by the President and were not rejected by Congress. Therefore, the Air Force was required by law to implement the commission's recommendations.

25.1.3 Comment: An issue that should be discussed is that if an alternative is selected that does not contribute to airfield operating costs, there will be an impact on the next round of base closures. Homestead Air Reserve Station will be a prime candidate for closure.

Response: The Air Force disagrees that the issue of potential closure of Homestead Air Reserve Station should be discussed. If another base closure process is authorized by Congress, all Air Force bases will be reviewed equally at that time. The Air Force is not willing to speculate about the possible outcome for any base. Some bases would be reduced in size or closed completely; other bases would grow. What would be recommended would be very dependent upon circumstances existing at the time the future base closure process was conducted.

For the 1991, 1993, and 1995 base closure rounds, the following eight criteria, with minor modifications, were used to evaluate a military department's recommendations for a closure or realignment.

Military Value (given overall priority consideration):

1. The current and future mission requirements and the impact on operational readiness of the Department of Defense's total force.
2. The availability and condition of land, facilities, and associated airspace at both the existing and potential receiving locations.
3. The ability to accommodate contingency, mobilization, and future total force requirements at both the existing and potential receiving locations.
4. The cost and manpower implications.

Return on Investment:

5. The extent and timing of potential costs and savings, including the number of years, beginning with the date of completion of the closure or realignment, for the savings to exceed the costs.

Impacts:

6. The economic impact on communities.
7. The ability of both the existing and potential receiving communities' infrastructure to support forces, missions, and personnel.
8. The environmental impact.

As can be seen, cost implications have been an important factor in the decision making process, but they were not the only factor.

The potential effect a property disposal might have on a future base closure process is not considered an appropriate consideration for the property disposal decision making process. The property disposal decision-making process is directed towards economic redevelopment, not towards enhancing or diminishing the future chances of remaining Department of Defense installations.

25.2 Federal Screening Process

25.2.1 Comment: Once property is declared surplus and excess, other federal agencies have an opportunity to claim it. When the window of opportunity closes, they no longer have the opportunity to come back at a later date and say, "Now we want it." That precludes the Department of the Interior from asking for the property at this time so they can execute the Collier trade.

Response: Although the details of the process are somewhat complicated, a goal of the BRAC property disposal process is an early determination of which excess property, if any, will be retained for use by others within the Department of Defense (DOD) or by other federal agencies, and which property will be declared surplus and available for disposal. One of the purposes of making an early determination is to facilitate planning by a Local Redevelopment Authority (LRA). The time frame for that determination passed years ago.

However, DOD regulations also state that, prior to the disposal of property, a military department may, at its discretion, withdraw a surplus determination and evaluate a federal agency's late request for excess property. As part of such a review, the military department should consider any comments by the LRA and the time and effort invested by the LRA in the planning process. Please refer to the regulations for a complete description of the rules.

25.2.2 Comment: Consideration of a request by the Department of the Interior for property at former Homestead AFB would not be in the best interest of the communities affected by the closure of Homestead AFB. It would be a direct affront to them.

Response: The Air Force and the FAA have not made any final decisions, and all alternatives will be considered.

25.2.3 Comment: Even if the Air Force had the discretion to consider a late request by the Department of the Interior for property at former Homestead AFB, it would be a clear abuse of discretion for the Air Force to grant such a request in this case. By regulation, transfers based on a late request are "limited to special cases as determined by the Secretary of the Military Department..." (32 CFR §175.7(a)(15)(i)). At a minimum, the Secretary is required to take into account the "time and effort invested by the LRA in the process" (32 CFR §175.7(a)(15)(iii)). There can be no question that the LRA, as well as the federal government, have invested substantial time and effort into the disposal and transfer of Homestead AFB. Miami-Dade County has received approximately \$15 million from the federal government for planning and development. It would be an extraordinary waste of taxpayers' funding to have spent this money with no return.

Response: The Air Force has the authority to withdraw surplus determinations and consider late requests by federal agencies for excess property. Procedures and matters to be considered have been specified by DOD in the regulation cited in the comment. Comments received from the LRA are among the matters to be considered. The commentor's opinion about what decision should be made in the event of a late request is noted.

25.2.4 Comment: Transfer of property to the Department of the Interior for the purposes intended, regardless of the lateness of the request, would, in any event, run afoul of BRAC and DOD's surplus regulations. Fundamental to these is the principle that the requesting agency's request for excess property be premised upon the need for the property to fulfill a specific purpose relevant to that agency's program (32 CFR §175.7(a)(9)–(10), 41 CFR 101–42.201–2, 101–47.801(b)). The benefit accrues because the agency would otherwise purchase non-federal land to accomplish its goal. In this case, the Department of

the Interior is interested in Homestead AFB for no purpose other than to swap the land for the Collier's mineral rights in Big Cypress National Preserve.

Response: A late request for excess property from the Department of the Interior or any other federal agency would be evaluated by the Air Force in accordance with the procedures specified for late requests. Late requests must meet the requirements imposed on other requests for excess property. The commentor's opinions about what those requirements are and whether the purposes attributed to the Department of the Interior could meet those requirements are noted.

25.3 Local Redevelopment Authority

25.3.1 Comment: Several comments stated that federal base closure law requires the Air Force to give substantial deference to the Local Redevelopment Authority and its redevelopment plan. Other comments stated more strongly that the Air Force is required to defer to the LRA's plan.

Response: The Air Force is mindful of the very important role that an LRA plays in the disposal and redevelopment of surplus property at military bases that have been closed or realigned. The Air Force listens closely to the needs of LRAs and works hard to address their concerns. As a technical matter, however, these comments are not correct statements of the legal requirements applicable to the disposal of property at Homestead.

In 1994, Congress enacted two alternative processes for addressing the availability of property at closed or realigned bases for meeting the needs of the homeless. One procedure applies to bases closed or realigned before October 25, 1994. The other procedure largely applies to bases closed or realigned after that date, though it also applies to any base approved for closure or realignment before then if the redevelopment authority so requests. (See Defense Base Closure and Realignment Act of 1990, Public Law 101-510, as amended, §§ 2905(b)(6) and (b)(7) (10 U.S.C. § 2687 note).)

Miami-Dade County did not request that DOD apply the procedures applicable after 1994. Therefore, the provisions that are applicable to the property at Homestead are those of subsection (b)(6). Those provisions do not require substantial deference to the local redevelopment authorities' plans.

The provisions that the commentors presumably have in mind are those of subsection (b)(7). Under those provisions, the local redevelopment authority is required to create a redevelopment plan that considers using property to assist the homeless, and the redevelopment authority is required to obtain approval of that plan by the Secretary of Housing and Urban Development. The military department, in turn, is required to treat an approved redevelopment plan as part of the federal proposed action and, in making disposal decisions, to give the plan "substantial deference." (See, e.g., §§ 2905(b)(7)(K)(ii) and (iii).) As previously stated, however, those provisions are not applicable to property disposals at former Homestead AFB.

Although neither strict adherence nor substantial deference is required as a matter of law, the Air Force does prefer to dispose of the property to the LRA. The preferences of the Air Force are described in Section 2.12 in Volume I.

25.3.2 Comment: Miami-Dade County is the designated Local Redevelopment Authority for former Homestead AFB.

Response: The Draft SEIS stated that "Miami-Dade County was designated as the Local Reuse Authority (LRA) responsible for formulating a reuse plan for the former base property." That statement had two errors that have been corrected in the Final SEIS.

RESPONSES TO COMMENTS

First, the phrase used in the DOD regulations is “Local Redevelopment Authority,” not “Local Reuse Authority.” Second, as a technical matter, in late 1993 Congress gave the term “redevelopment authority” a precise statutory meaning involving formal recognition by the Secretary of Defense (which is accomplished by the DOD Office of Economic Adjustment [OEA]). OEA’s practice is to formally recognize an LRA only in two circumstances: (1) to accomplish an economic development conveyance, or (2) for preparation or implementation of a redevelopment plan pursuant to the procedures of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994. Absent those two circumstances—neither of which has been applicable to Homestead—formal recognition by OEA is neither required nor accomplished. This means that OEA has not formally recognized Miami-Dade County as the LRA.

However, the Air Force has dealt with Miami-Dade County as the LRA since 1993–94. This is because Miami-Dade County is the local Florida government that has jurisdiction over land use and zoning issues for property at the former Homestead AFB, and it is the community planning body that received funding in 1993 and 1994 from OEA to support development of a base reuse plan. It is the primary local body with whom the federal government deals on matters concerning redevelopment of former Homestead AFB. It is also the local body that would be recognized formally by OEA were formal recognition required to accomplish an economic development conveyance.

The Final SEIS has been corrected to reflect the correct definition of the acronym “LRA” and to remove the statement that Miami-Dade County has been formally recognized.

25.3.3 Comment: The Local Redevelopment Authority plan was approved as a master plan by the Miami-Dade County Commission. The master plan received all required approvals at the regional and state levels. The final state approval was issued pursuant to the unanimous decision of Governor Chiles and his cabinet sitting as the state Administration Commission.

Response: The county enacted its original master plan in 1996. The Administration Commission issued an order that required the county to make changes in its plan to address environmental concerns. The county’s new plan, as amended, was enacted by the County Commissioners in 1998 as amendments to the Miami-Dade County Comprehensive Development Master Plan. Subsequent to that action, a Florida state court reversed the Administration Commission’s order and ruled that it was unlawful for the Administration Commission to have approved the county’s plan before completion of the federal SEIS and before completion of studies required of Miami-Dade County. Though not presently implementable, the county’s adopted master plan is considered, for purposes of the analysis, to be a reasonable representation of the county’s intentions.

25.3.4 Comment: The Air Force has a duty to work cooperatively with the LRA, and if the LRA’s redevelopment plan is not a reasonable alternative, the Air Force has a duty to identify problematic elements and work with the LRA to devise mutually acceptable modifications to the plan. The Air Force has never required Miami-Dade County to modify the plan’s basic purpose, that of a commercial airport. The Air Force has made the elementary finding that the LRA’s plan has passed the threshold requirement to be “legally permissible.”

Response: The SEIS did not make a finding worded the way the comment states. The county’s proposal, like the other alternatives analyzed, is dependent upon obtaining various governmental approvals not within the jurisdiction of the Air Force. However, the Air Force is not aware of any legal reason that would in principle bar the county’s proposal or that of any of the other alternatives.

25.3.5 Comment: At this time, under law, policy and precedent, the community’s plan, in this case the commercial airport, must be given presumptive weight by the Air Force.

Response: DOD policy is to be deferential to the community's wishes, as represented by the Local Redevelopment Authority. That does not mean, however, that the community's plan must be followed in every case. Any of the alternatives analyzed in the SEIS may be chosen by the Air Force, not just the Proposed Action.

25.3.6 Comment: Environmental compatibility of the proposed airport at former Homestead AFB can only be assured if responsibility and control remain with Miami-Dade County. The present agreement with Homestead Air Base Developers, Inc. (HABDI) should be terminated and a public entity placed in control.

Response: The Proposed Action analyzed in the SEIS is proposed by Miami-Dade County, not HABDI. The county has chosen HABDI as its airport developer. However, should the Air Force decide to dispose of the property for airport purposes, it would be the county, not the developer, that the federal government would transfer property to and hold accountable for complying with the agreement.

25.3.7 Comment: Commissioner Sorenson said the Collier-Hoover plan would take the project out of the hands of the local government and put it on the federal level.

Response: None of the alternatives would result in a project being run at the federal level. According to the transcript of the public hearing held on February 1, Commissioner Sorenson said that "the Collier-Hoover plan takes the politics out of Miami-Dade County. Under the Collier plan the county will have no claim to the land."

25.4 Compensation for Base Property

25.4.1 Comment: The government should require compensation for the airport. Only the Collier-Hoover alternative proposes compensation for base property. The Proposed Action contains no compensation for the base. The federal government should not be giving away valuable property for nothing.

Response: It is long-standing government policy to give away surplus property in order to accomplish important public objectives. Government property is given away for schools, parks, historic monuments, homeless assistance, and other categories of uses. Surplus airports have been given away for over 50 years. Property at realigned military installations can also be transferred at no cost to accomplish economic redevelopment. All of these policies have been enacted by Congress.

25.4.2 Comment: The Draft SEIS does not analyze the fair market value of the 1,600 acres of the base nor analyze the compensation for each alternative.

Response: This information is not needed to meet the requirement of the National Environmental Policy Act. Information about the fair market value of some of the surplus property may eventually be available from the federal government. The Department of the Interior is conducting an appraisal of the approximately 717 acres that are available for transfer to the Collier Resources Company.

25.4.3 Comment: A criticism of the Collier plan was that the federal property would be turned over to a private entity. In the county's plan, the property would also be given to a private company—an entity that received a private backdoor, no-bid deal swung by lobbyists.

Response: The Proposed Action analyzed in the SEIS is proposed by Miami-Dade County, not Homestead Air Base Developers, Inc. The county has chosen HABDI as its airport developer. However, should the Air Force decide to dispose of the property for airport purposes, it would be the county, not the

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developer, that the federal government would transfer property to and hold accountable for complying with the agreement. See also the response to comment 25.4.1.

25.4.4 Comment: The Mixed Use alternative would transfer valuable assets to wealthy developers.

Response: Property transfers under the Mixed Use alternative would not be gifts. The recipients would have to pay fair market value to buy the property.

25.5 Conditions of Property Transfer

25.5.1 Comment: The Air Force might be liable for handing over property before the ultimate use of it has been fully explained or detailed.

Response: The purpose of the National Environmental Policy Act analysis is to examine the reasonably foreseeable uses of the property. The SEIS has taken great care to do so. The property can be conveyed even though potential plans for it are still unfinished. Indeed, none of the plans for the property have been completely finalized.

25.5.2 Comment: Some highly sensitive federal agencies will still occupy some portions of the base. Are we assured all proposed developers are and will be truly sensitive to national security needs?

Response: The Air Force does not believe that the commercial airport or any of the scenarios considered under the Mixed Use alternative would interfere with continuing federal aviation operations at Homestead. There are, however, some potential operational conflicts with the Commercial Spaceport alternative that would require resolution as part of any spaceport development. For further information, see Section 2.3 in Volume I.

25.5.3 Comment: The property is being conveyed in fee simple. That is a very powerful thing.

Response: Whether the property at former Homestead AFB is conveyed in fee simple depends on the alternative selected. For example, if the Collier-Hoover proposal is selected, the property title would be conveyed in fee simple to the Collier Resources Company, since they would be paying fair market value for it. Under the Proposed Action, the title that would be conveyed to Miami-Dade County would be something less than fee simple, since the deed would require that the property be used for airport purposes and the federal government would retain rights of reversion.

25.5.4 Comment: After the land has been transferred, who will ensure the project is completed in a timely manner and that local workers are hired?

Response: Implementation of the selected alternative will be the responsibility of the entity who receives the property.

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Zinn, Rick		Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-4
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	Ackermann, Kristen	Noise (10.0), Air Quality (13.0)	S-3
Ackermann Enterprises Inc.	Ackermann, T. F.	Noise (10.0), Air Quality (13.0)	S-3
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Aircraft Owners and Pilots Association	Gerencer, Christy	SEIS Process (2.0), Purpose and Need (3.0), Base Realignment Process and Property Disposal (25.0)	W-289
All Seasons Tree Care	Cheshire, Matthew S.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Allen Development Corporation	Morris, Allen I.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Alston & Bird, LLP	Williams, Ralph, Jr.	Noise (10.0), Air Quality (13.0)	S-3
Alternatives Research & Development Foundation	McArdle, John	General (1.0), South Florida Ecosystem Restoration (24.0)	W-162
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Beachem Investments	Beachem, J. W.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Beacon Council	Nero, Frank R.	Alternatives (4.2.20, 4.2.21), Socioeconomics (6.1.16, 6.1.30)	O-28, W-22
Beverly Surgical Associates, Inc.	Karol, Susan V.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-4
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BK/Barrit	Kershner, Bryson	Noise (10.0), Air Quality (13.0)	S-3
Blizzard, Grodd & Hasenauer, P.C.	Grodd, Leslie E.	Noise (10.0), Air Quality (13.0)	S-3
Blue Water Capital	Acheson, Michael H.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Bowden Productions	Bowden, R.	Noise (10.0), Air Quality (13.0)	S-3
Broyhill Asset Management LLC	Broyhill, Hunt	SEIS Process (2.0), Socioeconomics (6.0), Noise (10.0), Land Use and Aesthetics (11.0), Hazardous Materials and Waste and Petroleum Products (12.0), Air Quality (13.0), Water Resources (15.0), Cumulative Impacts (23.0)	W-461
Builders Association of South Florida	Burton, Truly	Alternatives (4.0), Noise (10.0), Water Resources (15.0)	W-289
Cameron Incorporated	Kelley, Cameron M.	Noise (10.0), Air Quality (13.0)	S-3
Capitol Title Services	Garcia, Sylvia	General (1.0)	O-134
Challenge Air Cargo	Spohrer, B. F.	Alternatives (4.2.31)	W-432
Charles A. Alden, Landscape Architect, A.S.L.A.	Alden, Charles A.	General (1.0), Alternatives (4.2.1), Content and Methodology (5.1.1, 5.5.1), Land Use and Aesthetics (11.2.2)	O-39, W-19, W-572

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City of Hialeah	Martinez, Raul, Mayor	Purpose and Need (3.0), Socioeconomics (6.0)	O-9, W-31
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City of Homestead	Shiver, Steve, Mayor	SEIS Process (2.0), Purpose and Need (3.0), Biological Resources (16.0)	O-8
City of Miami Beach	Parcher, Robert	Alternatives (4.0), Socioeconomics (6.0), Noise (10.0), Land Use and Aesthetics (11.0), Water Resources (15.0)	W-565
City of South Miami	Robaina, Julio, Mayor	Alternatives (4.0), Socioeconomics (6.0)	W-566
City of Sweetwater	Diaz, Jose, Mayor	General (1.0)	O-10
Clark Foodservice, Inc.	Hindman, Don J.	Alternatives (4.0)	W-383
Clinton Enterprises	Clinton, Ray	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Coalition for Environmental Justice	Levinson, Lawrence	SEIS Process (2.1.6), Alternatives (4.1.2), Base Realignment Process and Property Disposal (25.3.5)	O-23
Coca-Cola Bottling Company of Southeastern New England	Kitchings, Chester W., Sr.	Noise (10.0), Air Quality (13.0)	S-3
Coca-Cola Enterprises, Inc.	Malo, Raymond J.	Noise (10.0), Air Quality (13.0)	S-3
Coconut Grove Civic Club	McMaster, James	General (1.0), Noise (10.0), Land Use and Aesthetics (11.0)	O-104
Collier Resources Company	Duncan., Robert D., Jr	General (1.0)	W-386
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Community Bank of Florida	Johnson, Eric S.	Alternatives (4.0)	W-94
Community Bank of Homestead	Epling, Robert L.	SEIS Process (2.0)	W-104
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Corley Communities Inc.	Turk, Richard J., Jr.	Noise (10.0), Air Quality (13.0)	S-3
Cranston	Ariosa, Robert J.	Noise (10.0), Air Quality (13.0)	S-3
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D'Elegante, Inc.	Jones, Delle & Ted	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
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Dade County Farm Bureau	Sapp, Steve	Land Use and Aesthetics (11.0)	O-33
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Double Eagle Distributing, Inc.	Orthwein, James B., Jr.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Earthwise Productions, Inc.	Peterman, Audrey	General (1.0)	O-155
Eden, Inc.	Forbes, Ken	SEIS Process (2.0), Purpose and Need (3.0), Base Realignment Process and Property Disposal (25.0)	W-359
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Elfin Acres Organic Farm	Mejides, Yvonne	General (1.0), Alternatives (4.2.13), Airspace and Safety (9.4.1, 9.4.4)	W-244
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Equitrac	Kane, John	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
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Fazio, Dawson, DiSalvo, Cannon, Abers, Podrecca & Fazio	Fazio, D. Fredrico	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
Fazio, Dawson, DiSalvo, Cannon, Abers, Podrecca & Fazio	Fazio, Joseph R., III	Noise (10.0), Air Quality (13.0)	S-3
FBF Inc.	McAllister, D. Edward & Constance C.	Noise (10.0), Air Quality (13.0)	S-3
Federal Employee Benefits Service	Moses, Elizabeth C.	Noise (10.0), Air Quality (13.0)	S-3
Financial Asset Management Inc.	Rader, James B.	Noise (10.0), Air Quality (13.0)	S-3
First National Bank of Homestead	Richardson, Michael E.	General (1.0), Purpose and Need (3.2.2), Alternatives (4.1.3, 4.2.2, 4.3.1), Content and Methodology (5.6.2), Socioeconomics (6.1.7), Transportation (7.2.2), Airspace and Safety (9.2.6, 9.3.5), Land Use and Aesthetics (11.1.1, 11.2.4, 11.2.5), Water Resources (15.10.7), Buffer Area (21.0.7), Mitigation Measures (22.0.1), Base Realignment Process and Property Disposal (25.1.3, 25.2.1)	O-24, W-108
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Flat Rock Metal, Inc.	Shields, Peter & Margaret	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
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Florida Keys Fishing Guides Association	Ehlers, Mike	General (1.0)	S-1
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Florida Legislature	Thrasher, John	Noise (10.3.5)	W-67
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I.B.E.W. Local Union 349	Riley, William	General (1.0)	O-28, O-171
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Isakson-Barnhart	Barnhart, David L.	Noise (10.0), Air Quality (13.0), Water Resources (15.0), Mitigation Measures (22.0)	S-3, S-4
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ACRONYMS AND ABBREVIATIONS

AFB	Air Force Base	O ₃	ozone
AQRV	air quality related values	OEA	Office of Economic Adjustment
ARS	Air Reserve Station	OPF	Opa-Locka Airport
ATC	Air Traffic Control	OU	operable unit
BRAC	Base Realignment and Closure	PAH	polycyclic aromatic hydrocarbons
CEQ	Council on Environmental Quality	PSD	Prevention of Significant Deterioration
CFR	Code of Federal Regulations	RCRA	Resource Conservation and Recovery Act
CO	carbon monoxide	SAIC	Science Applications International Corporation
dB	decibel(s)	SEIS	Supplemental Environmental Impact Statement
dBA	A-weighted decibel(s)	SEL	Sound Exposure Level
DERM	Department of Environmental Resources Management (Miami-Dade County)	SFWMD	South Florida Water Management District
DNL	Day-Night Average Sound Level	SO ₂	sulfur dioxide
DOI	Department of the Interior	STDA	stormwater treatment and distribution area
DOD	Department of Defense	SWMM	Surface Water Management Model
DOT	Department of Transportation	TA	Time Above
EA	Environmental Assessment	TAamb	Time Above ambient
FAA	Federal Aviation Administration	TAD	Transportation Analysis District
FICON	Federal Interagency Committee on Noise	UAM	Urban Airshed Model
FLL	Fort Lauderdale-Hollywood International Airport	UDB	Urban Development Boundary
HABDI	Homestead Air Base Developers, Inc.	U.S.C.	United States Code
HST	Homestead Regional Airport	USEPA	U.S. Environmental Protection Agency
INM	Integrated Noise Model	VMT	vehicle miles traveled
IRP	Installation Restoration Program	VOC	volatile organic compound
ISIS	Integrated Sound Information System		
LAm _{ax}	Maximum Sound Level		
Leq	Equivalent Sound Energy Level		
Leq(h)	Peak Hour Equivalent Sound Level		
LRA	Local Redevelopment Authority		
MIA	Miami International Airport		
MTOW	Maximum Take Off Weight		
NAAQS	National Ambient Air Quality Standards		
NEPA	National Environmental Policy Act		
NO ₂	nitrogen dioxide		
NO _x	nitrogen oxides		
NPIAS	National Plan of Integrated Airport Systems		
NPS	National Park Service		
NRC	Nuclear Regulatory Commission		
NRDC	Natural Resources Defense Council		
NWR	National Wildlife Refuge		

