

tools on other naval installations and military bases around the country.

There will be no low-level over-flight of the Pocosin Lakes NWR and noise levels there are expected to be near ambient levels. The FEIS and the supporting noise study provide a comprehensive analysis of noise impacts from operation of an OLF at Site C. Site-specific noise modeling was conducted at the Pocosin Lakes NWR and DNL noise information was augmented with sound exposure level data to ensure an adequate assessment of noise impacts was provided.

Several of the comments received suggested that an OLF at Site C would result in adverse impacts to the bald eagle and red wolf, both federally listed threatened or endangered species. The Navy, with the assistance of the USFWS, identified endangered animal and plant species that could be affected by the construction and operation of an OLF at all proposed OLF locations, including Site C. The bald eagle is known to occur in the general vicinity of Site C. Site C does not contain nesting, roosting, or perching habitat for the bald eagle; therefore, the presence of bald eagles at Site C will be limited to incidental occurrences by individuals traveling over the site during migration or those that travel greater than average distances from nest sites to forage. Based on the absence of suitable nesting, roosting, or perching habitat, and studies suggesting that noise has a minimal effect on bald eagles, the Navy determined that an OLF at Site C was not likely to adversely affect the bald eagle.

Site C is located in an area important to the growth and recovery of the wild red wolf population. Wild red wolves could potentially occur in Pocosin Lakes NWR, approximately five miles east of the site. Based on a lack of reproductive and shelter habitat, wild red wolves would be considered only transient at Site C, if present. As previously discussed, no low-level flight tracks will be located above Pocosin Lakes NWR, and noise levels in the refuge will increase by an insignificant amount because of aircraft operations at Site C. Therefore, the Navy determined that an OLF at Site C was not likely to adversely affect red wolves occurring in Pocosin Lakes NWR.

Pursuant to the requirements of section 7 of the Endangered Species Act, the Navy consulted with the USFWS on potential impacts to the endangered species present at Site C. The USFWS concurred with the Navy's determination that construction and operations of an OLF in Washington

County is not likely to adversely impact endangered species.

One of the comments received criticized the Navy for failing to consider the requirements of the Migratory Bird Treaty Act (MBTA). As discussed in the EIS, construction and operation of an OLF at Site C will not result in the intentional taking of any migratory birds. The Navy is instituting a BASH program in order to minimize any incidental effects from military readiness activities on birds found in the vicinity of Site C, including migratory birds.

Some of the comments received expressed concern that the FEIS did not discuss the exact number of buildings at the OLF site and how much land would be fenced, the future expansion possibilities, and exactly how the Navy plans to manage the OLF site. Specific OLF construction plans will be dictated by the unique characteristics of the site. Although the Navy does not know at this time the exact number of buildings or structures that will be constructed at the OLF or the extent of the area of the OLF that will be enclosed by a fence, the FEIS estimates that about 500 acres of the core area will be directly impacted by construction activities. The Navy took this approach in the FEIS to allow for flexibility in the design and construction of the OLF to ensure minimization of the environmental impacts. The level of analysis in the FEIS is sufficient to allow the Navy to make an informed decision. Management of the OLF site will similarly depend on the characteristics of the site chosen. A fence will enclose the core area. There currently are no plans to construct a fence around the entire 30,000-acre acquisition area. Future expansion of the OLF site currently is not contemplated. However, should the Navy in the future contemplate either expansion of the OLF and/or a significant change in operations at the OLF, preparation of additional analysis under NEPA would be completed prior to any decision to implement such changes.

Many of the comments received suggested that the Navy's BASH analysis was incomplete and inaccurate. The Navy recognized the importance of BASH early in the EIS process and met with FWS and other interested parties on many occasions. The Navy used the Bird Avoidance Model (BAM) to assist in the screening of OLF alternative sites. The Draft and Final EIS included a detailed BASH analysis of all OLF sites and recognized that BASH was a serious concern for some of the sites under consideration. Because of concerns identified with Site C during the EIS

process, the Navy conducted several additional site visits between December 2002 and February 2003 and also performed a bird radar survey towards the end of the wintering waterfowl season. The bird radar survey at Site C was one data point relied on in the overall BASH assessment of all OLF sites prepared by an independent contractor with significant BASH program management experience. Additional BASH analysis included an evaluation by the Naval Safety Center's BASH Program Manager and by individuals currently working BASH issues at other naval air facilities. The Navy determined that a comprehensive BASH prevention program can be implemented at Site C and that the proposed flight operations can be conducted there in a safe manner. The BASH analysis process is discussed in detail in Section 12 of the FEIS.

One of the comments received questioned why the cost of a BASH program was not included in the FEIS. Because a BASH plan would be specific to a particular OLF site, the Navy did not attempt to develop cost estimates for BASH efforts at each of the OLF sites. A BASH plan would be developed as part of an overall INRMP for the facility. The Navy recognizes that there will be a cost to implement an INRMP at the OLF site and that those costs would include a comprehensive BASH program.

One of the comments received suggested that two large permanent conservation easements would be impacted by construction and operation of the OLF. The Navy, working with the local Natural Resource Conservation Service office, identified all permanent conservation easements in the vicinity of the OLF site. Although there are conservation easements bordering the noise contours associated with the OLF, there are no known conservation easements in the core area where construction would occur.

One of the comments received suggested that the environmental costs of building an OLF at Site E (Craven County, North Carolina) are grossly overstated, the wetlands at Site E are of marginal value, and that the presence of wetlands on the site should not be used as an excuse for eliminating it from serious consideration. As outlined in the FEIS, approximately 500 acres of wetlands would be filled if an OLF were constructed at Site E. The Navy concurs that wetlands at Site E may be of marginal value and that wetland mitigation opportunities are available at Site E that would result in a significant positive gain to wetland functions and values. For those very reasons Site E