

comment@boardmantoemingway.com

From: MCARDLE, Richard L NAVFAC NW, AM <rick.mcardle@navy.mil>
Sent: Tuesday, March 17, 2015 12:11 PM
To: comment@boardmantoemingway.com; Tamara Gertsch
Cc: Nortier, Michael K CAPT CO NAS Whidbey Is, N00; Tickle, Ronald E CIV OASN (EI&E), OPDASN EI&E; Senska, Matthew C CTR OPNAV, N45; Foskey, Karen CIV OPNAV, N45; Taplin, Aundrea E CIV OASN (EI&E), OAGC EI&E; Bishop, Laura E LCDR RLSON NW, BANGOR; Malik, Joan M CDR COMPACFLT, N465JMM; Burt, Amy E CIV NAVFAC NW, OP3E21; Mosher, John G CIV COMPACFLT, N465JM; Bianchi, Michael C NAVFAC NW, PRW4; Phillips, John R CIV NAVFAC NW, PRW4; Campbell, Kendall CIV NAVFAC NW, PRW4; Stanton, Angela M CIV NAVFAC NW, OP3B; Sodano, Gerald T CTR NAS Whidbey Is, N32; lolavera, Patricia R CIV NAVFAC NW, AM; rick.mcardle@gmail.com; MacDowell, Ken CONT COMPACFLT, N77/N465KM; Mathes, Kent R CIV NAS Whidbey Is., N00RM; Glazier, Nancy D CIV NAVFAC NW OGC, 09C; Conlow, Judy A CIV NAVFAC NW, O9C; Kirby, Tracy D LCDR COMPACFLT, N465TK
Subject: U.S. Navy Comments to B2H Draft EIS
Attachments: Navy Comments B2H DEIS w Attachments 150319.pdf

Tamara:

Attached are the Navy's comments on BLM's Draft EIS for the B2H transmission project. We appreciate the opportunity to participate in the DEIS process and to provide these comments. Please contact me anytime if you have questions or would like to discuss Navy-related aspects of the B2H proposal.

Respectfully,
Rick

Rick McArdle
Community Planning Liaison Officer
Northwest Training Range Complex
(360) 257-1413
rick.mcardle@navy.mil

NAS Whidbey Island
3730 Charles Porter Ave.
Bldg 385, Room 127
Oak Harbor, WA 98278-5000

U.S. Navy Comments
on
Draft Environmental Impact Statement
for
Boardman to Hemingway Transmission Line Project

19 March 2015

Introduction:

These comments are provided to the U. S. Bureau of Land Management (BLM) as NEPA lead federal agency for the Boardman to Hemingway (B2H) transmission line project proposed by Idaho Power Company (IPC), in response to BLM's Draft Environmental Impact Statement (DEIS) issued 19 December 2014 . The Navy is a major landowner in Morrow County, Oregon, near the north terminus of the proposed transmission line. Authorization from the U.S. Navy would be required for project features that would be located on or cross over lands that are under its jurisdiction or that underlay designated military airspace. The Navy's Purpose and Need for action on IPC's proposal is described in the DEIS Section 1.2.4.

Navy Mission Background:

The Navy owns the approximately 47,000-acre Navy Weapons System Training Facility (NWSTF) located just south of the town of Boardman, in Morrow County, Oregon. Associated with this land asset is a much larger area of Restricted Airspace (R-5701), Military Operations Area (R-5706), and Military Training Routes (MTR's) designated by the FAA for military training. This combination of land asset and airspace co-located with and surrounding NWSTF Boardman represents a unique and strategically important training venue for the Department of Defense (DoD). Administered by Naval Air Station Whidbey Island as part of the Northwest Training Range Complex (NWTRC), NWSTF Boardman and the associated airspace provide air and land-related training opportunities to a wide range of DoD entities. It is the only safe low altitude tactical training (LATT) area available for junior naval aviators flying out of Naval Air Station (NAS) Whidbey Island. It is used for training by Oregon National Guard (ORNG) air and ground units from throughout the state of Oregon. NWSTF Boardman also supports training requirements of the U.S. Air Force Reserve (Washington-based units) and the restricted airspace is used by DoD contractors to conduct Unmanned Aerial System (UAS) testing and ORNG UAS training.

Navy Position on Proposed B2H Route Alternatives

The DEIS describes three route alternatives for the Morrow-Umatilla segment of the B2H project: Horn Butte Alternative, Longhorn Alternative, and Longhorn Variation Alternative. All three of these alternatives occur in the immediate vicinity of NWSTF Boardman. During BLM's preparation of the DEIS, the Navy evaluated those alternatives for potential impacts to the air and ground training activities at NWSTF Boardman and provided to BLM and IPC its concerns and preferences with regard to those alternatives. The Navy's position, including general evaluation criteria, was provided in a letter dated 23 April 2013 from CAPT Nortier, Commanding Officer NAS Whidbey Island, to BLM (attached). Additional clarity of the Navy's position on an "East of Bombing Range Road" (EBRR) route was provided in a letter dated 21 June 2013 from CAPT Nortier to IPC (attached). That position can be summarized as follows:

Proposed Action / Horn Butte Alternative ("Southern Option"): Least operational impact to training; acceptable to Navy.

Longhorn Alternative ("Eastern Option"): Greatest operational impact; unacceptable to Navy.

Longhorn Variation ("East of Bombing Range Road Option"): Assuming the height and locational constraints described in the 21 June 2013 letter can be met, operational impacts would be mitigated to a level acceptable to the Navy.

With regard to these three alternatives, the Navy's position is unchanged and we have no additional comments to provide on the DEIS.

In addition to the Navy's input, DoD provided its position on routing alternatives in a 20 November 2014 letter to BLM from Mr. Michael Ainone, Executive Director of the DoD Siting Clearinghouse (attached). DoD's position is consistent with the Navy's.

West of Bombing Range Road (WBRR) Potential Alternative Route

During the course of discussions in public venues and in direct discussions with IPC representatives over the past several months, the Navy has learned of an additional potential route alternative that has not yet been formally proposed and is therefore not addressed in the DEIS. The so-called West of Bombing Range Road (WBRR) route would parallel the Longhorn Variation Alternative, with at least a portion being located wholly on Navy-owned NWSTF land west of Bombing Range Road.

In February 2014 the Navy granted IPC a Right of Entry to its property along Bombing Range Road to assess the feasibility of a "possible route" (IPC letter dated 13 December 2013) for the B2H project. Land, topography, and biological and cultural resource surveys were completed, and on 12 January 2015 IPC submitted to the Navy a formal request for a utility easement 10 miles long by 200 feet wide.

The exact route location, tower height, easement width, and relationship to existing utilities are still unclear. However, it is apparent from information received to date that the WBRR route would require an easement on Navy land, including land currently unencumbered by existing utilities. The full effects of the easement, particularly the degradation of the military training mission at NWSTF, are currently being analyzed. Beyond those mission impacts, a number of unresolved concerns/issues have been identified:

1. Reasonable Alternatives Test (SECNAVINST 11011.47C)

Three alternative routes and one route variant are described in the DEIS, none of which would be included unless they were considered generally viable to meet the B2H project objectives. Until/unless it is demonstrated that all of those alternatives are not “reasonable”, and that the WBRR is the only alternative that is “reasonable”, encumbering Navy land with a new B2H easement would be inconsistent with this SECNAV instruction. This is particularly true for the Proposed Action and the Horn Butte (Southern) Alternative, the routes preferred by the Navy and a number of local Ag landowners and Morrow County officials. No compelling arguments have been provided for not choosing one of those southern routes. They appear viable, reasonable, and would cause the least impact to the military training mission.

2. Washington Ground Squirrel ESA Listing

NWSTF Boardman represents the largest remaining contiguous area of shrub-steppe habitat in the region, which supports a number of special status wildlife species. Most prominent of those is the Washington Ground Squirrel (WGS), which is a candidate for Endangered Species Act (ESA) listing by the U.S. Fish and Wildlife Service (USFWS). Through the course of planning for future training activities and preparation of the Boardman EIS, the Navy has consulted extensively with USFWS regarding impacts to and protection of the WGS on NWSTF. A WBRR route for B2H would introduce additional habitat disturbance and WGS impact that would need to be fully described and analyzed in the B2H DEIS Section 3.2.4.6 Environmental Consequences, including the effects on the USFWS consultations with the Navy with regard to possible ESA listing. If the B2H project triggers an ESA listing, future training activities on NWSTF could be further constrained.

3. Cumulative Impacts

A key concern of the Navy and other local stakeholders is the continuing introduction of transmission corridors to accommodate requirements of power generators, consumers, and overall grid functionality. Specifically in the Morrow/Umatilla area, proposed wind energy projects will ultimately require transmission to the existing grid beyond what can be accommodated by the B2H project. These future needs should be anticipated and described in the Cumulative Effects section of the B2H EIS so the impacts of various routing options can be fully determined. Without this “bigger picture” look at transmission needs, incremental consideration of individual transmission projects will likely result in continued pressure to create new corridors, with greater overall impacts to property owners.

4. Weapons Danger Zones (WDZ) and Surface Danger Zones (SDZ)

For military training facilities such as NWSTF Boardman, WDZ's and SDZ's are mathematically predicted, three-dimensional areas where projectiles from ground-delivered or aircraft-delivered

ordnance could be encountered. They are essentially danger zones established to protect the safety of training participants and the public at large. Extensive portions of NWSTF are mapped as WDZ's and SDZ's, including areas along the east property perimeter that could conflict with a WBRR transmission route. If that route is added as an alternative, Section 3.2.12 Public Health and Safety of the DEIS should be expanded to address this issue.

5. Unexploded Ordnance (UXO)

As a result of decades of military training on NWSTF, unexploded ordnance is routinely encountered on the property. The Navy has strict protocols for locating and disposing of UXO, as well as safety briefings and warning signage for range users and visitors. Any ground activity, particularly construction activities such as a WBRR transmission project, would require an extensive UXO clearance and disposal effort. If that route is added as an alternative, Section 3.2.12 Public Health and Safety of the DEIS should be expanded to address this issue.

6. Research Natural Areas

The Navy and The Nature Conservancy (TNC) have a cooperative agreement for over 5,000 acres on NWSTF Boardman to be managed as Research Natural Areas (RNAs). The RNAs are focused primarily on the conservation of relic populations of native grasslands and are used for ecological studies. A WBRR route would potentially cause ground disturbance and/or conflict with the management objectives in those areas. If that route is added as an alternative, Chapter 3.2.6 Land Use, Agriculture, Recreation, Transportation of the DEIS should be expanded to address this issue.

7. Conflicts with Existing Utilities

Both the Longhorn Variant and potential WBRR Alternative would be located in the Bombing Range Road corridor. In addition to the road itself a number of overhead and underground utilities already exist within approximately 200 feet of each other in that area: BPA transmission lines, UEC transmission and distribution lines, natural gas transmission pipeline, fiber optics cable, and irrigation water main. Depending on the details of the B2H design, either The Longhorn Variant (east of the road) or WBRR would likely require lateral separation, relocation, or reconstruction of existing facilities. This is particularly true if the BRR corridor is to accommodate the additional transmission needs of proposed wind energy projects proposed to the south (see above discussion of Cumulative Impacts). The B2H EIS should address potential conflicts with existing utilities, including the secondary impacts of relocation/reconstruction.

8. Historical, Cultural, Archaeological Resources

The Boardman EIS prepared for military training activities at NWSTF Boardman includes a description of significant historical, cultural, and archaeological resources unique to the property. A WBRR route would potentially impact these resources. If that route is added as an alternative, Chapter 3.2.8 Cultural Resources of the B2H DEIS should be expanded to address this issue.

9. Native American Resources

Preparation of the Boardman EIS included consultation with the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Confederated Tribes and Bands of the Yakama Nation, and the Nez Perce Tribe. CTUIR conducted a traditional properties survey on NWSTF, and a Memorandum of Agreement (MOA) between CTUIR and the Navy is being prepared to address potential impacts and mitigation measures related to future military training activities on the property. If WBRR route is added as an alternative route for B2H, Chapter 3.2.8 Cultural Resources of the B2H DEIS should be expanded to address this issue, including consistency of the project with the MOA.

Though not yet formally proposed, the prospect of a WBRR route alternative was addressed in DoD's 20 November 2014 letter to BLM. In recognition of the issues described above, that letter stated in part, "... for a number of significant operational and environmental concerns, DoD considers this alternative [WBRR] to be unacceptable and would likely not support an easement request by IPC to cross Navy property."

Summary:

For the WBRR potential alternative route the B2H DEIS is insufficient to meet NEPA compliance and satisfy the Navy's requirements for consideration of an easement. If IPC chooses to formally introduce this new alternative, a number of additional issues (see above) would need to be addressed and fully analyzed, either in the Final EIS or in a separate NEPA document.

Attachments (3)



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

IN REPLY REFER TO :

3700
Ser N00/0503
23 Apr 13

Ms. Natalie Cooper
Bureau of Land Management (BLM)
Interim National Project Manager
Boardman to Hemingway (B2H) Project
1387 S. Vinnell Way
Boise, ID 83709

Dear Ms. Cooper:

SUBJECT: OPERATIONAL INPUT AND PREFERENCE REGARDING B2H PROPOSED
ROUTES IVO NAVAL WEAPONS SYSTEMS TRAINING FACILITY
(NWSTF) BOARDMAN AND SURROUNDING SPECIAL USE AIRSPACE
(SUA)

Naval Air Station Whidbey Island and the Northwest Training Range Complex appreciate the opportunity to provide comments to the Bureau of Land Management on the proposed Boardman to Hemmingway (B2H) transmission line project. This submission summarizes the results of an analysis that examined the operational impacts of the B2H transmission line project on Naval Weapons System Training Facility (NWSTF) Boardman and associated Special Use Airspace (SUA). The analysis examined multiple transmission-line project route options and rated their operational impacts to training and readiness activities conducted at and around NWSTF Boardman.

The following decision considerations and constraints for power transmission line route options were established and shared with power companies to assist in maximizing the continued utilization of, while minimizing the impact to Low Altitude Training (LAT) capability within, NWSTF Boardman and surrounding established and proposed SUA:

- a. Minimize new power transmission lines and tower obstructions to the greatest extent possible.
- b. In instances where new power transmission lines are proposed, have them parallel existing lines to the greatest extent possible, to minimize new obstructions, and build them no higher than the height of established towers and lines.
- c. In instances where new lines are proposed within R-5701 or the proposed NE MOA that do not parallel existing lines, limit tower and line heights to no higher than 100 feet Above Ground Level (AGL).

3700
Ser N00/0503
23 Apr 13

d. In instances where new lines are proposed on the perimeter or along the border of R-5701 or the proposed NE MOA, limit tower and line heights to no higher than 170 feet AGL.

e. In instances where new lines are proposed that will cross existing avigation easements, comply with easement requirements of no higher than 35 feet AGL.

Resulting analysis of B2H proposed power transmission route options utilizing the above decision matrix constraints and in consultation with this installation, the Oregon National Guard Aviation Officer, and the Idaho Power B2H Project Leader, Mr. Mike Vaughn, yielded the following hierarchy of preference based on minimizing adverse operational impacts:

a. Joint transmission line up Bombing Range Road. Although this option entails construction of new line, it would replace or parallel existing line and minimize total new line required inside of restricted airspace R-5701. Potential drawbacks include meeting height constraints due to span requirements and unacceptable compromises inherent in any joint endeavor.

b. The route option with the least operational impact is the Idaho Power/B2H proposed route or "Southern Option." Although this route would entail construction of a large amount of new transmission line, most of it would be outside of R-5701 and, where inside of R-5701, the line would be built within the 100' AGL height constraint. Remaining line to reach the Grassland sub-station would parallel and be no higher than existing line in the area.

c. The route option with the greatest operational impact, and, therefore, the least favorable in consideration of range activities, is the Idaho Power/B2H alternate route or "Eastern Option." This proposed route would introduce new transmission line inside of R-5701 in the middle of critical maneuvering area used for high-speed and abrupt LAT as low as 200' AGL. Due to conflicts with existing crop circles, habitat and infrastructure, Mr. Vaughan indicated it is unlikely that the project design could meet the 100' height constraint. Additionally, at least five miles of this route option would fall under existing Navy avigation easements where transmission lines are restricted to 35' AGL.

Aircraft operators have stressed that building power transmission lines and towers in excess of the parameters established in paragraph 2 within the Boardman Complex would negatively impact Training and Readiness for EA-6B and EA-18G Operational Squadrons and the Fleet

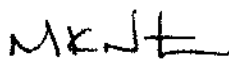
3700
Ser N00/0503
23 Apr 13

Replacement Squadron (FRS). Currently the Boardman Range is the only local airspace that begins at the surface and where the FRS can complete the student/instructor under training (IUT) LAT syllabus.

Based on the findings of the operational analysis and for the reasons summarized above, I strongly recommend against selection of the Idaho Power/B2H alternate route or "Eastern Option." I also request consideration be given to requiring transmission lines be buried were feasible to further reduce the footprint of vertical obstructions.

My point of contact for this issue is: Mr. Kent Mathes, commercial (360) 257-3315, DSN 820-3315 or email kent.mathes@navy.mil.

Sincerely,



M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosure 1: Joint Transmission Projects - Boardman Vicinity Map

Copy to: Assistant Secretary of the Navy (EI&E)
Chief of Naval Operations (N45)
Commander, Navy Region Northwest
Commander, Navy Facility Northwest
Commander, Electronic Attack Wing, U.S. Pacific Fleet
Aviation Officer, Oregon National Guard

Don Gonzalez
Vale District Manager (BLM)
100 Oregon St.
Vale, OR 97918-9629



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
OAK HARBOR, WASHINGTON 98278-50003700
Ser N00/0902
June 21, 2013

Mr. Doug Dockter
Manager, 500kV Projects
Idaho Power Corporation
P.O. Box 70
Boise, ID 83707

SUBJECT: CONCURRENCE ON PRELIMINARY DESIGN/ROUTE FOR THE
BOARDMAN TO HEMINGWAY (B2H) PROJECT EAST OF BOMBING
RANGE ROAD ALTERNATIVE

Dear Mr. Dockter,

The Northwest Training Range Complex (NWTRC) and Naval Air Station Whidbey Island appreciate the opportunity to provide comments to Idaho Power on the proposed Boardman to Hemmingway (B2H) transmission line project. As requested in the email from Mr. Mike Vaughn to Mr. Kent Mathes dated June 7, 2013, we have reviewed the "Preliminary design for an alternate B2H route down the east side of Bombing Range Road (BRR)" maps, and submit the following assurance:

While this design does not meet all of our operational constraints as outlined in the email from Mr. Kent Mathes to Mr. Mike Vaughn dated February 23, 2012, specifically: the 35' Above Ground Level (AGL) height within Navy held avigation easements; and, remaining equal to or lower than existing parallel line pole heights; it is preferred over the "eastern route" (Longhorn Alternative) currently under Environmental Impact Study (EIS) consideration. The route alternative with the least operational impact remains the "southern route" (Horn Butte Alternative) because of the design's ability to meet all of our operational constraints.

If obstructions cannot otherwise be mitigated within the R-5701 restricted area, we prefer having obstructions co-located to facilitate operator recognition and minimize operator accommodations vice having them spread throughout the operating area. For this reason, we would be willing to relax height restrictions along the western boundary of our eastern avigation run-in easement with the understanding that the maximum pole height there and within the R-5701 boundaries would be limited to no higher than 100' AGL as shown in the "Preliminary design

3700
Ser N00/0902
June 21, 2013

for an alternate B2H route down the east side of Bombing Range Road (BRR)" maps in order to have this route introduced as a B2H alternative for the Boardman area. Furthermore, we would request that, if this proposal is accepted, power lines and towers exceeding existing obstruction heights within R-5701 be marked and painted to facilitate operator recognition as new obstructions.

We understand that, ultimately, this proposal is contingent on EIS considerations, easement acquisition and potential agreements with Umatilla Electric Co-op and the "2Morrow" wind project.

My point of contact for this issue is: Mr. Kent Mathes, commercial (360) 257-3315, DSN 820-3315 or email kent.mathes@navy.mil.

Sincerely,



M. K. NORTIER
Captain, U.S. Navy
Commanding Officer

Enclosures: 1. Email from Mr. Mike Vaughn to Mr. Kent Mathes dated June 7, 2013
2. PDF File (B2H.TD08.EoBRR_P&P.rev2.2013.05.14)
3. Email from Mr. Kent Mathes to Mr. Mike Vaughn dated 23Feb2012

Copy to:
Commander, Navy Region Northwest
Commander, Navy Facility Northwest
Commander, Electronic Attack Wing, U.S. Pacific Fleet
Aviation Officer, Oregon National Guard



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400

NOV 20 2014

Tamara Gertsch
Project Manager
Bureau of Land Management
5353 Yellowstone Road
Cheyenne, WY 82009

Dear Ms. Gertsch:

This letter responds to a Bureau of Land Management (BLM) request for a Department of Defense (DoD) review of the Boardman to Hemingway Transmission Project Administrative Draft Environmental Impact Statement (ADEIS). After review, the DoD has no objection to the Agency Preferred Alternative Route (PAR) (East of Bombing Range Road) for the transmission line as it traverses under Restricted Airspace # R-5701, assuming the specific tower height constraints described below are met. However, as detailed in the enclosure, this route is not DoD's most preferred alternative. Therefore, should the PAR be modified during the remaining NEPA process, DoD will urge further discussion of the DoD preferred alternative route outlined in the enclosure.

The airspace in and around R-5701 provides a relatively unobstructed environment to conduct Low Altitude Tactical Training for Navy Airborne Electronic Warfare aircraft stationed at Naval Air Station Whidbey Island, WA (NASWI). To preserve the long-term viability of flight testing, training and operational missions that transit into R-5701 on a nearly daily basis, our first preference would be that no new obstructions be constructed under the R-5701 designated airspace. That said, if new obstructions are proposed to be constructed under the R-5701 designated airspace, we request they not exceed 100 feet Above Ground Level (AGL) in height within R-5701, or 35 feet AGL in height within existing aviation easements east and west of Naval Weapons Systems Training Facility (NWSTF) Boardman, without specific approval of Commanding Officer, NASWI. Furthermore, we request a height limit of 170 feet AGL in height in areas outside and immediately adjacent to the perimeter of R-5701. In all instances we plan to continue to work with the proponent on appropriate markings for any transmission lines within and near the restricted airspace.

In addition to the route alternatives outlined in the enclosure, Idaho Power Company (IPC) representatives have recently indicated the possibility of another route alternative, paralleling the Longhorn Variation Alternative, but located West of Bombing Range Road and on Navy-owned NWSTF Boardman property. It is unclear to us when/if this additional alternative will be addressed in the NEPA process, but for a number of significant operational and environmental concerns, DoD considers this alternative to be unacceptable and would likely not support an easement request by IPC to cross Navy property.

Thank you for the opportunity to participate in the Boardman to Hemingway NEPA process. We look forward to continued engagement with you in completion of the EIS and associated Record of Decision reflecting DoD's concerns. Should you have any questions concerning our stipulations, please contact Mr. William Van Houten, at (703) 571-9068 or william.j.vanhouten.civ@mail.mil.

Sincerely,



Michael A. Aimone, PE
Executive Director
DoD Siting Clearinghouse

Enclosures:
As Stated

cc:
BLM-Main
PDASN (EE&I)
Region 10, REC
PACFLT
NASWI
CNRNW

Enclosure
Boardman to Hemingway (B2H) Transmission Project

Two alternatives offered by the proponent are generally compatible with Navy mission requirements. One of the proposed alternatives, number 3 below, is unacceptable.

- *Proponent proposed Alternative Route #1:* The Horn Butte/Southern Alternative layout largely avoids building the transmission line inside R-5701, avoiding impacts to LAT. This proposed route is acceptable to DoD, and poses the least operational impact
- *Proponent proposed Alternative Route #2:* The Longhorn Variation/East Bombing Range Road alternative co-locates the transmission line with an existing obstruction along Bombing Range Road. If height is restricted (<100' AGL), the layout would be in an area that is already known as an obstruction to aviators and would not result in additional impact to LAT. This proposed route is acceptable to DoD, although poses some operational impact which can be mitigated
- *Proponent proposed Alternative Route #3:* The Longhorn Alternative/Eastern Alternative proposal presents a new obstruction for LAT inside R-5701 and is inconsistent with Navy previously articulated positions. This alternative would require height restrictions <100' AGL in R-5701 and <35' AGL inside the Navy aviation easement to the east of NWSTF Boardman, and the proponent has indicated to Navy staff they are unable to meet these height restrictions. Without these height restrictions the Navy and DoD oppose this alternative.