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TOWNSEND BOMBING RANGE MODERNIZATION

Frequently Asked Questions—August 2011

BACKGROUND

Townsend Bombing Range, and the complex of Special Use Airspace that supports the air-to-ground training at the range, is a vital asset for Marine Corps aviation.

Who owns, operates, and uses Townsend Bombing Range?

Townsend Bombing Range (TBR) is federal property administered by the U.S. Marine Corps and operated by the Georgia Air National Guard as a part of its Combat Readiness Training Center. TBR is the primary air-to-ground training range for Marine Corps aviation units stationed at Marine Corps Air Station Beaufort, South Carolina. In addition to being an essential training asset to U.S. Marine Corps aviation units, the U.S. Navy, U.S. Air Force and Air National Guard, and U.S. Army also train at TBR.

What is the primary purpose of TBR?

Townsend Bombing Range is routinely used by all services to train air crews (e.g., pilots, navigators, etc.) to meet their air combat proficiency requirements. The training range is used for “inert” air-to-ground ordnance including guns, rockets, bombs, and laser training munitions, as well as low-angle strafing training (shooting at large “bulls-eye” targets set up on the range), and close air support training exercises. Inert ordnance sometimes will have a small spotting charge that activates upon impact to help score how well the ordnance was delivered on the target but it does not contain high explosives. Tracers and flares are not allowed.

Where is TBR located?

Townsend Bombing Range is located in McIntosh County in southeast, coastal Georgia, 71 nautical miles southwest of MCAS Beaufort, between Darien and Ludowici, GA, off Highway 57.

When did TBR begin its current operations?

Townsend Bombing Range (TBR) was leased for military training beginning in the 1940s. The U.S. Navy operated TBR until 1972, when it was closed along with the closure of Naval Air Station Glynco in Brunswick, Georgia. The current use of TBR began in 1981, when the range was leased from Union Camp and reopened. The Marine Corps purchased the land in 1991.

How is TBR operated and what are its operating hours?

Georgia Air National Guard flight controllers direct aircraft to the Townsend Bombing Range (TBR) target area where inert munitions are delivered to simulated military targets. Inert bombs contain a small spotting charge that activates upon impact to help score the run. Highly sophisticated scoring equipment locates the proximity of the bomb’s impact to the target. Bombs containing high explosives are prohibited in training at TBR.

TBR’s normal business hours are Monday and Friday 8:00 AM – 5:00 PM and Tuesday thru Thursday 8:00 AM-10:00 PM. Any times outside of normal business hours will be coordinated with the Federal Aviation Administration (FAA) by Notice to Airmen (NOTAM) with at least 24 hours notice.
Would modernizing TBR change the number of operations or timing of use of the Range?

The Environmental Impact Statement (EIS) will examine how Townsend Bombing Range (TBR) would be used under each of the alternatives to be studied in the EIS – including numbers of operations and other factors.
TOWNSEND BOMBING RANGE MODERNIZATION
Frequently Asked Questions—August 2011

MARINE CORPS REQUIREMENTS

The Marine Corps is the nation’s Expeditionary Force in Readiness. To maintain readiness, Marine aviators must train as they fight. Realistic training increases skill and the likelihood of mission success, which improves the probability that Marine aviators and the ground troops they support will safely return home.

What initiated the consideration to modernize TBR?

The Marine Corps Requirements Oversight Council (MROC) identified a requirement for an east coast range to train Marine Corps aviators. The MROC recommended Townsend Bombing Range (TBR) for study for modernization to accommodate precision-guided munitions training for aviation units.

The Department of the Navy then requested that the Department of Defense grant approval to consider land acquisition to augment TBR. The Under Secretary of Defense for Acquisitions, Logistics, and Technology granted the Navy and the Marine Corps approval to study potential land acquisition, allowing the modernization study to go forward.

Why is TBR important to national security?

Townsend Bombing Range (TBR) is the primary air-to-ground training range for Marine Corps Air Station Beaufort, South Carolina, and is also used for training by the U.S. Navy, U.S. Air Force and Air National Guard, and the U.S. Army.

To fulfill their responsibilities in the national security strategy, it is critical that our aviators are highly trained, meeting very specific training requirements. These training requirements ensure that combat aviators are mission ready and prepared to meet combat situations with the utmost competence and experience. Aviator training is a continual process, rather than a single-time training experience. Marine Corps aviators must train as they fight, and training at TBR is critical component of that preparation.

Is it true that TBR cannot meet current Marine Corps aviation training requirements?

Yes. Townsend Bombing Range (TBR) can support only 43% of the required air-to-ground training in the training syllabus for Marine Corps F/A-18 aircrews. TBR cannot support training with precision-guided munitions (PGMs), which are key components of Marine Corps war fighting. Modernization of TBR would allow aircrews to meet up to 93% of their air-to-ground training requirements, including training with PGMs.

Why do PGMs require more range land area?

Although very accurate in combat, precision-guided munitions (PGMs) are released to their target from much greater distances and altitudes than other ordnance. To train as they fight, Marines must practice releasing PGMs from combat distances, altitudes, and airspeeds. If a PGM were to malfunction – either the guidance or a mechanical system – its potential impact area is much larger than ordnance released from lower altitudes and shorter distances. Therefore the “safety zones” at Townsend Bombing Range (TBR) must be sized to ensure that even an errant bomb will safely land within TBR. To modernize TBR to meet this requirement, additional land must be acquired. If TBR is not modernized, Marine Corps units must continue to deploy to California and Arizona to conduct PGM training.
Why can’t the Marines use Fort Stewart for this training?

Although, the Army and the Marine Corps often serve side-by-side, they have different training requirements in order to meet complete their different missions. The air-to-ground training required for the Marine Corps aviators, particularly training with precision-guided munitions (PGMs), conflicts with the training needs at Fort Stewart. As a result, Fort Stewart cannot support the training requirements that drive the proposed modernization at Townsend Bombing Range (TBR).

If Townsend Bombing Range is only able to support 43% of air-to-ground training in the F/A-18 training syllabus for the Marine Aviators at MCAS Beaufort, where has the rest of the training occurred?

The Marine Corps’ east coast ranges cannot accommodate precision-guided munitions (PGM) training. Townsend Bombing Range (TBR) in its current configuration can only meet 43% of the air-to-ground training requirements of the aircrew training syllabus for the F/A-18. If PGMs could be used for training at TBR, Marine Corps F/A-18 aircrews could meet up to 93% of the air-to-ground portion of their training syllabus. Therefore, in order to train to the level required by the Marine Corps, the aviators stationed at Marine Corps Air Station (MCAS) Beaufort deploy to the west coast ranges (in Arizona and California) to train with PGM and complete the remainder of the training. Marine Corps ranges on the east coast cannot currently accommodate this training.

This reliance on the west coast ranges renders Marine Corps aviation training, overall, suboptimal and less efficient because it detracts from the west coast ranges’ focus on advanced-level and higher skills training for which those ranges are uniquely suited. The proposed expansion and modernization of TBR would allow training at TBR to fulfill up to 93% of the air-to-ground training requirements specified in the current F/A-18 individual aircrew training syllabus and enable more efficient utilization of the other Marine Corps training ranges to achieve unit readiness in support of national defense.

If Townsend Bombing Range is modernized, will Marine aviators stationed at Marine Corps Air Station (MCAS) Beaufort continue to deploy to the west coast ranges for training?

The west coast ranges are uniquely suited for complex unit and higher skills training. Training at Townsend Bombing Range (TBR) is restricted to inert munitions, which contain a small spotting charge to help score the aircrew’s run on the target. The west coast ranges, on the other hand, can accommodate air units and ground units at the same time in one combined training exercise as well as live-fire training. These characteristics provide invaluable training opportunities to the warfighter. Individual aircrews who have trained with inert precision-guided munitions (PGMs) at TBR would then train in large-scale (unit) exercises with live ordnance, simulating realistic combat scenarios, at the west coast ranges to achieve unit readiness for deployment.
ENVIRONMENTAL REVIEW PROCESS

The decision to potentially expand and modernize Townsend Bombing Range is a process that involves careful study and public participation.

How will the determination be made regarding whether to modernize TBR?

An Environmental Impact Statement (EIS) will be produced to examine alternatives to meet precision-guided munitions (PGM) training. The EIS will evaluate and discuss the environmental effects of various reasonable alternatives to expand Townsend Bombing Range (TBR) to accommodate PGM training. A key component of the process of preparing the EIS will be providing opportunities for public review and comment on the alternatives, issues to be studied, and the Draft and Final EIS.

The EIS process began with the publishing of a Notice of Intent (NOI) on August 6, 2010. Public scoping meetings were held in Darien and Ludowici. A 30-day public scoping comment period, which was extended for an additional 30 days, allowed the public to comment on the alternatives and issues to be studied in the EIS. Comments on the NOI have helped to shape the issues and alternatives to be studied in the EIS.

The EIS will analyze land near TBR’s boundaries for possible acquisition, as well as the slight modification to current Special Use Airspace associated with TBR. Multiple configurations are being evaluated and environmental impacts will be assessed for a range of reasonable alternatives, including any necessary mitigation. A Draft EIS will be released for public comment in Spring 2012 and a Final EIS is scheduled for release in Winter 2013.

During preparation of the EIS, the Department of the Navy, the Marine Corps, the Georgia Air National Guard and the Federal Aviation Administration (FAA) will receive additional input and comments from federal, state, local, and tribal governments; resource, regulatory, and planning agencies; as well as non-governmental stakeholders with an interest in the proposed modernization effort.

The Secretary of the Navy will assess the information contained in the EIS, as well as cost, training, and other issues, and will then publish a Record of Decision (ROD) regarding whether to modernize TBR and, if so, what alternative to select. The ROD is scheduled for Spring 2013.

If the ROD proposes acquisition of any new lands, the FAA would then undertake its established processes to determine whether to modify the current Special Use Airspace (Restricted Area R-3007) associated with TBR. Such a modification would be to incorporate the airspace from 0 to 100 feet above ground level into the currently established Restricted Area that already supports TBR aviation training activities.

Is this a done deal?

No. The Department of the Navy and the Marine Corps are preparing an Environmental Impact Statement (EIS) and working with regulators, resource agencies and stakeholders to study the potential environmental effects of a range of reasonable alternatives to meet Marine Corps training requirements at Townsend Bombing Range (TBR). The public has had and will have further opportunities to comment during the process; any land acquisition ultimately would have to be approved by Congress and any Special Use Airspace would have to be established or modified by the Federal Aviation Administration (FAA).
How did the Marine Corps determine the areas to be studied?

The Marine Corps used planning models that accurately plot the area in which any ordnance will land after release from an aircraft. Sufficient area is proposed in each potential alternative for acquisition to assure safe training operations based on these models. In all of the alternatives, the “safety zones” are safely within the potential acquisition area.

Three potential acquisition areas were originally identified that were near the range, underneath the Townsend Bombing Range (TBR) Special Use Airspace and could be utilized along with the current TBR.
How much acreage is being studied?

Originally in August 2011 the Marine Corps announced its intention to study approximately 12,000 acres up to 51,580 acres for possible acquisition. During the initial analysis of the original five alternatives, Study Area 2 was removed from further study in the EIS. With the removal of Area 2, the Marine Corps has reduced its study area for potential land acquisition to 36,828 acres, down from up to 51,580 acres.

The Marine Corps presented to the public three proposed land acquisition areas for study in the Environmental Impact Statement (EIS) for the Townsend Bombing Range (TBR) Modernization and Expansion during the scoping process in Fall 2010. These areas, as stand-alone options or in combination, produced the five original alternatives to study for possible modernization in addition to the No Action Alternative. The original land acquisition alternatives presented during scoping were: the smallest alternative being studied would have added approximately 12,000 acres (Study Area One); two alternatives contained approximately 25,000 acres each (one would have combined Study Areas One and Two, the other would have been Study Area Three); one alternative would have added approximately 36,000 acres (Study Areas One and Three); and the largest alternative would have added all three study areas, totaling approximately 51,000 acres.

The graphic below shows the three original study areas and their relation to each other and to the current range.
Why did the Marine Corps remove Area 2 from further consideration in the EIS?

During additional analysis of the original five alternatives, Study Area 2 (which is 14,752 acres to the southeast of the current boundary of TBR between the Altamaha River and the power line) was removed from further study in the EIS for the following reasons:

- Study Area 2 fails to meet the minimum training requirement.
- Area 2 is frequently flooded by the Altamaha River and inaccessible for range maintenance and clearance.

The removal of Area 2 eliminates Alternative 4 (26,700 acres) and Alternative 5 (51,580 acres) from further study in the EIS. The Marine Corps has reduced its study area for potential land acquisition from approximately 51,580 acres to up to 36,828 acres.

Three land acquisition alternatives, in addition to the No Action Alternative, will be carried-forward for study in the EIS. The graphic below depicts Area 1 and Area 3 and how they related to Alternatives 1-3 being carried forward in the EIS.

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1 Minimum Threshold Training Requirement: (A) Must provide for a minimum of (2) two, 15-degree cones for final attack heading (one tactical), with release of weapons at airspeeds from 360-540 knots and from altitudes up to 24,000 feet (B) The range must also allow for the delivery of Guided Bomb Units (GBU) 31, 32, and 38; Joint Direct Attack Munitions; and Laser GBU 10, 12, and 16.
How would the Marine Corps and the Navy acquire any land if the Record of Decision opted for land acquisition to modernize TBR?

If the Record of Decision (ROD) approves any land acquisition, Congress would need to approve Military Construction (MILCON) funding to finance land acquisition. All property owners would be offered fair market value for any property to be acquired.

Does the proposed modernization of TBR involve the establishment or modification of Special Use Airspace?

The Environmental Impact Statement will study a slight modification to a portion of the Special Use Airspace (SUA), Restricted Area R-3007 that is currently associated with Townsend Bombing Range (TBR). SUA is airspace that the Federal Aviation Administration (who regulates the national airspace) has set aside for military or other unusual flight activity. Such a modification would include the addition of the airspace from the surface (zero feet) to 100 feet above ground level under currently charted Restrict Area that supports the range operations. The proposed modernization would not require the establishment of other Special Use Airspace.

What is the project schedule?

The current project schedule is as follows:

- Notice of Intent to Undertake an Environmental Impact Statement (EIS) was released August 6, 2010
- Public Scoping Meetings – August 24 and 26, 2010
- Public Scoping Comment Period – August 6 to September 7, 2010 and October 10 to November 8, 2010
- Draft EIS and Public Comment Period – Publish in Federal Register in Spring 2012
- Final EIS – Publish in Winter 2013
- Record of Decision – Publish in Spring 2013
- If called for in the Record of Decision:
  - Real Estate Acquisition Planning – 2013
  - Special Use Airspace reviewed in Federal Aviation Administration (FAA) Established Processes – 2013
  - First Military Construction Award and Acquisition – 2014

What is the current stage of the project and when is its anticipated completion?

The public scoping period is complete and the Marine Corps is in the process of developing the Draft Environmental Impact Statement (EIS) which will be published in Spring 2012. A Final EIS is scheduled for publication in Winter 2013 and the Record of Decision (ROD) issued by the Secretary of the Navy is anticipated for publication in Spring 2013. If called for in the ROD, Military Construction funding for acquisition is anticipated in 2014.
Of the three alternatives, which one does the Marine Corps prefer?

The U.S. Marine Corps has not yet identified a preferred alternative. In the course of conducting the initial evaluation of the five action alternatives and the No Action Alternative, Study Area 2 (which is 14,752 acres to the southeast of the current boundary of Townsend Bombing Range (TBR) between the Altamaha River and the power line) was removed from further study in the EIS.

Therefore, the Marine Corps is in the process of analyzing the impact of each of the three remaining alternatives—Alternative 1 (Study Area 1); Alternative 2 (Study Area 3); and Alternative 3 (Study Areas 1 & 3), as well as the No Action Alternative. After publication of a Draft EIS, federal, state, local, and tribal governments, resource, regulatory, and planning agencies, as well as non-governmental stakeholders with an interest in the proposed modernization effort will be able to review and comment on the analysis, including the selection of a preferred alternative. These comments will be considered in preparation of the Final EIS.

Who is responsible for determining mitigation?

The Environmental Impact Statement (EIS) will identify any environmental impacts of the proposed action for each of the proposed alternatives as well as the No Action Alternative. When the Final EIS (FEIS) is submitted to the Secretary of the Navy in Winter 2012, the Secretary will assess the information contained in the EIS, including any proposed mitigation, as well as cost, training requirements, and other issues. The Secretary of the Navy will then publish a Record of Decision (ROD) regarding whether to modernize Townsend Bombing Range (TBR) and, if so, what alternative to select. The ROD will also specify what, if any, mitigation will be provided. The ROD is scheduled for publication in 2013.
COMMITMENT TO THE PUBLIC

The Marine Corps with its partner the Georgia Air National Guard will conduct the Environmental Impact Statement (EIS) with full public participation. The public will have multiple opportunities to comment during the preparation of the EIS.

How will the public express its views on the project, the alternatives, and the issues to be studied?

Consistent with the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) guidelines and Department of the Navy policy, the Navy received scoping comments from the public on the proposed alternatives and issues at public meetings held in August 2010 and during two, 30-day public scoping comment periods. Comments have been considered to establish the range of reasonable alternatives and issues to be studied in the project’s Environmental Impact Statement (EIS).

A Draft EIS will be released and stakeholders, including local communities, public agencies, state, local, and tribal governments, businesses, conservationists, among other interested parties, will have an opportunity to review and comment on the Draft EIS. The Marine Corps and its project partners intend to work closely with the community stakeholders throughout this process and will consider all comments in establishing the alternatives and issues to be studied and to ensure that the EIS appropriately analyzes impacts and potential mitigation, if appropriate. The record of the EIS process will be available for review by the Secretary of the Navy during the formulation of a Record of Decision.

Where can I find more information about the project?

You can find more information about the project, including graphics that depict the study areas and alternatives, at: http://www.townsendbombingrangeeis.com

Was there a problem receiving the public comments during the Scoping Period?

The project team identified an issue with the Post Office Box that was established to receive public comments. This issue caused some of the comments to be undeliverable or returned to the sender. To address the delivery issue, the public comment period was reopened from October 10 to November 8, 2010. In total the Marine Corps received 110 comments during the scoping periods. These comments will be used to finalize the range of reasonable alternatives and issues to be studied in the EIS.
What was the outcome of the public scoping period?

The Marine Corps received strong community participation in its Public Scoping Periods conducted August 6 to September 7, 2010 and again from October 10 to November 8, 2010. Scoping is the process by which the Navy and Marine Corps solicited input from the public and interested agencies on the nature and extent of issues and impacts to be addressed in the TBR Modernization Environmental Impact Statement (EIS). The Marine Corps received 110 comments from the local community and other interested stakeholders during the two scoping periods. These comments will be used to finalize the range of reasonable alternatives and inform the issues to be studied in the EIS. A number of issues received comment by the public during the Scoping Period, including (in no particular order): the economic well-being of the surrounding communities; interests of the Marine Corps encroachment prevention partners in preserving conservation values in the area; biological and water resources protection; transportation issues; hunting, fishing, and other recreation activities; noise and other quality of life impacts.

How would the proposed modernization of TBR restrict the mobility of residents in Long and McIntosh Counties along Highway 57? Would Highway 57 be closed?

The Marine Corps recognizes the importance of Highway 57 as a thoroughfare for local residents and travelers in Long and McIntosh Counties. While the Marine Corps is studying the impact of possible land acquisition along stretches of Highway 57 near the existing range, the Marine Corps has no plans to propose to close or relocate Highway 57 under any of the alternatives for modernization under study. Any land acquisition and the training operations conducted in any new training range area would ensure sufficient safety zones to allow for the public’s continued safe use of Highway 57.
STEWARDSHIP

The Environmental Impact Statement will evaluate a range of reasonable alternatives and the potential impacts associated with each alternative. This analysis will allow the Secretary of the Navy to make a decision that continues the Marine Corps tradition of being a good neighbor and steward of natural resources, habitat, and cultural resources.

What would be done about any environmental impacts?
The Environmental Impact Statement (EIS) will study and evaluate the environmental impacts that could occur under each alternative to be studied, as well as under the No Action Alternative. Impacts to natural resources, as well as socioeconomic impacts, will be studied. Any appropriate mitigation requirements will be identified during completion of the EIS.

Would the proposed modernization have an impact on the historical or archeological resources?
These issues will be studied in the EIS and the analyses shared with the public.

What threatened and endangered species are found within the study area?
The EIS will study all of the natural resources and will identify any listed species or critical habitat that might be impacted by the alternatives. The analyses will be shared with the public and will be developed in consultation with resource management agencies such as Georgia Department of Natural Resources (GA DNR) and the U.S. Fish and Wildlife Service.

How will the Marine Corps address the loss of tax revenue that would result from adding land to TBR? Will the municipalities receive Payments in Lieu of Taxes?
The EIS will study a variety of environmental impacts including the socio-economic impacts of the proposed modernization. Any appropriate mitigation requirements will be identified during completion of the EIS. These analyses will be shared with the public.

Will the proposed modernization create additional noise and air traffic at TBR?
The Marine Corps is studying potential noise impacts as part of the required Environmental Impact Statement (EIS) analysis. The analyses will be shared with the public in the Draft Environmental Impact Statement which will be published in Spring 2012.

Will the project restrict public access to recreation areas near TBR particularly the Altamaha River and the Townsend Wildlife Management Area?
The EIS will evaluate any potential impacts to recreation under each of the proposed alternatives. The analyses will be shared with the public. During the initial analysis of the original five alternatives, Study Area 2 (which is 14,752 acres to the southeast of the current boundary of TBR between the Altamaha River and the power line) was removed from further study in the EIS. Study Area 2 encompassed land up to the bank of the Altamaha River and the Townsend Wildlife Management Area. These areas are no longer under consideration for acquisition in this EIS.
How will the proposed modernization affect hunting?

The EIS will evaluate these issues under each of the proposed alternatives. The analyses will be shared with the public when the Draft EIS is published.
The proposal to modernize and expand Townsend Bombing Range is a weapons-driven, rather than airframe driven, requirement.

How is this project related to the Joint Strike Fighter (JSF) basing decision that was recently announced?

The proposed modernization of Townsend Bombing Range (TBR) is a separate action from the Joint Strike Fighter east coast Basing decision that was announced through a Record of Decision in December 2010. Both projects are subject to compliance with the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) guidelines and Department of the Navy policy that require the preparation of an Environmental Impact Statement (EIS) and the solicitation of public input through public meetings and comment periods. These two projects are subject to the same EIS process but they are separate actions with separate documents. Most importantly these two projects address separate aviation requirements for the Marine Corps. The modernization at TBR is to support the training needs of the current aircraft, the F/A-18, flown by the Marine Air Group (MAG) 31 based at Marine Corps Air Station Beaufort whereas the JSF basing decision answered the question as to which Marine Corps Air Stations should receive these new aircraft.

If the Joint Strike Fighter is scheduled to replace the F/A-18, why is Townsend Bombing Range under consideration for modernization to support F/A-18 aircrew training?

The requirement that initiated the proposal to modernize TBR is a weapon-driven (rather than airframe-driven) requirement. The aircrews currently assigned to the F/A-18s at MCAS Beaufort have a need to train with precision-guided munitions (PGM). In order to prepare for combat, particularly given the nature of the current conflicts, aircrew need to train with and be proficient in, among other things, the delivery of precision-guided munitions (PGM) and use of air-borne weapons against a range of target types, including supporting military operations on urban terrain (MOUT). Training with PGM will continue to be emphasized to achieve readiness for future national security and military missions. The lack of a Marine Corps air-to-ground training range on the east coast has created inefficiencies in the use of the Marine Corps aviation training ranges as a whole.

The process to evaluate possible methods to address the deficiency for the east coast aviation began in 2003 when the requirement was identified. If the Record of Decision (ROD) calls for the acquisition of land and modernization of TBR, the land acquisition process and range equipment instrumentation process will begin in fiscal year 2014. The F/A-18 assigned to Marine Air Group 31 is scheduled to remain in service until 2022.