Attachments: Draft Amended Analysis to Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex, Washington

Olympic Forest Coalition
April 2025

Documents from a Navy whistleblower:

1. From footnote #51: U.S. Navy Region Northwest (NRNW) In Water Construction Projects – pile-driving. Example of NEPA segmentation for 5,200 pilings in Puget Sound/Strait. XL spreadsheet.

2. Footnote #52: U.S. Navy, NW-NEPA-Report-12-15-2015 showing number of NEPA projects and segmentation.

3. Footnote #53: Example of intent to segment and violate NEPA: US Navy internal memo – Goodman, Layna. Proposed NEPA Approach for Planned Waterfront Projects Which May Require Environmental Impact Statements, Naval Base Kitsap Bangor.

1	**NRNW In Water Construction Projects**					
2						
3	*Does not include in-water construction projects for which applicability of a CATEX is anticipated					
4	**Does not include potential proposed actions (if any) of which action proponents have not informed NAVFAC NW					
5	***In situations where the total number of piles was not specified in the 1391, it was then estimated 1 pile is built every 10 LF					
6	****Project descriptions, construction timeframes, and the approximate # of piles can change during the design and environmental planning process					
7						
8	**Project**		**Project # or Name**	**Project Description**	**approximate # of piles**	**Timeframe of Construction (actual if programmed or best guess)**	**NEPA funded (yes or no)**
9							
10	**NBK-Bangor**						
12	**Included in Pile Repair & Replacement EA**						
13		1	Bangor Contingency Piles	15 piles per year for a total of 75 piles between FY13 and FY18; repairs to be conducted on an "as needed/if needed" basis in response to annually conducted pier inspections for structural integrity	75	Contingency FY 13-FY18	yes
14		2	EHW-1 Repair Project	Replace critical structure piles	104	FY13-FY18	yes
15		3	K/B Dock Repair	Replace deteriorated creosote-timber piles on a WWII vintage pier with new treated timber piles, which will maintain the usability of the pier. Six timber piles will be removed with a vibratory hammer. Five fender pile, guide piles 2013, 2014 Ten Fender piles for 2015, Ten Fender piles for 2016, 15 Fender piles for 2017, 15 fender piles for 2018	60	Unprogrammed FY13-FY18	yes
16		4	Zelatched Point Dock Repair	Five Fender piles 2015, Five Fender piles for 2016, Five Fender piles for 2017, Five Fender piles for 2018; note that Zelatched Point is in Dabob Bay section of Hood Canal approx 9-11 miles by boat from Bangor waterfront.	30	Unprogrammed FY15-FY18	yes
17	**Stand Alone Environmental Assessment**						
18	Service Pier (Barge) Mooring Dolphins		RDT&E project	Install two mooring dolphins and two guide piles to provide a permanent mooring for a RDT&E barge.	20	FY13	yes
19							
20	**Environmental Impact Statements**						
21	EHW-2		P-990	Construct a second explosive handling wharf to meet Trident mission requirements at Bangor.	1250	FY12-FY16	yes
22	Land Water Interface		P-983	Construct two piers across intertidal zone with steel mesh (10x10 inch grid) extending to the seafloor and north and south abutments.	136	FY14-FY15	yes
23	Electro Magnetic Measurement Range Installation		EMMR	Project involves installation of a 21-sensor array on the seafloor. The magnetic range is needed to degauss submarines when they return from deployment to reduce their electronic signatures. Horizontal directional drilling, jet plow, and cable armoring would be used for cable installation from array to existing MSF building on NBK-Bangor. The project would also involve construction of a camera platform with cable junction. The 15 ft x 15 ft offshore platform would require installation of five 24-inch square batter pre-cast concrete piles (one for each corner and one in the center of the platform). Sponsor is evaluating performance and design characteristics in an effort to reduce significance of both impacts and potential public interest.	5	FY14-FY15	proponent willing to fund

24	Transit Protection System		P-925	A berthing pier for the Transit Protection System and Port Operations craft assigned to NBK Bangor. The berthing pier will consist of a pile-supported reinforced concrete structure. The pier will be provided with full hotel service capability including power, potable water, fire protection, sewage connections, Ship Overboard Drainage (SOD) collection, fuel, telephone, cable, and Local Area Network (LAN) service. This pier will be located at the site of the existing Magnetic Silencing Facility (MSF). The pier and berths will have lighting. The pier will support 25-ton capacity mobile crane operations. The pier and berthing slips will be provided with necessary mooring, fendering, and corrosion protection systems. The project will proved a berth to accommodate a fuel barge moored permanently to the pier. A study is underway to determine if there are more cost effective solutions than the originally envisioned project.	21-27	FY16-FY17	proponent willing to fund
25	Service Pier Extension		P-834	Construct 28,000 SF general purpose berthing pier. Construct 2153 SF permanent standby generator building with four new 2 MW 900 RPM emergency generators. Construct 19,500 SF Ships Service Support Building. 320 piles for the pier extension and 11 piles for the wave attenuation component.	320	Unprogrammed. FY14 or later	partially funded; additional funding promised
27				***Estimated Pile Total at NBK Bangor***	**2000**		
28	**NBK-Keport**						
31	**Included in Pile Repair & Replacement EA**						
32		1	Keyport Contingency Piles	Up to 16 piles from FY13 - FY18; repairs to be conducted on an "as needed/if needed" basis in response to annually conducted pier inspections for structural integrity	16	Contingency FY 13-FY18	yes
33				***Estimated Pile Total at Keyport***	**16**		
34	**NAVSTA Everett**						
37	**Included in Pile Repair & Replacement EA**						
38		1	Contingency Piles	15 piles per year for a total of 75 piles between FY13 and FY18; repairs to be conducted on an "as needed/if needed" basis in response to annually conducted pier inspections for structural integrity	75	Contingency FY 13-FY18	yes
39		2	Major Waterfront Repairs		5	Unprogrammed FY13-FY18	yes
40	**NEPA Strategy Unknown/Early Project Planning Still Underway**						
41	Piers D&E Replacement		P-165		1671	Unprogrammed. FY15 or later	no
42				***Estimated Pile Total at Everett***	**1751**		
43	**NAS Whidbey Island**						
44	**Included in Pile Repair & Replacement EA**						
45		1	Contingency Piles	12 piles per year for a total of 60 piles between FY13 and FY18; repairs to be conducted on an "as needed/if needed" basis in response to annually conducted pier inspections for structural integrity	60	Contingency FY 13-FY18	yes
46	**Stand Alone Environmental Assessment**						
47	Fuel Pier Breakwater		P-191	There are 43, W14x120 steel plumb piling plus 43, 24 inch diameter steel pipe batter piling with 8 ft wide x 3 ft deep concrete pile cap and concrete wall panels for the new breakwater. There would also be a sheet pile wall consisting of 16" sheet piles for the length of the 270 ft wall resulting in ~203 sheet piles. The breakwater and sheet pile wall are needed to replace a pier that is collapsing and must be demolished due to storm inflicted major damage on it ~9 years ago. The failing/disintegrating pier currently provides the breakwater protection that the proposed new pier would replace.	289	FY14-FY15	yes
48				***Estimated Pile Total at NASWI***	**349**		
49	**NBK Bremerton - PSNS**						
50	**Included in Pile Repair & Replacement EA**						
51		1	Contingency Piles	10 piles per year for a total of 50 piles between FY13 and FY18; repairs to be conducted on an "as needed/if needed" basis in response to annually conducted pier inspections for structural integrity	50	Contingency FY 13-FY18	yes
52		2	Replace Fendering System Pier 6	Up to 415 concrete piles would be used	415	FY14-FY15	yes
53		3	Replace Fendering System Pier 5	Concrete Piles for Pier 5	380	FY16-FY17	yes
54		4	Pier 4 Repair Fendering System	Steel piles	43	Unprogrammed FY13-FY18	yes
55	**NEPA Strategy Unknown/Early Project Planning Still Underway**						
56	Ship Maintenance and Pier Replacement		P-411	Construct a permanent concrete ship maintenance pier 404 meters (1325 ft) by 38 meters (125 ft) to replace existing Pier 4 to be located at the site of the existing Pier 4. Structure consists of solid prestressed concrete piles and concrete pile caps supporting a concrete deck capable of supporting a 60-ton portal crane and a 140-ton mobile crane load. The pier will include portal crane rail, cleats, twelve 100-ton bollards and four 200-ton bollards, and a fendering/camel system capable of supporting SSBN and SSN hulls.	182	Unprogrammed. FY18 or later	no
57							
58				***Estimated Pile Total at Bremerton***	**1070**		
59	**Manchester Fuel Department**						
60	**Covered under Pile Repair & Replacement EA**						
61		1	Contingency Piles	8 piles per year for a total of 40 piles between FY13 and FY18; repairs to be conducted on an "as needed/if needed" basis in response to annually conducted pier inspections for structural integrity	40	Contingency FY 13-FY18	yes
62		2	Barge Mooring Pier Repairs		TBD	Unprogrammed FY13-FY18	yes
63				***Estimated Pile Total at Manchester***	**40**		
64	**Region (USCG Station Port Angeles, WA)**						
65	**Stand alone Environmental Assessment**						
66	Transit Protection System Operational Pier at USCG Station Port Angeles		P-854	Construct a permanent floating concrete pier structure, with 5- mooring dolphins and shore power delivery	30	Unprogrammed. FY13 or later	yes
67				***Estimated Pile Total in Region***	**30**		
68							
69							
70							

(end NRNW In-Water Construction Projects)

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Following from footnote 52, U.S. Navy, NW-NEPA-Report-12-15-2015

NEPA Project Manager	Project Name	Description	Type	eProjects WON Clickable Link	Activity	NEPA Preparer	NEPA Notification Ltr signed by Action Proponent	NNL/ NOI from CNRNW to CNIC	NNL/NOI from CNIC from CNO(N45)	Draft EA/DEIS	Draft EA Public Review	Final EA/FEIS	FONSI/ROD Signed	FONSI/ROD Signatory	Coop Age
FY16 FONSI/ROD															
Stevenson	P-603 Shore Power to Ammo Pier, NAVMAG Indian Island	Construct permanent electrical distribution system to provide power to Ammunition Pier. Demolish 1 storage shed, construct 1 building. Remove temporary generators. Consolidate pier side equipment storage.	EA	1357306	NAVMAG Indian Island	NAVFAC NW	6/24/14	7/22/14	8/6/14	7/6/15	8/12/2015 - 9/11/2015	10/19/15	11/25/15	CNRNW	Non
Escola	INRMP, Everett	Implementation of the revised INRMP for NAVSTA Everett.	EA	1331172	NAVSTA Everett	NAVFAC LANT NAVFAC NW	2/3/14	2/18/14	3/24/14	8/1/14	1/9/2015 - 2/9/2015	10/9/15	12/31/15	CNRNW	Non
Kler	Northwest Training and Testing (NWTT)	Combined EIS for ranges covered by Northwest Training Range Complex and NUWC Keyport; plus other Pacific Northwest RDT&E and pier side maintenance at PSNS, NSE and Bangor.	EIS/OEIS	1131527	Fleet	SRS-Parsons	N/A	N/A	N/A	1/24/14	N/A	10/2/15	1/15/16	ASN(EI&E)	Yes
Burt	NWSTF Boardman	Ongoing and proposed naval training activities at Naval Weapons Systems Training Facility (NWSTF) Boardman.	EIS	810307	Fleet	SRS-Parsons	N/A	N/A	N/A	09/07/2012	N/A	12/18/15	1/29/16	ASN(EI&E)	Oregon National Guard, N Federal Aviation A
Whalen	In-Water Activities, Acoustic Research Detachment (ARD), Bayview	EA to cover in-water RDT&E activities conducted by ARD Bayview.	EA	1292301	NSWC Carderock	SRS-Parsons	4/10/14	N/A	N/A	1/2/14	3/11/2015 to 4/9/2015	12/30/15	2/1/16	NAVSEA	Non
Whalen	INRMP, NBK	Implementation of the revised INRMP for NBK.	EA	870067	NAVBASE Kitsap	NAVFAC NW	3/11/10	4/13/10	6/3/10	4/3/15	12/23/15	2/22/16	4/1/16	CNRNW	Non
Burt	Gulf of Alaska	Supplemental EIS for Gulf of Alaska to renew MMPA permit by May 2016, will include new acoustic modeling and other updated data.	SEIS/ OEIS	1172776	Fleet	SRS-Parsons	N/A	N/A	N/A	8/22/14	N/A	1/29/16	4/11/16	ASN(EI&E)	Yes
Dildine/Senner	Land/Water Interface P-983 and Service Pier Extension P-834, NBK Bangor	Construction of two land/water interface barriers to connect both ends of Bangor's waterfront security enclave to the existing floating barriers and construction of an extension to the existing Bangor Service Pier.	EIS	962462	NAVBASE Kitsap	Leidos	N/A	8/21/12	N/A	2/13/15	N/A	2/12/16	4/20/16	ASN(EI&E)	USACE N
Miksa	INRMP, Pacific Beach	Implementation of INRMP for Pacific Beach	EA	1370689	Pacific Beach	NAVFAC NW	3/17/15	4/6/15	4/28/15	1/19/16	2/29/16	4/18/16	5/31/16	CNRNW	TBD
Escola	INRMP, NAVMAG Indian Island	Implementation of the revised INRMP for NAVMAG Indian Island.	EA	962456	NAVMAG Indian Island	NAVMAG	6/7/13	7/18/13	8/18/13	2/15/16	2/29/16	5/9/16	6/28/16	CNRNW	Non
Miksa	Airfield Obstruction Removal, NASWI	Identify and remove trees within airfield safety and approach/departure zones.	EA	1384020	NAS Whidbey Island	NAVFAC NW	10/28/15	12/8/15		3/15/16	4/16/16	5/3/16	6/30/16	CNRNW	TBD
Senner	P-993 Transit Protection System at Port Angeles	Install 144 piles to support a new fixed pier for forward staging of Transit Protection System (TPS) vessels at United States Coast Guard station Port Angeles.	EA	1172828	NAVBASE Kitsap	Cardno TEC-AECOM JV	3/28/14	4/4/14	5/20/14	7/23/15	DOPAA: 1/26/2015 - 2/25/2015 Draft EA: 11/30/2015 - 01/26/2016	6/24/16	8/8/16	CNRNW	USCG
Stevenson	INRMP, Manchester	Implementation of updated INRMP for Manchester	EA	1384015	NAVBASE Kitsap	NAVFAC NW				3/18/16	4/18/16	7/28/16	9/6/16	CNRNW	TBD
Whalen	SPECWAR NW Training	Naval Special Warfare in-water and on-land training in Western WA State. FONSI would be signed by CNO.	EA	1384019	SPECWAR	TBD				TBD	TBD	TBD	TBD	CNRNW	TBD
Escola	INRMP, Remote AK properties	Implementation of INRMP for Icy Cape, Point McIntyre, and Barrow, Alaska	EA	1370808	CNRNW	NAVFAC NW				TBD	TBD	TBD	TBD	CNRNW	TBD
Whalen	INRMP, SEAFAC AK	Implementation of INRMP for SEAFAC property in Alaska	EA	1370812	NAVBASE Kitsap	NAVFAC NW				TBD	TBD	TBD	TBD	CNRNW	TBD

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End footnote 52, U.S. Navy, NW-NEPA-Report-12-15-2015.

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Following is from footnote 53, Internal email: US Navy – Goodman, Layna. Proposed NEPA Approach for Planned Waterfront Projects Which May Require Environmental Impact Statements, Naval Base Kitsap Bangor. Intent to violate NEPA.

DRAFT – Pre-decisional document; at least partially exempt from release under FOIA, P.L. 93-502 (5 U.S.C. §552), by Exemption 5, 5 U.S.C. 552(b)(5). Do not release or forward outside the Navy without prior specific approval of originator or higher authority.

Background and Analysis

Environmental Impact Statement (EIS) for Waterfront Projects
Naval Base Kitsap at Bangor

BACKGROUND

- Per 15 CFR §1508.25, actions should be discussed in the same impact statement if they:
  - are connected actions; or
  - have cumulatively significant impacts when viewed with other proposed actions.
- Similar actions such as common timing or geography may be discussed in the same impact statement, but this is not required.
- The subject projects have different project sponsors and different design schedules. Notional project schedules have been developed; ASN approval for all schedules is required.
  - LWI/P-983 has SSP as the project sponsor. 35% design is scheduled for February 2012. The project is programmed for FY14.
  - EMMR has COMSUBPAC as project sponsor. 100% design is complete. The project is currently planned for FY14 construction. Project sponsor is currently evaluating design requirements to potentially reduce the NEPA and mitigation requirement.
  - SPE/P-834 is not currently programmed in FY-14; but may be an OSD add; the project will be resubmitted for the FY15 MILCON program. CSDS-5 (COMSUBPAC) is project sponsor. 10% conceptual design is scheduled for February 2012. Navy analysis initially determined an EA was appropriate; subsequent analysis and regulatory requirements indicate an EIS is required.
  - Shore facilities to support the Transit Protection System (TPS/P-925) are listed as a FY16 project in the FY13 POM submit. SSP is the project sponsor. Planning

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studies are underway, and conceptual design information is available. It is anticipated the project will require an EIS.

- This paper uses the term "project sponsor" to refer to the command that is funding preparation of the NEPA documentation. The project sponsor is frequently, but not always, the same as the action proponent.

ANALYSIS OF POSSIBLE COAs

COA-1 Combined Bangor Waterfront EIS (LWI/P-983, EMMR, SPE/P-834 EIS and TPS/P-925)

Purpose and Need:

The purpose is to provide security enhancements and to improve support, maintenance and homeporting capabilities for submarines at Naval Base Kitsap at Bangor. The proposed action is needed because critical assets along the Bangor waterfront must be protected from threats. Protection of strategic military assets is a vital national security concern. Aggressive security improvements within the Navy pre-date the USS Cole incident and the terrorist attacks of

September 11, 2001, and continue today. The Navy continues to improve security at the Bangor waterfront to protect its assets. Existing support, maintenance and homeporting facilities are not adequate to support the Department of Defense (DOD) and to alleviate deployment constraints imposed by current SSBN, SSGN and SEAWOLF homeport locations and maintenance operations.

These actions have similar geography and may have cumulatively significant impacts and schedules that overlap to some extent. The EIS will describe a preferred alternative for each project/site as well as other project/site alternatives and the no action alternative. A combination of preferred alternatives will be selected in the ROD.

- *Pros*:
  - Avoids or minimizes appearance of segmented environmental planning and reduces litigation risk.
  - Streamlines review time for regulatory agencies, tribes, stakeholders and the public.
  - Minimizes documents requiring regulatory and tribal consultations and chain-of-command reviews and endorsements.
  - Minimizes public burden of reviewing multiple documents and attending multiple meetings/hearings.
  - Minimizes technical and legal staff workload to review multiple documents for projects with similar impacts in the same geographic area.
  - Cumulative impacts, tribal concerns, and mitigation could be considered comprehensively instead of project-by-project.
  - Improves consistency across one large document with multiple project sponsors.
  - Reduces overall costs as compared to individual EIS costs.
  - Could utilize existing contract actions with some modifications.

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- *Cons:*
  - Delay in one project could affect all projects. More than one ROD may be required to support projects on different timelines. For projects that require additional consultation or action, supplemental NEPA documentation would be prepared for components not included in the earlier ROD.
    - This approach was used for Guam and CNMI Military Relocation EIS and Undersea Warfare Training Range EIS.
    - NUWC Keyport Range Complex Extension EIS/OEIS is example of combining multiple sites/projects into one EIS. EIS/OEIS describes each site/project alternative leading to a preferred alternative for each site. PDASN had option to select a combination of preferred alternatives for ROD.
    - Unknown if ASN(E,I&E) and OPNAV N45 would support this concept for a Bangor Waterfront EIS.
  - Getting tribal consensus on all four projects may prove difficult, and could result in the most problematic project affecting other projects.
  - Multiple funding sources, project sponsors, and contractors required.
  - Modifications to existing Task Orders for SPE/P-834 and LWI/P-983 will be needed.
  - A combined EIS will not reduce the number of required Clean Water Act permits (Section 10, Section 401/404).

  - If the design for TPS/P-925 is not sufficiently developed in time to support an FY14 ROD, a supplemental EIS would be required for this proposed action.
  - Discussions with the Project Sponsors indicate this is not their preferred COA.

- **COA-2 → Two combined EISs; 1) SSP Focused (LWI/P-983 and TPS/P-925) and 2) COMSUBPAC Focused (EMMR and SPE/P-834)**
-
- *Purpose and Need:*
- 1) SSP Focused: To maintain existing security posture and provide necessary security enhancements for Naval Base Kitsap at Bangor. The proposed action is needed to protect Strategic Weapons Systems from increased and evolving threats. Protection of strategic military assets is a vital national security concern. Aggressive security improvements within the Navy pre-date the USS Cole incident and the terrorist attacks of September 11, 2001, and continue today. The Navy continues to improve security at the Bangor waterfront to protect its submarines and critical support facilities.

  2) COMSUBPAC Focused: The purpose is to provide support and maintenance for *Seawolf* and *Ohio*-class submarines and to enhance homeporting capabilities at Naval Base Kitsap at Bangor to enable these assets to support the mission of COMSUBPAC. The proposed action is needed to provide enhanced and efficient operation and maintenance of these submarines and to alleviate deployment constraints imposed by current SSBN, SSGN and SEAWOLF homeport locations by improving submarine support and facilities.

  The documents would be structured the same as COA-1; separate alternatives analyses conducted for each project contained within the overall SSP or COMSUBPAC focused EIS. A combination of preferred alternatives would be chosen in the ROD.
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- *Pros:*
  - Projects included in one EIS may not be directly affected by schedule delays in projects covered in the other EIS.
  - Each project sponsor would have a focused document supporting their projects.
  - Somewhat streamlines review time for regulatory agencies, tribes, stakeholders and the public.
  - Reduces documents requiring regulatory and tribal consultations and chain-of-command reviews and endorsements.
  - Reduces public burden of reviewing multiple documents and attending multiple meetings/hearings.
  - Reduces technical and legal staff workload to review multiple documents for projects with similar impacts in the same geographic area.
  - Consistency across two documents with different project sponsors somewhat easier compared to four separate documents.
  - Reduces some costs as compared to individual EIS costs.
  - Could utilize existing contract actions with some modifications.
  - Discussions with SSP staff indicate they may support this COA if amenable to OPNAV N45 and ASN(E,I&E).
- *Cons:*

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- Does not fully address NEPA segmentation issues (15 CFR §1508.25); increased susceptibility to legal challenges as projects are occurring within same geographic area at same time.
- Multiple consultation packages submitted to regulatory agencies during the same timeframe. Since Regulatory agencies have limited staff, they may require that all consultations be consolidated (precedent is NMFS consultation with Keyport and NWTRC EISs).
- Multiple documents submitted for tribal consultation during same timeframe. Tribes may not agree on treaty mitigation for one project when impacts of the other projects are still under negotiation.
- Delay in one project could affect other projects in the EIS. More than one ROD may be required to support projects on different timelines. For projects that require additional consultation or action, supplemental NEPA documentation would be prepared for components not included in the earlier ROD.
  - For example, if the design for TPS/P-925 is not sufficiently developed in time to support an FY14 ROD, a supplemental EIS would be required for this proposed action.
- Modifications to existing Task Orders for SPE/P-834 and LWI/P-983 will be needed.
- A sponsor specific EIS will not reduce the number of required Clean Water Act permits (Section 10, Section 401/404).
- Discussions with COMSUBPAC indicate this is not their preferred COA.

COA-3 → Individual EISs for LWI/P-983, EMMR, SPE/P-834 and TPS/P-925

Purpose and need statements would be developed to support the individual projects. Project focused alternatives analysis and project-specific RODs would be prepared.

- *Pros:*
  - Individual projects may not be directly affected by schedule delays in another project.
  - Current contract actions could continue as planned with project-specific modifications as needed.
  - Each project sponsor would have a focused document supporting one project.
  - A tribal objection to one project may not necessarily affect other projects.
  - Project Sponsors support this COA.
- *Cons:*
  - Does not fully address NEPA segmentation issues (15 CFR §1508.25); increased susceptibility to legal challenges as projects are occurring within same geographic area with project schedules that overlap to some extent.
  - Schedule changes in any of the projects may result in overlapping reviews, releases or submittals. Project priorities and business rules would be required, should one project schedule negatively impact another project.
  - An independent review to ensure consistency among the four documents would be required under this COA adding time and cost to the schedule.

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- Multiple consultation packages submitted to regulatory agencies during the same timeframe. Since Regulatory agencies have limited staff, they may require that all consultations be consolidated (precedent is NMFS consultation with Keyport and NWTRC EISs).¶
- Multiple documents submitted for tribal consultation during same timeframe. Tribes may not agree on treaty mitigation for one project when impacts of the other projects are still under negotiation.¶

End footnote 53.

~~End Attachments~~