

COMMENTS ON THE DRAFT EIS

The Air Force has released its August 2019 draft Environmental Impact Statement for the beddown of F-35A fighter jets at five Air National Guard based including Truax Field in Madison, Wisconsin.¹ The following comments should be addressed prior to release of the final EIS.

Rank the Five Sites by Environmental Impacts

Based on the anticipated environmental impacts described in the EIS, Truax Field and Madison, Wisconsin is the worst location for the proposed fighter jets. Too many people will be impacted, including low-income and minority families. The fighter jets should be located at one of the other sites that is less densely populated with fewer low-income and minority residents. For example, the Florida site will have no people living within the 65 dB DNL noise level.

The EIS should be revised to list the five sites in order of environmental impacts to clearly show Truax Field and Madison it by far the worst choice.

Expand the Noise Analysis to include Populated Areas

The EIS noise analysis estimates that 1,318 households and 2,766 people in Madison will fall within the 65 dB DNL noise level. This level is mandated by the Federal Aviation Administration to determine who qualifies for protection from aircraft noise. This 65 dB DNL noise level is nearly 50 years old! There are 60,000 people living within 3 miles of Truax Field. Most of these people, including many in our east and northside neighborhoods, were excluded from the noise analysis in the EIS since we were outside of the 65 dB DNL noise level.

As people who are living outside the 65 dB DNL, we can attest by experience that the current noise levels due to existing fighter jets is already unacceptable. Teaching staff at area schools including East High School, Lowell Elementary, Goodman Community Center, Lake View Elementary, Isthmus Montessori Academy and Richardson School report that teaching and learning is currently halted by frequent jet flight noise. The EIS identifies 16 points of interest including daycare centers and Lake View Elementary School, which will experience noise exposure from 53 to 71 dB DNL. 14 of these points will experience an increase in noise impacts due the F-35A jets. The EIS concludes that speech interference at schools near Truax Field may hinder the ability of students including low-income and minority students to learn. Modern research shows that aircraft noise adversely affects school performance at noise levels well below the FAA standard. In its report on burdens due to environmental noise, the World Health Organization found that: 1) 50 % of children exposed to 65 decibels will develop noise induced cognitive impairment, 2) over 20 studies have shown negative

¹ <http://www.angf35eis.com/>

effects of noise on reading and memory in children, and 3) noise exposure during critical periods of learning at school could potentially impair development and have a lifelong effect on educational attainment. The Madison Metropolitan School District is attempting to close the achievement gap between white and minority students. Noise from the new F-35A squadron will expand this gap. The 65 dB DNL does not account for the impacts of noise including stress, sleep disturbance, high blood pressure, heart disease, strokes, and reduction in the educational performance of children. As an example of current noise levels, here is a link to a video the SASY Neighborhood Association provided to County Exec Parisi in a 2012 meeting to ask him for more airport noise abatement.² Using lower sound levels than the 65 dB DNL to evaluate aircraft noise is a procedure used by other airports.

The Air Force should amend the EIS to more accurately show residents impacted by the new fighter jets by: 1) expanding the noise analysis to include people within the 60 and 55 dB DNL, and 2) determining the number of households, people, schools, day care centers, and other sensitive receptors in these areas.

Provide Residents a Real-Life Noise Test

The noise analysis in the EIS makes it difficult to understand the noise levels that will be experienced by Madison residents. The Air Force should bring F-35A fighter jets to Madison and demonstrate takeoffs and landings at Truax Field with and without afterburners. Hearing for ourselves is the only true test, not relying on the military's modeling.

Noise Modeling Assumptions Need to be Verifiable and Enforceable

The results of noise modeling to determine households and residents living within the noise contours is dependent on many assumptions including the amount of time in which the F35A fighter jets will use their afterburners and flight patterns. For example, it is assumed that afterburners will be used 5% of the time. The residents in Burlington, Vermont have learned that other airports already using the F-35A jets are using afterburners 50 to 100% of the time, significantly increasing the noise impacts. If the noise modeling assumes only 5% afterburner use at Truax Field, this should become a verifiable and enforceable condition of operating the jets.

The Air Force should update the EIS to explain the assumptions used for the noise modeling including afterburner usage and flight patterns, and explain how these assumptions will be verified and enforced.

² <https://www.youtube.com/watch?v=NyPf70KOD50&feature=youtu.be>

Identify Noise Abatement and Funding

The EIS shows there will be 2,766 people living within the 65 dB DNL noise level. The FAA will allow airport funds to be used to provide noise abatement for these people. However, the Air Force clearly states in the EIS that it will provide no funds for noise abatement, and that noise abatement is the responsibility of the local airport. The Minneapolis Airport provides up to \$14,000 for noise abatement for homes located within a lower 60 dB DNL noise level. At that rate, over \$18 million will be needed to add insulation, windows and air conditioning to existing homes. Even if homes, apartments and schools are insulated, people will still be exposed when outdoors. The Louisville Airport uses a more effective protection method by purchasing homes within the 65 dB DNL noise level. The average home value in the impacted area of Madison is \$216,838. At this rate, over \$285 million will be needed to purchase homes so Madison residents can move. In 2012, the SASY Neighborhood Association met with county airport staff and County Exec Parisi to discuss additional noise abatement such as insulation for homes. We received a cold welcome and have seen no improvements. For this reason, we have little confidence the county airport will help the 2,766 people who will be hurt by this project.

The Air Force should update the EIS to describe noise abatement methods, provide cost estimates and determine who can provide the funds to implement noise abatement.

Determine Specific Mitigation Measures to Protect Low-Income and Minority Families

The EIS concludes that for Truax Field impacts on low-income and minority children would be considered disproportionate and significant. It is the only site where this conclusion was reached. If we believe in environmental justice and oppose environmental racism, Truax Field is the worst location for the F-35A squadron. The EIS estimates that 292 persons would be located in the 70-75 dB DNL noise contour where housing is incompatible. However, the EIS discusses no solutions to help these people. In Burlington, Vermont, two hundred homes near its ANG base were purchased and demolished by the city due to fighter jet noise.

The EIS should be updated to explain measures that are available to avoid impacting low-income and minority children.

Evaluate the Cost of Cleaning up Groundwater Contamination due to PFAS

The EIS mentions the current groundwater contamination around Truax Field due to the use of PFAS in fire-fighting foams. Well 15 which serves thousands of Madison residents is contaminated and was shutdown. The Air National Guard is already liable for exposing the Madison residents to toxic chemicals. It is responsible for the contamination and will need to pay for extensive cleanup. This is only beginning and the full extent and cost of the remediation is unknown. This is a huge, unknown

liability for the Air National Guard at Truax Field. It is estimated that cleanup of Department of Defense properties could exceed \$2 billion. This contamination makes Truax Field a poor choice for the F-35A squadron due to the unknown liability and costs.

The EIS should be updated to estimate the liability and cost to Truax Field for investigation and cleanup of the PFAS groundwater contamination.

Evaluate Contamination Due to Other Chemicals

The draft EIS does not discuss the many other toxic contaminants discovered at Truax Field including petroleum compounds, PCBs, metals, PCE, TCE, and others. These have not been fully remediated.

The EIS should be updated to review other non-PFAS chemicals which have contaminated surrounding soils and groundwater at Truax Field, and provide an estimate of the liability and cost to Truax Field for investigation and cleanup of the contamination.

Evaluate Chemical Usage by F-35A Operations

The EIS doesn't list the types of chemicals that will be required for F-35A operations or how they could be released into the environment. Citizens and alders submitted comments asking that the EIS include this information.

The EIS should be updated to include specific types and amounts of chemicals required for F-35A operations, how and where they will be used, and all the potential ways they could be released into the environment.

Evaluate Potential Contamination During Construction

The extensive new construction needed to accommodate this project will disrupt soils contaminated with PFAS and other chemicals which will run off into adjacent Starkweather Creek with stormwater. The EIS dismisses these impacts as "not significant" by assuring that Truax ANG will follow stormwater laws. However, the existing soil and groundwater contamination has been caused by the failure of Truax ANG staff to comply with existing laws.

The EIS should be updated to include extensive details about how Truax ANG staff will comply with specific city, county, and state stormwater laws to prevent release of contamination all over the base into Starkweather Creek.

Determine Compliance with Wisconsin Hazardous Air Pollutant Regulations

The EIS discusses emissions of the 187 hazardous air pollutants regulated under the Clean Air Act. However, the Wisconsin Department of Natural Resources has its own regulations under Chapter NR 445, Wis. Adm. Code, for over 500 chemicals. These rules include allowable emission rates and exposure standards for the general public. The EIS does not identify the specific HAP that will be released, their dispersion or compliance with the WDNR air quality standards for HAP. For example, emissions during the ground testing of jet engines will expose nearby low-income and minority families.

The EIS should be updated to identify the specific chemicals released as emissions by F-35A fighter jets and compare these emissions with the limitations and standards under NR 445.