



CITY OF WINOOSKI

CITY COUNCIL

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Statement in Response to the Draft Environmental Impact Statement Issued by the United States Air Force

Issued: June 18, 2012

The Winooski City Council is issuing this formal statement in response to the Draft Environmental Impact Statement issued by the United States Air Force regarding the deployment of the F-35A aircraft to the Vermont Air National Guard at the Burlington International Airport. This statement is made in conjunction with our previously passed Resolution and the attached questions.

We, the Winooski City Council believe it is our responsibility to assure that we make decisions that place Winooski on a sustainable path to our future. We take that responsibility seriously and take action based on careful consideration of facts.

The first facts must be about the City of Winooski. We are an old mill town that seemed to be on the verge of demise many times through the years. Whether the mills closed, promised investments in Model Cities evaporated, or an economic crash delayed a major economic investment, we have consistently found a way to be even better than before. We are in the process of a major renaissance. New people are moving into Winooski to get a start. These folks are refugees, folks downsizing in mid life, and young professionals purchasing their first home. These folks live next to those who have lived in town for many generations. We are proud of our little city of 7,300 people where over twenty languages are spoken. We are proud to hear the number of our residents who love it here. We recognize our responsibility to protect that new energy and investment of time and passion as well as money.

The Environmental Impact Statement (EIS) process has been difficult for our city. The community is divided. We hear from our constituents in meetings, but also on the street, in phone conversations, via e-mail, and in the flower shop. The overwhelming number of public statements demonstrates citizen's desire to stop the

deployment. Privately, we have heard from many people who support the proposed deployment. It is also clear that most citizens of Winooski recognize the service of the Guard to our community and State.

While the Draft EIS issued by the United States Air Force is a thorough analysis of the available data, much of the information is based on projection that make it impossible to understand the flying conditions of the F-35A at the Burlington International Airport. While it is clear that the F-35A will be louder than the F-16, how much louder and the impact of that increase remains unclear. The United States Air Force's Final EIS needs to provide facts that can be relied upon in ascertaining the impacts of these aircraft on our community.

Noise is the defining issue for Winooski. The data in the draft EIS clearly indicates an increase in noise as the direct result of the change in aircraft. While the Vermont Air National Guard has indicated that they are committed to mitigate the noise, there is no information available on the feasibility of those mitigation measures. **The Winooski City Council opposes any activity that will increase noise in a manner that will have a detrimental effect on our community.** Given the relationship between actual noise and perception of noise on real estate values, the Council wishes to reiterate their position stated in the previously passed resolution (5/21/2012) that **noise impacts must be mitigated to ensure that both DNL contours and maximum noise levels remain at their current state (magnitude and spatial orientation) with F16 operations.**

If such mitigation is not possible, then the Council does not support the bed down of the F35As at Burlington International Airport.

As such, we, the City Council will respond as follows:

The Winooski City Council will take all possible steps to protect our citizens from an increase in noise that will cause harm to our children, elders, refugees, and other compromised residents.

We will fight to protect our way of life. As an urban center, noise is inevitable, but excessive noise that causes long term harm to people, their property, or property value is unacceptable to our community.

We will oppose any efforts to place a large portion of our city in a position to be purchased by the Airport in order to create an empty noise zone.

We will work tirelessly to advocate for the needs of our citizens and business owners, continuing to work with the Vermont Air National Guard, the Burlington International Airport, the Airport Commission, the Mayor of Burlington, the Congressional Delegation, the Governor, the Legislature of the State of Vermont, and any other organization to assure our voices are heard, our citizens protected from harm, and our investments remain strong.

Finally, we formally request that a decision on deployment not be made until the impact of all mitigation efforts are well understood and the City of Winooski is again invited to provide input on the new noise models.

We ask that those individuals who will make F-35A basing decisions and those who may influence that decision continue to work with us to assure that **any** impact of operations at the Airport consider the effect on the City of Winooski. We request that the Vermont Air National Guard reach out to those communities impacted by current as well as future operations and regularly hear concerns in order to continue efforts at noise mitigation already underway.

We recognize that the proposed basing, or any changes in operations – be they military or commercial - at the Burlington Airport will have an impact on our community. We will request formal membership on the Airport Commission so that we may weigh in on decisions long before they are made.

If the decision is made to base the F-35A in our community without addressing our concerns, we ask to have access to funds from the Federal Aviation Administration in order to mitigate the impact from any air operations in order to support improvements in all homes subject to an increase in noise levels in excess of 65dB DNL. And finally, we ask for every effort to be made by the United States Air Force to assist the Vermont Air National Guard in their efforts at noise reduction through operational adjustments.

We in the City of Winooski are proud of our heritage and excited about our future. That will not change. Yet, our City absorbs an extraordinary part of the burden of airport operations with no additional benefit. That cannot continue.


We therefore submit this statement as a representation of the position of our community on the F-35A basing decision. Our efforts begin with this process. We, the Winooski City Council will continue to use due diligence to examine facts as we exercise our responsibility to advocate for the residents of our City.

We thank you for the opportunity to submit comments.

Signed this 18th day of June at Winooski, Vermont by:



Mayor Michael R. O'Brien




Deputy Mayor Sally Tipson



Councilor John Little



Councilor Megan Moir



Councilor Sarah Robinson



MAYOR MICHAEL O'BRIEN

Mayor@onioncity.com

DEPUTY MAYOR SALLY TIPSON

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KATHERINE R. DECARREAU
CITY MANAGER

COUNCILOR JOHN LITTLE

COUNCILOR MEGAN MOIR

COUNCILOR SARAH ROBINSON

Resolution

Re: Comment on the US Air Force Proposed F35 A Bed Down Environmental Impact Statement

Whereas the United States Air Force is considering changing the current fighter jets at the Burlington International Airport from the F 16 to the F 35A in the next decade as the useful life of the F16s will come to an end, and;

Whereas the City of Winooski is directly impacted by the operations of the Vermont Air National Guard Base and as such wishes to respond to a request for comments on the Environmental Impact Statement issued by the United States Air Force, and;

Whereas the City of Winooski wishes to support the Vermont Air National Guard Base located at the Burlington International Airport, and;

Whereas Winooski recognizes the important and courageous mission of the Air Guard including critical missions after September 11, 2001, and;

Whereas Winooski recognizes the valuable impact of the Air Guard Base on the local economy, including one thousand thirty five (1,035) jobs and millions of dollars of local spending annually, and;

Whereas the City of Winooski, the State of Vermont, the Department of Housing and Urban Development, and our private partners have invested over \$175 million dollars in revitalizing our downtown which, in turn, has sparked a revitalization of the entire City of Winooski as an attractive place to live and work, leaving open the possibility that property values would decline and the downtown would become less desirable under the conditions outlined in the study, and;

Whereas the required Environmental Impact Statement has been released by the United States Air Force, indicating an increase in noise in Winooski both in maximum volumes during takeoffs and landings and in the average Day Night Level (DNL) resulting in "adverse unavoidable

impacts” to noise levels, which will rise to or above the level that the Federal Aviation Administration (FAA) has determined to be “incompatible” with residential use, and:

Whereas the 65 dB noise contour band in either scenario would encompass more than fifty percent (50%) of our community by the change in operations, disproportionately impacting the City including most of the low income families and people of color identified in the EIS, and;

Whereas it is unclear as to the actual difference in decibel level between the F 16 and the F35A during take offs and landings, leaving serious concern about the potential increase in health risks related to the exposure of residents including those in a nursing home, several senior living complexes, and a school, and;

Whereas the City of Winooski was informed by the Vermont National Guard and by United States Air Force staff in the initial hearings that the noise levels could be mitigated by operational changes,

Now therefore be it resolved by the Mayor and City Council of the City of Winooski, Vermont as follows:

The City formally requests that the United States Air Force:

1. Review the noise impacts of the F35A on the city of Winooski and clearly identify the potential impact on the economic health of the City of Winooski and the welfare of our citizens given the FAA’s conclusion that living within the 65 db contour is incompatible with residential use, and;
2. Explain why Burlington International Air Base and the Burlington International Airport is considered a preferred location over areas that may have fewer adverse impacts, and;
3. Condition operating procedures for the F35A at the Burlington International Airport to mitigate the impact of increased noise on the city of Winooski in a manner that brings the DNL levels back to their current state and reduces the maximum noise levels of the F35A jets to the current levels of the F16 jets.

The Council formally authorizes the Mayor to meet with the Governor of the State of Vermont, members of the Congressional Delegation, and command staff at the Vermont Air National Guard Base and any other entity capable of impacting this decision to advocate for the City’s position in this matter.

Resolution # 2012 - 1

Dated May 21, 2012

Introduced by

Affirmative Vote

Sally Tyson

Negative Vote

Adopted 5/21/2012

Rejected

Attest
City Clerk

Approved Date May 21, 2012

Mayor



MAYOR MICHAEL O'BRIEN
Mayor@winooski.vt.org
DEPUTY MAYOR SALLY TIPSON

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EIS Response from City of Winooski requesting answers on the following items.

Note: These responses are being provided to the City of Winooski by the Vermont Air National Guard (VTANG) prior to the end of the Draft EIS public comment period to assist the City with their submission of comments and questions for the Air Force as part of the EIS process. These answers are based on our local experience as Vermont Air National Guard Members, and are not intended to reflect the official position of the Air Force or Air Combat Command.

To be considered by the Air Force as part of the EIS process, all comments must be submitted in writing to Mr. Nicholas Germanos, HQ ACC/A7PS, 129 Andrews St. Suite 332, Langley AFB, VA 23665-2769.

QUESTIONS ON F-35A

1. Can the F-35As take off without use of afterburners?

Yes. The F-35 has sufficient thrust to take-off in "Military Power" (sub-afterburner) from Burlington.

2. Does the F-16 always use afterburners during takeoff? Why and when did this begin?

The F-16s use afterburners 95% of the time currently. This increased in the last 5 years from approximately 65% of takeoffs due to reconfiguring of the loads carried by the F-16 for training.

3. What is the range of maximum noise levels for the F-35As at full afterburner versus non-afterburner takeoff?

Table BR3.2-1 in the Draft EIS, Volume 1, page BR4-18 lists Sound Exposure Level (SEL) and Maximum Sound Level (L_{max}) for the F-16 and the F-35A at various altitudes in different operations and power settings. Note that this table is confusing as presented in the draft, and the VTANG has requested that it be clarified in the final EIS. The "Afterburner Take-off³ (1,000 feet AGL)" row of data actually reflects afterburners being turned off by the time the jet reaches 1,000 feet AGL.

4. How will the takeoff noise from the F-35A (both with and without afterburner) differ from the F16? What data can be provided to substantiate these noise levels?

The actual noise a resident in Winooski will hear during an F-35A takeoff while Mil Power (no afterburner) will be very similar to the noise they experience now with the F-16 taking off in afterburner. The DEIS is the best source for this information. (www.acplanning.org)

Please refer to page 3-8 in Volume 1 of the Draft EIS for a discussion of the Day-Night Average Sound Level (DNL). Appendix C, Volume 2 of the Draft EIS also has additional detailed information about Noise Modeling and the DNL (Page C-11).

12. How does the noise of the F-35A compare to the noise from the former F4s?

The noise contours in the Environmental Assessment prepared for the F-4 to F-16 conversion indicate that the F-4 was significantly louder than the F-35A is expected to be.

13. Can the Air Force provide a fly over of the F-35A or a recording comparing the F-35A to the F-16?

The VTANG would like to see this also, but it is not achievable based on the cost of flying the aircraft and the fact that since it's still technically in development all of its sorties are dedicated to testing at other locations.

14. Is the developer of the F-35A working on reducing the noise emissions from the plane?

The VTANG is not aware of any effort to reduce noise from the F-35A itself, but local mitigation efforts described in questions 8 and 9 above should reduce the noise that Winooski residents hear.

15. Are there other noise mitigation strategies being used in other places that can be used here? (insulation, windows)

Yes. The Federal Aviation Administration (FAA) can approve and provide funding for noise mitigation programs at civilian airports like the Burlington International Airport. This is part of the 14 CFR Part 150 Noise Compatibility Program (NCP), and is the same program that is funding the property purchases around the airport now. The NCP process is initiated by the airport, and eventually approved by the FAA, but it is a public process with public involvement opportunities along the way. Some of the noise mitigation strategies the airport and FAA can implement under this program include sound insulation of properties within the 65 dB DNL contour and land-based noise mitigation structures such as berms and walls on and around the airfield.

16. Why is Burlington one of the top two preferred alternative sites for the F-35A given the "adverse impacts" – including dense population outlined in the EIS?

The Air Force conducted a suitability study at 205 DoD locations and ranked them on Mission Requirement, Cost, Capacity, Military Judgment and Environmental. Based on the rankings of the first 4, Vermont was selected as a "Preferred Alternative". The Environmental Assessment is ongoing in the form of this Draft EIS.

17. Has the Air Force studied the impact of noise on property values in other areas? What data is available (seems to be missing from EIS, although it is listed in Table of Contents - per Corey Mack's email)?

Please refer to section C2.7, page C-46 in Appendix C, Volume 2 of the Draft EIS for a discussion of studies that assessed the effect of aircraft noise on property values. In short, the data is inconclusive. The Draft EIS cites one study that says there could be some effect and one that says "aircraft noise has no meaningful effect on housing values".

18. Will expansion of the 65 db DNL contours into Winooski make affected properties eligible for a buy out? What assurances do we have that this program will not expand into Winooski?

The Burlington International Airport has stated that it has no intention of extending the property purchase program into Winooski. See question 15 above for more information on the Part 150 Noise Compatibility Program.

The Air Force is not a decision-making entity in the FAA NCP buy-back or other mitigation programs.

19. Does the Air Force have information related to noise and hearing loss? Specifically, at what noise levels does hearing get impacted? Do short bursts of noise similar to those projected from the F-35As have a potential impact on hearing loss? Where is the data on this?

Please refer to section C2.0, starting on page C-16 of Appendix C, Volume 2 of the Draft EIS for a discussion of noise effects on health and hearing. In short, depending on the study referenced, hearing impacts need only be considered inside the 75-80 DNL line. No parts of Winooski are in this area, as these generally fall within the airport property itself.

20. What will the payload of the F-35A be during normal operations?

As with the F-16 currently, no live ordnance is forecast to fly out of Burlington. We will continue to deploy to other locations to drop live ordnance. Training is simulated with on-board systems.

21. What is the correct address for public comments, and what is the deadline (BFP reports deadline has been extended to June 20th)? Snail mail, phone and email please!

To be included and responded to in the Final EIS, all written comments and questions need to be submitted by June 20, 2012 to this address:

Mr. Nicholas Germanos, HQ ACC/A7PS
129 Andrews St., Suite 332
Langley AFB, VA 23665-2769

Comments submitted by telephone or email are not accepted by ACC as part of the official record.