

October 8, 2019

Dear fellow CDA Board Members,

On August 9, 2019, the United States Air Force published a Draft F-35A Operational Beddown Air National Guard Environmental Impact Statement (EIS).

A month later, on September 10, city staff published an analysis of the Draft EIS, which I've attached here.

The Air Force established a process for receiving public comments, which initially were due by September 27.

In response to a request by U.S. Representative Marc Pocan, the Air Force extended the deadline for public comments to November 1.

It is important to note the Air Force has specified it will only consider "substantive comments," which the Air Force defines as "comments that challenge the analysis, methodologies, or information in the Draft EIS as being factually inaccurate or analytically inadequate; identify impacts not analyzed or identify reasonable alternatives or feasible mitigations not considered by the agency; or offer specific information that may have a bearing on the decision such as differences in interpretations of significance, scientific data, or technical conclusions."

In light of the extension for public comments, I spoke up at our last CDA meeting, suggesting we draft a statement regarding *impacts not analyzed*, namely the impacts the basing of the F-3s will have on individuals residing in CDA-owned properties at Truax and Rethke.

Please review the attached draft and let me know if you have any suggestions in advance of our October 16th meeting.

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CDA Statement on proposed Air National Guard F-35A Operational Beddown

October 16, 2019

Madison's Community Development Authority (CDA) governs the city's 857 public and multifamily housing units. The focus of this housing is to "provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities" (<https://www.cityofmadison.com/dpced/housing/public-housing/316/>). The CDA is charged with upholding Wisconsin State statute (Wis. Stat. § 66.1201) to operate in the public interest of providing safe and sanitary housing for vulnerable residents.

There are multiple CDA properties, as well as many low-income housing units, within or very near to the 65 dB DNL contour presented in the *Draft United States Air Force F-35A Operational Beddown Air National Guard Environmental Impact Statement*, which was released in August of 2019. In particular, the Truax Park Apartments and the Webb-Rethke townhomes are located on the border of the 65 dB DNL contour. According to the City of Madison Staff Analysis of the draft EIS, "head of household demographics at Truax and Webb-Rethke are 70% persons of color, 100% low income, 45% disabled and 14% elderly" (<https://www.cityofmadison.com/mayor/documents/F35%20EIS%20staff%20analysis%209-10-19.pdf>).

However, the draft EIS has not adequately analyzed the impact of the proposed F-35 beddown on these properties. The draft EIS states that 551 people will be impacted by the 65-70 dB DNL contour (2019, p. WI-24), however, the population at these two properties alone is 600 residents— over the total number of affected residents accounted for in the draft EIS.

The inclusion of the CDA properties in the final EIS is particularly important because, according to the draft EIS, "upon completion of the Final EIS, a mitigation plan will be prepared" (2019, p. WI-17). Given this stipulation, the 600 residents on the border of the 65 dB DNL contour are at risk of being unacknowledged and left without recourse to possible mitigation considerations.

Considering this information, the CDA is requesting that the US Air Force include these public housing complexes in the noise impact analysis in the final version of the environmental impact statement. Not only are these residents potentially impacted by the F-35 beddown, they are also limited in their ability to move away from the Truax area in the event of adverse impacts.

The Community Development Authority requests that the Air National Guard revise their environmental impact statement to include consideration of CDA properties, particularly the Truax Park apartments and the Webb-Rethke townhomes.