

Eken Park Neighborhood Association
P.O. Box 7162
Madison, Wisconsin 53707-7162

October 28th, 2019

F-35A EIS Project Manager
NGB/A4AM
Shepperd Hall
3501 Fetchet Avenue
Joint Base Andrews MD 20762-5157

Dear Concerned Representatives of the United States Air Force:

As the elected officers of the Eken Park Neighborhood Association, in accordance with our stated purpose (per EPNA By Laws: <http://www.ekenpark.org/pdfs/EPNA%20BY-LAWS.pdf>), and with the approval of voting members, we hereby submit the following comment regarding the proposed F35A Operational Beddown as it pertains to the 115th Fighter Wing (115 FW) at Dane County Regional Airport, Madison, Wisconsin.

As a neighborhood directly impacted by the proposed beddown, we would ask for a formal rebuttal concerning the following criticisms of the draft EIS prior to the USAF making a final decision on where to locate the F35A's:

- Recognizing that the USAF "evaluation resulted in minimal to no requirement for afterburner use," (*Executive Summary of the United States Air Force F-35A Operational Beddown Air National Guard Environmental Impact Statement. p15*), no substantive assurance has been provided that future afterburner use will be maintained at or below the 5% assumption (*EIS p15*) used to determine the 65db line of impact.
- Given that USAF recognizes that even using current assumptions, "There would be significant disproportionate impacts to low-income and minority populations," (*EIS. Table ES-2: Summary of Impacts*) and given that "areas immediately adjacent to but outside the 65 db contour may experience more significant impacts," and "Nearly every impacted area within the City of Madison belongs to a census tract with rates of persons of color well above the city- and county-wide averages." (*F35 EIS Staff Analysis delivered to Mayor Rhodes-Conway on Sept 1-th, 2019.*), no substantive justification for the impacts on marginalized urban populations has been provided.
- In light of the recent surge of flooding events in Madison, and given that our neighborhood is downstream of Truax Field within the Starkweather Creek watershed, and given the presence of known environmental contaminants at the site, including, "including PFAS PRLs [Potential Release Locations]." (*EIS. Table ES-2: Hazardous Materials and Waste*), it is incomprehensible for the USAF to conclude, "Impacts relative to hazardous materials and wastes would not be significant." (*EIS. Table ES-2: Hazardous Materials and Waste*).

Specific actions that the USAF could take prior to making a final decision of where to locate the F35As, and which would constitute a meaningful response to the concerns noted above, include:

- Written agreements with the City, County, and State specifically limiting afterburner use to less than 5%.
- A reexamination of the 65db line of impact using assumptions of greater than 5% afterburner use or with the recognition that significant impacts extend beyond the 65db line, and a formal commitment to provide mitigation to all affected households and business.
- Formal public agreements to coordinate with the WDNR and/or the Governor's Task Force on Climate Change (*Executive Order #52*) to reexamine the environmental impacts on the area.
- Providing an articulated argument concerning the USAF's suggestion that Truax Field is the best choice of airfields to place the F35A's, and allowing an appropriate public comment period for consideration of the argument.

On behalf of the citizens of our community who will be impacted by your decision, in recognition of your service to the country, and with the highest regard, we look forward to knowing how you will plan to address our concerns.

Sincerely,



Officers of the Eken Park Neighborhood Association

Erich Eifler - EPNA Co-chair
Catie Shannon - EPNA Co-chair
Ben Shannon - EPNA Secretary
Zach Johnson - EPNA Treasurer

CC:

U.S. Senator Tammy Baldwin
U.S. Senator Ron Johnson
U.S. Representative Mark Pocan
Governor Tony Evers
Lt. Governor Mandela Barnes
State Senator Fred Risser
State Representative Chris Taylor
County Executive Joe Parisi
County Supervisor Paul Rusk
County Supervisor Heidi Wegleitner
Mayor Satya Rhodes-Conway
Alder Syed Abbas