



To: Ramon Ortiz, 35A EIS Project Manager

From: City of Madison, WI. October 30, 2019
Sustainable Madison Committee Response to EIS

RE: FR#2018-02468

We, the members of the Sustainable Madison Committee, a committee that takes a leadership role in the promotion of sustainability for the City of Madison, the Madison community, and the region, hereby express concerns regarding details included in the recently released Draft United States Air Force F-35A Operational Beddown National Guard Environmental Impact Statement (EIS) pertaining to the 115 Fighter Wing at Truax Airfield.

Specifically, we note the EIS predicts that upon the basing of the F-35s, the annual Truax airfield CO₂ emissions would increase by approximately 12,478 tons or 135 percent versus that which is currently emitted by the F-16 squadron, and that this is equivalent to adding an additional 2,438 passenger vehicles onto our city's roads, driving 11,500 miles per year on average.

Further, because the use of afterburners may be more frequent than accounted for in the draft EIS, the estimated amount of CO₂ emissions may in reality be much higher than the calculated amount. According to a USAF memo obtained by the *Isthmus* newspaper, it is very likely that, in practice, F-35 pilots are likely to use their afterburners up to 50% of the time (<https://isthmus.com/news/news/f-35s-could-use-afterburners-more-frequently-than-air-national-guard-promises/>). The draft EIS uses an estimate of up to 5 percent afterburner use, which is potentially 45 percent lower than actual use.

Please note, the Sustainable Madison Committee helped craft legislation passed by Madison's Common Council in 2017 committing our city to 100% renewable energy and net zero carbon emissions. As Truax is located within the city, the stationing of F-35s, which the draft EIS states will burn more CO₂ than the currently-stationed F-16s, counteracts the work that the city is doing to achieve these goals.

As city residents, we take seriously the reality of our climate crisis and the health impacts of air pollution. We further believe all levels of government must commit to

reducing carbon emissions and thereby embrace a sustainable path ensuring the planet's livability for future generations.

Moreover, we are concerned that the F-35 Environmental Impact Statement is lacking in providing a comprehensive assessment on the environmental health impacts to our ecosystem and our community, including serious health risks associated with air and noise pollution, including: poor quality sleep, negative impacts on mood and mental health, decreased school performance, and increases in stress hormones, blood pressure, inflammation, and heart disease. The associated social and economic costs to our community are immense. The environmental impact study acknowledges there will be "significant disproportionate impacts to low-income and minority populations as well as children." Many families who live in the affected area are already burdened by racial inequities, such as poverty, which severely limits their capacity to move and often forces families to rely on open windows for cooling. Some of the lowest income communities affected by this decision may not qualify for mitigation.

The draft EIS does not address one environmental issue that has become quite important to our community. For many years the ANG has used fire-fighting foam containing PFAS chemicals at Truax airport to extinguish fires and in training exercises. These chemicals have been found at very high levels in groundwater at the airport and in Starkweather Creek, which receives waters draining from the airport. The Madison Water utility has stopped utilizing water from one municipal well found to contain levels of PFAs at 9.4 to 12 ppt. The WI Department of Health Services has recommended a groundwater standard for PFOA and PFOS of 20 ppt (<https://www.cityofmadison.com/water/water-quality/water-quality-testing/perfluorinated-compounds>). While these foams may soon be replaced by other fire-fighting materials, we ask that you include impact analysis for past and future PFAs use and expected replacements at the airport in the final EIS.

We respectfully ask the Air Force to issue a revised EIS clarifying the impacts the basing of the F-35s would have on our city's health and carbon load, specifically addressing means by which these environmental health burdens may be reduced.

Finally, if there are no means for effectively reducing these environmental health burdens, we respectfully oppose the Air Force basing of the F-35s at Truax.