

MEJO Comments for F-35 Listening Session, Wed. Feb 28, 2018, East Madison Community Center

Dear Madison Alders & Dane County Supervisors:

Thank you Alder Rummel and other east/north side alders for organizing a listening session to hear citizens' questions and concerns about the proposal to locate F-35 fighter jets at Madison's Truax Wisconsin Air National Guard (WANG) base.

The Midwest Environmental Justice Organization is strongly opposed to locating 18 F-35 fighter jets in Madison. Unfortunately, Madison and Dane County residents were not asked for their input before the Truax Air National Guard site was selected as one of the two "preferred" sites for the F-35s.

Below are some critical issues that should be considered in the Environmental Impact Statement (EIS) that will be prepared according to National Environmental Policy Act (NEPA) requirements before the final decision is made to locate the F-35s in Madison.

We ask that Dane County Supervisors (in addition to city alders) also consider these issues and request that the Air National Guard evaluate them in the EIS. Dane County is responsible for oversight of adherence to EPCRA laws (through the Local Emergency Planning Committee) and owns most of the land under the base. The WANG is a co-permittee on the county airport's WPDES stormwater permit. All stormwater drainage from the WANG site goes to Starkweather Creek, which is the largest watershed flowing into Lake Monona, and both are on the EPA 303(d) "impaired waterways" list. Many anglers, including low-income subsistence anglers, eat fish from them.¹

Summary of issues the F-35 Environmental Impact Statement (EIS) should address:

1. Environmental justice

- Comprehensive evaluation of the potential health effects of the noise, air, stormwater, and all other types of pollution created by the F-35s on the low income and minority communities living very near the WANG base and/or under its landing/take off routes, following: [Promising Practices for EJ Methodologies in NEPA Reviews](#)
- All of the factors below are also environmental justice issues that should be addressed in the EIS

2. Soil, groundwater, and vapor contamination resulting from F-35s; delineation of vertical and horizontal extent of existing groundwater contamination & vapor intrusion

- Analysis of how F-35 operations and maintenance (chemicals, fuels, and solvents required, crashes, etc) could further contaminate soils, groundwater, and air (vapors) at the WANG site
- Full delineation of the vertical and lateral extents of the groundwater contamination currently at the site (needed to appropriately assess the first point above)
- Analysis of the potential for groundwater VOC plumes at the site to reach Madison Water Utility Well 15
- Complete testing for chemicals used and/or released on the site that have not been assessed or inadequately tested to date (TCE, PCE, PAHs, PCBs, metals, PFOA/PFAS, radioactive compounds)
- Thorough assessment of vapor intrusion in WANG base buildings where military staff live and/or work

3. Potential impacts of F-35s on Starkweather Creek, effects of existing site stormwater runoff on creek

- Complete assessment of how F-35 operations and maintenance, and new facilities constructed for the F-35s, could affect Starkweather Creek (water, sediments, fish, and other wildlife) via stormwater runoff and other emissions
- Comprehensive assessment of how contaminated stormwater runoff from the WANG site has already affected water, sediments, fish, wildlife etc in Starkweather Creek (needed to assess the first point above)

4. Environmental, health, safety consequences of potential F-35 crashes

- Complete assessment of all chemicals and fuels potentially released if an F-35 crashes

¹ Given that Dane County and the City of Madison are co-permittees in the MS4 Madison Area Municipal Storm Water Partnership (MAMSWP), evaluating and mitigating effects of the WANG base operations on Starkweather Creek should be priorities for both entities.

- Full analysis of the kinds of munitions/weapons that will be carried on these planes and what would be released from these munitions if the planes crash and/or burn
- Full assessment of which Madison residents and environmental resources (land, water, wildlife, wetlands, etc) would be most at risk for a crash and the nature of the consequences to people and the environment
- See more detailed comments by Jim Powell, submitted separately

5. Noise effects

- Comprehensive and technically state of the art assessment of the types and levels of noise produced by the full range of operations of the F-35 jets (afterburner, in fight, take off, landing, etc)
- Thorough evaluation of the physical, social/psychological and neurological effects to Madison residents, especially to those people living closest to the base.
- We support comments by Steve Klafka provided at this meeting

6. Truax WANG's adherence to Emergency Planning Community Right to Know (EPCRA) laws

- Complete evaluation of how EPCRA laws are being followed at Truax WANG now
- Evaluation of what further EPCRA requirements will come into play with the F 35s at the base

7. Air emissions/air quality effects

- Analysis of full range of types and levels of air pollutants (including CO2) F-35s emit during all modes of operation
- Assessment of human exposures to these pollutants, especially among those people living nearest to the base, as well as effects on the environment , fish and wildlife.

8. Social, cultural and economic impacts

- Evaluation of who will be negatively affected socially, culturally and economically by the F-35 siting in Madison, and who will benefit
- Assessment of effects on Native American mounds and artifacts on the airport/ANG sites²

9. Effects on adjacent wetlands and wildlife

- Assessment of how Cherokee Marsh and remnant wetlands that surround the base—and the birds, fish and wildlife that depend on them for food and habitat—will be affected by the noise, air, water, and other pollution related to the F-35 maintenance and operations, flights, and potential crashes.

10. Flooding/climate change effects

- Assessment of how future extreme weather events exacerbated by climate change could cause flooding at the Air National Guard base (which is on former wetland, in a floodplain) and consequences of such flooding on F-35 and base operations as well as potential releases of contaminated soils, groundwater, munitions and other toxic materials at the site into Starkweather Creek, adjacent wetlands, and residential and public areas adjacent to the base (MATC).

I thank city alders for organizing this meeting and relaying our EIS recommendations to the Air National Guard. Again, I ask the Dane County Supervisors to also take an active role in this process given the county's ownership of the land on which the Truax WANG base operates.

Thank you,

Maria Powell PhD
 President, Midwest Environmental Justice Organization
mariapowell@mejo.us, mejo.us

² The 2004 *"Preliminary Final Environmental Assessment for Proposed Construction Projects"* at the Truax Air National Guard site (written by ANG consultants) noted that there are no "traditional resources" on the ANG site itself, but also stated: "Archaeological surveys of potential development areas conducted at the airport in 1993 recorded two archaeological sites (FAA 1996)"and "Two historic mound sites are found between 1 and 2 miles away from the airport. A previously recorded mound site is located within the southern portion of the airport...at least 8 sites have been recorded within 2 miles of the airport... two sites are considered to be eligible for the National Register. The airport is considered to have a high potential for archeological materials in undeveloped areas (FAA 1996)."