



SECRETARY OF THE AIR FORCE  
WASHINGTON

SEP 24 2019

The Honorable Mark Pocan  
United States Representative  
Washington, DC 20515

Dear Representative Pocan:

Thank you for your August 19, 2019 letter expressing your concerns and those of your constituents from the Draft Environmental Impact Statement (EIS) for the F-35A operational beddown at Truax Field in Madison, Wisconsin. We are grateful to the City of Madison for its strong support to military Airmen and their families based at the site of the current Dane County Regional Airport for more than 77 years. This historic partnership contributed to the Air Force decision to consider basing our most advanced fighter aircraft at this airfield. However, we are mindful of the challenges communities face when hosting a military installation.

The federal mission of Air National Guard (ANG) units is to support the USAF by maintaining well-trained, well-equipped units available for prompt mobilization during wartime, and to provide assistance during national emergencies. The ANG must train with the current USAF aircraft, operate combat and support aircraft, and train personnel using the requirements established by Air Combat Command through its Ready Aircrew Program. The beddown actions and associated training assures availability of combat-ready pilots to operate the most advanced fighter aircraft in the world.

As you know, the Draft EIS is evaluating potential environmental impacts associated with the proposed beddown of F-35A aircraft at two of five alternative ANG locations. Identification and analysis of alternatives is one of the core elements of the Draft EIS process under National Environment Protection Act and USAF implementing regulations. The Draft EIS was published in August and is open for public comment. All substantive comments received during the public comment period open through September 27th will be considered during preparation of the Final EIS.

In order to be completely transparent and continue to inform the citizens of Madison, I offer the enclosed responses to your questions. We are proud the Wisconsin Air National Guard is being considered to receive state-of-the-art 5th Generation aircraft.

Thanks for your support of our mission, our Airmen and their families.

Sincerely,

A handwritten signature in black ink, reading "Matthew P. Donovan".

Matthew P. Donovan  
Acting

Attachment:  
Questions and Answers

cc:  
SAF/AA

**CONGRESSIONAL: ASECAF Letter from CM Pocan re: Ops 5 & 6 Draft EIS – Truax, Madison, Wisconsin**

**NOISE:**

Q1: “How does the U.S. Air Force (USAF) define ‘incompatible for residential land use?’”

A1: Incompatible use” does not mean non-livable conditions. In fact, there are many communities/neighborhoods throughout the country with residential development, and other sensitive land uses, within airport high noise areas or zones. In general sound levels greater than 65 dB Day-Night Average Sound Level (DNL) are considered to be incompatible with residential land use. The federal government has established guidelines to help assess land use compatibility with aircraft noise exposure. For example, the Department of Housing and Urban Development labels community noise exposure between 65 dB and 75 dB as “Normally Unacceptable.” Federal project assistance is permitted for residential development with additional attenuation (beyond normal construction) in the building’s shell (24 CFR 51.104(a)(1)). Compatibility, in relation to military readiness, can be defined as the balance and / or compromise between community and military needs and interests. The goal of compatibility planning is to promote an environment where both entities can coexist successfully. These guidelines are intended as a planning tool, and as such provide general indications as to whether particular land uses are appropriate for certain predicted noise exposure levels.

Q2: “In layman’s terms, what does this mean for families currently living in this area?”

A2: The DNL is a metric designed to express in a single number all the noise that occurs over the course of a 24-hour period. Furthermore, it recognizes that noise at night is more disruptive than daytime noise by penalizing sounds experienced between 10 p.m. and 7 a.m. with a weighting factor. Aircraft noise does not happen continuously; it is a series of individual events. A higher DNL in this case means that there are slightly more events expected than there were previously (roughly 2 flights per day) and the individual events will be louder (due to the new aircraft being introduced). A shift of some daytime flights to nighttime flights (with the same number of flights by the same aircraft) would also raise the DNL due to the weighting factor. That does not mean that they would be required to vacate their homes.

This DNL is typically described as an annoyance generally and a minor effect on speech intelligibility for a few seconds during an overflight. According to the Wyle Model, Handbook of Noise Control, 65-75 dB sound level is the equivalent of a vacuum cleaner at 10 feet, automobile at 100 feet or air conditioner unit at 100 feet distance. With the current mission, there are already many households (551 people, 229 households) within the 65-70 dB contour. 65-75 dB is considered “moderately loud” with “very loud” starting at 90 dB (the sound equivalent of a heavy truck at 50 feet distance).

Should the FAA prepare and implement an updated Part 150 Study, specific mitigations could be identified, as needed, and implemented to minimize impacts to residences within the 65 dB and higher DNL noise contours. This FAA program could include

providing noise mitigation to the homes (insulation, windows, etc.), or even purchasing homes in some extreme cases.

Q3: “What recourse is available to those who currently live in the area defined as “potentially incompatible for residential land use?”

A3: Since sound/noise is air pressure, noise mitigation begins with sealing the exterior shell of a structure. Common weatherization improvements that make a home more energy efficient (like caulking windows and installing weatherstripping) also improve its acoustic performance. Many local governments and utility providers offer guidance and funding for weatherization improvements. This is particularly true for low-income residents,

Q4: “Are there strategies the USAF can use to reduce the area of residential land included in the 64-75 dB DNL range?”

A4: There are several operational changes that could reduce the area subjected to additional noise. Steeper departure and approach angles, less nighttime training, less aircraft/sorties, and restricted afterburner use have been effective in other locations.

Q5: “What noise mitigation strategies are available to the affected locations?”

A5: The Wisconsin Department of Administration’s, Division of Energy, Housing, and Community Resources funds weatherization programs through the Project Home program

(<https://www.projecthomewi.org/programs/weatherization/weatherization.html>).

Project Home funds energy efficiency improvements for qualifying homeowners at no cost. Rental property owners that do not qualify individually are only charged 15% of the project costs.

Dane County Regional Airport has proactively engaged in development of aviation easements within the vicinity of the airport. Numerous aviation easements have been purchased by Dane County Regional Airport in residential areas affected by airport operations. In addition, should the FAA prepare and implement an updated Part 150 Study, other specific mitigations would be identified, if needed, and implemented to minimize impacts to residences within the 65 dB and higher DNL noise contours.

Q6: “What support, including any noise mitigation efforts, will the USAF offer impacted families and communities in Madison?”

A6: The USAF works diligently with the City of Madison and the State of Wisconsin to be a good neighbor and responsible member of the community. Support for the community includes \$62M in annual payroll for its 1000 employees as part of \$100M in total economic activity.

As discussed in the Draft EIS (Pg. WI-17, §W12.6), the USAF does not have authority to expend appropriated funds on facilities that are not under the direct control of the USAF. However, the FAA has a program that addresses noise and compatible land use near airports. The FAA’s regulations implementing the Aviation Safety and Noise Abatement Act of 1979 set forth at 14 C.F.R. Part 150 provide a voluntary process whereby an airport sponsor can use to mitigate significant noise impacts from airport users. It is important to note that this FAA program is not a guarantee that sound mitigation or abatement will take place. Eligibility for sound insulation in noise-

sensitive land uses through the FAA's Airport Improvement Program requires that the impacted property be located within a 65 dB DNL or higher noise contour and meets other FAA sound mitigation guidance.

**Operations:**

Q1: "Will flight simulators for the new F-35A planes be made available at Truax Field?"

A1: Flight simulators are a part of the proposed action and are included in the Draft EIS. (pg. WI-62 and for other alternatives, ppg. ID-63, FL-60, MI-64, and AL-62).

Q2: "Will simulators reduce the number of annual sorties proposed in the draft EIS?"

A2: Simulators were considered when analyzing the number of air operations. See Draft EIS pages WI-62, as well as similar simulator info for other candidates on Draft IES pages ID-63, FL-60, MI-64, and AL-62. The simulator requirements are in addition to actual flights required. As the F-35 simulators systems mature over time, more tasks may be accomplished in the simulators, but not at this time.

Q3: "What can we actually expect with respect to the number of flights that depart and land in Madison compared to the numbers we currently experience?"

A3: The Draft EIS fully describes the potential impacts of our anticipated F-35A operations at the Dane County Regional Airport, as well as other alternate locations. The number of operations analyzed in the Draft EIS, an increase of approximately 3 percent in total airfield operations, are based on the requirements established by 115 FW, Air Combat Command, and the National Guard Bureau. The Draft EIS indicates there would be no impact to the local air traffic environment or terminal procedures at Dane County Regional Airport due to available capacity in the area. If Truax Field Air National Guard Base is selected for this basing action, further understanding on actual flight operation numbers will become apparent following completion of the beddown.

**LATE ADD QUESTION RE NUCLEAR:**

Q1: "Does the Air Force plan to store nuclear weapons at Truax Air National Guard base, or make the F-35 jets based at Truax nuclear-capable?"

A1: Although the F-35A could eventually be "nuclear capable", the beddown being considered at Traux Air National Guard base does not include nuclear weapons storage.