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For More Information, Contact: Rep. Chris Taylor, 608-266-5342

Community Leaders, Businesses, and Government Agencies Raise Serious Concerns about F-35s as Comment Period Ends

Local Elected Officials and state and local agencies detail extensive issues in comments to Air Force

MADISON—Last Friday, numerous local leaders, community groups, private companies, and state and local government agencies raised substantial and serious concerns in comments to the U.S. Air Force about their proposal to base F-35A military jets at Truax Air National Guard Base. Friday, November 1st was the public comment deadline on the Air Force's draft Environmental Impact Statement (dEIS). In the dEIS, the Air Force set forth serious consequences for a potential F-35 placement in Madison, including having a disparate impact on low-income individuals, communities of color and children.

Many of the comments, including those submitted by the Wisconsin Department of Natural Resources (WDNR), the Madison Water Utility, and Madison Mayor Satya Rhodes-Conway, highlighted the growing threat of PFAS contamination in our ground and surface water and local waterways. The Air National Guard has admitted responsibility for this contamination, yet have failed to comply with WDNR requirements for investigation and remediation. Mayor Rhodes-Conway's comments listed five requests by the City of the U.S. Air Force and Air National Guard, including full site investigation, remediation and cleanup of the contamination, and a commitment from U.S. Department of Defense to assume the costs associated with PFAS cleanup at Well 15, which was shut down earlier this year.

The comments submitted by Madison-area real estate firm, Solidarity Realty, focused on the dEIS's lack of data and information relevant to the impacts of the proposal on property values in the areas surrounding Truax Field. Agents from Solidarity Reality conducted a canvass of the 2019 Property Tax Assessments of every domicile within the 65dB DNL noise contour, which is estimated to experience the most intense noise, and found that over \$255 million of assessed residential properties lie within this area. These properties may be at risk of devaluation if Madison is chosen to house these jets, which are not fit for dense, residential areas.

The City of Madison's Community Development Authority, responsible for the City's affordable housing programs, submitted comments asking that the U.S. Air Force include public housing complexes in the noise impact analysis in the final EIS and raised concerns about their ability to continue receiving federal subsidies: "Being located on the border of the 65 dB DNL contour would likely result in higher vacancies. The negative impact of maintaining a low occupancy rate at these properties would result in a low performance score with HUD, which in turn, would reduce federal public housing subsidy to Truax Park Apartments and Webb-Rethke Townhomes."

In addition to expressing her strong opposition to the proposal, Rep. Taylor's own submitted comments echo these key areas the dEIS either neglects or is deficient in addressing, such as the impacts of this proposal on property values, the Air National Guard's PFAS contamination, the disproportionate negative

effects on communities of color, low-income communities, and children and the general degradation of the quality of life for residents of the north and east sides.

In her comments, Rep. Taylor called, yet again, for the Air Force to produce a revised dEIS, on which the community has an opportunity to comment and respond, that more adequately meets the informational needs of the impacted communities.

Rep. Taylor released the following statement:

"It is highly inappropriate, and I believe unprecedented, to place such jets at an Air National Guard Base in such a dense, residential and urban environment, where an estimated 60,000 individuals live within three miles of the airport. These are the communities who are least able to afford a move and least likely to have alternative housing choices.

"The extent of public concern about the proposal is wide-spread. Madison Mayor Satya Rhodes-Conway has called for an alternative site. The Madison Common Council, members of the Dane County Board, the Madison School Board, the Madison Water Utility, the Community Development Authority, the Sustainable Madison Committee, the Wisconsin DNR, and numerous other groups have raised substantial concerns and questions about the proposal, and underscored the woefully inadequate dEIS.

"I call on the Secretary of the Air Force to heed these concerns expressed at all levels of government, and select a more appropriate site for the basing of these jets. With the environmental justice concerns these jets pose, Madison should be removed from consideration entirely. At a minimum, I again call for the Air Force to release a revised dEIS that actually addresses all of the questions and concerns raised by the myriad of comments submitted, provide the information the community needs in multiple languages, and allow for another comment period for members of the community to react to this additional draft. Outside of outright rejection of Madison as an F-35 site, this is the only other fair way to proceed."