

### **Official Responses from Vermont Air National Guard**

Posted on 10.25.21 - <https://www.winooski.vt.gov/1392/Learn-About-Airport-Sound-Mitigation>

On Tuesday, September 7, 2021, Winooski City Council held their regular meeting where the Vermont Air National Guard was asked to give an update to the community regarding their current operations. For reference, please see the following information:

- [9.7.21 City Council Meeting Warning and Agenda](#)
- [9.7.21 City Council Meeting Minutes](#)
- [9.7.21 City Council Meeting Recording](#)

Members of the public attended the meeting in-person at City Hall and virtually via Zoom to provide public comments and ask questions. During the public comment facilitation period, Mayor Kristine Lott put together a list of questions that she, the City Council, and the general public asked during the meeting. Some of the answers were addressed by the Vermont National Guard during the meeting, while others were agreed to be answered after the meeting. Please see the questions (organized by category) and [responses \(in blue\)](#) below. Note: Mayor Kristine Lott sent the initial questions on 9.9.21 and received responses from the Vermont Air National Guard on 9.30.21. Follow up questions were sent on 10.3.21, and additional responses were received on 10.19.21.

### **Decision Making Authority**

- Who has the authority to change the mission/move the basing?
- What are legal pathways to end the F-35 mission/change the mission?
- If Governor Scott ordered the Air Guard to halt training with the F-35s, would they obey that order?
- Why are the F35s in Burlington if they were not the top-ranked site (was ranked 4<sup>th</sup> in the EIS)?
- What data would show decision makers that the F'35s shouldn't be based at BTW?

Some of the questions are beyond the purview of the Vermont Air National Guard, or the information is available in the F-35A Final Environmental Impact Statement (FEIS) or the Record of Decision (ROD), both found here [www.158fw.ang.af.mil/about/environmental](http://www.158fw.ang.af.mil/about/environmental) or here [www.vtguard.com/f35](http://www.vtguard.com/f35). During the meeting we were asked a variety of questions regarding steps to remove the F-35s, the possibility of a change to the 158th Fighter Wing mission, and if local government has the authority to prevent flying. The Director of the Air National Guard, Lt. Gen. Michael Loh, recently responded to a similar line of questions. He stated in part, that, "the Air Force has no plans to remove the F-35s from Burlington," which also means that there will be no change to our federal mission. Additionally, as we mentioned last December, the Governor's authority to halt training flights is limited because VTANG personnel are not training for station



missions and their training is more constrained by the purpose of the federal appropriation (i.e., the funding that pays for the training) than it is by the command and control. The 158th Fighter Wing flying mission supports a federal capability and is federally funded, and therefore the extent of authority at the state level is limited. To further underscore that point, a recent Burlington Free Press article attributes the following statement to Governor's Office spokesperson Jason Maulucci, "Gubernatorial authority over F-35 training missions is narrowly limited to occasions when flights interfere with an in-state emergency response – a scenario that has yet to arise."  
([www.burlingtonfreepress.com/story/news/2021/08/19/vermont-air-national-guard-f-35-flights-noise-saveourskiesvt-stop-fights/5544758001/](http://www.burlingtonfreepress.com/story/news/2021/08/19/vermont-air-national-guard-f-35-flights-noise-saveourskiesvt-stop-fights/5544758001/))

The basing decision, mission set, and flying operations requirements are not determined at the local level. While we plan to continue a transparent dialogue with nearby communities, it is important for your constituents to understand there are no plans to change location, mission, or flight operations.

It is equally important to remember that it is our federal mission that enables us to serve our communities in times of crisis. Without the funding, equipment and training we receive to conduct our federal mission, we could not have been able to deliver more than 3 million meals, construct COVID-19 sample kits, assist State Emergency Operation planning, work in the National Strategic Stockpile warehouse, conduct mass COVID-19 testing and contact mapping, construct and staff a 450-bed Alternate Healthcare Facility twice, and administer more than 60,000 vaccines in Vermont.

### Mission

- Please describe the missions that you must fly and what are the federal training requirements?
- What is the benefit the mission provides (which justifies the harm/risk)?
- How much of your training is defensive vs offensive?

As mentioned previously, there are no plans to change our federal mission. The F-35A FEIS Vol. 1 states that the F-35 supports the core competencies of air and space superiority, global attack, precision engagement, and agile combat support. Military operations can be both offensive and defensive in nature at the same time.



Follow up questions:

- In our meeting, it was stated that there were at least 5 missions being flown. Can you please share more details about what those are, what the federally mandated training requirements are? If it is in the FEIS, please direct me to a section or page.

We cannot share additional mission-specific details, including specific training requirements. The reference we mentioned is from the bottom of page 54, Section 1.4 "Need for F-35A Operational Beddown."

## Operations

- Is there a mandate to fly as often as you do, or could you reduce flying frequency? You shared some data on operational differences that were either less than F-16 Ops or reduced below what's allowed under EIS. Please share that data. And you said you could share data on takeoffs over Winooski vs Williston. Can we assume that if takeoff is one direction, landing is the other?
- Could you do more simulator flights? Can you share with us the volume of sims vs real flights?
- Can the takeoff windows be reduced, or adhered to more often? You shared it is +/- 15 minutes window – share how often you meet that 15-minute window vs not and explain the factors that force you to extend beyond it.
- Can you also explain why often on landing it isn't a straight run in, and instead you loop around Winooski before coming in for landing, causing double the disruptions? Can you do this stuff over the lake instead of our city?
- Can you explain why some takeoffs and landings are quieter than others? Are there conditions we could recognize and be able to anticipate when it will be louder? I.e. cloudy vs clear skies
- Can you adjust operations to avoid major cultural holidays for our community, especially non-Christian ones? Can you deviate from following only the Federal holidays? You were going to check with Joint Force HQ Leadership.
- How secure is the operation in reference to the crash risk and can you share with us how an F-35 crash would be responded to, the procedures? Specifically, does it actually take 2 weeks to burn out and do you have to evacuate 2 sq miles? How do you mitigate crash risk?

An "operation," is defined in the FEIS as a takeoff, or a landing, or a pattern at BTW. We currently have our full complement of 20 aircraft and flying operations will continue similar to the current levels for the foreseeable future. The flying program and associated training is driven by numerous Air Force regulations, training requirements, and fiscal limitations. The FEIS noted 8,099 F-16 airport operations, and projected 5,486 F-35 operations. We are 100% complete with our fiscal year flying with fewer than 4,000 operations. Regarding takeoffs, the Burlington International



Airport is responsible for setting takeoff direction based on winds and airport factors and they may have the most recent information you requested. Runway 15 takes off over Williston and Runway 33 takes off over Winooski. The VTANG is not required to adhere to a defined takeoff window. However, takeoffs do generally occur within a 30-minute time period. This generalization was shared to help add a measure of predictability for the community. That actual time can change based on numerous factors (training requirements, airspace availability, maintenance factors, weather, and air traffic control are few examples). We typically fly Tuesday through Friday, and one weekend per month, to accommodate the training needs of our drill status guardsmen. Scheduling and additional information is available at [www.vtguard.com/f35](http://www.vtguard.com/f35). The VTANG consists of federal and state employees and adheres to federally recognized holidays.

The traffic pattern is an established procedure with Burlington IAP that adheres to Air Force guidance, reduces the sound footprint, and allows for efficient sequencing. We raised our standard traffic pattern 500 feet higher than it was with the F-16s. Flying straight in, as commercial aircraft do, would put the aircraft lower and slower for a greater amount of time and may result in air traffic congestion that could impact civilian incoming or outgoing flights. Weather can drive the arrival pattern lower and change the way sound is carried.

Regarding simulator use, the Air Force requires training in both the simulator and the aircraft.

Regarding mitigating risk, the Air Force has an extensive safety program that covers air and ground safety, both on and off duty. The VTANG has a long history of excellence in this area.

Follow up questions:

- Could you share numbers on how often takeoffs occur within a 30-minute vs how often they do not? Even a rough estimate (ie. 50/50) would be helpful.
- Can you share any details about what kind of weather drives the pattern lower or carries more sound? For example, if it's cloudy out instead of clear, should we expect more noise on those days?
- Can you share how much sim training you do compared to actual flying and/or what the requirement is for one over the other?
- Can you point to an emergency response that includes details and process for addressing a crash? Can you answer the specific question raised by a resident, whether a burning F-35 takes 2 weeks to burn out and a 2-mile radius evacuation is required?



While we do track this information, it would require a line-by-line analysis of our records and we do not have the resources to examine the information to that depth.

Ample scientific information about how weather effects sound propagation is available on-line. With respect to operations however, the recovery pattern has been modified to keep aircraft higher if the weather allows. In general, the higher the ceiling, the less sound will be experienced.

Details of our training requirements are not releasable, but the use of our simulators do allow us to fly fewer local operations than allowed in the EIS.

We are unable to provide a detailed response to a hypothetical scenario. The response to and effects of a burning aircraft are dependent on many factors including the amount of fuel, the ability to get water/foam fire suppressant to the crash site, as well as wind speed and direction. However, our fire department is highly trained to respond to various scenarios and the Winooski Fire Department has received training from the VTANG fire department and is well versed in responding to aircraft accidents.

### **Noise Mitigation**

- Please detail your current mitigation efforts. Include how you mitigate noise over open spaces and over schools. You shared that you take the highest approach that you can, go out as straight and high as you can (but are sometimes required to do low approaches – can you tell us how often?), that you coast in when possible (can you share what makes this not possible and how often it happens?) You shared that you changed your pattern over the Winooski school complex, can you please detail that. And is there anything you can do to reduce impact on the St. Francis and Centerpoint Schools?
- Is The Guard doing anything beyond operational changes to mitigate impacts?
- Is any data being collected on noise mitigation efforts and impacts?
- How are complaints recorded? How many have been recorded? Is there a public record? How is the info being used? You shared that you do have a record, which people can request via FOIA. That you report up to chain of command at Joint Force Headquarters and that you do let complaints inform decisions – Ex. Changed pattern to fly around the high school instead of directly over it because it was reported that that was a quieter.

We understand that our flying operations affect the community and we continue to balance that impact, while still fulfilling our federal flying mission responsibilities. We continue to operate within the parameters of the FEIS. Regarding afterburner use, we are well under the 5% authorized under the FEIS. In fact, afterburner has been used only once locally.



Later this year, we expect the FAA to implement soundproofing measures for qualified local residents. We're working closely with our partners at Burlington International Airport to provide as much support during this process as needed. Additional information on the Burlington International Airport Noise Compatibility Program can be found here [www.btvsound.com](http://www.btvsound.com).

As we've discussed and is outlined in the Mitigation and Management Plan, the following noise study has been contracted and will commence in FY 22. This effort will be in synchronization with BTV's efforts to produce an updated Noise Exposure Map estimated to be published in 2023.

Follow up questions:

- Can you write out in some detail about how in the past, operations were shifted to reduce noise impact on our school district? And can anything be done for the St. Francis school at 5 St. Peter St. or the Centerpoint School at 94 W. Canal St.?

We were able to modify patterns for some schools because of their distance from the runway. The schools you referenced, due to proximity to the runway, do not allow us to change our flight path.

### Research on Impacts

- Is anyone looking at health effects of F-35, especially on children? Is anyone monitoring long-term impacts of F-35 in general? How will you mitigate trauma, environmental racism, hearing loss, learning loss at school? Are you doing anything to improve the mental health impacts of those particularly susceptible to exposure to the F35s, such as those with PTSD?
- Have there been any studies done to see if there are any economic impacts for this region? Do we have studies showing a positive economic impact of F-35s in our area?
- What does the military do to protect members from noise exposure and mitigate impact? You shared the Occupational Health section in your medical group monitors airmen who work in high noise environment, and they're provided ear protection – is this info available to public? Can the military provide ear protection to impacted residents?
- Could you form an advisory/partnership/some kind of ongoing opportunity for community members to voice concerns and you to adjust ops as much as you can?

Our commitment to protecting the environment remains steadfast. Environmental impact information is available in the FEIS and ROD, both found here: <http://www.158fw.af.mil/about/environmental/>. We encourage your constituents to reference those documents if they have additional questions.



Regarding the economic impact to the local area, we offer more than 400 fulltime jobs, and more than 1,000 part time jobs, which have totaled more than \$210M in payroll since Fiscal Year 2018. In that same timeframe, we awarded more than \$60M in local business contracts under our Sustainment, Restoration, and Modernization program. Our fire and emergency services are the sole fire and emergency support asset for Burlington IAP and provided more than \$3M in mutual aid support during Fiscal Year 2020.

During 2020, the VTANG Fire Department responded to 904 events, 218 of those were mutual aid responses to surrounding communities. Year to date for 2021, the Fire Department has responded to 684 events, and 174 were mutual aid responses.

We are continually updating the [www.vtguard.com/f35](http://www.vtguard.com/f35) website and we encourage the community to review the information provided there, as well as contact us through the comment feature if they have questions not addressed on that page.

Thank you for this opportunity to provide a more detailed response with references. We remain committed to serving Winooski and all our communities as we execute our federal and state missions to the best of our abilities. Please feel free to share this response with your constituents to help them understand the importance and enduring presence of the 158th Fighter Wing.

Follow up questions:

- Can you point to any specific sections or page numbers? It's a very large document. Some of the specific impacts residents asked about were related to trauma, environmental racism, hearing loss, learning loss, PTSD and mental health. And is there data on what is being done to mitigate and monitor hearing impacts for Guardsmen and women included in the EIS or elsewhere.

The environmental impact analysis begins on Page 192 (actual) under Section BR3.0 Burlington AGS Affected Environment and Environmental Consequences. It must be emphasized the reader should focus on impacts under Scenario 1 (18 aircraft) versus Scenario 2 (24 aircraft). Page 196 Section BR3.2.11 discusses noise exposure as it relates to hearing and learning. A more extensive primer on noise may be found in Volume II Appendix C of the F-35A EIS. Page 252 Section BR3.12 addresses Environmental Justice.



**Other Questions** (Unanswered by the Vermont Air National Guard)

- How do you address the military uses of the plane on civilians around the world?
- Do you acknowledge that this is harm to the people in this community?
- Are you willing to watch local videos documenting F-35 impacts?
- Are you aware that civilians report physical pain or injury from the F-35 training in this densely populated area?
- Is there a military regulation that authorizes you to conduct training in a location where you are routinely hurting or injuring civilians?
- Is there a military regulation that requires distinction or separation of military operations from populated areas?
- Is the Vermont Air National Guard conducting the F-35 training under Title 32 which has command and control under the state even though the federal government pays the bills?
- Is the Vermont Guard foregoing all F-35 afterburner takeoff training? or is the Guard conducting that afterburner training at another location?
- Does the F-35 mission require that the takeoffs and landings take place in a densely populated area?
- Is there a military necessity for F-35 takeoffs and landings to take place in a densely populated area?

