

VALPARAISO COMMENT  
EGLIN AIR FORCE BASE, FLORIDA  
IMPLEMENTATION OF BRAC DECISIONS  
PROPOSED ENVIRONMENTAL IMPACT STATEMENT SCOPING  
(December 5, 2007)

Submitted to: Mr. Michael Spaits  
Public Affairs, 96CEG/CEVPA  
Eglin Air Force Base, Fl 32542-5000  
(850-882-2878)

Prepared by: City of Valparaiso, Florida  
(850-729-5402)

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CITY OF VALPARAISO – COMMENT ON EIS SCOPING – BRAC

EXECUTIVE SUMMARY

The proposed federal action (BRAC – Eglin) appears to present new:

- Safety impacts on the community,
- Special Risks to Children in Valparaiso,
- Disproportionate impacts to minority/low income populations in Valparaiso,
- Cumulative impacts – past/present/future covering two generations,
- Cultural impacts involving existing resources, specific to historical properties in Valparaiso
- Noise/Safety and Land Use considerations which compromise the very survival of a small town – Valparaiso,
- Impacts and a scope of development which would normally trigger State of Florida requirements involving ‘Development of Regional Impact’ documentation,
- Requirements for substantive funding for new local infrastructure; region wide.

Resolving the challenges of the proposal faces all of Northwest Florida. Valparaiso however lies alone under the exhaust pipe of the proposal’s economic engine. In support of the regional engine the city only requests the disclosure of and any mitigation and management practices proposed by the Air Force to resolve local impacts. We support the regional economic ‘engine’ as we have since Valparaiso built the first airfield at Eglin in 1934.

From a local perspective, the Air Force also bears a heavy challenge and obligation.

In this case the Air Force represents the United States in perceptively conflicting roles, i.e. that of:

- a. proposer of the federal action
- b. the decision maker regarding the action, including the ‘NO ACTION’ alternative,
- c. the sole party responsible for defining alternatives,
- d. outlining for the public any proposed mitigation, or long term management commitments,
- e. controller of the public documentation process itself,
- f. the agency who controls what, when, where and how much in so far as the budget and funding, subject to Congressional decisions;
- g. and, has publicly announced in local Town Hall meetings that the public’s involvement in the decision making process is ‘how’ to implement a decision already made, vs. ‘if’ the action proposal should be implemented.

The Air Force decisions and process sculpture in this case is not limited to that of a federal funding agency or federal permitting agency. They are all of the above and an owner/operator. The standard of compliance with the National Environmental Protection Act and all implementing regulation appears perceptively high.

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## 1. Socioeconomics

Valparaiso is adjacent to and within the Eglin Air Force main base industrial complex. The main base industrial complex is also within the 1921 chartered (State of Florida) city limits of Valparaiso.

This is unique also in that Valparaiso with its ‘depression era’ funds and those of both Okaloosa County and the Florida’s State Road Department built the initial airfield in 1934.

In this case socioeconomic impacts in Valparaiso cannot be spread across a region – they must be addressed in the context of a local jurisdiction (Valparaiso). Impacts of BRAC at Eglin in Valparaiso are not ‘common’ to the region, due primarily to proximity and unique jurisdictional limits (which also involve deed cessions granted by Florida in the 1940’s).

Valparaiso is a ‘built-out’ community and cannot reasonably anticipate new jobs or any change in employment/unemployment levels. There is no ‘job growth’ in Valparaiso – the community is relatively static.

Also, the statement drafter should be sensitive to geography when quantifying socio economic as well as other impacts involving demographics. Due to the reach inside Eglin’s East Gate within the Valparaiso city limits, the military population residing in housing (inclusive of dorms) will be listed (in some data bases) on the north east side as ‘residents’ of Valparaiso; as opposed to those living on Eglin’s southwest side (who are listed as ‘county’ residents). It is estimated that 500 (in the northeast portion of the main base) are Valparaiso ‘residents’.

## 2. Special Risks to Children

Reference is made to Executive Order (EO) 13045, Protection of Children from Environmental Health Risks and Safety Risks, Office of the President of the United States, White House, 1997.

According to the Air Force, "...children are more sensitive to some environmental effects than the adult population...Activities occurring near areas that tend to have a higher concentration of children than the typical residential area, such as schools and child care facilities may further (e.a.) intensify potential impacts to children."

Valparaiso has two schools operated by the Okaloosa County School District – Valparaiso Elementary (1957) and Lewis Middle School (1970). There are additional churches and day care centers.

The Air Force has further advised the local community (2006):

"Finally, children are at greater risk to hearing loss than adults. The proportion for a disproportionate impact to children would result from construction noises as children's hearing is more sensitive to harm than adults. (National Institute for Occupational Safety and Health, 1999)."

Although 'construction' noise is of limited duration, 'aircraft noise' over these schools is permanent and is expected to increase substantially with the current proposal.

### Safety

In 2006 the Air Force advised Valparaiso that "Education Services" are not a compatible land use within Accident Potential Zones, and "should be prohibited".

Approximately 1/3 of the Valparaiso Elementary School property; not the school building itself but the playgrounds and a little league field lie in these 'Accident Potential Zones'. It is difficult to actually draw this line based on maps available from the Air Force but our city engineer has tried.

## Noise

Valparaiso Elementary School lies within the current (2006) 65-70 noise zone. The Air Force advises that noise insulation is required and specific study is necessary to achieve compatibility regarding the building. No indication is provided regarding the outside playground.

Aircraft operations is expected to increase in the 2009-2015 time frame per the Air Force (2007) by two to three fold. The Air Force future aircraft noise impacts (F-35) have not yet been released (exception for 11/07/07 noted below).

The noise impacts on Valparaiso Elementary School are currently being examined by a consultant (Tetra-Tech) retained by the Okaloosa County Commission in a Joint Land Use Study (JLUS) funded by the Office of Economic Assistance/ Department of Defense and Florida's Office of the Governor; as managed by the Okaloosa County Department of Growth Management.

Since the announced Air Force future noise is not yet available, Growth Management (Okaloosa County) has suggested that the JLUS initiative add ½ mile geographically to the current noise lines in anticipation of the arrival at Eglin of the new F-35 aircraft and 'Fighter Town – USA'.

Valparaiso asked the city engineer to produce a 'PLUS ONE HALF MILE MAP'.

This map places Valparaiso Elementary School about halfway between the 75 and 80 noise contour lines. The Air Force (2006) has advised Valparaiso that in this area schools "...are not compatible and should be prohibited." The future of this school (Valparaiso Elementary) is in doubt.

Note: The Air Force map (11/07/07 – Blended mix alternative) appears to place the school in the 65-69.

If this is the case, it would appear that conventional noise insulation standards for buildings (-20) cannot achieve 'compatibility' for the Valparaiso Elementary School.

Further, the half mile map indicates the 70 noise line now will traverse Lewis Middle School – "specific evaluation is warranted" (Air Force – 2006).

Note: The Air Force map (11/07/07 – Blended Mix alternative) appears to place the school in the 70-74.

In summary, Valparaiso suggests that the EIS address, specifically regarding Valparaiso:

- special risks to children in Valparaiso
- the continued viability of our two local schools

Other (General):

1. 43% of the enrollment at Lewis Middle School are military dependents residing on Eglin Air Force Base. In comparison, 18% of total enrollment in Okaloosa County Schools are military dependents (2007).
2. The sound insulation characteristics of both schools is not known. What is known is that neither school qualifies (State of Florida) as a 'hurricane shelter' (like most do not in Okaloosa County). And, that "...specific evaluation is warranted."

Other:

1. Florida Statutes 333.03 indicates in part that:

"...neither residential construction nor any educational facility ...shall be permitted within the area contiguous to the airport defined by an outer noise contour that is considered incompatible..."

2. Further, 333.03 prohibits

"...the construction of an educational facility or a public or private school at either end of a runway of a publicly owned, public use airport within an area which extends 5 miles in a direct line along the centerline of the runway, and which has a width measuring one-half of the runway."

The total campus of the Valparaiso Elementary School appears to lie well within this prohibited footprint. Only if the study proposal demonstrates that a noise study evaluation indicates the building is compatible does this school building pass.

3. F.S. 333.01 (2) defines an airport – which appears inclusive of military installations. Further, obstruction standards are adopted elsewhere in F.S. 333 sensitive to military installations.
4. It is acknowledged that military aviation installations are not specifically indicated with respect to F.S. 333.

However, these installations are specifically protected by the statutes under F.S. 333.03 by reference to Federal Aviation Regulations (FAR).

It appears that Valparaiso Elementary School (established in 1957) pursuant to the intent of Florida's legislature is incompatible with both the current and proposed future use of aircraft operations at Eglin Air Force Base.

5. Civil aviation air traffic also traverses over the safety corridor defined by the military installation at Eglin in its approaches to Runway 19.

This occurs over Valparaiso Elementary School playgrounds – if not the actual school building.

6. With regard to civil and U.S. military air traffic the Florida Statutes appear clear – the existing elementary school is an incompatible land use.

Overall, since the aircraft operational use over Valparaiso Elementary is utilized 49% (Runway 19) of the time and noise regarding Lewis Middle School is expected to increase, the impacts and any proposed mitigation (regarding these schools) should be documented for public disclosure purposes.

### Summary

The future operation of two existing schools in the City of Valparaiso do not appear compatible with the proposal. The EIS should address by special evaluation the impacts on these two schools inclusive of special risks to children and propose appropriate mitigation.

### Note:

It is acknowledged that you have to draw the line in the sand somewhere.

The Edge Elementary School (1946) lies only 500 feet outside the Air Force ‘preferred’ 65 noise impact line in Niceville.

Likely eligible for the National Historic Registry, the school due to its cultural resource contribution of long standing in the community (in addition to education) should be specifically examined for impacts.

Further, the Destin Middle School may be newly exposed to the 65 Ldn noise- it is difficult to tell based on the scale of the 11/07/07 Town Hall meeting maps.

### 3. Environmental Justice

Reference is made to Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, Office of the President, United States of America, White House, 11 February 1994. Further reference is made to 32 CFR 989, The Environmental Impact Analysis Process, and the Presidential Transmittal Memorandum referencing federal statutes and regulations to be used in conjunction with Executive Order 12898.

With the limited exception of West Niceville the adverse impacts of the Runway 19 CZ/APZ I – II and aircraft noise as potential adverse impacts are limited to a single municipality – Valparaiso.

No other local developed area impacted by departing/arriving aircraft has comparable residential areas, including the main base itself. Due to these highly concentrated and substantially adverse impacts they should be isolated (for the purposes of impact identification). For example, an analysis that would develop a ‘community of comparison’ throughout many thousands of square miles of dedicated ‘airspace’ for environmental justice disclosure purposes would be unreasonable.

The aircraft fly over Valparaiso at low altitudes. In summary, the establishment of a ‘community of comparison’ in the case of Eglin Air Force Base’s anticipated impacts is challenging.

People living in Valparaiso are exposed to higher noise levels and approach zone characteristics than people living under ‘airspace’ across the multi-county region.

Full disclosure of disproportionate impacts on minority and low income populations in this case will also pose the following challenges:

- A. According to the Air Force “...(noise) is generally a greater concern for populations living off base (e.a.), since military personnel and dependents living on Air Force bases with operating airfields would expect exposure to higher noise levels.”

However, locally the Air Force has announced that it will not build even its own housing units in any area that will exceed the 60 noise level. And these are residents who “...would expect exposure to higher noise levels.”

- B. Eglin’s main base demographics will indicate a higher proportion of minority/low income populations when compared to Okaloosa County. However, this housing is being moved.
- C. Part of Eglin’s housing demographics include the City of Valparaiso.

- D. The limited geographic area of Niceville's west side, while impacted does not justify lumping the two total communities (Valparaiso and Niceville) together to address full disclosure regarding environmental justice.
- E. The large undeveloped portions of Valparaiso (even outside the gate) owned by the Air Force geographically tend to concentrate the overall populations in a smaller area impacted by noise.
- F. Low income housing concentrations lie in the approach zones in 'multi-family' developments vs. 'garden' type developments.
- G. Eglin's housing EIS (March, 2006) utilized Okaloosa County as a Community of Comparison with 19.03% minority and 8.84% low income (2000 census).

Valparaiso's demographics according to the Economic Development Council of Okaloosa County (2005) indicate disproportionately higher numbers. Admittedly, the demographic sources vary.

However, if the Air Force in the preparation of this EIS is to remain consistent with their prior identification of a Community of Comparison, i.e. Okaloosa County – it is likely that it will identify Valparaiso as disproportionately impacted from an environmental justice stand point.

#### 4. Water Resources

Valparaiso is concerned with the protection of the Tom's Creek watershed area.

The creek drains generally from northwest to southeast. Traversing the watershed are Highway 123 (near the head waters), Highway 85, the commercial/industrial gate access road (to Eglin), the approach to Runway 19 and its associated approach lighting system, and two high tension power lines.

The watershed lands of Tom's Creek are substantially owned by Eglin Air Force Base. The outlet of the creek and one other minor tributary flow into the waters of the State of Florida in Valparaiso. (Tom's Bayou).

The lands adjoining Tom's Bayou in Valparaiso are limited to single family homes on the north side; and on the south side it is largely undeveloped (5 homes on  $\frac{3}{4}$  mile of waterfront) due to Air Force ownership of the waterfront.

Tom's Bayou enjoys access to the Gulf of Mexico about five nautical miles away through Choctawhatchee Bay (Class II waters of Florida).

Valparaiso is concerned with impacts of the proposal (specifically the increased use (new aircraft operations) of Runway 19) that may compromise the quality and use of Tom's Bayou – which is highly recreational with access provided by a nearby park system.

Over the years of Air Force development the western end of the bayou has become clogged with runoff sediment. Shellfish plentiful as late as the 1960's have gone away; and likely the federally endangered snail darter.

Runoff from Runway 19 and test sites southwest of Tom's Bayou continue to impact these waters.

The proposal statement should document the impacts, particularly cumulatively with respect to increased use of Runway 19 and the test sites, on the waters of Tom's Bayou. And, the Air Force should definitively disclose its plans for the future use of their lands owned on the bayou's south side in Valparaiso. A future study is not the answer.

The concerns above are mirrored for the Turkey Creek watershed which flows through APZ II (Runway 19) northwest to southeast into Boggy Bayou.

The difference regarding this watershed (Turkey Creek) is that it involves a generally open highly flowing fresh water tributary with public parks at each end and a raised platform nature trail with substantial public recreation between College Boulevard and Boggy Bayou. It would appear to lie between the future 70 and 75 noise contour lines.

The EIS should disclose any possible impacts on these watersheds and propose appropriate mitigation.

Other:

Florida's Northwest Florida Water Management District has for the past generation encouraged multiple water user communities in Northwest Florida to consider the alternative use of surface water sources vs. the Florida Aquifer as sources for community water use. To date none have proven economically viable.

However, both Turkey Creek and Tom's Creek have been specifically considered as local community alternative water sources – fresh water from the surface vs. the aquifer.

As such, the proposals possible long term impacts on these water shed resources is important and should be documented.

Note:

Valparaiso has also expressed concerns under index item #9 Hazardous Waste Materials, with respect to ground facilities.

These concerns should also be incorporated here under 'water quality'. The water runoff, especially cumulatively over the years since the development of the airfield from existing and new pavements when combined with likely increased use may impact water quality in the concerned Tom's Creek watershed.

Using an isolated example of very small magnitude with respect to the proposal – does the 'north gate' access road to the munitions area have retention ponds to 'clean' water run-off into the Tom's Creek watershed?

Other:

The Air Force's announced (11/07/07) and preferred noise alternative (blended mix) appears to indicate substantial new noise due to over flights of the Shoal River and its drainage basin east of Highway 85 near Crestview (off Air Force lands). In nearby Walton County the Shoal River is listed by the State of Florida as an "outstanding" water source – the highest possible and relatively rare designation (state-wide). Due to this proximity the EIS should examine specifically any new impacts posed by the Duke Field facility (or others) with respect to Florida's Shoal River.

## 5. Air Quality

Valparaiso is a Class II area pursuant to the Prevention of Significant Deterioration Program (PSD) relating to the goals of the Clean Air Act; as is most of Florida.

Florida's Department of Environmental Protection considers Eglin Air Force a major emissions source with respect to the PSD program.

Valparaiso is within the approach to Eglin Air Force Base Runway 19 – the runway utilized at Eglin for aircraft operations 49% of the time.

Valparaiso is concerned with the air quality in the area underlying these aircraft approaches and departures in the city. The mobile source emissions of these approach and departing aircraft are heavily concentrated in Valparaiso; as well as emissions from aircraft ground equipment.

And, to adequately address cumulative air quality impacts the proposal should be examined on a base line using 1977 annual aircraft operations (approximately 36,000). In some cases the State of Florida has established more stringent standards with respect to pollutants and this should be considered when identifying impacts on Valparaiso.

The low altitude (200 feet) and volume of approaching/departing military aircraft over Valparaiso does not allow for conventional particulate dispersion over a wide area and should be a factor in the study.

Air quality impacts in this small area from aircraft operations will not be short term with respect to the proposed action, and are of a scale which should not be spread region wide.

Valparaiso is also concerned with air quality emissions that will be concentrated due to increased automobile traffic passing through Valparaiso to Eglin's East Gate. This is one of two main commuter gates serving the main base industrial complex.

Air quality impacts appear in this case to be localized in Valparaiso and should not be spread largely – for example over all of Okaloosa County or the region. Emissions associated with aircraft operations should be specifically examined with respect to the City of Valparaiso as well as the region.

Although the air quality in Okaloosa County may enjoy attainment status, we are not so sure that the immediate environs of Eglin Air Force Base share this status; and particularly since the Florida Department of Environmental Protection considers Eglin to be a major emissions source.

Valparaiso suggests that a conformity determination study as part of the EIS examining Valparaiso itself pursuant to the Clean Air Act be conducted as part of the disclosure of impacts regarding the proposal. This should not be set aside for a future study.

## 6. Biological Resources

Red-cockaded woodpeckers (RCW) may utilize the pine – hardwoods in Valparaiso including lands owned (in Valparaiso) by Eglin as habitat. These lands are extensive – hundreds of acres under the approach to Runway 19 and Valparaiso lands near Eglin’s East Gate.

These woodpeckers require older, in this case long leaf pines to construct their nests. Long leaf pines exist throughout Valparaiso – and in many cases are marked by early 20<sup>th</sup> century turpentine harvest scars indicating perhaps a 120 year old tree. This is a ‘marked’ potential habitat that remains throughout Valparaiso even as a ‘yard’ tree. Valparaiso suggests not that the ‘yard’ tree represents habitat. Rather only that in the significant undeveloped Eglin lands which also enjoyed the turpentine generation indicate that the habitat likely exists.

Eglin has made a recognizable effort to preserve this woodpecker, marking for example possible woodpecker trees near public roads in the county with a white painted band.

The proposals impact on the red-cockaded woodpecker in Valparaiso should be documented. Colonies may exist in the approach zone to Runway 19 between Valparaiso and the threshold of the runway as well as on Eglin lands east of Runway 19 extending to John Sims Parkway. All these lands have the characteristics of the RCW habitat.

The EIS should document any impacts on biological resources on lands proximate to the main base. The woodpecker is used only as an example. The osprey is also a resident of the area – a ‘hunting pair’ is routinely observed over the western reaches of Tom’s Bayou.

The EIS should address specific impacts on biological resources such as these that maybe present under the approach to Runway 19 due to the increased use of the runway posed by the training (JSF) proposal.

In addition, similar impacts should be addressed regarding new impacts, particularly aircraft training, at Duke Field and Choctaw Field.

## 7. Cultural Resources

Valparaiso has a local Historic Registry and a Historic District in old downtown Valparaiso.

The historic district was established in 1990 and the local registry recognizing buildings/site/structures/homes and other resources throughout the city in 2000.

There are 29 sites/structures/buildings or resources listed currently in the Valparaiso Historic Registry – most have recognition plates mounted on the building/structure.

The anticipated impact of the proposal on these structures may be noise from aircraft.

Although noise may not impact structural integrity – it may impact the residents. Many of these buildings are preserved as single family homes.

For example, it may be difficult physically if not economically prohibitive to preserve these historic listings as habitable homes. The -20 noise insulation standard (Air Force, 2006) for sound insulation may not be a reasonable expectation.

Valparaiso would specifically recommend that the Air Force encourage Florida's State Historic Preservation Office (SHPO) and other categorically concerned parties to independently consult with the City of Valparaiso regarding its local concerns in formulating their general response to the proposal.

In summary, we like our history and Eglin – Valparaiso built the first Eglin runways with its Great Depression era public funds in 1934 – and leased the field that year to the military for \$1/year.

Any EIS document should disclose specific impacts on these historical resources within the City of Valparaiso.

For example, Valparaiso is concerned that auditory impacts (noise from aircraft operations) will alter the setting, character or use (e.g. residential) of the historical resources to the extent that they may be rendered incompatible from a land use standpoint with their current use (residential) and with surrounding properties.

And, Valparaiso is unaware as to whether or not any of these (29) properties or the district itself may be eligible for nomination to the National Registry of Historic Properties (NRHP) with respect to historical significance. Recordation and data recovery in this case does not appear to provide adequate information. Simply, noise disturbances could result in the irreversible and irretrievable loss of these resources in their natural state (generally housing).

Valparaiso believes that these local properties should be protected from adverse impacts; and preserved for possible NRHP nomination.

The Air Force EIS document should include an appropriate survey of these resources and document impacts and proposed mitigation as may be required by the National Historic Preservation Act, Air Force guidelines, and the Archaeological Resources Protection Act.

### Schools

A. The Valparaiso Elementary School campus (constructed in 1957) is eligible for listing on Valparaiso's Historic Registry and the Florida Historic Registry.

Valparaiso Elementary is a currently operating elementary school – one of the oldest in Okaloosa County. It has never been converted back/forth with utilization by other school grades, being utilized solely by elementary grade students for the last fifty years.

It also represents an architectural example of local 'Cold War' construction before the days of air conditioning.

Built under the path of Eglin's 1950's B-52 bombers absent any knowledge of concern or modern school siting demands, the school is expected to sustain new substantial impacts.

New national standards developed many years following Valparaiso Elementary's construction place the school in "ACCIDENT POTENTIAL ZONES", specifically APZ-I.

It also appears that this school building campus is moving now from the noise 65-70 to the noise 70-75 noise category zone if the Air Force 'preferred' alternative (mixed blend) is implemented.

Thus it appears per the Air Force to indicate that noise insulation achieving -30 dB is warranted vs. -25 dB and that "...special evaluation is warranted...; and that, this cultural resource (school) "...should be prohibited (in the Accident Potential Zone)."

Valparaiso believes that the EIS should evaluate this school as a cultural resource in addition to land use/noise compatibility (as noted elsewhere).

B. The original Valparaiso School constructed in the 1920's lies on Glendale Avenue across from Glen Argyle Park.

The school building is preserved and was renovated with public and volunteer funds and service organization labor in 2004. It serves today as a multi-

community senior center, used daily. Owned by the City of Valparaiso as a donation from a pioneer family, the senior center receives public support from numerous agencies including the City of Niceville and Okaloosa County.

The building is listed on the Valparaiso Historic Registry and with the State of Florida (survey 2000). It is likely eligible for listing on the National Register.

The 'preferred' Air Force noise alternative will move this facility newly into the 65-70 noise zone.

This senior center/school/cultural resource has no noise insulation. Pursuant to Air Force noise standards it will in the near future be incompatible for its current use; in addition to the impact on the sustenance of the building as a cultural resource.

The Air Force should propose specific mitigation in the EIS.

### Churches

There are currently two churches in the Valparaiso Historic District:

- Trinity Presbyterian Church and,
- Korean Full Gospel Hope Church, listed on Valparaiso Historic Registry. This church is likely eligible for listing on the National Register – built as a community church in the 1920's by Valparaiso's pioneer developer.

Trinity Presbyterian recently expanded and developed its expansion pursuant to historic district standards.

Both churches are proposed by the Air Force to be within the new 65-69 aircraft noise zone.

The EIS should specifically examine these structures with respect to noise insulation standards of -25/30 as recommended by the Air Force and with respect to the proposals impacts regarding their historic preservation.

### Other

1. Valparaiso has a late 19<sup>th</sup> century cemetery that is listed on its local historic registry. The cemetery comprises approximately 10 acres which lies in noise zones. The original cemetery plot was only about one acre. This small one acre part is likely eligible for national registry listing.
2. The (29) listed properties on Valparaiso's Historic Registry are limited in listings and documentation by the constraints imposed by geography and

financial resources available to the city in 2000 for study (financed by the State of Florida).

There are likely numerous others not yet identified which may be impacted by the proposed action.

3. Archeological resources within the city should also be examined for possible impacts; particularly with respect to the Fort Walton (Mississippian) culture.
4. The EIS for the proposed action should include a plan with respect to mitigation of adverse impacts on historic resources in Valparaiso; and prepared in detail.

Both the City of Valparaiso and the State Historic Preservation Office should be consulted in preparation of the mitigation plan. The consultation should also involve individual resource property owners.

Mitigation should be physical and funding identified. It should not be limited to future studies or management practices.

8. Land Use Planning

[RESERVED]

## 9. Hazards

Due to Valparaiso's proximity to the Eglin Air Force Base industrial complex supporting the proposal, the city is concerned with hazardous materials and hazardous waste management.

Valparaiso is also concerned with the existence of old facilities at Eglin Air Force Base which may be impacting the Tom's Bayou watershed. Although the proposal itself may not have a direct impact, there should be a definitive cumulative impact.

The statement could be enhanced if it included a summary of any Air Force program to identify, quantify and mitigate hazardous waste sites on the main base and within one mile of Valparaiso. If further site investigations are necessary and not funded these should be specifically identified.

Valparaiso is also concerned with the cumulative impact of hazardous waste. The Air Force should document hazardous waste situations as far back (at least through the Vietnam War) as study work is available. Valparaiso is particularly concerned with the presence of Agent Orange and other munitions sites that may remain 'uncleaned' within one mile of the city limits; or lack funding for adequate study.

The Tom's Creek watershed may be especially vulnerable. This watershed underlies the approach to Runway 19 and is impacted by the proposal's heavy use of the runway for new training purposes.

In addition to the over flight by aircraft approaching Runway 19, the following supporting ground facilities lie on relatively high levels dropping off into the Tom's Creek watershed:

- a. Test Site A-19,
- b. Test Site A-26,
- c. Eglin's munitions storage area,
- d. The runway 19 pavement,
- e. The runway 19 approach lighting system traversing Tom's Creek itself,
- f. The North Gate access road which now accepts all commercial delivery traffic into Eglin traversing the creek,
- g. Associated taxiways and perimeter roads associated with all the above.

It is not known if any of the above facilities enjoy protection from hazardous waste possible run-off or disposal or even conventional pavement run-off to ensure water quality. For example, are there any water retention ponds associated with these sites?

All of the ground facilities noted above with the possible exception of sites A-19 and A-26 (we do not know what happens there) are to some degree associated with either the JSF cantonment or its training activity. Perhaps these sites are involved cumulatively with the proposal. In any case the EIS should address same.

## 10. Garbage

The impacts of solid waste (permanent) and construction debris (temporary) should be documented in the draft EIS.

Research will likely document that all of Northwest Florida's garbage is disposed of by transport to sanitary landfills existing near Marianna, Florida and Andalusia, Alabama. The capacity of these landfills (and others if available) to absorb increased solid waste should be quantified and documented. Any increase in waste products which may reduce the economic life of these landfills and thus increase the costs on local government to dispose of waste should be quantified.

The capacity of local transfer stations (currently limited to two in Fort Walton Beach) should be examined. Costs at transfer stations typically drive local economic impacts. The alternative of establishing landfills for construction debris or sanitary waste on Eglin lands should be part of this alternative examination.

Conventional vendor responses to inquiry regarding landfills will indicate that capacity is available. What is not so readily available is whether or not this available capacity will absorb increases at existing disposal monetary rates.

Rate increases will impact all of Northwest Florida. The proposal should examine and document projected rate increases – independent of vendor estimates.

The cumulative impact of solid waste disposal and construction debris should be documented with respect to other current Air Force proposals such as that involving military housing.

For example, the JSF cantonment area proposal alone involves two alternatives ranging from 1.6 million square feet of demolition/renovation to 2.8 million square feet of demolition/renovation – all taking place over a very few years (2009-2011).

Construction and demolition debris estimated by the Air Force over a 10 year period for the multi-family housing (MFH) project disclosed in 2006 encompassed 3.5 – 3.6 million square feet of housing (not including streets and infrastructure) was estimated to generate about 144,00 tons of construction/demolition debris (non hazardous waste).

Adding driveways and roadways added another 9,000 ton over ten years.

Using roughly the same numbers, say 150,000 tons for 3.5 million square feet for housing;

then, the proposal for the JSF alone will generate at the preferred alternative location:

- 4 million square feet construction, about 7,000 tons
- 1.6 million square feet demolition/renovation about 70,000 tons

total – about 80,000 tons of total debris concentrated over less than five years.

Admittedly, this crude analysis is apples and oranges.

Construction, demolition and renovating of heavy industrial facilities involving the proposal should consume substantially greater volumes, i.e. as compared to housing at the USEPA standard of 4.83 pounds/square foot (construction) and 77.6 pounds/square foot (demolition).

Substantially impacting the above crude estimate is the Air Force's announced time frame – "...executing the BRAC 2005 program, completing by September 5, 2011."

This has the impact of possibly placing on the local construction/demolition debris market as much as 80,000 tons or more over two years or 40,000 tons/year.

The Multi Family Housing (MFH) proposal by the Air Force (2006) cited a ten year low of 8,951 tons (year 2) to 33,299 tons high (year 5).

The EIS proposal should carefully examine the ability of local landfill in Okaloosa County to absorb this possibly concentrated influx of volume without increasing disposal rates (monetary) on the general public.

Alternatively and preferably the Air Force (since it owns 724 square land miles) contiguous to the project should consider establishing its own landfill to receive construction/demolition debris as part of the proposal. Unlike the MFH project, management practices and best management practices cannot conventionally be set aside to a contractor.

As the Air Force has previously noted, they can "... (harvest) fill dirt (for the Proposal) on landfill property to expand the landfill...".

Valparaiso also remains concerned with respect to the route that possibly 40,000 tons of disposal per year material will move in one year over local streets highways, and to where?

All the above is crude, what are the real numbers and impacts? The EIS should document this impact.

## 11. Safety

The introduction of (107) new based F-35 aircraft at Eglin for pilot training with world wide aviation customers will change the mission character of the base from munitions testing and proficiency maintenance to basic training (pilots and maintenance). Announcements indicate aircraft operations will increase three to five fold.

### Note:

The Air Force's 11/07/07 announcement indicate conflicting information – a two fold increase of the F-35 vs. F-15; yet, Col. Ross said the F-35 will fly 3-4 times as often as the F-15 and about 400,000 operations annually. The EIS should be specific.

Current (2005) annual aircraft operations at Eglin approximate 66,000 vs. 35,000 (1977); source: 2006 AICUZ. The increase means a new annual total of 200,000 to 300,000; and for pilots in a new aircraft. The study should disclose the 'mishap rate' for 'training (basic) operations' vs. conventional proficiency operations as it likely results in more mishaps.

The disclosure should document the Air Force definition of aircraft mishaps, i.e. classes A, B, C, and High Accident Potential with some focus on Class A tragedies because of their possibility of impacting the public or private property.

It is acknowledged that there is no historical 'mishap rate' for the F-35. However, the Air Force should be able to assign a reasonable rate projection using a similar aircraft in an initial training situation.

It would appear also that this reasonable rate projection cannot rely on historical mishap rates at Eglin, i.e. it's a new training mission.

It is also acknowledged that it is impossible to predict locations with respect to aircraft accidents. However, at Eglin 49% of aircraft operations (Runway 19 – 2006 AICUZ) currently occur

- over the population center of Valparaiso at very low altitudes
- overflying clear zones and accident prevention zones involving residential housing, churches, schools, and parks with seasonal concentrations of people.

Using the conservative annual figure of 200,000 aircraft operations this means that approximately 100,000 training operations will traverse these areas of Valparaiso.

Further, using Air Force studies and mishap rates assigned to the F-15 (one mishap per 41,000 flying hours, assuming 1.5 hours per operation) it would appear that:

- 100,000 annual operations x 1.5 hours/operation = 150,000 flying hours for every mishap
- $\frac{150,000 \text{ flying hours}}{41,000 \text{ flying hours per mishap}} = 3.66$  mishaps annually
- 3.66 mishaps annually would then happen with respect to aircraft traversing Valparaiso

The Air Force advised Valparaiso in 2006 that (using 1968 -1972 data)

- 39% of aircraft accidents occur in the Clear Zone,
- 7.9% of aircraft accidents occur in APZ – 1,
- 4.9% of aircraft accidents occur in APZ – 2 or,

a total of about 52% of all accidents.

$$0.52 \times 3.66 = \underline{1.9 \text{ aircraft accidents involving Valparaiso each year.}}$$

The city has been indeed fortunate – the last aircraft crash on a Valparaiso home occurred in the clear zone in 2003 (but, annual operations at Eglin were then only about 66,000).

### Alternative Analysis

Using alternative data,

- Air Force 2006 (AICUZ)  
(838) accidents – 1968 – 1995
  - 27.4% of accidents occur in Clear Zone
  - 10.1% of accidents occur in APZ-1
  - 5.6% of accidents occur in APZ-2
  - Runway 19 used 49% at Eglin.
- Air Force 2007 (Town Hall meeting)
  - (125) sorties per training day (F-35)
  - (246) training days per year (F-35)
  - assume (1.5) flying hours/sortie
  - assume same rate, i.e. 1 accident/41,000 flying hours

then, 125 sorties/day x 246 days/year x 1.5 hours/sortie

$$= 46,125 \text{ annual training hours/year for F-35;}$$

$$\text{then, } \frac{46,125}{41,000 \text{ hours/mishap}} = (1.125) \text{ mishaps/year at Eglin for F-35;}$$

further, if R/W 19 is used 49% of the time

$$\text{then, } 1.125 \times .49 = .55 \text{ mishaps/year}$$

but, if – the clear zone (Runway 19) is 27.4% of accidents, and

- the APZ-1 is 10.1% of accidents
- the APZ-2 is 5.6% of accidents or  $27.4 + 10.1 + 5.6 = 43.1\%$  cumulative.

Then,  $.55 \text{ mishaps/year} \times .431 = .237 \text{ mishaps/year}$  involving Valparaiso for the new F-35 operations.

Or,  $\frac{100}{23.7} = \frac{(1) \text{ F-35 mishap in Valparaiso}}{\text{every 4.2 years}}$

However, this represents the cumulative of the Clear Zone + APZ-1 + APZ-2.

If, by whatever means such as for example,

- displacement of the Runway 19 threshold,
- acquisition of clear zone properties,

then, the cumulative of APZ-1 + APZ-2 would be  $10.1 + 5.6 = 15.7\%$

then,  $.55 \text{ mishaps} \times .157 = .864$

or,  $\frac{100}{8.64} = \frac{(1) \text{ F-35 mishap in Valparaiso}}{\text{every 11.6 years}}$

### Summary

The substantial range of this crude analysis from (2) to (12) years indicates a need for professional examination and serious consideration of mitigation measures vs. ‘management practices’ regarding the use of Runway 19 at Eglin with respect to ‘safety’ involving lands in the off- base community.

Underlying even the 12 year scenario remain churches, day care, numerous homes and one elementary school.

The accident rate should be documented by a professional. The above numbers are solely illustrative.

Further, they should be quantified against some identifiable standard that can be easily understood by the public. For example, how often does a home burn under any circumstance?

Finally, Valparaiso has a long established and successful Volunteer Fire Department. Their response time in the local community is about 4 minutes – about the best possible.

However, this municipal fire department is neither equipped, financed or trained to respond to the likely level of risk associated with aircraft mishaps presented possibly with the proposal action.

Eglin's ability to respond to aircraft mishaps with crash/fire/rescue units in Runway 19's Clear Zone, APZ-1 and APZ-2 with respect to adequate equipment, fire fighters and within standard response times by route should be disclosed in the EIS; along with appropriate mitigation such as new fire stations and financial support of off-base volunteer units if warranted.

The environmental impact statement should quantify as closely as possible this impact and propose adequate mitigation (particularly with respect to the possible challenges imposed on the Valparaiso Volunteer Fire Department). This impact identification should be sensitive to cumulative impacts since 1977 (annual aircraft operations).

### Other

#### 1. Community Housing in Valparaiso

One local developer (2007) of what amounts to multi-units of new affordable housing in Valparaiso has communicated informally to city officials noting difficulty with respect to closing Veteran's Administration (VA) financially backed units based on whether or not the unit was in an accident zone. The VA finally determined his units were not in this zone.

However, as not elsewhere approximately 1/3 of Valparaiso is in this zone for Runway 19 at Eglin. Homes in this zone apparently cannot expect VA backing for mortgages.

And, this VA consideration example did not appear to examine the 'noise' impact, rather only 'safety'.

This is symptomatic of the proposal's impact on Valparaiso (if not mitigated) regarding Runway 19.

The EIS should document specific impacts on financing of any residential or other structures in Valparaiso due to noise impacts and safety zones.

#### 2. The Air Force (2006) has advised Valparaiso that:

“While the potential for aircraft accidents in APZ I and II does not warrant land acquisition by the Air Force, land use planning and controls are strongly encouraged in these areas for the protection of the public (e.a.)”

The simple response is how does Valparaiso provide land use controls on development that preceded the disclosure? And, why does this not necessarily

warrant land acquisition by the Air Force if the new proposal for BRAC provides even further impacts.

We know the Clear Zone – APZ may not change unless the Air Force modifies the use of Runway 19. However, many more aircraft will be flying through at very low altitudes per the proposal – increasing safety risks.

3. The Air Force (2006) has advised Valparaiso that:

“Accident potential ...within the CZ (clear zone) is so high that the necessary land use restrictions would prohibit reasonable economic use of land ...(and that),

It is Air Force policy to request that Congress authorize and appropriate funds to purchase the real property interests in this area...”.

Approximately 10-20 Valparaiso homes in Valparaiso on Andrew Drive lie in this Clear Zone. An aircraft crashed on two homes in 2003. These homes have been there since the 1960’s.

This Clear Zone to Valparaiso is ‘new’.

In promulgating its 1977 AICUZ study the Air Force carved out a ‘clear zone’ around these Andrew Drive homes. In 2006 the Air Force AICUZ carved them back in.

The Air Force acknowledged in 2006 public hearing that perhaps they should not have done this (the carve out in 1977).

Anyhow – where are we today?

Valparaiso is unaware of any Air Force initiative to implement policy regarding:

“...acquiring real estate interests in the CZ through purchase or easement when feasible”, requesting Congress to provide funds for same – whether by authorization or appropriation.

Valparaiso suggests that the EIS for the proposal should document that this impact (land/property acquisition in the Clear Zone) is covered by ‘appropriated’ funds supporting BRAC; and not be subject to future ‘authorizations’.

## 12. Noise

### Noise in other locations

A comparison of the 1977 vs. 2006 noise impact contours further indicates that the largest noise increase has occurred over Choctawhatchee Bay in the direction of Destin.

Further, in addition to Valparaiso (and Eglin owned areas)

- 2006 aircraft departure flight tracks occur over:
  - Shalimar
  - Destin
  - Okaloosa Island,
- 2006 aircraft closed pattern flight tracks mostly occur over:
  - Destin,
- 2006 aircraft arrival flight tracks mostly occur over:
  - Destin.

Although these flight profiles are at higher levels, noise and other future impacts over Destin should be isolated and carefully examined as part of the proposal.

Destin has in recent years experienced citizen sensitivity to aircraft operations at a small general aviation airport; and overall perhaps has the highest density development of any municipality in Okaloosa County.

A 2 to 3 fold increase in air traffic in the area as a result of the proposal could impact significantly current residents in Destin, Florida; particularly with respect to arrival and closed pattern flight tracks.

However less than conventional standards, i.e. 65, noise impacts at the 55 level on Destin should be provided as part of the proposal due to:

- past sensitivity
- very high density development.

Valparaiso does not presume to communicate comments with respect to Destin or any other community – we only know what the Air Force itself has advised in the media and other documents.

For example, the noise impacts (65) of the F-35 now reach (per the Air Force November, 2007) into the bay front areas of Okaloosa County and perhaps Destin west of the mid bay bridge such as Kelly Plantation on par with what happens now in most of Valparaiso. It appears these impacts (65 Ldn) begin at the south foot of the mid-bay bridge and extend west to Jones Bayou – possibly involving

also Destin Middle School. This is for the Air Force announced preferred (blended noise) alternative to spread the noise around (not the decision yet).

The same impacts (Duke Field and Choctaw Field) appear to go off the Air Force reservation into areas east of Crestview north of the Shoal River, I-10 and U. S. 90 (approximately 2-4 miles east of Highway 85); and impact Santa Rosa County bay front areas on East Bay.

Note:

Although Destin's Harbor escapes substantially new noise impacts under the Eglin preferred (blended noise) alternative, other alternatives remain under consideration by the Air Force.

The 'escape' appears fueled by allegedly moving (per the maps) noise to Choctaw Field and the East Bay bay front area of Santa Rosa County – and to Crestview.

Three of the four alternatives (Choctaw Heavy, Duke Heavy, Eglin Heavy) currently under consideration by the Air Force place substantially new and heavy noise over the Destin Harbor and beach front areas including Okaloosa Island.

However, in summary it appears with crude examination that the Air Force's preferred noise alternative moves its new noise away from the community's highly developed and unaffordable housing areas on to undeveloped and perhaps future 'affordable housing' areas.

And, all the while the Eglin main base housing proposals remain unsubstantially impacted – even with the 'Eglin Heavy' alternative.

#### Hospital Noise Impacts

According to the proposed noise presentation at the town hall meeting as 'preferred' by the Air Force (blended mix) on 11/07/07 the Niceville-Valparaiso Hospital campus moves into the 65-70 noise line.

The Air Force has advised that hospitals and nursing homes are compatible in this area (65-70) if noise levels reductions are achieved by construction to reduce noise levels by 25-30.

The Air Force should as part of the EIS examine the Niceville-Valparaiso hospital with respect to noise insulation and compatibility with respect to the proposal for new noise and propose/fund any necessary mitigation as part of the proposal.

## Church Noise Impacts

The 'blended mix' preferred Air Force noise alternative (11/07/07) appears to impact churches in the nearby community as follows (the list is not all inclusive):

1. New Hope Baptist Church  
108 Aurora Street, Valparaiso, Florida  
old Air Force noise zone (2005 base line): 70-74;  
new noise zone preferred by Air Force: 70-74;  
impact: noise impact approximately doubles due to eastward movement of noise line;  
other: lies in Accident Potential Zone I for Runway 19;  
constructed: 1958
  
2. First Assembly of God  
571 Highway 190, Valparaiso, Florida  
old Air Force noise zone: (2005 base line) 70-74;  
new noise zone preferred by Air Force: 75-79 (partially); the building itself appears in the 70-74 with the campus now covered by the 75-79;  
impact: noise impact approximately doubles due to eastward movement of noise line; future building construction in the western part of the campus toward Lincoln Avenue should be prohibited according to the Air Force;  
other: church lies in Accident Potential Zone I for Runway 19;  
constructed:
  
3. Soverign Grace Church of Valparaiso  
Valparaiso Parkway, Valparaiso, Florida  
[RESERVED]
  
4. First Baptist Church of Valparaiso  
444 Valparaiso Parkway, Valparaiso, Florida  
old Air Force noise zone (2005 base line): 65-69;  
new noise zone preferred by Air Force: 65-69;  
impact: noise impact approximately double due to eastward movement of noise line;  
other: church does not lie in Accident Potential Zone for Runway 19;  
constructed:
  
5. Korean Full Gospel Hope Church  
160 Chicago Avenue, Valparaiso, Florida  
old Air Force noise zone (2005 baseline): none  
new noise zone preferred by Air Force: 65-69  
impact: noise impacts approximately double due to eastward movement of noise line; any new construction should include noise reduction measures involving substantial costs;

other: church does not lie in Accident Potential Zone for Runway 19;  
church does lie in Valparaiso Historic District and is listed on the  
Valparaiso Historic Registry; likely eligible for National Registry.  
constructed: 1920's

6. Trinity Presbyterian Church  
44 Southview Avenue, Valparaiso, Florida  
old Air Force noise zone (2005 base line): none  
new noise zone preferred by Air Force: 65-69  
impacts: noise impacts approximately double due to eastward movement  
of noise line; any new construction should include noise reduction  
measures involving substantial costs;  
other: church does not lie in Accident Potential Zone for Runway 19;  
church does lie in Valparaiso Historic District;  
constructed:
  
7. River of Life Family Church  
100 Hart, Niceville, Florida  
old Air Force noise zone (2005 base line): none  
new noise zone preferred by Air Force: 65-69  
impacts: noise impacts approximately double due to eastward movement  
of noise line; any new construction should involve noise reduction  
measures involving substantial costs;  
the parking lot to the east is outside the noise line; the building itself and  
the underdeveloped property to the west is newly impacted;  
the building itself is a former industrial facility; existing insulation is not  
known.  
Constructed:

The EIS should examine these churches for compatibility with respect to safety  
and noise and document only impacts.

It also appears that the bay front areas of Fort Walton Beach, Cinco Bayou and  
Shalimar (Garnier's Bayou) are also newly impacted as Valparaiso is today.

Admittedly, the maps available are hard to read. It would help if the Air Force  
could provide better maps in the EIS.

The EIS should examine modifications to airspace use and management, airfield  
layout, ground operations and aircraft maintenance activity on the Eglin main  
base to mitigate noise impacts on the community. The following are mitigation  
measures that should be examined (all are not necessarily consistent and are  
presented as varying alternatives).

### Airspace use/management

1. Adopt specific noise mitigation restrictive criteria regarding rate of speed, rate of climb, and turning radius for take offs on Runway 01 (to the north east).
2. Adopt arrival restrictions for military aircraft on Runway 19.
3. Modify departure, arrival and closed pattern flight tracks.
4. Route all F-35 take offs and landings over military owned lands or state waters when not demanded by wind conditions.
5. Restrict 'after-burner' use over the Valparaiso community.

### Airfield layout

1. Close runway 01/19.
2. Close the east parallel taxiway of Runway 19/01.
3. Displace the landing threshold of Runway 19.

#### Note:

The Air Force (Col. Ross) disclosed at the Town Hall meeting on November 7, 2007 that the Air Force needs 2 – 8,000 foot long runways for the F-35.

Runway 12/32 exceeds 12,000 feet and Runway 19/01 exceeds 10,000 feet.

Valparaiso necessarily remains concerned with the approach to the 10,000 foot Runway 19.

If only 8,000 feet of any runway is needed for BRAC it appears reasonable that the landing threshold of Runway 19 could be displaced by 2,000 feet; especially since 49% of the operations occur on Runway 19 and it is the sole runway impacting any off-base community.

This is not a new suggestion. Following the disclosure of the 2006 AICUZ Valparaiso's mayor made a suggestion to the Air Force that the landing threshold of Runway 19 be 'temporarily' displaced by 1,000 feet pending study in order to remove Valparaiso homes from the 'clear zone'.

The Air Force rejected the proposal citing financial constraints.

Today we remain faced with the same issue, except with the BRAC proposal there appears to be available \$400 million for a BRAC F-35 campus on Eglin. Within the context of cost vs. benefit the displacement of the Runway 19 threshold should be examined in the EIS.

4. Eliminate aircraft parking on the east side of the northern ½ of Runway 01/19.
5. Close the old northeast/southwest runway for taxiway operations and aircraft parking.
6. Construct a new parallel taxiway west of Runway 19.

#### Aircraft maintenance and maintenance training

1. Conduct engine run-up requirements in hush houses.

##### Note:

At the November 7, 2007 Town Hall meeting in Niceville one commenter (Ms. Stefanik, Shalimar) "...asked about noise from ground testing of F-35 engines. Air Force Col. Ross replied that the F-35 is designed not to require run-ups at full power because the new aircraft has so many built in test capabilities. Tentatively, there are no plans to build a 'hush house', as was done for current fighter aircraft like the F-15's, he said. Minimizing run-up noise, often done at night, is also an Air Force concern, he said, because students attending the training center would be housed nearby (e.a.)".

What remains unclear is whether or not this means engine tests for operational maintenance of the F-35 or engine testing for maintenance training. For example, on November 7, 2007 the Bay Beacon published a photo of the "most powerful engine ever put in a military fighter jet, Pratt and Whitney's F-135 engine...". The photo obviously depicts an engine on a test stand – not an aircraft.

Valparaiso residents are also housed nearby – likely not as close as the proposed Air Force campus but perhaps closer than the commenter; perhaps begging the question as to how much noise is idle speed, where will these engines be pointed, and will maintenance training be actually limited to idle speed levels on aircraft – even in daytime?

Valparaiso residents currently experience noise impact from engine run-ups.

It is unclear also as to whether or not the noise impact profiles (and alternatives) or November 7, 2007 included noise from aircraft maintenance and/or training.

Valparaiso believes that non-flight noise should be specifically quantified separately in the EIS as the training proposal involves "...teaching 200 support personnel each year at the F-35 training unit." This should be separate from flying noise to enable identification of both mitigation and management practices to minimize impacts on the community.

2. Point engine run-ups/maintenance to the northwest, away from the Valparaiso community.
3. Limit ground run-up/maintenance to day time hours.
4. Engine Test Noise (specific)

Engine test noise should be identified/quantified separately in the proposed EIS and then added cumulatively to overall noise impacts on the community.

Valparaiso has experienced this noise, often under nighttime conditions for many years. Indeed, the 2006 AICUZ report indicates (p.3-4) that "...17 percent of aircraft maintenance run up operations at Eglin occur during nighttime (10:00pm to 7:00am)."

However, standard methodology for measuring noise does not appear to place a 'penalty' of 10 db per event on this type of activity. Nor, is there any separate measurement provided for this type noise.

What we do know is that Col. Ross said at the November 7, 2007 Town Hall meeting was that his air persons needed their sleep – and that since they were close to the flight line the run up would only be at 'idle' speed.

What we do not know is:

- a. the cumulative yet separate impact of this type noise overall at Eglin;
- b. at which direction the engines will be pointed, either old existing engines at Eglin or those of the new F-35;
- c. whether or not Eglin will continue to use existing engine run up areas, test stands and at what hours;
- d. the locations from which any of this type noise originates.

It is important that this type noise be documented and measured separately in the EIS.

The community's perception has been that Air Force management actions in following years after implementation remain sensitive to air traffic management (flight tracks, noise abatement) but drop through the crack with respect to engine run up.

Only if this impact is documented separately with respect to impacts, directions, maintenance vs. training activity and cumulatively regarding existing similar (not aircraft operations) can the community expect reasonable mitigation to result in follow-up continuous management action to mitigate this noise.

For example, in March 2006 at a public hearing held by the Air Force on the 2006 AICUZ a Valparaiso citizen asked if the noise impacts included 'maintenance', particularly at night. The Air Force response was 'yes' and the citizen then asked from where and was the data available?

The Air Force response referred the citizen to the 'Freedom of Information Act' as their response.

Cumulative ground engine noise as Eglin should be documented separately in the EIS – it has a perceptively high impact on the community. Frankly, it is currently perceived that Eglin locates and points this noise at Valparaiso – away from its own on-base housing.

### Ground Operations

1. Eliminate taxiway powered take offs on Runway 19.
2. Reserved

### Population Impacted by Noise

The population affected by noise is per the Air Force (AICUZ, p. 4-5) estimated by using:

- a. 2000 census data, and
- b. assuming the population is equally distributed within a census tract area.

What is unclear is whether or not this conventionally reasonable methodology will actually capture and disclose the numbers of noise impacted people living in Valparaiso.

For example, what is the census tract footprint in Valparaiso? And, what is the population?

As indicated in other comments Valparaiso's land demographic from a 'city limits' standpoint covers, in addition to the town itself:

- a. 137 acres donated to the Air Force in 1935 for the beginnings of the airfield; and,
- b. 1432 acres donated to the Air Force about 1937 – today's Eglin industrial complex; and,
- c. 166 acres conveyed to the Air Force in a 1950 land trade.

These 1700+ acres represent a substantial portion of Valparaiso; and include to some degree dormitory and other 'on-base' housing. Are they in the census tract? We don't know.

The EIS should disclose in greater detail than the 2006 AICUZ the methodology used in determining the number of 'off installation' population impacted by the proposal – particularly since the off installation impacts appear to involve a disproportionately minority and low income population.

This disclosure should also reach back to the 1977 AICUZ as a baseline (as well as the 2006 baseline). Table 4.2 (2006 AICUZ) indicates a reduction in the number of noise impacted acres between 1977 (14,372 acres) and 2006 (13,092 acres). What remains undisclosed is where these reductions occurred, e.g.

- a. on-base vs. off base
- b. over water
- c. over Eglin's reservation, in summary where?

Figure 4.4 (2006 AICUZ) appears to indicate that the greatest increase in noise area between 1977 and 2006 was over Choctawhatchee Bay to the southeast. This area is impacted by landings on Runway 30 or take offs from Runway 12. However, this combined use of this runway is 40%, where as Runway 01/19 is used for 60% of the annual aircraft operations (p.3-4 2006 AICUZ).

And, between 1977 and 2006 annual aircraft operations at Eglin almost doubled from 36,000 (1977 AICUZ) to 66,000 (2006 AICUZ). It is difficult to understand how the number of annual aircraft operations between 1977 and 2006 doubled while the land area impacted became less.

It is important that the public understand the cumulative impacts since 1977, today's 2005-2006 snapshot and the impacts of the proposal, especially since there has been little population growth in Valparaiso between 1977 and now.

Further, spreading the population over the census tract does not appear to account for zoning restraints. Lands zoned as industrial with little residential development concentrate people in areas that are set aside for housing. The EIS should identify and quantify zoning lines in Valparaiso when disclosing concentrations of people impacted by noise (as spread over a census tract). And, this should not be delayed for disclosure in other studies.

Aircraft Operations-Noise

Background:

Florida’s Department of Transportation lists about (20) airports state-wide as providing ‘commercial’ passenger service into – out of Florida, a cornerstone in Florida’s economy.

Listing them in descending ‘annual aviation operations’ which is a primary indicator of noise impact on the surrounding communities, they are:

FLORIDA COMMERCIAL SERVICE AIRPORTS

<u>AIRPORT – THE TOP TEN</u>	<u>ANNUAL AIRCRAFT OPERATIONS</u>
1. Orlando International	391,000
2. Miami International	384,000
3. Orlando-Sanford	320,000
4. Fort Lauderdale International	310,000
5. Tampa International	262,000
6. Daytona Beach International	258,000
7. Melbourne International	219,000
8. St. Pete-Clearwater International	205,000
9. Palm Beach International	199,000
10. Sarasota-Bradenton International	163,000
<u>AIRPORT – THE NEXT TEN</u>	<u>ANNUAL AIRCRAFT OPERATIONS</u>
11. Gainesville Regional	133,000
12. Saint Augustine	126,000
<b>EGLIN AIR FORCE BASE</b>	<b>126,000</b>
13. Pensacola Regional	111,000
14. Tallahassee	100,000
15. Key West International	94,000
16. Panama City	88,000
17. SW Florida International (Ft. Myers)	88,000
18. Naples	87,000
19. Florida Keys – Marathon	53,000

The above numbers are based on Master Record Data (FAA Form 5010) for the 12 months ending March, 2006.

Issue:

The Eglin noise study (2006) acknowledges only 66,000 annual aircraft operations based on 2005 data.

The study also acknowledges that the military and the FAA count aircraft differently, i.e.

- the FAA uses an ‘average annual day’ whereas
- the military uses an ‘average busy day’.

Valparaiso does not understand the different methodology, but remains desirous of understanding them from the civilian side.

For example, if the Air Force says it has 66,000 annual operations today on their methodology that’s o.k. It appears to equate to 125,000 annual operations at a civil airport in Florida; or about 2x, that’s ok also. Valparaiso is just trying to figure out where we fit into the big picture state wide.

Eglin communicated in November, 2007 Town Hall meetings by handout that the BRAC proposal would bring an additional

- 125 sorties/day for 246 days/year
- a sortie is (2) operations (2006 AICUZ);

so  $(125) \times (246) \times (2) = 61,500$  additional annual aircraft operations at Eglin.

Using the 2x methodology above, then this equates to an increase in aircraft operations (military to civilian equivalent) of

$61,500 \times 2 = 123,000$  new annual aircraft operations  
or a doubling of noise – which matches roughly Col. Ross’s assessment at the town hall meeting (11/07).

If the above extrapolations make sense in comparison to Florida’s civilian tourist destination airport’s the annual aircraft operations at EGLIN become equivalent to

- 126,000 (old)
- 123,000 (new)

249,000 annual aircraft operations TOTAL.

In other words, from a Florida state-wide perspective Eglin moves in a very few years from the equivalent of Pensacola/St. Augustine to Daytona Beach/Tampa

International with respect to annual aircraft operations or, from number 13 to number 7 with all the associated impacts on the community.

And, 49% of all aircraft operations occur over Valparaiso (Eglin AICUZ, 2006). The increase will not be via small general aviation aircraft or today's quieter commercial airliners but rather via the 'noisiest aircraft' ever built by the military.

Problem:

The above analysis is crude. The EIS should disclose some expert analysis equating this new impact at Eglin to civil standards.

State wide our legislators understand aviation impacts their districts when they relate to Florida's civil airports. The public living under these impacts in Florida and local governments work as possible to resolve land use compatibility issues.

Executive departments under Florida's governor strive to set reasonable standards regarding land use planning.

Valparaiso was one of a number of Florida communities surveyed by Florida's House of Representatives in September, 2007 with respect to military impacts on the community. Our response at the time communicated a perception that Eglin was about to become to the equivalent of Miami/Orlando International Airports.

The Town Hall meeting (11/07/07) has moved the perception down to Daytona/Tampa International level. This is what we will be communicating to Florida's upcoming 2008 Legislature inclusive of the stuff which is laying the groundwork for the 2008 session now.

Bottom line:

The EIS should disclose to the public some reasonable equivalent of the impacts of the proposal understandable in civil aviation terms/data such as may be equated to other aviation facilities in Florida.

### 13. Public Participation

Reference is made for record purposes to the regulations/requirements of the Council on Environmental Quality and 32 Code of Federal Regulations 989.

Valparaiso and the western edge of Niceville lie under the approach to Eglin's Runway 19; with significant lands in the Clear Zone/Accident Potential Zones I and II. Runway 19 is the busiest runway on Eglin. Of the four approaches to two runways Runway 19 has been characterized as used 49% for air operations.

The public participation with respect to these 'most impacted communities' could be enhanced with public hearings/town hall meetings in these community areas.

Valparaiso believes that public participation can be enhanced if hearings/town hall meetings can be taped/recorded and made available by the Air Force for public viewing on local public access TV channels (Valparaiso owns one, Cox Communications is the other; both have public access channels).

It would help also if:

- i. press releases and other informational outreach during the process are routinely shared with the City of Valparaiso,
- ii. if the Air Force would establish and maintain an 'outreach book' at our public library,
- iii. the Air Force could participate in outreach to the public at regular city commission meetings – the overall subject has been a continuous agenda item at these meetings for the last eighteen months, and frankly – the presence of a uniformed 'representative' is helpful – even if, not 'expert' the presence of a uniformed 'stake holder' makes a difference,
- iv. a court reporter should be retained by the Air Force to take a transcript at all public hearings; and a complete copy of the transcripts should be made available to the public as part of the administrative record of the draft EIS,
- v. responses to comments/input received in the scoping process should be listed and responded to in the draft EIS (hard copy, not a disk).

#### Maps

However well intended in the past, maps utilized by the Air Force in disclosing environmental impacts do not allow the public to identify readily their home, place of business or other private property with respect to impacts.

Simply, past disclosures have not been to a readable scale and have inhibited public input/comment.

For example, Eglin's 2006 AICUZ (noise) study was published on a 1 inch=5,000 feet (almost one mile) scale; and some critical noise lines go off-the-maps.

This scale does not work for highly impacted communities such as Valparaiso and possibly Destin and Okaloosa Island.

In 2007 Valparaiso tasked the City Engineer with reproducing these Air Force maps at approximately 1 inch = 400 feet. The product was crude and the best we could get.

But, this scale allows a property owner to see where they live, work or play with respect to impacts. It also (when overlaid on aerial photographs) helps tell people where they are.

Public participation could be substantially enhanced and contribute to the EIS process if they can easily figure out where they are regarding impacts. This task should not be delegated to the crude process noted above.

The EIS should provide in readable hard copy impact maps at no less than 1"=400'. This would be especially helpful with respect to 'noise' impact and 'safety' maps.

Note:

The City of Valparaiso provided comment at the Niceville Town Hall meeting (11/07/07) to the Air Force regarding the 'scale of available maps'. As a follow-up Valparaiso requested maps showing noise of Air Force public affairs officers at Eglin depicting noise as presented at the meeting. These were furnished but not at the larger scale.

14. Irreversible and Irretrievable Commitment of Resources, and; Unavoidable Adverse Impacts and Considerations that offset these impacts

The Committee for a Sustainable Emerald Coast (CSEC – Walton/Okaloosa/Santa Rosa/Escambia) published in October, 2007 a draft goal in its proposed report to Florida’s Governor:

“Establish quality livable communities with a sense of place within successful urban areas and small towns in the Emerald Coast region where citizens can live, work, and play”.

In defining sustainability, the CSEC quotes a Chinese proverb:

“One generation plants a tree, the next has the shade”.

Valparaiso planted the economic tree of Eglin Air Force Base in 1934; and today the entire region of Northwest Florida enjoys this shade.

And, trees grow; no one in 1934 could have envisioned that this seedling would shade what it does today – or will in its projected near future.

As the shade of the tree grows so do the trunk and roots of the healthy tree. The tree gradually cracks and pushes aside transitory human foundations.

Valparaiso remains in the path of Tree – Eglin. The trunk and roots have cracked the city’s foundations as a small town “...where citizens can live, work and play”.

Whether or not Valparaiso can sustain itself as a viable community with Tree – Eglin’s announced near term growth is questionable.

Valparaiso only asks – ‘Tell us what’s coming; what is irreversible, irretrievable, unavoidable, adverse and document proposed off setting considerations – all specific to our city’.

## 15. Cumulative Impacts

Reference is made to Council of Environmental Quality regulations, 40 CFR 1508, et-al.

The BRAC EIS should address the military's future plans for its significant lands in Valparaiso – if not for housing, then what then? Particular emphasis is placed on the Eglin lands in three Valparaiso plats – Plat 3, Eglin Heights and Plat 6.

The recent 2004 housing proposal by Eglin (setting aside housing) is utilized as only one example (of the future).

Since the early days following the National Environmental Protection Act of 1969 Eglin's air operations have substantially increased, almost doubling between 1977 (36,000) and 2006 (66,000). The Air Force has announced that operations pursuant to the proposed action are expected to triple again by 2015.

Cumulative proposed actions at Eglin since 1977 include a host of many smaller actions environmentally documented as 'categorical exclusions' or 'findings of no significant impact'. For example, Eglin announced in 2007 another draft 'finding of no significant impact' for the Navy Explosive Ordnance Disposal School Master Development Plan. The announcement of the finding cites "...an approval of the increase in the overall size of the U.S. Army...".

Valparaiso suggests that the cited examples, i.e.

- a. Doubling (35,000 to 66,000) of Air Force aircraft annual operations between 1977 and 2006 (past);
- b. using a singular example, another proposal for a Navy school increase due to the Army size increases (current);
- c. combined with anticipated triple Air Force aircraft operational increases (future);

is indicative that past, present and future impacts should all be carefully and cumulatively examined as part of the current proposal. Multi-services (Air Force, Army, Navy) have all expanded over the years at Eglin.

The myriad of all environmental decision making regarding proposed and implemented actions since the early 1970's has produced environmental impacts to the point that it is overwhelmingly 'obvious'; and all should be disclosed in a single document. All are now interacting.

Projects which may have appeared of minor scope in the past have essentially laid the foundation for the current proposal – Fighter Town USA. And, it is continuing.

The past and future actions now cumulatively coincide with the current (present) proposal and all should be publicly disclosed in detail in this one statement.

Cumulative impacts are expected with respect to environmental impacts regarding this proposal. They are defined by 40 CFR 1508.7 as "...the incremental impacts of the action when added to other past, present and reasonably foreseeable future (e.a.) actions regardless of what agency or other person undertakes such other actions...".

The Air Force also noted in 2006 that "...BRAC will have significant impacts in The region ...(and that) the Air Force would address the cumulative nature of BRAC actions in regard to other actions in the region, including (the Military Family Housing Demolition, Construction, Renovation and Leasing Program), in BRAC NEPA documentation".

In context of BRAC, Valparaiso does not perceive the housing proposal, however challenging to quantify as "...minor..." (Air Force); within the scope of BRAC. And, Valparaiso has and continues to support the Air Force preferred alternative with respect to housing (not in Valparaiso). We would like the housing to be in Valparaiso, but Eglin has rejected this option. In any case, the cumulative impact of the non-BRAC housing proposal should be incorporated in the BRAC EIS. This only represents the previously announced Air Force commitment to include it in the BRAC EIS.

Note:

On November 1, 2007 the Air Force announced at a community conference that it planned to:

- tear down (1866) homes at Eglin
- build (1340) new homes
- publish a request for proposals (new homes) in December, 2007 to close in October, 2008 for privatization of military housing
- representing 76% of needed military housing

However, it is our understanding based on Air Force communications that the 'draft' EIS for BRAC will not be available to the public until May, 2008; and that a Record of Decision (11/01/07) will not be available to the public until November, 2008.

The scheduling conflicts are recognizably resolvable.

From a cumulative impact standpoint the Air Force committed in its revised draft EIS regarding housing (March, 2006) to assess this housing proposal as part of the EIS for BRAC. It should be so assessed and documented (cumulatively) to the community; and prior to federal funding commitments regarding housing.

From a context standpoint this (military housing proposal) mirrors the small Valparaiso community. We have about (1700) homes – Eglin is (most recent announcement) tearing down (1866) and building back (1340).

From a cumulative standpoint the housing action alone is equivalent to our total small town – which lies both adjacent, proximate and within the main base.

The BRAC EIS should incorporate this housing proposal (today it does not). Per the town hall meeting of 11/07/07 it is specifically excluded. The RFP for housing should be suspended at this time as it appears ‘pre-decisional’ for environmental decision making purposes as it is ‘cumulative’ to BRAC.

Alternatively, perhaps the BRAC EIS process could be accelerated.

#### Number of aircraft operations

On November 7, 2007 Col. Ross at the Niceville Town Hall meeting advised:

- the baseline of the EIS will be 2005 and,
- the F-35 will fly 3 to 4 times the F-15 operations.

The 2006 Air Force AICUZ shows for 2005 (113) total daily operations for the F-15 at Eglin.

The 2005 (113) total for the F-15 uses 260 days/year; while the F-35 is set (11/07/07) at 246 days/year.

Extrapolating crudely,

Eglin will get 246 days x 4 (4x the F-15) x 113 (F-15 daily ops) or  
111,192 new annual F-35 operations.

The current (2005) aircraft operations at Eglin is about 66,000.

111,000 (new) + 66,000 (old) = 176,000  
annual aircraft operations (future)

But what is the future?

Eglin has announced locally that the 33<sup>rd</sup> Fighter Wing is going away soon.

However, the EIS will as announced only cover the ‘addition’ of the F-35. It is unclear if the EIS will cumulatively cover the announced subtraction of the F-15, 33<sup>rd</sup> Wing. If so, it should be covered.

Is Eglin to subtract:

(113) F-15 operations x 260 days = 29,380  
annual operations or not?

In the subtraction case the near term annual aircraft operations at Eglin would be about 176,000 -29,000 = 147,000 .

Col. Ross at the Town Hall hearing (11/07/07) also noted that each noise alternative (four) presented had about 400,000 annual aircraft operations. This roughly equates to September, 2005 media reports. "...a landing or take-off every 90 seconds..."

The range of annual aircraft operations for BRAC tells us the:

- 1977 base line is about 36,000 (annual)
- 2005 base line is about 66,000 (annual)
- expect BRAC to add 111,000 (annual)
- but, it 'might' all add up to 400,000 (annual)
- and perhaps you could subtract 29,000 (annual)  
but, that's not part of the study.

The EIS should present real numbers – and based on a cumulative impact above the 36,000 annual aircraft operations in 1977 (past, present, future).

Question:

Why does Valparaiso care what the numbers are?

Answer

1. Because, 49% of the aircraft operations at Eglin occur today over Valparaiso; in both the clear zone and the accident potential zones of Runway 19 (Air Force 2006).

Alternatively, according to the Air Force (2006) operations/runway use on other runways is:

- a. Runway 01 – 10%
- b. Runway 02 - 28%
- c. Runway 30 - 12%

The approaches to these other runways are all over underdeveloped Air Force lands or Choctawhatchee Bay.

2. Because, Valparaiso residents, business and property owners should be fully informed of the total cumulative impacts.

## 16. Other

1. Mitigation actions proposed by the Air Force with respect to new impacts on the community should not be limited to those required for ‘permit’ actions.

Note: It is acknowledged that the Air Force in the past has defined:

- a. mitigation actions, as those specifically tied to regulatory or permitting actions and routinely sets them aside as not known until the project design is complete;
- b. management actions, as those associated to offset potential impacts associated with the project itself – to be identified later,
- c. best management practices, with uncertain minimization of impacts and with no sustained accountability conventionally identified in the EIS.

In the case of the instant proposal the Air Force should be held to a higher standard.

The Air Force here is substantially ‘immune’ with respect to ‘permitting’. They have announced that the ‘NO ACTION’ proposal is not to be considered by the decision maker; which has the effect of suborning even ‘federal’ and ‘state’ permitting agencies to ‘how’ not ‘if’ with respect to comments.

This can only lead to a substantive ‘chilling’ effect on anyone who proposes reasonable mitigation – whatever may be the agency, federal-state-local.

It also has the perceptive impact of ‘chilling’ public involvement in the decision making process. ‘How’ vs. ‘if’ compromises ‘public involvement’ on meaningful input.

In this case the Air Force drives the total process as the proposing agency, permitting agency and the implementation agency – responsible for all financing, and is ultimately the user.

The standard of disclosure in the EIS should in these circumstances raise the level of the bar for ‘mitigation’ above that of a standard for mitigation (permitting) and disclose above that of what is conventionally required for ‘permits’.

In this case, the decision maker is both a decision maker and the

owner/operator of the proposed action; and is generally immune from any state or local permit process. Any proposed mitigation which cites state or local 'permit' standards should also specify follow-up study commitments to evaluate compliance with these standards – and with funding from proposal funds (not funds to be identified later).

It is misleading today to the public to commit to future works to 'monitor' compliance only, to find later that 'funds are not available' for these purposes.

A combination of 'owner/operator' and 'decision maker' should demand the highest standard of compliance with the National Environmental Protection Act. In this case the United States itself proposes the action, will make the decisions alone inclusive of any mitigation; and totally controls the budget process which stops/starts/accelerates/slows down impacts, etc. This is not a federal 'permitting' or 'funding' decision to be implemented by others. Perceptively, this proposal demands a higher standard.

Further, mitigation actions should be specifically defined by responsibility, jurisdiction, and funding availability.

For example, if the Air Force suggests that mitigation or management actions to reduce aircraft noise in Valparaiso should include:

- d. land acquisition
- e. sound insulation of residents, business, public buildings, churches
- f. zoning changes

or any other measures to ensure land use compatibility then the EIS should also include:

- a. who (federal vs. non-federal) pays for it; and,
- b. when.

This should not be deferred to future study work; the financial impact should be disclosed as part of the EIS.

2. Any 'baseline' study document should be equally printed and made available to the public in hard copy along side the 'draft' EIS for public comment.

A hard copy of all appendix documents should be printed and made available for the public at local government locations as well as public libraries – resorting to a disk attachment to the draft EIS on a proposal of this magnitude compromises public involvement.

In addition, all referenced documents and footnotes should be provided at a central location in hard copy for review by the public. The public should

be able to read and copy (at cost) all documents without having to resort to electronic communications.

3. The Air Force should include in the EIS document its policy regarding the use of its lands (current and future) for public purposes regarding 'fair market' value considerations.

There are reportedly (media) over 160 'legacy leases' region wide involving Eglin lands at 'less' than conventional value. In 2007 Eglin announced that it will be the Defense Department's national fore runner of the \_\_\_\_\_ program.

Conversion to 'fair market value' of the 'legacy' leases and the future policy will seriously impact local government's initiative to both support the proposal and sustain current quality of life in the community; particularly with respect to public infrastructure.

The 'legacy' leases involve park lands, waste water treatment, cultural activities and rights-of-way – to mention a few. The near term future involves substantial planning for the total region's sustainability – beaches, major traffic arterials, etc.

The scope of the proposal's impact will necessarily involve substantial local investment. The Air Force policy regarding financial considerations for the public use of its lands should be defined in the EIS document if the proposal is intended to sustain the quality of life in the region.

The Air Force policy regarding this land use should be captured in the EIS. To continue to say that this 'will be announced' is insufficient – it is clearly both a cumulative and future impact of substantial magnitude regarding the proposal.

4. Eglin's current missions and tenants include among others the following (and others):

- 33<sup>rd</sup> Fighter Wing
- 46<sup>th</sup> and 53<sup>rd</sup> wings-conventional weapons testing
- McKinley Climatic Laboratory
- Navy Explosive Ordinance Disposal School
- Security Forces Regional Training
- 20<sup>th</sup> Space Surveillance Squadron
- Amphibious Ready Group/Maine Unit
- Expeditionary Training
- 919 Special Operations Wing – Air Force Reserves

The future mission (proposal) appears to add:

- 7<sup>th</sup> Army Special Forces
- F-35/Fighter Town, USA

From a cumulative impact standpoint if any missions/activities are to be subtracted and move elsewhere, the EIS should document same and present the overall impact within the context of the proposal.

Valparaiso supports the subsistence of all current activities/missions and the full use scenario involving the proposals additions.

5. Any changes to the ‘entrance’ gates at Eglin should be covered in the EIS and not deferred to further study work.

For example, if the 33<sup>rd</sup> Fighter Wing gate on Highway 85 is to be closed then it could possibly substantially increase traffic at the Eglin East Gate (Highway 397 thru Valparaiso) or the West Gate (traffic from Highway 85 from Shalimar/Fort Walton Beach). This is not a ‘design’ aspect of the proposal due to its substantial off-base impacts on traffic.

The impacts should be documented in the EIS.

6. The specific impacts of the BRAC EIS decision making process may likely be less important than the decision itself.

Valparaiso remains disturbed by Air Force announcements regarding the decision making process overall, the Air Force indicating decisions have already been made.

The November, 2007 Air Force handout for Town Hall meetings welcoming public involvement advises:

“The NEPA process allows the Air Force to make informed decisions based on Air Force and community needs.”

“This booklet will describe the three actions proposed by the BRAC 2005 Commission. It will also describe possible alternatives for each action.”

The three BRAC Actions and Alternatives listed in the handout are:

2. Build the JSF JTC and its cantonment,
3. Build the 7SFG(A) cantonment, and
4. Provide training areas for both JSF and 7 SFG (A) personnel.

The community at a Town Hall meeting in Niceville, November 7, 2007 was advised by Mr. Roland (Air Force) that:

- the Deputy Secretary of the Air Force for Installations (Ms. Kathleen Ferguson) is the decision maker;
- that the Air Force is required to consider the 'NO ACTION ALTERNATIVE';
- however, that this (no action) alternative will be a baseline only since Congress has already passed the law, (in other words) the EIS will only address "how" not "if".

If the Air Force is indeed involved in a "how" not "if" mode and has discarded the 'NO ACTION' alternative for Deputy Secretary Ferguson, then the credibility of the process itself has been compromised.

Maybe something is different about BRAC and the BRAC commission's authority with respect to the National Environmental Protection Act of 1969. If that is so, ok. It just makes it more challenging to perceive that the public has real involvement if announcements ask for solely comments on "how" and not "if".

## 7. Project area

Generally, the project area remains undefined to the public.

The proposal's actions as presented in November, 2007 define solely two cantonment areas and a joint training area.

The cantonment areas for the Joint Strike Fighter (JSF) Integrated Training Center (ITC) and the 7<sup>th</sup> Special Forces Group (Airborne) [7SFG(A)] are specifically defined in degree and alternatives involving:

- locations
- acreage
- square feet of construction/demolition/renovation.

What remains substantially undefined is the third element of the proposal, i.e.

"Provide training areas for both JSF and 7SFG(A) personnel."

Unlike the cantonment area proposal inclusive of alternatives with defined limits, the training areas are presented using vast acreage.

Although range training alternatives are outlined for the Special Forces, there is no similar outline for the Joint Strike Fighter with the associated noise and other impacts on the community.

The Air Force did present noise impacts at the November, 2007 Town Hall meeting outlining four alternatives. However, the wide screen presentation was to a scale that discouraged reasonable public comment.

Only when the scale reaches about 1" = 400 feet can anyone locate their home/business/private property and provide informal input. It is estimated that the presentation scale on a large overhead projector was about 1" = 20,000 feet – at which level its difficult to locate even a city.

Valparaiso asked for large scale maps at the Town Hall meeting and later - to date the request remains pending.

The extent of training over lands vs. water should be specifically quantified. It is acknowledged that training over land as opposed to water, that water is probably safer and that fuel usage likely limits training areas. However, training over land also significantly impacts communities such as Valparaiso. For example, touch/go aircraft operations on Runway 19 significantly impact the community.

It is recognized that touch/go operations impacts at Valparaiso may be mitigated by moving them somewhat to outlying fields this should be quantified. However, will 'instrument' training for the F-35 be conducted on Runway 19? Touch/go training with respect to instrument operations should be quantified with respect to Runway 19 vs. any mitigating scenario.