

From: Lofy, Bill
Sent: Wednesday, May 30, 2012 9:49 AM
To: MacLean, Alex; Spaulding, Jeb; Miller, Lawrence
Subject: FW: DHP comments/F-35A Operational Base
Attachments: Draft EIS comments.docx; ATT00001.htm

I'd like to discuss this before you submit it. Alex and Jeb, see attached.

From: <Miller>, Lawrence <Lawrence.Miller@state.vt.us>
To: Bill Lofy <bill.lofy@state.vt.us>
Subject: Fwd: DHP comments/F-35A Operational Base

I am inclined to authorize submittal. Any concerns?

Lawrence Miller, Secretary
VT Agency of Commerce and Community Development
(802) 371-9075

Begin forwarded message:

From: "Colman, Devin" <Devin.Colman@state.vt.us>
Date: May 30, 2012 9:28:02 AM EDT
To: "Mackay, Noelle" <Noelle.Mackay@state.vt.us>, "Miller, Lawrence" <Lawrence.Miller@state.vt.us>, "Peebles, Giovanna" <Giovanna.Peebles@state.vt.us>
Subject: DHP comments/F-35A Operational Base

Hi All,

Attached is a comment letter I have prepared in response to the Draft Environmental Impact Statement (EIS) for the F-35A Operational Wing Beddown at BTV. This letter has NOT been sent yet. These are all preliminary questions/comments and no formal determination of effect on historic resources is being offered at this point. Based on the responses to these questions and continued consultation with the Dept. of the Air Force, we will then be able to fully evaluate potential effects on historic resources and offer a final determination of effect.

The deadline to submit written comments is this Friday, June 1, but if we need more time I can contact the Public Affairs Office to let them know we will be submitting comments at a later date.

Thanks,

Devin Colman
Historic Preservation Review Coordinator
Vermont Division for Historic Preservation
One National Life Drive, Floor 6
Montpelier, VT 05620-0501

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May 29, 2012

Mr. Nick Germanos
F-35A EIS Project Manager
HQ ACCA/A7PS
129 Andrews Street
Suite 102 (Room 337)
Hampton, VA 23665-2769

**Re: F-35A Operational Wing Beddown Draft Environmental Impact Statement
DOD**

Dear Mr. Germanos:

Thank you for the opportunity to comment on the above-referenced project involving the Department of the Air Force (DHP #CH11-070). We received a copy of the Draft Environmental Impact Statement (EIS) on April 9, 2012, and are submitting these written comments for your consideration.

The Division for Historic Preservation is reviewing this proposed undertaking pursuant to 36 CFR 800.4, regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act. Project review consists of identifying the project's potential impacts to historic buildings and structures, historic districts, historic landscapes and settings, and to known or potential archeological resources.

The Burlington Air Guard Station is located within a heavily populated area in the City of South Burlington. Based on the maps showing the proposed noise contour bands for both Scenarios 1 and 2, between 1,700 to 1,800 households surrounding the Air Guard Station will be within the 65 to 85 dB range of noise exposure. This area extends from South Burlington into the adjacent cities of Winooski, Burlington and Williston. All of these communities contain historic buildings and districts, many of which are listed on or eligible for listing on the National Register of Historic Places.

For several years now the Burlington International Airport (BTV) has participated in Federal Aviation Administration's (FAA) "Part 150, Airport Noise Compatibility Planning" program. This program sets forth standards for airports to document noise exposure and establish programs to minimize noise-related land use incompatibilities. In the residential neighborhoods surrounding BTV, noise impacts are being reduced by purchasing and demolishing houses within

the 65 dB noise contour. To date, approximately 144 homes in South Burlington have been purchased and demolished, and another 60 are targeted for removal. Because the majority of the houses in the targeted area are less than fifty years old, there have not been any issues with the demolition of historic structures.

The expanded noise contour map for the F-35s, however, may expose numerous historic structures and districts to noise levels above 65 dB. In order to fully evaluate the potential effects of the proposed project on historic resources, can you please provide answers to the following questions:

1. If the F-35s are based at the Burlington Air Guard Station, will the Department of the Air Force, the Vermont Air National Guard and/or the Burlington International Airport have access to and utilize the “Part 150, Airport Noise Compatibility Planning” program to purchase and demolish homes within the expanded 65 dB noise contour?
2. What level of effort and documentation will be undertaken by the Department of the Air Force, the Vermont Air National Guard and/or the Burlington International Airport to identify and evaluate historic buildings within the expanded 65 dB noise contour?
3. How will the Department of the Air Force, the Vermont Air National Guard and/or the Burlington International Airport ensure compliance with Section 106 of the National Historic Preservation Act if historic buildings within the expanded 65 dB noise contour are proposed for demolition as a noise reduction measure?
4. Can you provide a larger and more detailed map of the areas within the expanded 65 dB noise contour? A map with street names identified will help us better understand which neighborhoods and buildings are included with this area.
5. Will the F-35 flyovers, take-offs and landings produce increased vibrations that could adversely affect historic buildings, specifically masonry structures, within the expanded 65 dB noise contour? If so, can you provide data as to the level of potential vibrations and effects on historic resources, taking into account cumulative effects over several years of exposure?
6. The EIS states that: “There would be no adverse impacts to National Register-eligible archaeological, architectural, or traditional cultural properties.” While this may be an accurate statement with regard to the actual placement of the new F-35s at the Burlington Air Guard Station, it does not address the potential for significant adverse effects on historic resources if houses within the expanded 65 dB will become candidates for purchase and demolition, or if vibrations have the potential to adversely affect historic structures over a long period of time. Will the final EIS take into account these potential effects?

We look forward to continuing our consultation with you on the proposed project. If you have any questions or need clarification regarding any of the above, please do not hesitate to contact Devin Colman, Historic Preservation Review Coordinator, at devin.colman@state.vt.us or 802-

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South Burlington, F-35 Beddown
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828-3043. Mr. Colman reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely,
VERMONT DIVISION FOR HISTORIC PRESERVATION

Giovanna Peebles
State Historic Preservation Officer

Cc: Mary O'Neil, CLG Coordinator, Burlington
Sanford Miller, City Manager, South Burlington
Matt Boulanger, CLG Coordinator, Williston
Katherine R. Decarreau, City Manger, Winooski

