

ATTN: Mr. David Martin, AETC NEPA Program Manager
HQ AETC/A7C
266F Street West, Bldg 901
Randolph AFB, TX 78150-4319

Re: F-35A Training Environmental Impact Statement
Tucson International Airport Air Guard Station

Dear Mr. Martin,

To help ensure that the TIA EIS will withstand legal challenges, it is imperative that analyses of noise impacts be based upon actual flights of F-35As over Midtown Tucson.

We propose the following:

- 1) The flights will include departures and some arrivals, using both 11L and 29R. Because the TUS7 departure is a radar vector route, the test routes will be defined later. The flights will be conducted at the power settings, altitudes, directions, and paths which the F-35As will use when they are assigned to TIA.
- 2) Sound exposure levels will be measured at ground level in each of the affected residential neighborhoods. Measurements will be made directly beneath the flights, and at varying sideline distances.
- 3) To provide a baseline for comparing the F-35A with existing noise levels, sound measurements of the F-16 (PW220) will be made, using identical parameters.
- 4) Data from the measurements will be used to compile a DNL contour map of F-35A operations over Tucson. Data will also be used to compile a map of peak sound exposure levels.

We also propose that, to comply with the requirements of the National Environmental Policy Act, the EIS consider alternative sites that are close to Tucson and are accessible to the Barry M. Goldwater Range. Alternative sites might include the Libby Air Field in Sierra Vista, the Gila Bend Auxiliary Air Field in Gila Bend, and the Pinal Air Park in Marana. While each of these sites might require greater investment in infrastructure than would TIA, none of them would require F-35As to fly over densely populated urban areas.

Sincerely,

[Signatures Attached]