



DEPARTMENT OF THE NAVY
COMMANDING OFFICER
NAVAL AIR STATION
700 AVENGER AVENUE
LEMOORE, CALIFORNIA 93248-5001

IN REPLY REFER TO:

11000
Ser N00/0075
04 Mar 2011

Sharon Kendall
Chairperson
City of Lemoore Planning Commission
210 Fox Street
Lemoore, CA, 93245

Dear Ms. Kendall;

Thank you for the opportunity to comment on proposed incompatible development west of Route 41 and beneath a pre-existing low level Military Training Route (MTR). Allowing proposed residential development underneath an established low level MTR would expose an estimated 850 residents to unnecessary Health and Safety risks by encroaching onto an existing ground control approach flight corridor.

Recently, Naval Air Station (NAS) Lemoore completed the Air Installations Compatible Use Zones (AICUZ) report. Copies were provided to Kings County, Fresno County and the City of Lemoore Planning Departments. The primary goals of the AICUZ program are to protect the health, safety, and welfare of those living and working on or near military installations while ensuring continued flight operations. In addition to providing mission compatible land use tables, the report provided 2020 Prospective Noise Contours for NAS Lemoore.

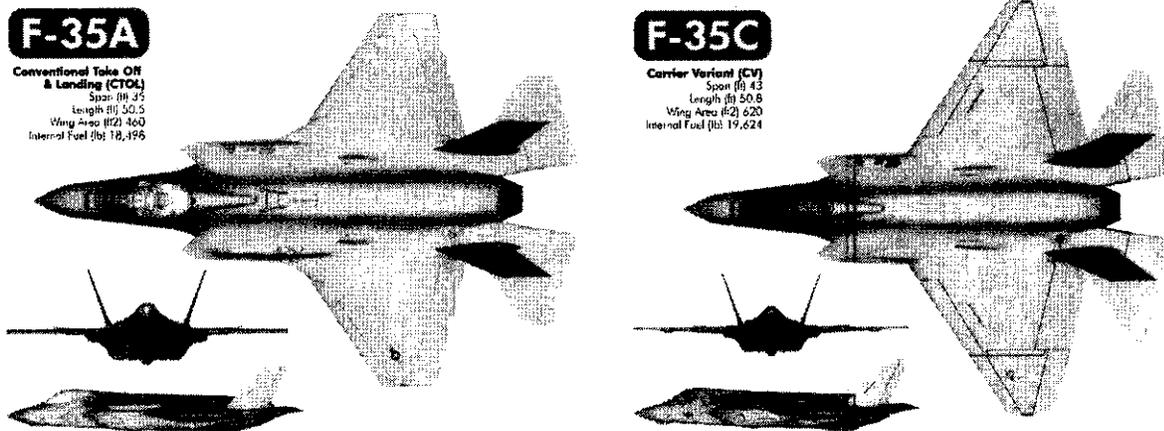
We concur that the proposed development falls within the <65 decibels Community Noise Equivalent Level (CNEL) noise contours. Strictly from a noise level index, the proposed land use would be compatible. However, we contend that allowing for residential construction underneath an existing low level MTR exposes residents to unnecessary health and safety risks, thus breaching one of the primary goals of the AICUZ study.

Amplifying comments for denying residential development underneath a low level MTR are submitted for your consideration;

a. Noise data used to model the 2020 Prospective noise contours at NAS Lemoore included F-18 Super Hornet and Joint Strike Fighter-35A (JSF-35A) noise data. The JSF-35A is the Air

Force's Conventional Take Off and Landing (CTOL) variant, and not the Navy's JSF-35C Carrier Variant (CV) aircraft. Primary differences between the two variant are both size (a larger wing surface area) and weight (4,200 lbs). As part of the Environmental Impact Study of F-35C Homebasing, new contours will be modeled as part of the process.

JSF-35 Characteristics:



US Air Force JSF F-35A CTOL variant	US Navy JSF F-35C CV variant
Length: 50.5 ft	Length: 50.8 ft
Width: 35.0 ft	Width: 43.0 ft
Wing Surface Area: 460 sq ft	Wing Surface Area: 620 sq ft
Weight (empty): 29,036 lbs	Weight (empty): 32,072lbs
Internal Fuel: 18,498 lbs	Internal Fuel: 19,624 lbs

b. The AICUZ study contours are produced utilizing a 24 hour CNEL. CNEL measurements are a weighted average of sound levels gathered throughout a 24-hour period. This is essentially a measure of ambient noise. Different weighting factors apply to day, evening, and nighttime periods. This weighting recognizes that community members are most sensitive to noise in late night and evening hours than in daytime hours. CNEL depends not only on the noise level of individual approaches, but also on the number of approaches during the measurement period.

c. Contrary to the weighted average represented by CNEL, the Single Event Level (SEL) represents a single-event noise. SEL is the maximum sound level produced by an individual approach over-flight at a particular measuring point. During routine flights over the proposed development area, SEL sound levels ranged between 100 decibels to 115 decibels. This noise is comparable to that produced by a riveting machine and experienced at the operator's position.

d. The Lemoore's adopted 2008 Environmental Impact Report (EIR) for future residential development. The EIR predicts that up to 23 percent of the population or over 7,000 people in the developed areas will be "highly annoyed" and states that future impacts will be both "significant and unavoidable" if the areas are developed as proposed.

Historically, encroachment threatened the future of a military installation, leading to closure or to increased restrictions on the installations activities. Again, the Navy defines encroachment as any non-Navy action planned or executed that inhibits, curtails, or possesses the potential to impede the performance of Navy activities. Employment statistics from Kings County Economic Development Corporation indicate that unemployment rates for Kings County teeter at over 14 percent. Additionally, they indicate that, Employment by Industry, "Government" is the largest employer in the region. As indicated in the 2008 NAS Lemoore Economic Impact Assessment, the installation contributes over \$1B to the local economy. Additionally, NAS Lemoore provides some 13,500 full-time jobs, over 23,000 part-time jobs and provides support service to over 8,000 retired military veterans and their families. The Navy and the City should continue to work together in order to maintain NAS Lemoore's strategic and economic capacity now and in the future.

My staff and I appreciate your consideration and look forward to working with the Planning Department. I'm confident that together, we will find alternatives which will allow our community to grow, provide for the health and safety of our citizens, and allow our installation to continue operating in a safe and encroachment free operating environment.

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My point of contact for this matter is Mr. Roman V. Benitez,
who can be reached at (559) 998-2939 or roman.bentiez@navy.mil.

Sincerely,


JAMES R. KNAPP