

Date: December 28, 2016
To: File
From: Dan Albrecht, Senior Planner

Re: Responsiveness Summary
Public comments on June 22, 2016 draft of Chittenden County Multi-Jurisdictional All-Hazards Mitigation Plan

A) Eight Comments on current and pending fighter jet operations at Vermont Air National Guard Base located at Burlington International Airport in the City of South Burlington

With regards to the pending basing and operation of the F-35 jet, commenters primarily expressed concerns that the Plan did not discuss the potential impacts in the event of a crash namely concerns over toxic substances released given the percentage of composite materials used in the jet's construction and concerns over adequacy of training and response capability of the VT Air Guard Fire Department and of local Fire Departments who would provide mutual aid. Another commenter also expressed concerns about the VT Air National Guard's current use of firefighting foam and its impacts to water quality and the expanding DNL/crash zone for F-16s/F-35. Another commenter expressed concern about the long-term impacts to the population, economy, loss of business and housing, etc. if a crash resulted in a contaminated and cordoned-off military crash area.

Response: To address these comments, additional text was added to Section 2.2.6. This text reads in part as follows:

The reader should first note that Preparedness, Response and Recovery are the Emergency Management functions by which this hazard is primarily addressed. Addressing the issue of the potential hazards of both civilian and military aircraft operations is currently a multiparty endeavor.

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For the purposes of how to address this concern, first and foremost it is useful to emphasize that this MJAHP concerns itself with Regional Mitigation Strategies. At the regional level, the CCRPC and the Local Emergency Planning Committee #1 have taken no formal position on the pending basing and operation of the F-35 fighter. The two primary municipalities that have engaged in extended discussions and public debate are the City of Winooski and the City of South Burlington. Further discussion of the concerns expressed in the comments received is addressed in those respective, municipal AHMPs.

In short, concerns expressed about F-35 operations are first, best addressed outside of the realm of mitigation and second, as comments are focused potential impacts within discrete municipalities, further discussion of these concerns is best addressed in those local hazard mitigation plans if desired by those municipality's governing body. Final drafts of those local plans will be developed by

CCRPC staff in consultation with municipal staff in January 2017 prior to submission to FEMA for formal review.

B) One comment about potential impacts of a railcar spill along Lake Champlain in Burlington

Response: To address these comments, additional text was added to Section 2.2.6. This text reads in part as follows

The reader should first note that Preparedness, Response and Recovery are the Emergency Management functions by which this hazard is primarily addressed by municipalities. Most important to understand, however, is that municipalities and the State have no authority over rail operations. By operation of federal law as set forth in the Interstate Commerce Commission Termination Act (49 U.S.C. §10101 et seq.) the United States Congress has granted regulatory authority of railroads to the U.S. agency known as the Surface Transportation Board (the “STB”). Railroad operations and safety are regulated by the Federal Railroad Administration (the “FRA”). While there have been one or two trainings regarding rail operations and incidents, there are no continuing education efforts. CCRPC has encouraged the Vermont Division of Emergency Management and Homeland Security and other relevant entities to provide, 1) ongoing opportunities for emergency response training, and 2) funding for the appropriate emergency response equipment and materials for the communities along these routes.

C) One comment about noise impacts to human health from F-35s and from other sources

Response: To address these comments, additional text was added to Section 2.3. This text reads in part as follows:

While acknowledging the commenter’s concerns, CCRPC feels that it is not appropriate at this time to elevate “Noise Pollution” to that of a profiled hazard for several reasons.

First, while there are undoubtedly some studies and research in Vermont regarding its hypothetical and/or documented effects (especially due to the debate over wind turbine operations) noise pollution is not identified in the 2013 Vermont State Hazard Mitigation Plan as a hazard. Second, the CCRPC is not aware of any consistent data set regarding noise levels in the County by which to be able to assess the Location, Extent and Impact of this hazard. Foremost, it was not identified by municipal staff or representatives as significant enough to warrant in this MJAHP an extended description, a risk assessment and vulnerability assessment and ultimately the development of discrete municipal mitigation actions. Third, it is worth noting that some municipalities in the County have Noise Ordinances to regulate noise emanating from private residences and businesses. Fourth, further discussion of noise hazards is limited to relevant municipal AHMPs.

D) One comment suggested additional detail be added about Epidemics

Response: To address these comments, additional text was added to Section 2.3.1.6. This text reads in part as follows:

It is primarily the Vermont Department of Health (VDH) rather than municipal governments to

implement emergency management measures (Preparedness, Mitigation, Response & Recovery) with regards to Epidemics. Concerns about avian influenza in 2006 prompted the Vermont Department of Health to issue a report, the Pandemic Preparedness and Response Plan, outlining the state's response to an influenza epidemic. In Chittenden County and across the state, discussions, workshops, and conferences about pandemic planning took place in 2006 and 2007. Some public education efforts regarding epidemics have been made, most notably in Burlington. Local authorities and private entities have expressed interest in more pandemic planning, particularly in response to the H1N1 pandemic in 2009. Municipal officials are concerned about how to operate if a large portion of the workforce is incapacitated. There is also concern over how to distribute supplies, enforce quarantines, keep critical personnel from becoming ill, and disseminate information in the case of an epidemic. Local colleges and universities are particularly concerned about the issue, as they would have to decide whether to send students home or keep them in Chittenden County. More recently, in 2015, VDH conducted a TB clinic in a local public school in the county and also carries out "Reportable Disease" surveillance, (see <http://healthvermont.gov/prevent/IDN/archive.aspx> for more information.

E) Two comment on solar storms and their potential to cause power outages

Response: To address these comments, additional text was added to Section 2.1.1.7. This text reads in part as follows:

The reader should first not that Preparedness, Response and Recovery are the Emergency Management functions by which this hazard is would primarily addressed by municipalities. In terms of Mitigation that is best carried out by the utilities (power, telecommunications, etc.) which operate the systems vulnerable to solar storms.

*-Note that one of these comments also referenced cyber-attacks/sabotage as a potential cause of power outages.

F) One question asked how FEMA would be involved in an economic recession

Response: No text was added to the Plan to address this inquiry. CCRPC staff inquired of FEMA staff of how best to address this question but received no reply at this time. CCRPC staff will inquire of FEMA again how best to address this inquiry.