

28 June 2006

Mr. James R. Mitchell
Director, Community Initiatives Team
56th Fighter Wing
14185 West Falcon Street
Luke AFB AZ 85309-1629

Mr. Harvey Krauss
City of Goodyear
P.O. Box 5100
Goodyear AZ 85338

Re: Case #06-52000032 Palm Valley Phase IX

Dear Mr. Krause

Thank you for the opportunity to provide additional comments on the Final Plat Application for Palm Valley Phase IX. We appreciated the opportunity to be invited to participate in the May 8, 2006 City Council Meeting concerning the Palm Valley Phase IX Development. We had an opportunity to present our concerns regarding the affects of building a residential and industrial development in close proximity to Luke AFB, including the Munitions Storage Area and Jet Engine Test Pad. We realize that the City Council Members voted to approve the Final Zoning and Preliminary Plat Development of Palm Valley Phase IX, but we wanted to ensure that the inherent dangers involved with the location of this development are completely understood. The industrial parcel is located inside the 65 Ldn, while the residential parcels are located up to 1/2 mile outside the 1988 JLUS 65 Ldn, "high noise or accident potential zone," as identified by A.R.S. § 28-8461 and is within the "territory in the vicinity of a military airport," also defined by A.R.S. § 28-8461. The residential units are also located adjacent to and within 1/2 mile of the Luke AFB Munitions Storage Area Quantity Distance (QD) arc.

Due to the location of Palm Valley Phase IX, adjacent to the Munitions Storage Area and High Noise or Accident Potential Zone, we believe further comment is warranted. The property is located adjacent to the Luke AFB high-explosive munitions storage area as well as less than a mile from our jet engine maintenance test pad. Although all residential dwellings are sited outside the QD arc, this does not guarantee that there will be no structural damage, injuries, or even fatalities if a mishap were to occur. The QD arc represents only an area outside which structural damage from overpressure is expected to be minimal. If a mishap should occur, the risk of some structural damage is still present, as well as the risk of bodily injury and possible fatalities from flying debris.

Additionally, while the dangers inherent with an explosive storage area are intuitive, the environmental issues concerning the jet engine test pad may not be as obvious. The jet engine test pad is required for routine maintenance and testing on our aircraft engines, often late into the evening hours, usually at full power settings. The peak single event noise level will far exceed the 24 hour average that the 65 Ldn noise contour is based upon. Mission requirements at Luke AFB require that we utilize the jet engine test pad late into the evening hours which will present a **significant** irritant for the future residents of Palm Valley Phase IX. Luke AFB currently receives numerous calls from citizens concerning the noise generated by the jet engine test pad negatively impacting their daily life. These calls are received from residential housing as well as the health care facility at the corner of Camelback and Litchfield roads.

If after consideration of these concerns, the City of Goodyear chooses to approve the development as submitted, special consideration must be made to mitigate the safety and noise issues. We recommend you review the sound attenuation requirements found in A.R.S. § 28-8482 and use those requirements as a bare minimum. Consideration should be given to potential blast effects in the layout of the development and design of the structures. In addition, a strong notification program on the part of the applicant is essential to inform potential residents about Luke AFB operations. We also recommend a review of the Luke AFB web site at <http://www.luke.af.mil>, Community Interests and Community Initiatives links, for further information.

If you have any questions, please contact my Community Planner, Mr. Bob Dubsy, at (623) 856-6195.

Sincerely

JAMES R. MITCHELL

cc:

Colonel Randell S. Meyer, Vice Commander, 56th Fighter Wing
Mr. Steve Cleveland, City Manager, City of Goodyear
Mr. Jay Ellingson, Suncor Development
Mr. David Kanning, Planner, City of Goodyear