

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

Ms. Lucia Soto  
City of Goodyear  
195 N. 145th Avenue, Building D  
Goodyear AZ 85338

Re: Case #15-50000002, Enclave at Palm Valley North

Dear Ms. Soto

Thank you for the opportunity to provide comments on the First Review Preliminary Plat Application for Enclave at Palm Valley North. This proposed site is on 8.1 acres located on the north side of Camelback Road approximately ½ miles west of Litchfield Road in Goodyear AZ and is an addition to the larger 80.36 acre Palm Valley Phase IX development. It is located less than 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 proposed residential units will also be located adjacent to and within 1/2 mile of the Luke AFB Munitions Storage Area (MSA) Quantity Distance (QD) arc.

The request is to develop the additional 8.1 acres with an attached “townhome” type product and will add an additional 48 lots; bringing the total number of lot to 267 in Palm Valley North. Luke AFB follows the guidelines in the Graduated Density Concept (GDC). The GDC proposes, in the absence of a more restrictive state, county or municipal general or comprehensive plan, graduating densities away from the 65 Ldn as follows: a maximum of 2 du/acre from the 65 Ldn to 1/2 mile, a maximum of 4 du/acre from 1/2 mile to 1 mile and a maximum of 6 du/acre from 1 to 3 miles. Enclave @ Palm Valley, with a density of 5.9 du/acre will not fall within these guidelines.

Of even greater concern is the close proximity to the Luke AFB, MSA DQ arc and Jet Engine Test Pad. On May 8, 2006, Luke participated in the City Council Meeting for the Palm Valley Phase IX Development and presented its concerns regarding the safety of building a residential development close to the MSA DQ arc and Jet Engine Test Pad. Despite these concerns the City Council Members voted to approve the Final Zoning and Preliminary Plat Development of Palm Valley Phase IX. On June 28, 2006, Luke sent the attached letter to reiterate the inherent dangers involved with the location of this development.

Luke's concerns remain the same as the inherent dangers have not changed; 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 the Enclave at Palm Valley. Luke AFB currently receives 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 and the associated inherent dangers, 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, Ms. Barbara Plante, at (623) 856-9981.

Sincerely

JAMES R. MITCHELL

Attachment: Luke AFB Letter dated June 28, 2006

cc:

Colonel Jeremy T. Sloane, Vice Commander, 56th Fighter Wing

Ms. Cindy L. Calderon, GS-13, General Environmental and Law Attorney, 56th Fighter Wing