November 6, 2013

The Honorable Eric K. Fanning
Acting Secretary
United States Air Force
1670 Air Force Pentagon
Washington, DC 20330-1670

General Mark A. Welsh III
Chief of Staff
United States Air Force
1670 Air Force Pentagon
Washington, DC 20330-1670

Dear Secretary Fanning and General Welsh:

As the civilian and military heads of the Air Force, you are in the process of selecting the first National Guard base at which to beddown the F-35A Lightning II, also known as the Joint Strike Fighter. This decision follows a long review of hundreds of base locations around the country. In 2010, the Air Force identified Burlington Air Guard Station in South Burlington, Vermont, as the preferred alternative to host the F-35A.

News reports indicate that your final decision is expected soon, even though the aircraft would not begin to beddown until at least 2015, and the entire contingent of aircraft would not arrive until at least 2020. We are writing to strongly urge you to delay this decision until the F-35A’s safety record is better established, especially since the Vermont location is in a residential area.

In 2009, when the Air Force announced its criteria for the base selection process, Deputy Assistant Secretary Kathleen Ferguson stated that, “Ensuring affected communities are involved, know what to expect and understand timelines for development are critical to the end process of basing all future Joint Strike Fighter aircraft.” We couldn’t agree more. However, the timelines for development continue to slip.

For the record, POGO has long raised concerns about this troubled program. We have recommended replacing the B and C variants of the F-35 with less costly, more reliable aircraft such as the F/A-18E/F. We have also called attention to and recommended ending concurrent testing, development, and production, and no more production until operational testing and evaluation are complete.

Concern has been raised by local Burlington residents and those from surrounding communities about the prospective safety and maturity of the F-35A by 2020, the year by which the Air Force expects the beddown of F-35As to be completed.

The Vermont Air National Guard, the unit located at Burlington Airport, has demonstrated an incredible safety record flying its current fleet of F-16s. This aircraft has been in service for more
than forty years and has matured into a very safe plane. However, this was not always the case. When the F-16 had logged a cumulative 25,000 flying hours, it crashed 25 times as often as it does today. Once the F-16 had logged 100,000 flying hours, it had a cumulative major accident rate of 17 times per 100,000 flying hours. When the F-16 came to Burlington, it had accumulated around 1 million flying hours and had a cumulative major accident rate of 7. And now, with 12 million fleet hours under its belt, the F-16’s cumulative major accident rate is down to 3.55.

As military aircraft mature and aviators become more trained and comfortable with flying these jets, their safety record typically improves. According to the Final F-35A Operational Basing Environmental Impact Statement (Final EIS), “historical trends show that mishaps of all types decrease the longer an aircraft is operational as flight crews and maintenance personnel learn more about the aircraft’s capabilities and limitations.”

That’s why the Air Force and Navy typically station new fighter aircraft in desert locations or near the ocean away from residential communities. Yet, Burlington Airport is surrounded by several residential communities, including those of South Burlington, Winooski, Williston, Burlington, Colchester, Essex, and Essex Junction.

During the environmental impact statement review process, some Burlington area residents expressed concern about the high composite constitution of the F-35A. Unlike the F-16, which is comprised of roughly two percent composite material, 42 percent of the F-35’s weight is composite material. As you know, composite materials are highly flammable and difficult to extinguish. In fact, when a B-2A crashed in Guam in 2008, it reportedly took firefighters more than two days to fully extinguish the blaze.

Air Force and Vermont Air National Guard officials responded to this concern by pointing out that local and Guard first responders are fully trained in extinguishing composite-fueled fires and dealing with other hazardous material incidents. However, it should be noted that besides the Guard, there is no civilian fire department located at Burlington Airport.

Besides the high amount of flammable composite structural material used in the F-35A, the aircraft is also covered in a highly toxic stealth coating layered over the composite material. This stealth coating adds to the toxicity of the aircraft’s composite material. When the stealth coating of an F-117 was burned at the facility known as “Area 51” in the 1980s, two employees died and five more were permanently disabled by the toxic fumes.

The Final EIS states that the “Air Force must ensure that the F-35A receives thorough, intensive testing and evaluation for its effective and safe operation.” We couldn’t agree more. However, recent testimony provided by Dr. William LaPlante, Principal Deputy Assistant Secretary of the Air Force (Acquisition), casts additional doubt on the reliability of current testing and evaluation schedules.

On October 23, 2013, Dr. LaPlante testified that automatic spending reductions, known as sequestration, could “require a reduction of up to $110 [million] from the F-35A development program, forcing delays to dedicated development test and evaluation flights through 2014.”
As you know, in Fiscal Year 2013, the Pentagon was able to protect the F-35 program from sequestration by using prior-year funds to shore up the program. As Dr. LaPlante notes, though, in Fiscal Year 2014, the F-35A will begin to undergo the first of what could be many years of spending reductions.

Since passage of the Budget Control Act in 2011, senior military leaders and the White House have encouraged Congress to void sequestration and bolster the Pentagon’s budget to no avail. In fact, just last week, the Chief of Naval Operations, Admiral Jonathan Greenert, referred to sequestration as “the law of the land,” to which the military services must now budget accordingly.

Next year, the Pentagon will submit two budget requests, one that adheres to post-sequester levels and another that continues from the President’s Fiscal Year 2014 budget request. In essence, senior military planners are acknowledging that sequestration is here for at least the foreseeable future. And just two weeks ago, Dr. LaPlante acknowledged formally sequestration’s likely impact on the F-35’s immediate future.

Last month, Lt. Col. Chris Caputo of the Vermont Air National Guard discussed the F-35’s safety record during a press conference in Vermont. Lt. Col. Caputo indicated to attendees that the F-35 will have logged 750,000 flying hours by the time it would beddown in Burlington. However, these estimates appear not to take into account the emerging effects of sequester spending reductions. In fact, it is becoming quite clear that the number of flying hours will not come close to those numbers in the foreseeable future.

Lt. Col. Caputo’s 750,000 hour estimate includes a totaling of flying time for all three variants of the F-35, even though commonality amongst the variants has fallen to just 25 percent. The program originally called for 70-90 percent commonality. In comparison, F-16 variants have near 100 percent commonality.

Separately, POGO has obtained electronic correspondence from an Air Force official, in which they state that the F-35A will have only logged approximately 28,000 hours of testing, and over 300,000 hours of training and operational flying by 2020. Pierre Sprey, a POGO founding adviser and one of the architects of the A-10 and F-16, puts the number of flying hours likely logged by 2020 at closer to 90,000-110,000.

In such an uncertain budgetary environment, in which the Department’s overall spending has declined for the first time in over a decade, with what level of confidence can you estimate the number of flying hours that the F-35 will have logged seven years from now?

Indeed, given that the F-35A would not arrive in Burlington until at least 2015, and the beddown would not be completed until 2020, there should be no rush to make a decision on the selection of an Air National Guard location for the F-35A. Furthermore, according to the Final EIS, infrastructure construction necessary for the F-35’s beddown would not begin at the Burlington International Airport until 2016, and is not expected to take longer than one year to complete.
As is noted in the Final EIS, “the Air Force must ensure this initial beddown provides a solid start to the program.” That’s why we strongly urge you to delay selecting a location for the F-35A’s operational beddown until the aircraft has logged a significant number of flying hours and until its safety record has been demonstrated.

Given myriad uncertainties with the Joint Strike Fighter program and other troubling concerns, and specifically future funding levels for testing and flight hours, it is clearly prudent to delay the basing decision for this unproven aircraft program. It is irresponsible for you to rush to beddown this immature aircraft in a residential zone. If you believe there is indeed some urgency, then you should not needlessly endanger the local population and should follow past precedent and place the F-35A in a less dangerous location.

Sincerely,

Danielle Brian
Executive Director