

Date: March 6, 2024
To: Kimberly Jones, Director, Dane County Regional Airport
Cc: Dane County and City of Madison Government Officials
From: Safe Skies Clean Water Wisconsin
Subject: Comments on Draft Part 150 Noise Compatibility Program

Thank you for providing an opportunity to review the draft report for the Noise Compatibility Program (NCP) dated February 2024 for the Dane County Airport. On behalf of Safe Skies Clean Water Wisconsin, I am providing the following comments which we hope will be addressed before finalizing the report.

Below is an introduction and summary of our comments and recommended improvements to the draft NCP. Further discussion and explanation are provided afterwards.

Introduction

The draft NCP is long on promises, and short on delivery. It repeats many of the failures of the current NCP prepared in 1991. Without significant changes to the draft NCP, Madison residents cannot not expect significant reduction in noise exposure from commercial and military aircraft using the Dane County Airport and Truax Field.

The draft NCP, like the current NCP prepared in 1991, assesses noise impacts using unreliable computer modeling to predict compliance with the 50-year old daily average FAA standard of 65 dB DNL. It fails to consider impacts at lower noise levels, or the instantaneous ear-splitting noise of the F-35 fighter jets.

The draft NCP relies on voluntary changes to flight patterns with no verification these changes will be followed. The current NCP has already failed to implement similar flight patterns. To save the airport money, the draft NCP eschews actual noise abatement measures used by other airports like home purchase, resident relocation, and installation of home and building noise insulation. The draft NCP does not even recommend purchase of the mobile home park adjacent to the main runway.

To avoid the construction of incompatible land uses, the draft NCP proposes a new and larger Airport Affected Area. However, the airport will not verify that the county and City of Madison will actually adopt and implement this area for future planning. The airport will continue to pass the buck and take no active role in the elimination or cessation of low-income housing near the airport.

The draft NCP does not evaluate the most effective noise abatement measures available to the county. These include relocation of the nearly 100-year old county airport out of Madison, and finding a new, more compatible mission for the 115th Fighter Wing of the Wisconsin Air National Guard that does not require F-35 fighter jets flying over Madison.

Summary of Comments and Recommendations

1. The draft NCP should be updated to include a disclaimer which summarizes all the shortcomings of the enclosed noise analysis. These include the use of an outdated noise standard, predictions of noise exposure based on unverifiable flight patterns, no

confirmation that noise measures will actually be followed, and avoidance of county airport expenditures for actual noise abatement measures such as relocation or noise insulation.

2. The draft NCP was prepared by advocates for the airport and development. It is based on an outdated FAA noise standard, relies on voluntary cooperation of airport users, provides no means to verify plan effectiveness, and offers no actual relief to those most impacted by airport noise. If the protection of Madison residents is the goal, the draft NCP report should be rejected and we should re-start its preparation.
3. The open house hosted by the airport on February 20th, does not meet the requirements for a public hearing as stated in the draft NCP. The public comment period on the draft NCP should be extended to allow the airport to host an actual public hearing and meet with impacted environmental justice communities.
4. Many of the noise abatement measures in the current 1991 NCP were not implemented and many of the new measures in the draft NCP are voluntary. The draft NCP should be updated to include an evaluation of compliance every six months. Since airport management does not have the skills or commitment, these evaluations should be conducted by an independent contractor. A public report should be released with each new evaluation and reviewed with the Noise Advisory Committee, if it is reactivated.
5. The draft NCP proposes a new Airport Affected Area to avoid the construction of incompatible land uses. The current Area adopted in 1991 was never accepted and implemented by the City of Madison. It appears nowhere in the City's Comprehensive Plan. As a result, incompatible land uses have already been constructed. The new Area is shown in Figure 3-2 of the draft report, and is a positive step since this new Area extends much further than the current area. However, it is also sad that we must sacrifice so much land to accommodate the presence of the 100-year old airport. The draft NCP should be updated to require the airport to verify that Dane County and the City of Madison actually adopt and implement the new Airport Affected Area. This new area should be incorporated into the City's Comprehensive Plan.
6. The draft NCP should be updated to require the airport to review all future developments within the Airport Affected Area and verify the development is compatible with the goal to reduce noise exposure.
7. Avigation easements as promoted in the current NCP, provide a one-time payment to land owners with no protection from noise exposure. The draft NCP should be updated to replace these easements with the offer to purchase properties and pay for relocation of residents.
8. Since the current FAA standard of 65 dB DNL is outdated and inadequate to protect surrounding residents from excessive noise exposure, the sales assistance program in the NCP should be extended to single family homes within the 60 dB DNL noise contour similar to the threshold used by the Minneapolis-St. Paul International Airport.
9. Since the adoption of the current NCP, we have learned that exposure to aircraft noise reduces the educational performance of students at noise levels well below the 65 dB DNL noise contour used by the airport. The draft NCP should be updated to provide sound insulation, air conditioning and air conditioning operating costs to all schools located within the new boundaries of the Airport Affected Area.
10. The draft NCP rejects the operation of a noise monitoring system due to cost. The airport has no shortage of funds. It should install a noise monitoring system as other airports have done to measure actual noise exposure and determine the effectiveness of any noise

abatement measures. Since the F-35 fighter jets generate noise which vibrates buildings and the bodies of people, the monitors should measure both the standard A-Scale based on our hearing range but also the C-Scale which measures the vibration frequencies.

11. The draft NCP does not include any actual noise monitoring conducted by the airport. In our December 7, 2023 email to you, we summarized two years of actual noise measurements collected by the neighborhood monitoring network. The measurements suggest the airport has under-estimated the peak noise levels of the F-35 fighter jets and the noise contours in the draft NCP are placed too close to the airport. Prior to finalizing the NCP, the airport should review our measurements, and make necessary changes to the noise predictions.
12. The draft NCP provides no relief for the residents of the Oak Park Terrace mobile home park adjacent to the main runway of the airport. This is a prime example of the airport's unwillingness to protect surrounding residents and the airport's continued promotion of environmental racism and injustice. The draft NCP should be updated to propose finding new homes for the residents of the mobile home park and purchase this property for a more suitable land use.
13. The draft NCP should be updated to establish a regular schedule to update the noise contours and the NCP itself. Since airport management has ignored these requirements in the current NCP, an independent consultant should be hired to verify compliance.
14. The draft NCP should be updated to require that a summary of noise complaints including the response to each complaint. This summary should be published on a regular basis both on the county airport web site but also in a report to local media.
15. The draft NCP should be updated to require outreach to the community to solicit suggestions for improving the complaint submission and response procedures.
16. It is good the Noise Advisory Committee may be reactivated after a five-year absence. To be more productive, this committee should include representatives with knowledge of noise impacts on public health and education, and an independent contractor familiar with the NCP who can report on the continued compliance and effectiveness of the NCP with recommendations for improvements.
17. Due to the wealth of information and community feedback that will be obtained from the current WANG Madison F35 Connection Project, we hope the county airport will delay the completion of the draft NCP and postpone its submission to FAA for approval. There may be concerns and noise abatement options discussed during the Connection Project that have not yet been considered by the airport. Any shortcomings in the new NCP will adversely affect the health and well-being of current and future Madison residents.
18. Our community would avoid the costs and impacts of increased aircraft noise if a new mission were found for the 115th Fighter Wing similar to the Air National Guard units in other states like Iowa and Ohio. There are over 40 missions available to the 115th Fighter Wing that do not require the use of the F-35 fighter jets. This noise abatement option was not evaluated by the draft NCP. It should be updated to evaluate the benefits and procedures for requesting a new mission for the 115th Fighter Wing.
19. The county airport has been located in Madison for nearly 100 years. The current NCP was prepared in 1991. Rather than once again attempt to reduce the noise impacts of the county airport, the draft NCP should include an evaluation of the feasibility of relocating the county airport. Examples like Austin and Denver can be evaluated to show how the former airport site can be developed to provide urban infill. New locations can be identified that don't

expose thousands of people to unhealthy noise, consume valuable urban land, or continue to contaminate our drinking water and Yahara Chain of Lakes with PFAS.

20. Appendix F: Public Comments of the draft NCP states: "Public comments will be included in this appendix after the public review period." Besides comments on the draft NCP, this appendix should provide copies of comments submitted earlier in the Part 150 process including the noise exposure map. Many of these comments relate to the content of the NCP. This will assure a complete record of public comments is provided.
21. The draft NCP should be updated to explain FAA procedures for the public to challenge the legality and effectiveness of the final NCP. This would include procedures such as filing a complaint or a petition for administrative review.

Overview

The Air Force provided no funds for noise mitigation even though the \$1.5 billion squadron of F-35 fighter jets it deployed to Madison have dramatically increased noise exposure in our city. Instead, the Air Force relied on the county airport to update its Part 150 noise mitigation plan including the draft NCP. We represent many of the people who live near the county airport and Truax Field.

Many of us have lived here for decades so are familiar with the history of the airport and its attempts at noise mitigation. We followed the airport's progress as it updated its Part 150 plan, preparing the noise exposure map and noise compatibility program. With the time consuming involvement of numerous government agencies and costly independent consultants, we hoped for concrete steps to reduce noise exposure of surrounding residents. Based on our review of the draft report and experience with prior noise abatement efforts, we doubt this new program will result in significant reduction in noise exposure.

The 2024 draft report reviews airport compliance with the current NCP developed in 1991. It was determined that many of the noise mitigation measures in the current NCP were either implemented poorly or not at all. With no oversight, airport managers ignored the current NCP. Without any means to regularly review compliance with the new NCP, airport managers will likely ignore this new plan.

The new NCP continues reliance on flight patterns using voluntary cooperation of commercial and military airport users. However, the new NCP again fails to provide procedures to verify compliance with these flight patterns. Our own experience shows these flight patterns are easily ignored. To save a few dollars, there will be no noise monitoring to measure current and future actual noise exposure.

The allocation of noise mitigation funds, if any, are based solely on computer predictions and ignores the two years of actual noise monitoring provided by surrounding neighborhoods. Computer predictions rely on an outdated daily average 65 decibel DNL noise standard developed over 50 years ago, which fails to address the health and educational noise impacts at lower noise levels, or the loud, instantaneous noise people actually hear. As a result, the majority of the people impacted by airport noise, there are 60,000 within 3 miles, are ignored in the NCP. Neither our homes or schools will receive any noise mitigation.

Notably, the neighborhood most impacted by airport noise, the mobile home park next door to the main runway, will not be relocated or received any noise mitigation. The draft NCP provides no

evaluation of the environmental racism and environmental injustice created by airport noise, or the ongoing expansion of low-income housing next to the airport.

This draft NCP was developed behind closed doors by a committee of airport and development proponents. The committee included no public representatives or advocates, or professionals knowledgeable in health and education impacts of noise exposure. Public comments on the noise exposure maps, modeling procedures, and noise mitigation methods were mostly ignored.

The draft NCP was prepared by advocates for the airport and development. It is based on an outdated FAA noise standard, relies on voluntary cooperation of airport users, provides no means to verify plan effectiveness, and offers no actual relief to those most impacted by airport noise. If the protection of Madison residents is the goal, the draft NCP report should be rejected and we should re-start its preparation.

Recommendations

Add a Disclaimer to the NCP

This study evaluates compliance with the FAA noise standard of 65 dB DNL. This standard was developed over 50 years ago and is based on 15% of people being highly annoyed to aircraft noise. As part of its recent Neighborhood Environmental Survey, FAA created a National Curve which shows 15% of people are now highly annoyed at 50 dB DNL or lower. Aside from annoyance, noise exposure has numerous adverse effects verified by scientific studies that are not considered. This study does not address hearing loss; tinnitus; sleep disruption; stress; cardiovascular disease; cerebrovascular disease; metabolic disturbances; exacerbation of psychological disorders; premature mortality; reduced cognition, learning, achievement and productivity; and, increased behavior problems and violence. This study does not address the lost desirability of surrounding neighborhoods, reduced quality of life, or lower property values. This study does not address the long-term concentration of low-income and families of color in neighborhoods immediately adjacent to the county airport, or the current expansion of low-income housing in these neighborhoods. The NCP should be updated every five years to account for any changes in the FAA noise standard, surrounding land use, and compliance with noise abatement measures.

The draft NCP should be updated to include a disclaimer at the beginning of the report which summarizes all the shortcomings of the enclosed noise analysis including the use of an outdated noise standard, predictions of noise exposure based on unverifiable flight patterns, no confirmation noise measures are actually followed, and its goal to minimize any county airport expenditures on actual noise abatement measures such as relocation or noise insulation.

Inadequate Opportunity for Public Review

This draft NCP was developed behind closed doors by a committee of airport and development proponents. The committee included no public representatives or advocates, or professionals knowledgeable in health and education impacts of noise exposure.

The Sponsor's Certification at the beginning of the draft NCP states:

It is further certified that adequate opportunity has been afforded to interested persons to submit their views, data, and comments concerning the formulation and adequacy of the NCP Report and the supporting documentation. The required public hearing was held on February 20, 2024 to obtain public comments related to the County-recommended NCP measures.

There are many people who live within the proposed Airport Affected Area who were not contacted about the draft NCP and the opportunity to comment. Most of the 60,000 people who live within 3 miles of the county airport were not contacted about the draft NCP and the opportunity to comment. Far more people that were not contacted live within the Part 150 Overview: Draft Study Area which extends 4 miles from the airport.

The open house held on February 20th at the airport terminal does not qualify as a “public hearing”. There were no presentations to the public, or opportunity for the public to ask questions where other residents could hear the questions and answers.

There was no effort to reach out and engage with environmental justice communities including low-income and minority residents who are the most impacted by airport operations and might not have the ability to travel to the airport for the open house. “Adequate opportunity” was not afforded to interested persons to submit their views, data and comments.

The open house hosted by the airport on February 20th, does not meet the requirements for a public hearing noted in the draft NCP. The public comment period on the draft NCP should be extended to allow the airport to host an actual public hearing and meet with impacted environmental justice communities.

Conduct Regular NCP Compliance Evaluations

The current NCP adopted in 1991 includes many noise abatement measures. The 2024 NCP conducted the first evaluation of compliance with the 1991 NCP since it was first adopted. Because it has taken over 30 years for the airport to review its compliance with the 1991 NCP, many of the measures proposed in 1991 were either ignored or poorly implemented by the airport, county or city.

Table 2-2 presents 1991 noise abatement measures. One of the seven was not implemented. Compliance with the remaining is rated at low to medium. Table 3-2 presents 1991 land use measures. Seven of the eleven land use abatement measures were never implemented by airport management during the past 30 years. Examples include: adding noise insulation to two area schools, adoption of an airport noise overlay zoning to assure new construction provides adequate noise insulation measures, and implementation of the “airport affected area” to restrict the use of land adjacent to or in the immediate vicinity of the Airport to activities and purposes compatible with normal airport operations including the landing and takeoff of aircraft.

The “airport affected area” was never adopted by the City of Madison. The city may in fact have violated this part of the 1991 NCP by changing zoning in this area from commercial, industrial, agricultural and recreational to incompatible uses like residential. The 1991 NPC required that noise contours be redrawn every five years and the NCP be updated when there was a significant (i.e. 17%) increase in air traffic. Neither of the steps were implemented.

The new NCP recommends air traffic control measures in Section 2 and include: flight tracks/paths, preferential runway use, arrival/departure procedures, airport layout modifications, and use restrictions. No pollution abatement measure will be followed if there is no means of verification. The need for regular compliance procedures was shown in 2012 when the SASY Neighborhood Association wrote to County Exec Parisi to ask for better enforcement of this procedure. The association’s letter noted that 54% of air traffic continued to fly over populated areas of Madison. This showed the procedure sending traffic away from populated areas was being ignored by the

airport. For the last five years the airport has stopped holding its twice per year public meetings to review the air traffic patterns and the history of noise complaints. This had been the only opportunity to review if air traffic had successfully been directed to the north, and number of complaints and airport response.

Since so many of the noise abatement measures in the current 1991 NCP were not implemented and many of the new measures in the draft NCP are voluntary, the draft NCP should be updated to include an evaluation of compliance every six months. Since airport management does not have the skills or commitment, these evaluations should be conducted by an independent contractor. A public report should be released with each new evaluation and reviewed with the Noise Advisory Committee, if it is reactivated.

Establish New Airport Affected Area

The current 1991 NCP developed an “Airport Affected Area” with boundaries well outside the predicted 65 dB DNL noise contour. This area was established to protect compatible land uses like industrial, commercial and recreational, and avoid rezoning to incompatible land uses like residential. The current area is shown in Figure 3-1 of the 2024 report. It was expected that Dane County and the City of Madison would adopt and enforce this Airport Affected Area. State law suggests this area be 3 miles from the boundary of the airport but the 1991 NCP used the 60 DNL noise. Like many noise abatement measures in the 1991 NCP, the Airport Affected Area was ignored. It was not adopted by the City of Madison or promoted by airport management. The city may in fact have violated this part of the 1991 NCP by changing zoning in this area from commercial, industrial, agricultural and recreational to incompatible uses like residential. Recent examples may include the construction of low-income apartments on the site of the former industrial site of the Bimbo bakery on East Washington Avenue and on the former agricultural site of the Raemisch Farm on Packers Avenue just west of the airport.

The draft NCP is proposing a new Airport Affected Area. The current area was never accepted and implemented by the City of Madison. The new area extends much further than the current area. This is shown in Figure 3-2 of the 2024 report. The draft NCP should be updated to require the airport to verify that Dane County and the City of Madison adopt the new Airport Affected Area. This new area should be incorporated into the City’s Comprehensive Plan.¹

Evaluation Compliance with the New Airport Affected Area

The purpose of the Airport Affected Area was to maintain existing compatible land uses. Of course, it won’t matter unless it is actually adopted and enforced by Madison. It also won’t matter if it allows incompatible land uses, especially additional low-income housing to be constructed.

The draft NCP should be updated to include a review of changes in land use within the Airport Affected Area first proposed in 1991 to determine if Dane County or the City of Madison changed any to incompatible land uses.

Enforce the NCP for New Developments

Section 3.1.7 discusses amended local land use plans to reflect the noise compatibility plan. This relies on the City of Madison and Dane County to incorporate the NCP into future development

¹ <https://www.cityofmadison.com/dpced/planning/comprehensive-plan/3894/>
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plans. The county airport should not rely on the City of Madison or Dane County to verify future development complies with the noise abatement goals of the NCP.

The draft NCP should be updated to require the airport to review all future developments within the Airport Affected Area and verify the development is compatible with the goal to reduce noise exposure.

End Use of Avigation Easements

Section 3.1.4 recommends the continued use of avigation easements. It says: “The noise and avigation easements would help to inform prospective property buyers that the land is subject to frequent aircraft overflight and aircraft noise. It would also protect the airport proprietor (Dane County), from lawsuits claiming damages for noise or other airport activities.”

Avigation easements as a one-time payment to land owners provide no protection from noise exposure. The draft NCP should be updated to replace these easements with the offer to purchase properties and pay for relocation of residents.

Clarify the Program to Purchase of Homes within 70 dB DNL

Under Section 3.1.10, the airport would continue to the program to purchase homes inside the 70 Ldn, LU-10: Establish sales assistance or purchase assurance program for homes impacted by noise above 70 Ldn. Under Section 3.2.2, the county recommends the potential acquisition of residential properties within the 70 DNL and higher contours as a corrective mitigation measure to make the properties compatible. This is now considered LU-2: Continue voluntary land acquisition inside the 70 DNL noise contour. The county may acquire 23 housing units. Under Section 3.3.4, Home Sales Assistance Program, it says: “A home sales assistance program was implemented as part of LU-10 in the existing NCP. The airport does not desire to continue this measure due to the logistics of implementation and estimated cost associated with these types of programs.” This is confusing since the county first says it will acquire 23 housing units, but then says it will discontinue the home sales assistance program.

The home sales assistance program should be continued and should be expanded to include all housing units within 65 dB DNL noise contour. Other airports have relocated homes inside the lower 65 dB DNL.

The 65 dB DNL noise contour is based on assumptions used for the noise modeling. Noise contour lines are not fixed reliable boundaries. Aircraft may or may not follow the recommended flight paths used for the noise modeling. To account for the lack of certainty in the noise contour, the home sales assistance program should be extended to all housing units within ¼ mile beyond the boundaries of the predicted 65 dB DNL.

The NCP is not clear about the airport purchase of homes within the 70 dB DNL noise contour. This program should be implemented. Due to the inability of the 65 dB DNL standard to protect the health of surrounding residents, the home purchase option should be offered to all residents within 65 dB DNL. Since the prediction of this standard is dependent on uncontrollable flight patterns, this option should be extended to all residents within ¼ mile of the predicted 65 dB DNL noise contour.

Airport Rejects Noise Abatement to Save Itself Money

Noise abatement measures are being rejected to reduce costs for the airport. Without these measures, noise exposure will increase and the operating costs of the airport will continue to be passed on to surrounding residents. Under Section 3.3.3, the airport rejects the purchase of the mobile home park located 500 feet from the main runway. Under Section 3.3.4, the airport rejects the home sales assistance program. Under Section 3.3.5, the airport rejects the installation of noise insulation on residential structures and schools, and says it: “does not believe that this measure would be most beneficial for residents.”

The airport proposes to rely on new flight paths to avoid noise exposure in populated areas of Madison. However, the current noise abatement plan already relies on flight paths and has shown to be inadequate. The airport has no control over the behavior of the flight controllers or aircraft pilots. Just like the current noise abatement plan, the airport has no measures in place to verify the new flight path measures are followed.

It is no secret the county airport has unlimited funds for the expansion of its facilities. This past year, an \$85 million terminal expansion was built. All the noise abatement measures rejected by the county airport, have been successfully implemented by other airports, including the Burlington airport where the F-35 fighter jets were also deployed. There is no practical reason they cannot be implemented in Madison except to save the county airport money. The county airport has a long history of avoiding its responsibility to protect surrounding residents from excessive noise exposure. When the last Part 150 plan was updated in 1991, airport noise was greater and the 65 dB DNL noise extended further into Madison. At that time, the airport failed to relocate residents or provide noise insulation to homes and schools. Instead of providing actual noise mitigation measures, the county airport relied on inexpensive noise avigation easements.

For this current NCP, the airport should make up for its past failures to protect surrounding residents. It should not again pass its operating costs onto the surrounding community by failing to address noise exposure. The airport should extend its noise abatement funds to as many people as possible. It should purchase and relocate the residents of the mobile home park. The airport should purchase homes and relocate any residents within the 65 dB DNL noise contour. It should provide noise insulation to all the homes and schools within this noise contour which cannot be voluntarily relocated.

We know the 65 dB DNL noise standard is outdated and will not protect surrounding residents from the many impacts of noise exposure. We know the 65 dB DNL noise contour is simply a prediction. To address the use of an outdated noise standard and inadequate prediction, noise abatement measures should be extended to residents and schools beyond the 65 dB DNL who are inside the newly created Airport Affected Area.

Extend the Sales Assistance to 60 dB DNL Noise Contour

As discussed under Section 3.1.10, the current NCP recommended that Dane County provide sales assistance or purchase assurance program for single-family homes within the 70 Ldn contour, based on a combination of the 1995 baseline and noise abatement plan contours. Under the current NCP there were 305 eligible homes, and 198 chose the avigation easement option and 13 parcels chose to have assistance with the sale of their home. There were 94 parcels that did not participate in the program.

Under Section 3.2.2 LU-2 to recommends that the county airport continue voluntary land acquisition inside the 70 DNL noise contour.

It is not clear why 70 Ldn contour was chosen for the threshold for the purchase of single-family homes. Most airports including the Burlington Airport where a squadron of F-35 jets were also deployed use the 65 dB DNL contour. The Minneapolis Airport uses a threshold of 60 dB DNL.

Since the current FAA standard of 65 dB DNL is outdated and inadequate to protect surrounding residents from excessive noise exposure, the sales assistance program in the NCP should be extended to single family homes within the 60 dB DNL noise contour similar to the threshold used by the Minneapolis-St. Paul International Airport.

Provide Sound Insulation to Schools within the Airport Affected Area

Section 3.1.11 discusses the failure of the county airport to implement the noise abatement procedure in the current NCP where sound insulation would be provided to two schools, Holy Cross Lutheran School on Milwaukee Avenue and Lowell Elementary School on Maple Avenue.

Since the adoption of the current NCP, we have learned that exposure to aircraft noise reduces the educational performance of students at noise levels well below the 65 dB DNL noise contour used by the airport. The draft NCP should be updated to provide sound insulation, air conditioning and air conditioning operating costs to all schools located within the new boundaries of the Airport Affected Area.

Install a Noise Monitoring System

Under Section 4.3.2 of the 2024 NCP, the county airport rejects the installation of a noise monitoring system as too costly. It is an embarrassment that neighborhoods surrounding the airport must install and operate a noise monitoring system to determine our actual noise exposure while the county airport relies on computer modeling and unverified noise abatement strategies. Like other airports, including the Burlington Airport which also hosts an F-35 fighter jet squadron, the county airport should install and operate a noise monitoring network. If the county airport can fund numerous expansions including the recent \$85 million terminal, it can fund a noise monitoring system. These monitors would determine current and future noise exposure. They will verify the effectiveness of the abatement measures in the new NCP. As noise standards change in the future, these monitors will determine if further noise reductions are necessary. The county airport should meet with neighborhood representatives to determine the location of the noise monitors and procedures for reporting the results.

The draft NCP rejects the operation of a noise monitoring system due to cost. The airport has no shortage of funds. It should install a noise monitoring system as other airports have done to measure actual noise exposure and determine the effectiveness of any noise abatement measures. Since the F-35 fighter jets generate noise causing building and body shaking vibrations, the monitors should measure both the standard A-Scale based on our hearing range but also the C-Scale which measures the vibration frequencies.

Review of Actual Noise Monitor Measurements

On December 7, 2023, we alerted the airport that a neighborhood noise monitoring system had collected measurements for the past two years. The email subject was: "Monitoring Shows Actual Noise Levels are Far Greater than Predicted in Dane County Airport Part 150 Noise Modeling

Report”. We compared the peak noise levels predicted by the Air Force in its Environmental Impact Statement for the F-35 fighter jets with those actually measured around the airport. Based on this comparison, we concluded that: 1) the F-35 fighter jets are far noisier than assumed by either the county airport and Air Force; 2) estimated noise levels by the county airport and Air Force are too low; and, 3) the 65 dB DNL noise contours drawn by the county airport and Air Force are too close to the airport and Truax Field such that more north and east side residents should qualify for noise abatement funds.

Unless the county airport wants to base its Part 150 noise abatement plans on faulty noise predictions, we suggested the airport will need to: 1) review noise monitoring data from the neighborhood network, or install and operate its own monitors to collect actual noise levels; 2) determine the correct noise levels of the F-35 fighter jets; 3) update its noise modeling provided in the Part 150 Noise Exposure Map Report; and, 4) redraw the noise exposure maps which are being used to determine who will qualify for noise abatement.

The draft NCP does not include any actual noise monitoring conducted by the airport. In our December 7, 2023 email to you, we summarized two years of actual noise measurements collected by the neighborhood monitoring network. The measurements suggest the airport has underestimated the peak noise levels of the F-35 fighter jets and the noise contours in the draft NCP are placed too close to the airport. Prior to finalizing the NCP, the airport should review our measurements, and make necessary changes to the noise predictions.

Mobile Home Park Residents Should be Protected

Under Section 3.2.1.5, the draft NCP states: “ensure future low-income and other residential developments are not built within the 65 DNL noise contour or adjacent to the Airport”.

Under Section 3.3.3 (Acquire the mobile home park and relocate the residents), it says the

“county does not recommend acquisition of the mobile home park due to the local housing shortage as described by the land use planning municipalities represented on the TAC. Note that mobile dwelling units are not eligible for mitigation because the FAA has determined that there are no effective sound insulation methods or materials for mobile homes.”

The mobile home park lies inside the 65 dB DNL if not the 70 dB DNL. When the 1991 NCP was adopted, the park was likely exposed to even higher noise levels but no relief was provided to the residents. The neighborhood noise monitoring network shows high noise exposure in the mobile home park. The continued presence of the mobile home park shows the airport’s continued promotion of environmental racism and environmental injustice. The failure to protect the residents of the mobile home park is an example of the failure of the county airport and its 2024 NCP.

The draft NCP provides no relief for the residents of the Oak Park Terrace mobile home park adjacent to the main runway of the airport. This is a prime example of the airport’s unwillingness to protect surrounding residents and the airport’s continued promotion of environmental racism and injustice. The draft NCP should be updated to propose finding new homes for the residents of the mobile home park and purchase this property for a more suitable land use.

Provide Regular Updates to the NCP

Section 4.1 Existing Program Management Measures summarizes current NCP requirements including updates to noise contours, updates to the NCP and responses to complaints. Since

adoption of the 1991 NCP, airport management has ignored these requirements or implemented them poorly. There have been no meetings of the noise abatement committee and review of noise complaints for five years.

The draft NCP should be updated to establish a regular schedule to update the noise contours and the NCP itself. Since airport management has ignored these requirements in the current NCP, an independent consultant should be hired to verify compliance.

The draft NCP should be updated to require that a summary of noise complaints including the response to each complaint should be published on a regular basis both on the county airport web site but also in a report to local media.

The draft NCP should be updated to require outreach to the community to solicit suggestions for improving the complaint submission and response procedures.

Improve the Effectiveness of the Noise Advisory Committee

Section 4.2.1 recommends that the noise advisory committee be re-established to assist the Airport with implementation, promotion, monitoring and reporting of the recommended NCP measures. If this committee is an important part of the airport's noise abatement procedures, it is unfortunate airport management decided to stop its regular meetings for the past five years. Citizen input would have assured the draft NCP addressed the concerns of the surrounding community.

It is good the Noise Advisory Committee may be reactivated after a five-year absence. To be more productive, this committee should include representatives with knowledge of noise effects on public health and education, and an independent contractor familiar with the NCP who can report on the continued compliance and effectiveness of the NCP with recommendations for improvements.

Delay the NCP Until WANG Completes Its Public Outreach Program

Last month, the Wisconsin Department of Military Affairs hosted listening sessions in response to community concerns about the basing of F-35 fighter jets at Truax Field. Senator Baldwin helped obtain a \$780,000 grant for community outreach, education and information collection to support noise mitigation. The proposed schedule includes stakeholder surveys, community focus groups, educational outreach, story maps and a community summit. This program is referred to as the "Madison F35 Community Connection Project".

The listening sessions and the Connection Project are providing a unique opportunity for Madison residents to voice their concerns about the F-35 fighter jets and make suggestions for reducing the noise impacts. The public outreach and listening sessions have been far superior to the open house format favored by the county airport which suppresses open discussion among residents. It is unfortunate the Connection Project is occurring so late in the decision-making process for deploying a squadron of F-35 fighter jets to Madison.

Due to the wealth of information and community feedback that will be obtained from the current WANG Madison F35 Connection Project, we hope the county airport will delay the completion of the draft NCP and postpone submission to FAA for approval. There may be concerns and noise abatement options discussed during the Connection Project that have not yet been considered by the airport. Any shortcomings in the new NCP will adversely affect the health and well-being of current and future Madison residents.

Obtain a New Mission for WANG 115th Fighter Wing

This new NCP was prompted by the Air Force deployment of a squadron of F-35 fighter jets to the WANG 115th Fighter Wing at Truax Field adjacent to the county airport. Based on measurements by the neighborhood noise monitoring network, the F-35 fighter jets are far louder than the prior F-16 jets. The F-35 jet noise includes low frequencies which shake buildings and vibrate the human body. These low frequencies are not considered by typical dB “A-scale” used for noise modeling or measured by typical noise monitors.

Our community would avoid the costs and impacts of increased aircraft noise if a new mission were found for the 115th Fighter Wing similar to the Air National Guard units in other states like Iowa and Ohio. There are over 40 missions available to the 115th Fighter Wing that do not require the use of the F-35 fighter jets. This noise abatement option was not evaluated by the draft NCP. It should be updated to evaluate the benefits and procedures for requesting a new mission for the 115th Fighter Wing.

Evaluate Relocation of the County Airport

The county airport has been in Madison for nearly 100 years. During this time, many things have changed. Madison and Dane County are the fastest growing areas in Wisconsin. The airport consumes 7% of the land area of Madison, eliminating opportunities for urban growth. We’ve learned the airport discharged PFAS into our groundwater and Yahara Chain of Lakes, shutting down Municipal Well 15 and making local fish poisonous. There will be 3,000 people living in neighborhoods considered ‘incompatible for residential use’ due to the unhealthy noise from commercial flights and the new F-35 fighter jets. We continue to promote environmental injustice and racism by expanding adjacent housing for low-income and minority families. We’ve started to fight global warming, but still host the airport in our city, a poster child for global warming, since airplanes are the least efficient form of travel and have 3 times more impact than ground-based emissions. Lastly, those fees paid by affluent passengers are not progressively shared but can only be spent on expansions like that recent new \$85 million terminal.

The current NCP was prepared in 1991. Rather than once again attempt to reduce the noise impacts of the county airport, the draft NCP should include an evaluation of the feasibility of relocating the county airport. Examples like Austin and Denver can be evaluated to show how the former airport site can be developed to provide urban infill. New locations can be identified that don’t expose thousands of people to unhealthy noise, consume valuable urban land, or continue to contaminate our drinking water and Yahara Chain of Lakes.

Include All Public Comments in Final NCP

Appendix F: Public Comments of the draft NCP states: “Public comments will be included in this appendix after the public review period.” Besides comments on the draft NCP, this appendix should provide copies of comments submitted earlier in the Part 150 process. Many of these comments relate to the content of the NCP. This will assure a complete record of public comments is provided.

Explain FAA Complaint and Appeal Procedures

The draft NCP should be updated to explain FAA procedures for the public to challenge the legality and effectiveness of the final NCP. This would include procedures such as filing a complaint or a petition for administrative review.

On behalf of Safe Skies Clean Water Wisconsin

Steven Klafka, P.E., BCEE, Environmental Engineer