

June 27, 2019

Gene Richards
Director of Aviation
Burlington International Airport
1200 Airport Drive
South Burlington, VT 05403

Re: City of Winooski's Public Comment on the 2019 Airport Noise Compatibility Program

Dear Mr. Richards,

Thank you for including the City of Winooski in the development of the 2019 BTV Noise Compatibility Program (NCP) update and request for funding to the Federal Aviation Administration (FAA.) With the draft updated Noise Exposure Map that was recently released, over 50% of the impact anticipated for 2023 will be borne by Winooski residents and businesses. In total 43% of our population and 41% of our homes will be within the 65 or higher DNL. This represents a significant change for the prior impact. Additionally, beyond the 65 DNL, our entire community will be impacted including our Winooski School District campus on Main Street.

Winooski is the most densely populated City in Northern New England (Vermont, New Hampshire, and Maine) with 7,200 people living in 1.4 mi². We are also the most diverse City in the State (21% of our neighbors are people of color) and a community committed to ensuring quality affordable rental housing (61% of our homes in Winooski are rentals with 53% of these being subsidized affordable homes.) Within the NEM there are now 398 subsidized housing units comprising 64% of our total subsidized housing. The 65 DNL entirely encompasses our second lowest income block group, with a median household income of \$26,362, or 40% of Area Median Income (AMI). The 65 DNL partially encompasses our lowest income block group, with a median household income of \$21,074, or 32% of AMI. Additionally, the 65 DNL entirely encompasses census tract 25, block group 2 which has the highest concentration of renters in the city at over 75% rentals. Finally, 96% of our subsidized housing for seniors and those with disabilities fall within the 65 DNL

We are a unique community that must be heard and supported through noise impact mitigation. We respectfully request that the City of Burlington lead the charge to greatly enhance the Federal resources brought to our community to ensure the health, safety, and vibrancy of our City continues. We are requesting the following:



Prioritization of Funding

With Winooski bearing the disproportionate negative impact projected in 2023, we request that 50% of the funding received by BTV from the FAA annually for sound mitigation be directed to our community.

Sound Mitigation Efforts

As the City Council and City Management of Winooski, we strongly support efforts and funding that will maintain and improve the existing housing stock in Winooski. To that end, we request that the BTV application for funding prioritize:

- Sound Insulation that will ensure that homes are retained and funds are reinvested in our current housing stock.
- Purchase Assurance that proves a one-time payment to current property owners, ensures that the properties are brought into compliance with sound mitigation practices, and sold on the open market to ensure that there continue to be housing options available for our residents. It is further requested, that within Purchase Assurance, homes are mitigated and returned to the market in no more than nine months.

We do not support any efforts to relocate or removes homes. Additionally, we do not support Sales Assistance that provides one-time payouts to homeowners with no reinvestment back into the housing stock.

Avigation Easements

The Technical Advisory Committee was provided samples of Avigation Easements. We understand that it is a Federal requirement that Easements accompany mitigation funds granted to individual properties. Upon review and discussion with our community, we request that:

- Any required Avigation Easement include a clause that invalidates the easement in the event a future amendment to the Noise Exposure Map indicates an increase in the noise exposure that would otherwise affect eligibility for initial or additional mitigation.
- Any required Avigation Easements include a clause that invalidates the easement if building or mitigation codes change that would result in new standards of sound mitigation.

Criteria of Funding Distribution

Once annual funding is received by the City of Burlington and in order to meet the unique diversity and equity needs of our residents, we request that the following criteria be used to allocate mitigation funding:

- Given that the impact in 2023 will increase by 1,500%, funding is prioritized to impact the most number of human lives. Dollars should be prioritized to multi-unit buildings with the greatest impact on human life.
- Given that satisfactory information has not been provided on the impact of short bursts of sound related to the F-35 takeoff on young ears and hearing is a critical component of



early education and cognitive growth, funding is prioritized to impact children from infancy through school age (World Health Organization presentation on "*Children and Noise.*")
Source: <https://www.who.int/ceh/capacity/noise.pdf>.

Municipal Interlocal Agreement

We understand that with 2,640 homes now impacted (an increase from the 2018 impact of 164 homes) it will take many years to provide full sound mitigation to all of our neighbors. To that end, we also anticipate requesting a Memorandum of Agreement between the City of Winooski, the City of Burlington, and perhaps our neighbor communities, which outlines our commitments to one another over the following decade. Our requests will include:

- A voting seat for Winooski on the Airport Advisory Commission
- A commitment from BTV that a request for FAA NCP funding will be submitted annually by the Airport to prioritize Winooski residents between calendar year 2019 and 2029.
- A commitment from BTV that they will hire at a minimum a full-time employee to be located at BTV to manage the NCP program and provide direct and local assistance to our residents.
- A commitment that the local match requirement for FAA grants be met by BTV or City of Burlington funds.
- A commitment from BTV that you will advocate to maintain the ratio of FAA funding/impacted person brought into the region for sound mitigation. Our understanding is that \$20M has been received over the last 5 years or \$4M/year for 381 people within the 65 DNL. Therefore, we request your advocacy for \$64M/year for 6,125 people within the 65 DNL.
- A commitment from BTV that actual sound levels will be monitored on a regular basis where there is a disproportionate impact on children to confirm the 65 DNL model and to measure noise outside the 65 DNL.
- A commitment from BTV that quarterly meetings will continue to be held between professional staff from each community to review plans, applications, staffing, and the impact on our community.
- A commitment from BTV that opportunities will be explored and secured to partner with other funders to maximize the improvement to our housing stock as sound mitigation efforts are underway. This could include partnerships with Efficiency Vermont, the Lead program, HOME dollars, or other local, state, and federal funding partners.

We appreciate the cooperation the City of Burlington has demonstrated as we work together to mitigate the disproportionate negative impact the City of Winooski will bear as a result of the F-35 arrival and the general airport operations.

Please feel free to contact City Manager Jessie Baker (jbaker@winooski.vt.gov) or Mayor Kristine Lott (mayor@winooski.vt.gov) with questions or comments.



Sincerely,

Winooski City Council



Mayor Kristine Lott



Deputy Mayor Hal Colston



Councilor James Duncan

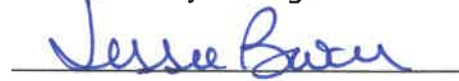


Councilor Amy Lafayette



Councilor Michael Myers

Winooski City Manager



CC: Mayor Miro Weinberger, City of Burlington
Senator Patrick Leahy
Senator Bernie Sanders
Congressmen Peter Welch

