



December 28, 2016

Ms. Amy Lind Corbett
New England Regional Administrator
Federal Aviation Administration
1200 District Avenue
Burlington, MA 01803-5299

Dear Administrator Corbett:

I write to you on behalf of the South Burlington City Council to request your support and that of the Federal Aviation Administration in a matter of urgent importance to our community related to noise associated with operations at the Burlington International Airport (BIA). We respectfully request that the FAA provide all relevant resources, including funding, to run the approved FAA noise model at BIA using Air Force F-35 data. Enclosed you will find a copy of a resolution passed by the South Burlington City Council endorsing this initiative and dated December 19, 2016.

As you know, the BIA is owned by the City of Burlington but is located in the City of South Burlington. Operations at the BIA also affect the communities at the end of Runway 15/33 - Williston and Winooski, respectively. We are all currently engaged in discussions with BIA management about updates to the Noise Compatibility Program (NCP) as well as the reuse of properties already acquired by the BIA/FAA in our community.

We understand that the BIA is in receipt of a grant to conduct an update to the Noise Exposure Maps (NEM) and the NCP in the 2019 – 2020 timeframe. This funding coincides with the arrival of the F-35 at the Air National Guard base on the northeast side of our joint-use Airport. Our Council and our community feel it is of utmost importance that we understand today, what the likely noise contours will be when F-35 operations begin in earnest here in 2019.

There are several reasons why we need this information right away. First, we are working with the BIA Sound Committee on elements of a new NCP. One of the initiatives under discussion is a change to our zoning bylaws for affected areas of our community to require upgraded construction standards to mitigate against higher levels of noise. We would not make these changes City-wide, as most of our community is unaffected by higher levels of noise from BIA operations. As such, we need to understand where the likely noise contours will be when the F-35 arrives so that we can begin to address any changes to our zoning bylaws for those areas now.

The issue of the zoning amendments is particularly important at this moment in time because one of the largest, if not the largest residential projects ever developed in South Burlington is moving through the planning process and it would very likely be affected by these suggested changes in zoning. We do not want to find out after the project is half completed that it should have been built to a higher standard for noise abatement. Ironically, there are affordable housing components of this project that are intended to help replace the inventory lost to the prior and current rounds of the BIA/FAA home buyout program.

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In addition to these zoning issues, we have an entire neighborhood near the airport comprised of residents who are very concerned about future noise impacts and mitigation programs. Residents need to be able to make decisions on their futures based upon a reasonable probability of where the noise contours will lie when the F-35s arrive. Waiting the three years for the study to begin and perhaps another year or two before the final report is published is an unreasonable burden on this neighborhood, particularly when a solution is close at hand - namely running the model.

Furthermore, it is our understanding that representatives of the BIA/FAA buyout program have already begun another round of meetings with residents within the existing 72 DNL line to negotiate the purchase of those properties. It is not the City of South Burlington's intent to get between a willing seller and a willing buyer in such a transaction. However, it would be tragic for both the home owners and our community to find out just a few months after demolition that those homes would have been outside the buyout line if only they had waited.

With that issue in mind, I would note that many of our Air Guard's F-16s are currently deployed outside the country. According to the news they are to be gone for three or more months. After that the Air Guard/Air Force will begin to draw down the number of F-16s based at BIA and prepare for the arrival of the F-35s. With the gradual departure of the F-16s and the preparation of our pilots and crews to fly and maintain the F-35s we can anticipate fewer fixed wing operations which will begin to have a meaningful impact on the noise contours. So, we would argue that the noise contours will be gradually contracting over the next two years until all of the F-16s are gone. At that time there will be no local military fixed wing operations until the F-35s begin to arrive late in 2019.

Let me pause, now to assure you that we fully support the proposed comprehensive Part 150 study to begin in 2019. We understand the requirement that this study be conducted at that time as there will be a change of operations when the F-35s arrive. And while we are baffled as to why the BIA's recent 2020 update didn't include the F-35 data as it will arrive prior to that date, and an Environmental Impact Statement was prepared by the Air Force several years ago as required by law using F-35 data, we nonetheless will support the future process when it begins.

What we are asking for today is something much simpler, however, merely running the model with F-35 data. We will support all appropriate disclaimers that this is not the official FAA study and that the data/maps should not be used for anything other than to predict probable future noise contours when the official study is completed. Having that NEM now will help us to consider zoning amendments, help developers to plan appropriately for housing and commercial construction in the area and provide some level of predictability to home and property owners in the general area around BIA.

As requested above, we believe that the FAA should fund this accelerated running of the model. The FAA has recently granted the BIA approximately \$16 million to purchase and demolish homes in a very important neighborhood in our community. For a tiny fraction of that amount the FAA could go a long way to address the anxiety that exists in the directly affected neighborhood and throughout our community. Additionally it will help our policy-makers put in place standards for construction that will avoid the need for these programs in newly constructed neighborhoods.

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I have reviewed the ongoing Part 150, 2020 update for the joint use airport in Boise, Idaho. The 152nd page of that document would indicate that the FAA has run the noise model with F-35 data as a replacement for the A-10 at Boise. You also ran a model for the F-15 as a replacement for the A-10. As this is a Part 150 proceeding I assume that the FAA is paying for all of that study. What we are asking for is, quite simply, the creation of that same map only here at BIA.

I would also note that even though I do not speak for the City of Winooski or the Town of Williston, my colleague managers in both communities are supportive of this initiative. I would be glad to have them confirm that with you personally if it would be helpful. They are copied on this letter.

Time is of the essence. Homes continue to be planned and constructed in areas that may --- or may not be brought inside the updated noise contours. In addition, it can take many months or years to work out changes to our zoning bylaws. If we are to address noise-related issues in those bylaw amendments we really need to get started immediately. It is our hope that you will support our request and that the model could be run and a map created during the first quarter of 2017.

Finally, we hope that you recognize the rare if not unique situation that the City of South Burlington finds itself in where our largest landowner is another community; Burlington in this case, and the land in question is an almost 900 acre international airport. There are occasions when we feel totally out of the loop when it comes to decisions being made by the FAA or by Airport management that affect our community. And while we acknowledge that the FAA must have a close working relationship with Airport management we feel it is the responsibility of the FAA to include our community in discussions involving Airport operations and programs that affect our community.

In his introductory letter to the Federal Aviation Administration Community Involvement Manual dated February, 2016, Administrator Huerta said the following; "The views of communities—including local residents, the general public, and stakeholders—are important to the FAA as we take the next steps to advance the national aviation system. This update to the FAA's Community Involvement Manual **reaffirms our commitment to inform and involve the public and to give meaningful consideration to community concerns and views as the FAA makes aviation decisions that affect them** (emphasis added)."

In the case of South Burlington, we are the community that is most affected by Airport operations. And I would note again that our neighbors in Winooski and Williston are also affected. The concerns of our communities cannot be adequately addressed by the City of Burlington in its discussions with the FAA as they are distant to flight operations and their community is unaffected by activities at the Airport. As such, we respectfully request a seat at the table with the FAA when discussions are being held about issues that affect our communities. We look to you as the Regional Agency official charged with ensuring community engagement to make sure that we have interested party status in such matters and in decisions that are made. We leave it to your discretion as to how and when to bring us to the table but we need your assurance that this will happen.

I would be happy to meet with you in your office at a time of your choosing to discuss these requests further. We recognize the great importance of the BIA to the City of Burlington, to our community and region and to the State of Vermont. We also honor and respect the brave men and women of our National Guard who serve to protect us and our nation and who are our neighbors, employees, friends

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and family members. The requests we make should not be construed as having any bias against the BIA or military and civilian operations at the Airport or the F-35 for that matter. It is simply a request to help us better understand what the future holds regarding Airport-generated noise as well as decisions that affect our community and plan appropriately.

Thank you for considering our request. I look forward to hearing from you soon.

Respectfully,



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Enclosures

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