

From: [Steven Klafka](#)
To: [Finance Committee](#)
Cc: [Dane County Board of Supervisors](#); [All Alders](#); [Mayor](#); [Safe Skies Coordinators](#); [Safe Skies Google Group](#); [Airport Director Kimberly Jones](#); [Dane County Airport Noise Study](#)
Subject: Comments on Item 82371 - Authorizing funding appropriation for 808 Melvin Court
Date: Sunday, March 10, 2024 3:57:47 PM

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City of Madison, Finance Committee

On behalf of [Safe Skies Clean Water Wisconsin](#), please accept these comments for your meeting on March 11th on Item 82371 - Authorizing the Mayor and City Clerk to execute a development agreement and authorizing a funding appropriation in the 2024 Capital Budget to fund a \$1,700,000 Tax Incremental Finance Loan to East Washington Apts, LLC, or its assigns to construct approximately 192 units of affordable housing and approximately 139 parking stalls located at 808 Melvin Court in the 3100 block of East Washington Avenue in Tax Incremental District (TID) 52. (District 12).

I found it odd there was no mention of the county airport or noise exposure in the developer's request for funding or the City's staff memo.

The county airport's has released its draft [Part 150 Noise Compatibility Plan](#) to address future noise levels from growing commercial air traffic and the squadron of F-35 fighter jets at Truax Field. The Mayor and City have been noticeably absent during the development of this plan even though it proposes restrictions on a large portion of Madison to protect residents from excessive noise exposure.

Based on a review of the current and proposed NCP, the proposed apartments are:

- On the flight path of the county airport main runway.
- Inside the 65 dB DNL noise contour of the current 1993 NCP considered incompatible with residential housing.
- Inside the Airport Affected Area of the current 1993 NCP where construction should be limited to compatible uses.
- Inside the 65 dB DNL noise contour of the draft NCP.
- Inside the new boundaries of the Airport Affected Area in the draft NCP
- Inside both the Limited Construction Area and the Restricted Construction Area in the draft NCP.

Below is Figure 3-1 from the airport's draft NCP with boundaries for noise contours and areas where construction should be limited to compatible uses. The blue area shows the location of the proposed apartments.

Please note that against our objections, the county airport uses the FAA's 65 dB DNL daily noise standard to identify areas of Madison considered incompatible for residential use. However, this standard is over 50 years old and doesn't address health and education impacts at lower noise exposure. It is a daily average that doesn't account for the instantaneous, ear splitting high noise levels like the 123 decibels we've measured from F-35 fighter jets. The noise contour is based on computer modeling so its location is not fixed but can change with change in modeling assumptions like flight patterns. The location of the proposed apartments will be an area considered incompatible for residential use based on the outdated FAA noise standard, and certainly incompatible based on any modern interpretation of acceptable noise exposure.

Here are a few comments and requests as the Finance Committee considers funding this project:

1. Any City approval related to this project should include discussion of its compatibility with the current and draft versions of the county airport's NCP, and its consistency with the 2020 resolution adopted by the Common Council opposing the deployment of the F-35 fighter jets to Madison.
2. By funding this project, why is the City expanding our Airport Ghetto and promoting environmental injustice and racism?
3. If the county airport is preparing a plan to reduce noise aircraft exposure, why is the City ignoring this plan and increasing the number of residents exposed to unhealthy noise?
4. On March 31, 2020, the Common Council adopted a resolution opposing the Air Force deployment of a squadron of F-35 fighter jets to the 115th Fighter Wing of the Wisconsin Air National Guard at Truax Field. Among the reasons given for opposing the jets, the Council said:

WHEREAS, the Final EIS released on February 18, 2020, confirms the significant environmental impacts identified in the Draft EIS, including substantially reduced quality and quantity of current affordable housing stock, decreased value of the property tax base, reduced opportunities for Transit-Oriented Development, ongoing soil, ground and surface water PFAS contamination violations by the ANG, significant adverse health effects that disproportionately affect children, residents who are low income and people of color; and,

WHEREAS, these impacts are contrary to the City of Madison's values of equity, sustainability, health and adaptability as codified in our Comprehensive Plan adopted in 2018, the City's Racial Equity and Social Justice Initiative, and undermine multiple long-term goals of City policy makers,

Why is the City ignoring its 2020 resolution, so that it expands the significant adverse health effects that disproportionately affect children, residents who are low income and people of color; and, promotes impacts that are contrary to the City of Madison's values of equity, sustainability, health and adaptability as codified in our Comprehensive Plan adopted in 2018, the City's Racial Equity and Social Justice Initiative, and undermine multiple long-term goals of City policy makers.

On behalf of Safe Skies Clean Water Wisconsin
Steven Klafka, P.E., BCEE, Environmental Engineer

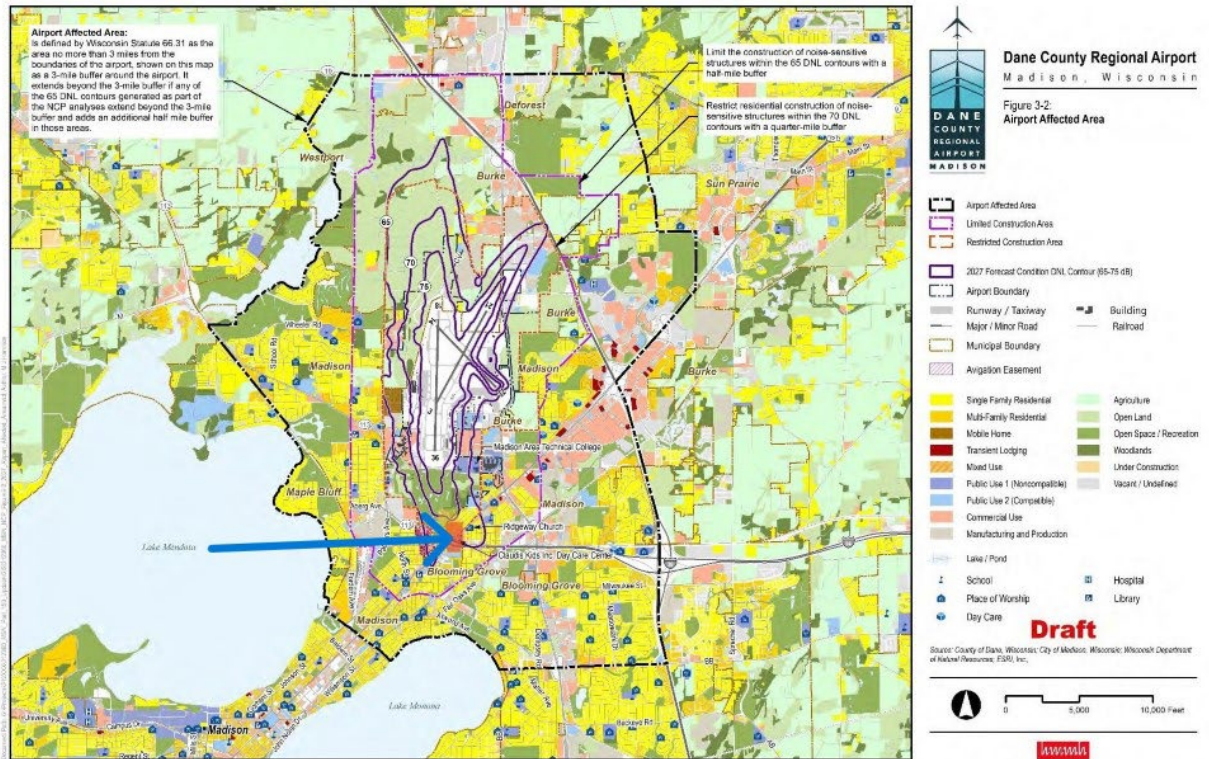


Figure 3-2. Recommended Approximate Airport Affected Area 2024

Source: HMMH, JPG 2023