

8/7/19 Draft Letter to POS:

Mr. Stephen R. Metruck
Executive Director, and
Port Commissioners
Port of Seattle
P. O. Box 1209
Seattle, WA 98121

Dear Mr. Metruck, Commissioners Bowman, Calkins, Felleman, Gregoire, and Steinbruck:

As you are aware, the City of Burien has ongoing concerns regarding certain plans and procedures the Port of Seattle is implementing at Seattle Tacoma International Airport and their impact on our community. Our examination of the Port's process regarding these plans and procedures, as well as our understanding of them, has led us to develop some questions related to the Port's intentions and activities. These questions are listed below.

1. Why have there been no studies evaluating increases in aircraft noise on ALL runways since the 2002-2007 Part 150 Study? (In case you didn't know, the 2013-2018 Part 150 Study only evaluated the third runway.) FAA guidance calls for new noise analyses whenever there is an increase of noise of at least 1.5 dB DNL.¹ Is it your position that no 1.5 dB DNL increases have occurred despite enormous growth of aircraft operations since 2002?

2. Why have many of the noise abatement procedures (i.e., nighttime flights, reverse thrust, etc.) remain un-implemented despite the Expert Arbitration Panel's Review of Noise (Final Report) recommendations in 1996²? Why has the Port ignored pleas for noise abatement flight procedures for 23 years; yet continues to "discuss" them with the StART Committee? Is this another futile effort to encourage the Port to modify its behavior?

3. When was the last time that Sea-Tac Airport's noise program was performance audited by the State of Washington or the FAA? Given the Port's lax oversight (documented by its own internal review) and exceedingly slow implementation of noise mitigation programs³ might

¹ June 13, 2018 FAA guidance memorandum from Katherine Andrus (AEE-400) re: NEPA responsibilities.

² March 27, 1996 Expert Arbitration Panel's Review, page 32 of 50, "We have nevertheless concluded, on the basis of all the evidence before us, that the ultimate results of these efforts, in terms of real on-the-ground noise impacts for the communities affected by Airport noise have not been sufficient to satisfy Resolution A-93-03. Many people at the Port, including its noise consultants, have labored long and hard to develop and implement abatement and mitigation programs; substantial resources have been dedicated to the effort; yet many people in the Region remain severely impacted by airport noise." these are the same implementation issues being discussed by StART recently!

³ March 27, 1996 Expert Arbitration Panel's Review, page 28 of 50, "Had the Port accelerated the program three years sooner, in mid-1990, an additional 4,000 homes could have been insulated by now. Doing so would have more than doubled the number of homes insulated by December 1995, from 3,647 to approximately 7,600. The number of people benefiting from that reduction in indoor sound levels would have also more than doubled, from 8,570 to about 18,000. Instead of a Residential Insulation Program about one-third completed, the Port would

such an audit be justified? A recent Port audit of the program indicated only 40 homes were sound insulated in three years, when just five miles away at King County Airport at Boeing Field, completed 100 homes/year while its program was operative between 2009-2015.

4. Why is the SAMP being prioritized over the Part 150 Study when there is evidence that the FAA's own noise analyses contained in its April 2018 Categorical Exclusion Report to the City of Burien indicated that 5.2% of the study area measured noise that exceeded 65 dB DNL (the decibel trigger for sound insulation eligibility) when the FAA could not use Sea-Tac's 2013-2018 Part 150 Study because it was already outdated? By not updating the Part 150 Study now, it's estimated that hundreds of homes will not be sound insulated at the Port's pace for another decade and noise abatement procedures will continue an illusory goal! Why should people continue to suffer when 80% of the cost of sound insulation is borne by the FAA?

5. Why are StART subcommittee meetings not open meetings, recorded, summarized, or notes prepared; speakers and agendas set solely by the Port; and "new" policy decisions announced by the Port even when the group had not taken a vote, or even reached consensus on specific issues?

6. Page 40 of 50 of the March 27, 1996 Final Report of the Expert Arbitration Panel's Review, (Commissioned by WSDOT and PSRC) it directs the Port: "g. Continue to work with the airlines to minimize nighttime engine run-ups, we note that, although many of the events are exempt from the King County Code, the exempted nighttime events have levels higher than the code permits. Existence of an exemption does not mean elimination of the impacts on people." This admonition was written in 1996, but nighttime engine run-ups are still a huge generator of 15-20 dB for each occurrence. Why hasn't the Port moved its engine run-ups away from the airport in compliance with WAC 173-60-050(1)(d), which reads: "Provided, that aircraft testing and maintenance shall be conducted at remote sites whenever possible."?

The Ground Runup Enclosure (GRE) has been dropped from further consideration by the Port due to the SAMP, despite the fact that this recommendation was included in two earlier Part 150 Studies; yet there is room on the airfield for a new maintenance campus, but no GRE that would improve livability for people living closest to the airport?

7. Why has there been no discussion of mitigation for the impact on citizens of ultra-fine particle pollution (UW study underway and commissioned by the State Legislature)? Is it logical (or ethical) to move forward on airport projects while the health, air, and cost-benefit analyses associated with these projects remain unfinished?

8. Why does Sea-Tac Airport wish to confine its air quality analysis to airport property when

have presented this Panel with an important mitigation program that was approximately 75% completed. We also note that the residents of those homes would have received the benefits sooner and would be enjoying them today." This pattern was repeated recently when the Port delayed sound insulation installation--even though it was approved by FAA in June 2014 yet didn't solicit an insulation contractor until late 2018!

past predictions found Clean Air Act violations in communities and air quality impacts up to five miles away with far fewer operations than today's "8th busiest airport" numbers?

In conclusion, the FAA recently published a Report to Congress, entitled National Plan of Integrated Airport Systems (NPIAS) for 2019-2023. On page 1, it states: "Airports should be compatible with surrounding communities, maintaining a balance between the needs of aviation, the environment, and the requirements of residents." We perceive "compatibility with surrounding communities" is not a priority for the Port of Seattle and it would be very useful and enlightening to learn why our perception is inaccurate.

Sincerely,