

CASE STUDY OF PUBLIC OUTREACH BY FAA RE: GREENER SKIES PROGRAM (NEXTGEN) AS IT RELATES TO BEACON HILL NEIGHBORHOOD IN SEATTLE

ASSERTIONS:

- 1. FAA's regulatory "oversight" intentionally ignored the existence of their own noise metric methodologies as reported by two airports: Sea-Tac (aka SEA) and King County International Airport, (aka KCIA/Boeing Field). Furthermore, FAA neglected to honor their responsibility and duty to recognize valid non-compatible land uses reported in KCIA's 2003-2008 Part 150 Study as Recommendation #1, described as "combined contours" on Beacon Hill. If FAA had properly provided oversight, the decibel measurements for the Greener Skies Program/NextGen flights would have revealed decibel levels above 65 dB DNL for areas of Beacon Hill; and would have necessitated mitigation of hundreds of homes otherwise denied sound insulation assistance.**

Combined Noise Contours from KCIA

In March 2002, King County International Airport (KCIA) submitted its Final Study Advisory Committee's (SAC) 2003-2008 Part 150 Study recommendations to the FAA and the first of its recommendations included this quote on Page 13 (attached as Exhibit A):

"One of the unusual, perhaps unique, features of KCIA is its close proximity to Sea-Tac International Airport (SEA) to the south. The two facilities are so close that their noise contours actually overlap. This Part 150 Study has taken the unusual analytical step of creating a combined contour for both airports. The purpose of this exercise is to define areas, which would not fall into either airport's individual 65 DNL and above contour, but which are exposed to 65 DNL when the noise levels from both airports are considered together....For this reason, the area within the combined KCIA/Sea-Tac 65 DNL and above contour should be eligible for federal noise attenuation funds....For estimation purposes, this program would be expected to include 2,642 homes at a cost of \$30,000 each for a total of \$79 Million."¹

- 2. There is clear evidence that FAA and SEA knew that the noise levels on Beacon Hill in 2002 already exceeded the FAA-mandated threshold of 65 dB DNL based upon Noise Exposure Map (NEM) for "combined noise contours" contained in KCIA's Part 150 Study that was approved by FAA in 2005; yet no action by FAA or SEA occurred to mitigate affected homes. Additionally, no FAA or SEA action transpired in order to include existing aircraft noise over Beacon Hill when the Greener Skies Program/NextGen was developed.**

Noise Exposure Maps (NEMs) (ie, FAA required maps outlining noise contours)

Statutory reference for this FAA regulatory oversight is 14 CFR Part 150.21 (d) (1) regarding creation of noise exposure maps that update noise contours whenever there is an operational

¹ The average cost per home for sound insulation in KCIA's program was actually \$60,000 each, which doubles this estimate.

APPENDIX

1. EAA's regulatory "oversight" (intentionally ignored the existence of their own noise rating methodologies as reported by two airports, San Jose (San Jose) and King County for regional airports like KCTVA-Bellingham Field. Further, EAA neglected to honor their responsibility and duty to regulate valid non-compliance found and reported in KCTVA's 2008 Part 150 study as a non-compliance. EAA described an "combined contours" as shown in the "combined contours" provided oversight, the decision made "combined contours" for the "combined contours" which would have exceeded noise levels shown in the DNL for areas of EAA's Part 150 and would have exceeded notification of hundreds of hundreds of homes either denied or no installation assistance.

Combined Noise Contours Part 150

In March 2002, King County International Airport (KIA) submitted its Final Study Advisory Committee's (SAC) 2002-2008 Part 150 Study recommendations to the EAA and the first of its recommendations included the noise on page 13 (attached as Exhibit A).

One of the unusual perhaps unique features of KIA is its close proximity to San Jose International Airport (SJA) to the south. The two facilities are so close that their noise contours actually overlap. The Part 150 study for KIA takes the unusual and final step of creating a combined contour for both airports. The purpose of this exercise is to define areas which would not fall into either airport's individual DNL and noise contours, but which are exposed to both DNL when the noise levels from both airports are considered together. For this reason, the noise within the combined KIA/SJA noise level DNL and noise contours should be similar for individual noise assessment levels. The combined contour, this program would be expected to include 2,442 homes in a total of 2,700 acres for a total of 270 million.

2. There is clear evidence that EAA and KIA know that the noise levels on Mission Hill in 2002 already exceeded the EAA mandated threshold of 65 dB DNL based upon noise exposure map (NEM) for "combined noise contours" contained in KIA's Part 150 study that was approved by EAA in 2002, yet no action by EAA or KIA occurred to mitigate affected homes. Additionally, the EAA or SJA was not considered in order to include existing aircraft noise over Mission Hill when the Greater King Program (GKP) was developed.

Noise Exposure Map (NEM) - EAA's required noise exposure map (NEM)

3. Noise exposure map for the EAA regulatory oversight is 14 CFR Part 150.11 (b) (1) regarding creation of noise exposure maps that require noise contours whenever there is an operational

1. The average cost per home for sound insulation in EAA's program was approximately \$60,000 each, which exceeds the

change (i.e., Greener Skies/NextGen) that increases annual DNL by at least 1.5 dB. This reference to the requirement to update noise exposure maps is also contained in “Element #21- Periodically review and, if necessary, update the Noise Exposure Maps (NEMs) and the Noise Compatibility Program (NCP)” included in FAA’s Record of Approval of Sea-Tac Airport’s 2013-2018 Part 150 Study, dated June 2014;

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FACT: No public outreach workshops, meetings, or open houses were conducted in the Beacon Hill neighborhood of Seattle prior to SEA implementing the FMS/GPS RNP Greener Skies Program/NextGen flights. According to FAA’s Final Environmental Assessment for Greener Skies Over Seattle, Volume 1, dated November 1, 2012, page iv:

“The process included two public scoping meetings—one held south of SEA on January 25 2012 in Federal Way and one north of SEA on January 26, 2012 in Shoreline—as well as an Agency scoping session and a Tribal scoping session each held at FAA’s offices on January 26, 2012 in Renton.”

FACT: Furthermore, there is no trace of public outreach or any information from SEA or FAA directed to Environmental Justice (EJ) and low-income populations speaking Vietnamese, two dialects of Chinese, Tagalog, Cambodian, and Spanish on Beacon Hill². Despite this fact, in its Final EA, the FAA reported on page vii:

“Of the 3,171,686 residents represented by the 40,788 population centroids in the Study Area, no one would be exposed to an increase in noise exposure that exceeds FAA’s criterion for significant impact (a 1.5 dB or greater increase to a DNL of 65 dB or greater) as a result of the Greener Skies Proposed Action for any of the study years examined.”

The above quote from FAA’s Final EA for Greener Skies contradicts what was already known by FAA and SEA ten years earlier--that combined flight operations over Beacon Hill exceeded in some areas the FAA noise metric of 65 dB DNL that supports eligibility of homes for sound mitigation. FAA ignored the combined contour noise exposure map published under their regulatory guidance a decade earlier; and misled the public to believe that in ten years, noise did not increase even by a mere 1.5 dB DNL! Perhaps that’s why there was no public outreach on Beacon Hill? Possibly FAA didn’t want to risk citizen reaction prior to implementation because KCIA had saturated residents with noise information during the development of its 2003-2008 Part 150 Study that contained a graphic of the combined noise contour map.

FAA’s Final Environmental Assessment for Greener Skies Over Seattle, November 1, 2012
(Access in web browser at FAA environmental review for Greener Skies, main document, at the bottom of FAA webpage.)

On page v, the section entitled, “Purpose and Need,” FAA writes:

² Incidentally in 2012, 53% of the population of Beacon Hill was designated Asian.

On page 4, the section entitled "Proposed and Existing Noise Levels" contains the following information:

(Access to web browser at FAA environmental review for Green Street Transit Station, located at the bottom of FAA website.)

FAA's Final Environmental Assessment for Green Street Transit Station, Appendix 1.1.1

Part 150 (2008) that contained a graphic of the predicted noise contours. KCA had estimated the noise contours during the development of the 2005-2008 Hillside Station. FAA didn't want to use that data as a basis for its prediction on noise contours. FAA stated that the predicted contours were not published under the regulatory guidance. FAA stated that the contours were not published under the regulatory guidance. FAA stated that the contours were not published under the regulatory guidance. FAA stated that the contours were not published under the regulatory guidance.

The above quote from FAA's 1 and 2 for Green Street Transit Station was already known to FAA and NEA ten years earlier. The complaint filed by the Hillside Station is that FAA and NEA noise levels of 55 dB DNL that support the right of way for sound level. FAA stated that the contours were not published under the regulatory guidance. FAA stated that the contours were not published under the regulatory guidance.

FAA's Environmental Assessment for Green Street Transit Station, Appendix 1.1.1.1. The FAA's Environmental Assessment for Green Street Transit Station, Appendix 1.1.1.1. The FAA's Environmental Assessment for Green Street Transit Station, Appendix 1.1.1.1. The FAA's Environmental Assessment for Green Street Transit Station, Appendix 1.1.1.1.

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“The FAA’s mission is “to provide the safest, most efficient aerospace system in the world. The ‘need’ faced in the complex airspace surrounding SEA is the lack of efficiency associated with existing standard instrument arrival procedures into SEA, both in terms of the throughput of traffic to the runways as well as the significant need for controller interaction to maintain safe separation standards between aircraft arriving on closely-spaced parallel runways....”

“The ‘purpose’ of the Greener Skies project is therefore to provide a partial solution to the inefficiencies of the existing air traffic control system. Greener Skies seeks to achieve this purpose by leveraging existing NextGen performance-based technology enhancement to reduce controller and pilot workloads, reduce the complexity of operations within the Seattle airspace, and increase system flexibility and predictability.”

Environmental benefits (reduction of noise, emissions, and less fuel consumption) represented the external marketing plan for Greener Skies/NextGen, yet the real reasons were to benefit flight throughput so that more and more flight capacity could be accommodated without accompanying mitigation for the residents experiencing ever-greater volumes of flights. These facts were hidden from the public!

FAA Failed to Instruct SEA to update NEMs after implementing Greener Skies/NextGen Program

SEA’s 2013-2018 Part 150 Study was approved by the FAA in June 2014; yet analyses conducted by City of Burien Airport Committee members during 2017 and released to the Burien City Council, uncovered large discrepancies between the Study’s projected and actual flight operations.

FACT: On page G-1 of SEA’s Final Part 150 Study in October 2013, they projected an increase of 15.4% flight operations by 2021; however, each year of the Study, actual flights exceeded projected flights by an average of 9% per year based upon actual flight data between 2013 and 2016. Didn’t FAA notice that by the end of 2019 flight operations at SEA (450,487 operations) were already 7% greater than what SEA had forecast for 2021 (418,597)--a full two years early!

None of these “red flags” (fast-paced growth that leap-frogged SEA flight projections) motivated the Northwest Mountain Region of FAA to require SEA to comply with FAA Advisory Circular 150/5020-1, dated August 3, 1983, paragraph 36b, page 10, that describes how airports need to conduct periodic reviews and updates to determine whether their Part 150 NCP (Noise Compatibility Program) is current or reflects “increased operations” or “when the noise exposure map or airport master plan is updated, should be scheduled and budgeted by the airport operator as an integral part of the program. Included within the formalized review should be consideration of those problems or deficiencies identified during the monitoring process and most notably those pertaining to the performance of the plan. The review will normally not be as extensive as the original effort but should establish whether the plan remains viable or what actions are necessary to correct existing or forecast deficiencies.”

It is a stunning fact that FAA did not provide regulatory oversight to SEA that would require a periodic review or update in compliance with this A/C despite the airport’s steady annual

operational increases that resulted in SEA in 2019 being considered the 8th busiest airport in the U.S., as compared to 14th busiest, which was their status when SEA published its 2013-2018 Part 150 Study growth projections. Additionally, FAA did not insist on SEA updating its NEMs to determine whether or not the 1.5 dB DNL had been exceeded, which it undoubtedly had, given its high national rank of “busyness.” Instead, the BAC was informed in September 2017 by Stan Shepherd, Noise Manager of SEA, that there were no plans to update Part 150 until AFTER the Sustainable Airport Master Plan (SAMP) which is scheduled for completion, or under construction by 2027. Since approval of a Part 150 Study would occur no earlier than a couple years after initiation, and allowing for another year for FAA approval, it’s foreseeable that mitigation of qualified homes from increased noise from 2013 and beyond would be stalled until 2030 at the earliest, and SEA is already years behind schedule!

It’s important to note that despite FAA’s approval of SEA’s 2013-2018 Part 150 Study in June 2014, SEA did not hire a contractor to begin sound insulation retrofitting of qualified homes until late Fall 2018! Hundreds of homes still have not been mitigated for the third runway’s installation that occurred in 2008. Consequently, SEA’s public outreach concerning outstanding mitigation directed at residents appears non-existent! Furthermore, no mitigation is even being considered for the residents of Beacon Hill where FAA and SEA has known since 2002 that homes were eligible for sound insulation. The absence of public outreach is deception!

FAA release of CATEX of “New Route” over Burien in April 2018

FAA has no reasonable defense for not knowing that SEA’s Part 150 Study was outdated from almost the moment of publication when it could not rely on this Study for noise analysis of the “New Route” as described below from page 35 of FAA’s CATEX document:

“As FAA started preparing NEPA documentation for the Preferred Alternative, the first noise analysis results were compared to the noise contours from the SEA Part 150 Study dated October 2013. FAA discovered that the noise exposure levels in the Turboprop-Only Analysis were not consistent with the Part 150 Study contours. This resulted in FAA conducting a second noise analysis that used all arriving and departing aircraft to account for the noise from all aircraft operating with the General Study Area.”

In Table 6 on page 38 of the CATEX, titled “Noise Results Using All Arrival and Departure Tracks”, the first column of Table 6 indicates that “5.2%” of the Study area was greater than 65+dB, making that area eligible for noise mitigation. Yet there has been no action from FAA or SEA to address outstanding need to update noise exposure maps prior to a new Part 150 Study!

Linkage Between Element #6 of FAA’s Record of Approval (ROA) and Noise Levels from Greener Skies Program/NextGen) included in SEA’s Noise Compatibility Program (NCP) in its 2013-2018 Part 150 Study

In FAA’s ROA dated June 2014 of SEA’s Part 150 Study, Element #6 titled “Measure A-15: Use of FMS Procedures – Page 5-9, Page 6-22 and Table 6-1, indicated the following that was bolded by the FAA:

occupational processes that resulted in SEA in 2019 being considered the "lowest airport in the U.S. as compared to 147 airports which were their status when SEA included as 2013-2018 Part 150 Study project. Additionally, FAA did not issue on SEA regarding the NTE is to determine whether or not the 1.5 dB DNL had been exceeded, which is undoubtedly part of the high national rank of "poor." Instead, the FAA was limited in September 2017 by the September 2018 Management of SEA that there was no plan to update Part 150 and ATIS the Sustainable Airport 2.0 (SAMP) which is scheduled for completion or under construction by 2022. Once approval of a Part 150 Study would occur, no earlier than a couple years after initiation, and allowing for another year for FAA approval, it is reasonable that mitigation of qualified noise Level increased noise from 2013 and beyond would be needed and 2010 in the earlier and SEA is already years behind schedule.

It is important to note that the final FAA report of SEA 2013-2018 Part 150 Study in June 2014, SEA did not include a contractor to begin sound installation (mitigation of qualified noise) in late Fall 2018. Hundreds of homes will have not been selected for the final study. Installation that occurred in 2008 - 2009, SEA's public outreach concerning remaining mitigation, limited at residents appears non-existent. Furthermore, no mitigation is even being considered for the thousands of homes in Hill where SEA and SEA has been since 2002 that homes were eligible for sound insulation. The scope of public outreach is insufficient.

FAA review of CAITX of "New Noise" over Boston in April 2019

FAA has no reasonable doubt for not knowing that SEA's Part 150 Study was outdated from almost the moment of publication when it could not rely on the study for noise analysis of the "New Noise" as described below from page 22 of CAITX document.

"As FAA started preparing NEPA documentation for the Preferred Alternative, the first noise analysis results were compared to the noise contours from the SEA and Part 150 Study dated October 2011. FAA also noted that the noise exposure levels in the 1.5 dB DNL study areas were not consistent with the Part 150 Study contours. This resulted in FAA conducting a second noise study that used all existing and projected aircraft to account for the noise from all aircraft operating at the General Aviation."

In Table 6 on page 22 of the CAITX dated 1/27/19, the R-squared being All Aircraft and Economics Table, the first column of Table 6 indicates that 82% of the study area was greater than 6.2 dB, indicating that area eligible for noise mitigation. Yet there has been no action from FAA or SEA to address outstanding need to update noise exposure maps prior to a new Part 150 Study.

Further Review of FAA's Review of Approval (ROA) and Noise Level from General Aviation Program (GAP) included in SEA's Noise Contour Program (NCP) in the 2013-2018 Part 150 Study

In FAA's ROA dated June 2019 of SEA's Part 150 Study, Element 36 titled "Noise and A-11 Use of FMS Procedures - Page 5-1, Page 5-22 and Table 5-1, indicated the following that was included by the FAA.

“FAA Determination: Approved as it is a continuation of a measure that was approved in the 2002³ ROA and no new FMS procedures are recommended in this NCP update. The 2002 ROA included the following language which is still pertinent.” “The Port is responsible for initiating coordination with the FAA and airlines on evaluating potential new FMS procedures. The FAA will work with the Port and airlines to determine if any other FMS procedures are feasible and would provide noise mitigation. The NCP analysis and preliminary FAA evaluation determined that FMS procedures and corridors recommended in the NCP *were not feasible and could severely impact on airspace capacity in the area. Approval of this measure does not commit the FAA to implementing new procedures.*” (Highlighting added for emphasis.)

Why didn't FAA exercise its regulatory oversight by following-up with SEA on its commitment for noise mitigation of areas affected by Greener Skies/NextGen? Why weren't residents informed of their eligibility for sound insulation consistent with the substance of FAA's "Determination" stated above?

Is the FAA's "Determination" an indictment of the failings of the FMS (aka NextGen) flight procedures used over Beacon Hill, Vashon, and North Seattle since they were initially promoted to reduce fuel, noise, and emissions to gain more flight efficiency? At least one group known as Aviation Impact Reform thought so and posted on December 11, 2017, that the Greener Skies Program (NextGen) was an "Environmental Fraud" (<http://aireform.com/faa-industrys-own-data-exposes...>). On page 5 of 8 of their report, Aviation Impact Reform concludes:

“B. A full five years after the FONSI signoff, FAA's controllers at Seattle TRACON are not even using the RNP procedure down the center of Elliott Bay that was the key component of Greener Skies, the one element supposed to enable the bulk of the environmental benefits. It is as if the entire Greener Skies public engagement process was just an exercise in propaganda.”

On page 7 of 8 of the report, Aviation Impact Reform summarizes their position based upon several tables contrasting actual and Greener Skies' fuel consumption contained in their report:

“Greener Skies was (and still is) both a fraud and a side-show 'act', using erroneous estimates while pretending to create benefits that *STILL* do not exist! And the impacts, using the questionable numbers provided by PoS/FAA are astounding; they are saying, in 2014, *arrivals to Sea-Tac consumed 2.6 million pounds of jetfuel PER DAY while on approach*, creating noise and air pollution that we are all supposed to ignore.”

3. As a result of FAA and SEA's failure to acknowledge decibel level increases since they approved Part 150 Studies from both SEA and KCIA, public outreach on Beacon Hill was denied. FAA intentionally avoided public outreach in the most densely populated segment of the Greener Skies Program/NextGen route.

³ Part 150 Studies generally cover a five-year period, so this ROA is for 2002-2007. It's confusing though since FAA and SEA refer to the 2013-2018 SEA Study sometimes as ending in 2018 and sometimes ending in 2021.

Personal Testimonial from Seattle Resident about Greener Skies/NextGen (Reference article⁴ by Eric Seigliano, dated January 13, 2013 published by Crosscut, <https://crosscut.com/2013/01/faa-greener-skies-quieter-skies-beacon-hill-jet-no>) that reveals his perception of FAA's strategy to downplay the effects of implementing Greener Skies/NextGen flights to affected neighborhoods, such as Beacon Hill:

Paragraph 4 of article: "FAA officials contend that the additional noise impacts will be "indistinguishable," less than 1.5 decibels more than present levels."

FACT: FAA and SEA already knew that areas of Beacon Hill exceeded the 65 dB DNL from the combined noise contours included in KCIA's Part 150 Study that occurred over a decade earlier.

Paragraph 8 of article: "FAA and Sea-Tac officials though, say volumes and noise impacts have actually declined in recent years, thanks to the recession and to the airlines flying quieter jets." This is a common refrain from local FAA and SEA officials that demonstrates their willingness to collaborate on misinforming the public⁵. Note also the quote on the bottom of page 4, where Stan Shepherd, Noise Manager at SEA, says "Boeing Field noise is not considered in our (noise impact) Part 150 calculations." More "cover" from SEA to downplay growing amounts of noise and emissions over Beacon Hill residents.

FAA controls all United States national airspace regardless of airport of origin. Why would FAA not insist that all Sea-Tac flights be measured as part of the noise modeling for Greener Skies/NextGen? To the population hearing aircraft noise on the ground, the type of flight (RNP or otherwise) is indistinguishable.

SUMMARY

This submission serves as a compilation of research and documentation collected and being submitted to the General Accounting Office (GAO) in response to their interviews of concerned citizens during the third week of August 2020 inquiring about public outreach conducted by the FAA as it relates to "Community Impacts from NextGen Noise Questions for Community Groups."

⁴ This article was written in 2013, after the national recession had ended; and after Sea-Tac's 2013-2018 Part 150 Study flight projections were published, that curiously under-estimated by about 33% actual flights above their Study's so-called flight projections for 2013-2018.

Editorial Note: While the GAO's emphasis in this endeavor is narrowly focused on public outreach related to the NextGen program known by many labels, the circumstances of interaction described between FAA and SEA in just one case study is only one example. Quiet Skis Coalitions from nearby communities could expand and describe other examples where the relationship between these two agencies could be described as conjoined twins. Because their relationship is so cozy and symbiotic, a profile of decision-making on critical health and environmental issues merge, and it's difficult for the public to discern where one agency begins and the other ends. However, the overall perception is that FAA is not fulfilling its regulatory, oversight role to insure accountability from SEA; but rather FAA acquiesces to SEA too often to the detriment of the public that they are both mandated to serve.

V. SOUND ATTENUATE RESIDENCES (cont.)

Consultants' Discussion (cont.)

conduct the insulation themselves, but either delegate it to local municipalities or to the residents themselves to choose from a pre-selected group of approved contractors. In all cases, the FAA has established certain acoustic standards that must be met upon completion of the insulation. Insulation program contractors must certify that noise levels in the homes have been reduced to and achieve no more than 45 dB noise levels inside, including a 20 dB reduction in noise levels, following insulation, in order for the homeowner to qualify for airport-sponsored insulation.

One of the unusual, perhaps unique, features of KCIA is its close proximity to Sea-Tac International Airport to the south. The two facilities are so close that their noise contours actually overlap. This Part 150 Study has taken the unusual analytical step of creating a combined contour for both airports. The purpose of this exercise is to define areas, which would not fall into either airport's individual 65 DNL and above contour, but which are exposed to 65 DNL when the noise levels from both airports are considered together.

This is an important analysis, because the two airports are orchestrated together from an air traffic standpoint; that is they are operated in tandem – both either in north or south flow. Thus, from a "real world" perspective, people on the ground are exposed to the combined noise levels of both airports simultaneously. As a result, the combined noise contour is a reflection of noise levels as they are actually experienced.

For this reason, the area within the combined KCIA/Sea-Tac 65 DNL and above contour should be eligible for federal noise attenuation funds. However, applying for federal sound insulation program funds using a combined contour would be a precedent setting action. Generally grants are given to a single airport for mitigation of its own impacts. The nature of a federal application, if this recommendation were adopted, would need to be determined. In all probability, some cooperative effort with the Port of Seattle (owner and operator of Sea-Tac) would be required.

For estimation purposes, this program would be expected to include 2,642 homes at a cost of \$30,000 each for a total of about \$79 Million.

SAC Discussion:

There will continue to be noise impacts on the community even if some of the other recommendations are implemented. Therefore, the community should be offered the opportunity to obtain home insulation to mitigate noise impacts. At an average cost of \$30,000 per home, the cost of insulating homes within the 65 DNL and above contour would be approximately \$59 million. The FAA may participate in funding this project at 90% (the Airport pays 10%), typically up to a maximum of \$5 million annually, making this program affordable for the Airport over a period of about 10 years. The SAC members assumed the FAA participation would be at this level.

Since KCIA air space overlaps with Sea-Tac Airport's airspace, some communities are heavily impacted by both airports; others are affected more by one airport than the other. In those areas where the KCIA effects alone do not result in exposure to 65 DNL or greater, but where the cumulative impacts of both airports would result in at least 65 DNL, the Committee felt that the cumulative impact should be addressed using the same standard as if either airport individually had created the impact. Thus, any home within the combined 65 DNL and above contour would qualify for residential soundproofing if this recommendation is adopted. Sea-Tac Airport has concurred with the use of this combined contour and has agreed to participate financially in insulation programs within the combined contours, subject to the order of priorities in the Sea-Tac Airport's own Part 150 Study.

The combined contour would add approximately one (1) additional square mile, including 367 housing units and 844 residents, to the KCIA 65 DNL and above contour.

A majority of SAC members agreed that single family residences and multi family residences should be treated equally for eligibility for home insulation programs. A minority felt that preference should be given to single family residences, and that relief should be provided to the resident (tenant and/or owner) and not just to the owner, if the owner does not reside in the building.

COMB ATTENUATE RESULTS

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