

Dear Ms. Hamer,

Again thanks for giving members of the community the opportunity to talk to the GAO in response to your study titled: "103933: Community Impacts from NextGen Noise." There were several prepared questions designed to support these three objectives:

- (1) What factors contribute to public perceptions about aviation noise?
- (2) How does FAA evaluate and mitigate noise impacts from flight path changes resulting from performance-based navigation?
- (3) How does FAA conduct public outreach, including the use of available guidance, in implementing performance-based navigation?

Yesterday I wrote to you expressing my concerns about documenting the concerns expressed by the community members. But then you did, in the first objective, refer to our "perceptions." Perceptions, and I assume our opinions, are not necessarily fact based and may be highly biased. I proposed that documentation should accompany every claim. In lieu of documentation, at least be sure to offer the FAA and Port of Seattle (PoS) an opportunity to address each allegation.

In response you stated: "Thanks for your perspective. As discussed, we welcome any documentation or additional information you would like to provide." My question is what will you do with those documents? If our community's comments and supporting documents are submitted, what credibility would they have if published in isolation omitting any rebuttal from the FAA or PoS? They would appear unsubstantiated. If they stand alone you risk two adverse effects. First the comments and documents may be challenged, discredited and diminish the authority of the study. Second, you and your team risk jeopardizing both your reputation and possibly the GAO's.

Collecting substantiating documentation is time consuming. Speaking for myself, some of my perceptions have their genesis in a web of interlocking transactions such that no one event or subject permit an easy description. However, I can think of two simple questions for which I have documentation. Previously, I have asked the FAA/ATO these questions, one dating back to April 2018, but they have refused to provide me with an explanation - details below. A third topic brought up by someone at the Skype meeting had to do with Part 150 Beacon Hill home noise mitigation - again details below. In each case it would appear appropriate to ask the FAA/PoS to respond, of course providing substantiating documentation. I think the benefits are obvious but worth reviewing. Obviously if the FAA/PoS refuse to answer your inquiries, the perception of the community would be substantiated. If the FAA/PoS answer your inquiries with a complete explanation, then a communications breakdown may be suspected and the community perception faulted.

The first and second example, given the first objective's breadth, may be deemed outside your scope. However, the third example is a golden opportunity to study the dynamics of the PoS, its commitment to Part 150, the FAA's endorsement which released funding, and the benefits of the noise mitigation enhancements bestowed upon the Beacon Hill community.

If these three examples are fully examined, I suspect additional documentation can be provided addressing other perceptions held within the community.

Example One:

Their projections for flight operations were woefully understated and during that time, Sea-Tac rose from 14<sup>th</sup> busiest airport in the country to 8<sup>th</sup>! Why would FAA permit and approve their actions when different divisions of the same airport would produce/publish such disparate projections as illustrated in Sea-Tac's Part 150 Study and its Sustained Airport Master Plan, or SAMP? Furthermore, Sea-Tac has refused to update their noise exposure maps (NEMs) to update noise contours and update eligibility for residents to qualify for sound mitigation until after the SAMP is approved and implemented. I believe this fact is regulatory malpractice!

My comment would highlight the fact that with the increase, they need to use current data/measurements (pre COVID19) to verify that either the exposure has increase or remained the same. How do they know?

#### SUPPORTING DOCUMENTATION:

Publish the FAA's or PoS's statement that they will not revise their noise exposure map until the SAMP is completed and EIS approved or whatever it is they have said. (I actually have no idea what was published, only bits and pieces. Someone needs to sort this out.)

**CONCERN #2 - When Questioned, the FAA Will Not Provide Explanations:**

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## Perception Draft

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So here is a draft format I was thinking of. The idea is to present the perception, the rules, our observation or background as we see it, and the documents/data /publications/emails the PoS or FAA has provided.

I believe the time is now, if we have complaints the momentum is in our favor and there is no up side to delaying. If we don't have the material, so it goes.

Perhaps we never did, perhaps we never really thought through our issues.

Walt

### PERCEPTION #1 - Noise Exposure Map:

We believe the noise exposure map is out of date and not being revised. The PoS and FAA completed the current 2013-2018 noise exposure map in 2012.

Since then, despite the nearly XX% increase in traffic, the noise map has not been revised IAW Part

150, §150.21.

POLICY GUIDANCE (REFERENCE)

**§150.21 Noise exposure maps and related descriptions.**

(d) The airport operator shall, in accordance with this section, **promptly prepare and submit a revised noise exposure map.**

(1) If, after submission of a noise exposure map under paragraph (a) of this section, **any change in the operation of the airport would create any "substantial, new noncompatible use"** in any area depicted on the map beyond that which is forecast for a period of at least five years after the date of submission, the airport operator shall, in accordance with this section, promptly prepare and submit a revised noise exposure map. A change in the operation of an airport creates a substantial new noncompatible use if that change results in an increase in the yearly day-night average sound level of 1.5 dB or greater in either a land area which was formerly compatible but is thereby made noncompatible under Appendix A (Table 1), or in a land area which was previously determined to be noncompatible under that Table and whose noncompatibility is now significantly increased.

OBSERVATION:

Sea-Tac's 2013-2018 Part 150 was out of compliance within a couple years of its release.