

Sharyn Parker's notes prepared for interview with GAO representatives:

GAO Research Objectives:

(1) What factors contribute to public perceptions about aviation noise?

The public is not aware of any of these topics listed below and FAA does nothing to add to the public's knowledge of important airspace issues, such as:

- The complexity of regional airspace: Five airports in 100 miles: Sea-Tac (SEA), Renton (RTN), King County International Airport (BFI), Paine Field (PAE), McChord AFB (TCM).
- Congested airspace: Three airports within five miles with two separate airspace classifications: B & D.
- BFI is an ATC training center and still uses visual identification of aircraft; TRACON uses radar identification to sequence flights between BFI and Sea-Tac. This situation slows the volume of air traffic within five miles of three airports.
- That the FAA controls all national airspace; that the Supremacy Clause of the US Constitution allows FAA to pre-empt all local decision-making, except the location of an airport.
- That the Interstate Commerce Clause of the US Constitution is interpreted as a "green light" for flights during night-time hours, no curfews, and no caps on flight operations. Even the number of glass beads per inch painted as runway stripes is prescribed by the FAA; there is nothing that FAA doesn't control at an airport, except staff hiring decisions.

FAA demonstrates no interest in what the public thinks—and I worked closely with FAA Region 10 officials continuously for 14 years as Noise Officer at BFI). (The FAA actually paid my salary during the final three years of managing BFI's Sound Insulation Program before my retirement in 2015.) FAA prefers the airport sponsor handle all outreach to the airport's constituents. It was my experience that FAA approved the plans and often the funding of public outreach, and they'll point to some advisory circulars that provide guidance, but they are not willing to be personally involved or be present at public events.

(2) How does FAA evaluate and mitigate noise impacts from flight path changes resulting from performance-based navigation?

When BFI completed its Part 150 Study in March 2005, they included "combined noise contours" that illustrated that residents on Beacon Hill (within BFI's 65+ dB DNL) experienced flights from Sea-Tac, BFI, and RTN that would qualify those residents for noise mitigation because noise levels exceeded 65 dB DNL. This was BEFORE Greener Skies was ever discussed with local stakeholders. Neither Sea-Tac nor FAA wanted to set a precedent for authorizing sound mitigation for noise from two airports! (BTW, the BH population at that time was 53% Asian and BFI produced sound insulation program materials in six languages: Vietnamese, two Chinese dialects, Laotian, Tagalog, and Spanish.)

Sea-Tac has a history of neglecting minority populations—including now in Burien—and did not address language differences during their development of their latest 2013-2018 Part 150 Study! Why didn't FAA regulatory oversight steer them in a more socially responsive direction? These are the same people who suffer the brunt of RNP, aka Greener Skies, and I have no first-hand knowledge of there being outreach to this population in advance of its implementation even though I spent time with FAA officials and the BFI constituency that included Beacon Hill.

Moreover, Sea-Tac's 2013-2018 Part 150 was out of compliance within a couple years of its release. Their projections for flight operations were woefully understated and during that time, Sea-Tac rose from 14th busiest airport in the country to 8th! 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!

It was also evident that Sea-Tac had done a poor job compiling its Part 150 Study (and I served on the Technical Review Committee on behalf of BFI and raised issues that were not, in my opinion, adequately addressed). When FAA was required to respond to the City of Burien's lawsuit against a new route over downtown Burien and previously very quiet residential area, FAA issued a CATEX report in April 2019 that indicated that the noise level in a portion (5.2%) of the "New Route" study area had actually increased and exceeded the 65 dB DNL despite its recent Part 150 Study's publication. This was only one year after Sea-Tac's Part 150 Study's future base case projections that were substantially lower than actual flight operations! While Sea-Tac was projecting low flight operations for the Part 150 Study, Sea-Tac projected aggressive increases in flight operations for the Sustainable Airport's Master Plan (SAMP) for its capital development campaign for nearly the same time period, which would cause a thinking person to wonder why the projections for flight operations that might be subject to costly mitigation would be so low compared to the ambitious numbers attributable to the SAMP development plan!

Moreover, the Greener Skies initiative or any plans for a RNP flight structure, were not included in any flight operations' projections for Sea-Tac Airport or its noise or emissions impact on neighborhoods affected by it!

(3) How does FAA conduct public outreach, including the use of available guidance, in implementing performance-based navigation?

FAA continuously fails to provide regulatory oversight as evidenced by the examples provided above. Another example is the requirement that whenever flight operations increase noise by a minimum of 1.5 dB DNL, new noise exposure maps (NEMs) should be developed and released for public comment. So far as I am aware, FAA has not required Sea-Tac to comply with this provision in recent years despite high growth of operations. Consequently, until recently when the POS Commission adopted a more aggressive sound mitigation funding effort, Sea-Tac has

been years, yes years, behind implementing sound mitigation in a timely manner. For example, when FAA approved Sea-Tac's 2013-2018 Part 150 Study in June 2014, the POS did not initiate a search for a contractor to begin noise mitigation until November 2018! Why didn't FAA require the POS to begin mitigation sooner? This is a repeated pattern as evidenced by an Expert Panel, appointed by the Governor and staffed by the Puget Sound Regional Council and Washington State Department of Transportation, that compiled a report in 1996 of Sea-Tac's noise mitigation, and other noise initiatives; wherein the Panel scolded the POS for unnecessarily delaying hundreds of households receiving sound mitigation benefits sooner! Until recently, that pattern continued and with costs associated with COVID 19 being unforeseen and unprecedented, the question is whether or not the POS will resume its old habits?

NOTE: If desired, I could share copies of each of these examples, except the actual combined contours which are stored in King County archives; however, I have excerpts from BFI's Part 150 Study that reference the combined contours as well as FAA and Sea-Tac's unwillingness to support sound mitigation for the mostly minority population in Beacon Hill, Seattle.