

A

**From:** Phyllis Shulman [<mailto:pshulman82@gmail.com>]  
**Sent:** Friday, October 25, 2019 3:35 PM  
**To:** Brian Wilson <[BrianW@burienwa.gov](mailto:BrianW@burienwa.gov)>  
**Cc:** Marco Milanese <[milanese.m@portseattle.org](mailto:milanese.m@portseattle.org)>  
**Subject:** Request for input on the StART Airfield Noise Analysis Scope

Hi Brian,

The StART Aviation Noise Working Group recommended that the Port hire a consultant to analyze ground noise at Sea-Tac Airport and provide recommendations, based on the analysis, for ground noise reduction. Brad Nicholas, noise consultant with HMMH, attended the October 23 StART meeting to begin the process of getting feedback from StART on the scope of the analysis. I have attached his presentation for your review.

The study could provide much greater clarity about the causes of airfield noise and lead to some potential promising efforts. Even though your city has made the decision to suspend your membership in StART, we felt that it is important to involve your city in the process of scoping the analysis and ask for your comments/feedback.

Specifically, the consultant is asking feedback for these two topics:

1. Identification of which sources of ground noise you would like to see included as part of the analysis; and
2. Suggestions for specific locations ground noise monitoring should occur (for example particular neighborhoods), and whether there are times of day that are most important for monitoring.

Please email me with your feedback on the scope by November 8.  
Let me know if you have any questions.

Thanks,

Phyllis

Phyllis Shulman

Civic Alchemy

(206) 446-8788

A

|

|

Lori Fleming

From: SHARYN PARKER <sparkward@comcast.net>  
 Sent: Monday, November 18, 2019 2:48 PM  
 To: Nancy Tosta; Javier Tordable; Larry Cripe; Debi Wagner (BAC); Pedro Olguin; Jimmy Matta; Jeff Harbaugh  
 Cc: Brian Wilson; Lori Fleming  
 Subject: Re: materials for BAC

**CAUTION:** This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Nancy,

I'll be there, but I thought the time was 5:30 pm; are you suggesting that it be changed to 5 pm?

Two points to make about the Port's "epistle" (their response to City of Burien's August letter asking nine questions, I think) that you enclosed in your latest email; and also the airfield noise study.

To the first, I drafted a response and circulated it to StART members because a few questions had to do with StART and I didn't want to draft a response without their feedback, but I didn't hear back from any member; and also, we hadn't decided yet how we would respond. Debbi did respond with answers to the air quality questions the City of Burien asked.

To the second, below is the draft I wrote about airfield noise, but didn't send it because I was not clear whether or not the City of Burien intended to respond because of its "suspended" status. I raised the issue in an email to the BAC, and heard no response. Anyway, if the BAC/City Council wants to respond, here are my thoughts about the airfield noise study:

"HMMH is a credible firm; I've worked with them in the past, although I have not worked with this analyst; but the consultant has the cart before the horse in my opinion!

The noise monitors don't all operate well according to Bernadine Lund, Puget Sound Quiet Skies, who carefully tracks these monitoring details every day. Without knowing every neighborhood or monitoring station myself, this is what I do know about noise monitors based upon my experience:

1. The consultant first needs to do their homework before asking any StART member the source(s) of ground noise. The consultant needs to correlate noise complaints to noise monitor stations (NMS) and then correlate those results with the timing of engine run-ups on the airfield. I believe they are required to maintain records of those events and the locations where they occurred. Then they can identify the NMS results to confirm the decibel level of each event. This is important because the Growth Management Act (GMA) contains environmental noise limits contained in WAC 173-60-040, maximum permissible environmental noise levels during 10 pm-7 am period and not to exceed 1.5-15 minutes in any one-hour period of the day) governed by DOE.
2. There are two primary sources of airfield noise in my opinion: engine run-ups and reverse thrust. In the case of engine run-ups, they normally last from 5-20 minutes, sometimes longer. Another issue is that WAC 173-60-050 provides "that aircraft testing and maintenance shall be conducted at remote sites whenever possible." The recent epistle from the Port claimed they are already doing that now, but I think records should be requested to confirm their declaration because where the hell are they engine testing off-site if not on the airfield?

3. Reverse thrust is a little trickier because I don't know if anyone at Sea-Tac records how many times/day or at what decibel levels they occur. Again, noise complaints correlated with NMS records will reveal some trends and patterns. Remember too that reverse thrust and engine run-ups have been "priority" issues from the public to the airport since 1996 and contained in the last two Part 150 Studies; yet they've not taken time to "study" and analyze these data sets?

4. On NOAA's website, historic data is available so that correlated NMS data can be compared to atmospheric and weather conditions; however, I discount the weather angles some because I think it is a diversion from the real noise issues, which are better identified by the data sets I already mentioned because it grants the airport the opportunity to say "they can't control the weather" when it is not the fault of weather that these noise incidents occur. Their Record of Approval for 2013-2018 Part 150, element #3 also states that "Engine run-ups necessary for maintenance checks above idle power not to exceed a total of two (2) minutes per aircraft." Airport records should be requested to verify that this actually occurs and NMS data would either support or deny their claims.

5. I'm confused by this ground-noise study; is it the same noise study identified in the SAMP (in the Leigh/Fisher executive summary) to identify construction-related noise tied to near-term projects? If so, some airfield/flights noise is supposed to be included in that study. Is there duplication of effort happening? Will one study cancel the other?

6. Consultant should complete these exercises and present results before asking for community input unless they want to validate some preliminary findings first. Bernadine also knows which monitors that have mysteriously not worked for quite some time and do not produce any measurements. She is a good resource for StART members to consult."

Sharyn

C

We appreciate the Port of Seattle's outreach – in various formats over the past month – with respect to a potential return of our cities to the Sea-Tac Airport Round Table (StART). On behalf of the cities of Burien and Des Moines, we will endeavor to explore in good faith the requirements for removing the current suspension. As stated in our correspondence relating to the participation suspensions and subsequent communications, there are multiple reasons for the suspensions, and residual concerns about re-setting StART. Our good faith exploration of terminating the suspensions requires a careful review of the current processes (including Bylaws), existing and anticipated substantive progress and outcomes, risks of participation, how other stakeholders have (or have not) participated, StART culture, StART facilitation, and of course, needed changes to any or all of the above.

This letter confirms we are moving forward with the goal of identifying how we can re-set StART in a safe, equitable, transparent, accountable, and substantively meaningful way, and to ensure that adequate process guardrails are provided to all stakeholders. While this may take some time – we need to get this right – and we do see several threshold matters that must be addressed at the outset as a predicate to the balance of this important work.

First – it is clear that any further participation will require an agreement that StART meetings be recorded – preferably audio and visual. This will create an atmosphere of trust, transparency and accountability. It will protect all participants and provide a record for the public. Please advise that this is agreeable.

Second – the action precipitating the suspensions by three cities must be reversed. We appreciate the repeated apologies, but they seem hollow when it is the underlying action itself that is problematic. The Port's proceeding with \$10 million in design work for an airport operation expansion project, without completion of the environmental reviews for that same project, seems to be an existential issue for re-setting StART. If the Port is simply going to do what it wants, when it wants, anyway, without actual collaboration with cities in information sharing and decision-making, it is difficult to see how StART can continue in good faith.

Third – there are numerous outstanding written requests and statements of concern from our cities this year that directly relate to airport operations that have never received a response. This lack of communication unfortunately dovetails with the recent failure to advise about the \$10 million in design work, and together forms a problematic frame for re-setting StART. The information addressed and requested by our cities is key to helping to re-set StART, and the Port's response (and courtesy of a response) is needed to help us conduct the good faith exploration discussed above. These include by way of example:

- Burien Resolution 406 and Resolution 407
- September 12, 2019, letter from Mayor Pina to Executive Director Metruck
- January 25, 2019, letter from Mayor Pina to Port of Seattle Commission
- **[other correspondence]**

Again, we are encouraged by the Port's outreach; however, we do not believe it is realistic that StART can proceed with the participation of our cities absent significant and reflective review and change. An affirmative response to the requests above will do much to demonstrate the good faith of the parties and allow this process to proceed in the most likely to achieve a positive result.

Thank you.

To: Port Commissioners, Steve Metruck, Lance Lyttle

We are writing to elaborate on our rationale to suspend our participation in the Sea-Tac Airport Round Table (StART) and the condition we would consider for re-engagement in those or other discussions.

As you are aware, our community and many others surrounding Sea-Tac Airport are experiencing significant impacts from aviation growth. We are constantly reminded by our residents of concerns about their health, air quality, and the value of their property. We have worked (and fought) with the Port for decades to try to address these concerns, asking for your help in prioritizing the environment, health, and economies of our communities over the desired growth of airlines. We obviously understand the benefits of aviation and Port activities to our region, but we have a primary responsibility to our residents for their safety and health and the viability of our community. Year after year, we've watched Port staff and Commissioners ignore our concerns and prioritize economic growth over the health and quality of life in our communities.

The last comprehensive assessment of the impacts of aviation and Sea-Tac Airport growth was published in 1997 in the form of the Final Supplemental Environmental Impact Statement for construction of the third runway. Since that time, flight operations have increased XX% from \_\_\_\_\_ to \_\_\_\_\_. Some may argue that planes are quieter, and impacts occur over a smaller area, but that is not the experience in our communities. A proposed increase of 60% more operations as part of the "Sustainable" Airport Master Plan will not benefit the health of our community. Knowing this, we, as a City Council passed a number of resolutions in January of this year, including Resolution #406 asking for your help. The language in our Resolution pertaining to the Port is as follows (you can view the full resolution here: \_\_\_\_\_):

*"NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, DOES RESOLVE AS FOLLOWS:*

*Section 1. Request that the Port of Seattle Delay Build-Out. In the interest of human health and safety and wise expenditure of public resources, the City Council hereby requests that the Port of Seattle delay any build-out or launch of additional infrastructure at the Airport, specifically as identified in the SAMP, until such time as the Puget Sound Regional Council and the Department of Commerce studies are completed, true impacts are assessed, and aviation capacity needs are fully documented.*

*Section 3. Request for Reporting. For full transparency, the City Council hereby requests that the Commissioners of the Port of Seattle provide the Burien City Council a report on proposed actions no later than six months from adoption of this resolution ...".*

We regret to acknowledge that neither of these requests was honored by the Port. In fact, we heard nothing from you in response to these actions. Furthermore, at your summer Port Commission meetings, you authorized expenditure of \$10 million for design work on the SAMP,

taking action with no interaction or input from surrounding communities that will be significantly affected by build-out that occurs as part of this design.

Your StART website states that “The Sea-Tac Airport Stakeholder Advisory Round Table (StART) is a new way for the communities ... to engage with the Port of Seattle staff...”. If this “new way” means not sharing information in a timely manner and not engaging with communities on issues you know matter to us greatly, we have no interest in participation. Hence, we chose to suspend until such time as a respectful, mutually beneficial engagement process can be defined.

For us to re-engage in StART or another forum that recognizes our equal standing in response to the growing needs of our region, we ask that your decision to begin design work for expansion activities planned under the SAMP be reversed. Stop spending public funds immediately. Wait until the SEPA and NEPA analyses are complete, recognizing that a “No Action” alternative could result in the healthiest decision for our region, as well as save taxpayer dollars. It makes little sense to expend \$10 million in design work, that could prove for naught. We will re-engage in dialog when you recognize that the interests we represent, the lives of people in our community, are at least equal in importance to more gates and flights at Sea-Tac.

We look forward to your response.

Burien City Council