

Final 8/13/19

8/13/19 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 many of the plans and procedures the Port of Seattle is implementing at Sea-Tac International Airport and the significant impacts these have had and will continue to have on our community. Our examination of the Port's process regarding these plans and procedures, as well as our understanding of them, has raised many questions (listed below). We respectfully request that you provide answers.

1. Why have there been no studies evaluating increases in aircraft noise on ALL runways since the 2002-2007 Part 150 Study? (The 2013-2018 Part 150 Study evaluated only 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 The communities believe that there have been increases of at least 1.5 dB DNL given the rapid growth in aircraft operations since 2002. Can you show us any evidence that this is not the case?
2. The Expert Arbitration Panel's Review of Noise (Final Report) recommendations in 1996² included many noise abatement procedures (e.g., minimizing nighttime flights, reverse thrust). Why have many of the noise abatement procedures not been implemented? Why has the Port ignored 23 years of pleas from the surrounding communities for noise abatement flight procedures and yet is willing to "discuss" such noise abatement procedures with the StART Committee?
3. When was the last time that the performance of Sea-Tac Airport's noise program was audited by the State of Washington or the FAA? Given the Port's lax oversight (documented by

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.

its own internal review) and exceedingly slow implementation of noise mitigation programs,³ might such an audit be justified? A recent Port audit of the program indicated only 40 homes were sound insulated in three years, while just five miles away at King County Airport at Boeing Field, 100 homes/year were insulated during operation of its program between 2009-2015.

4. Why is the Sustainable Airport Master Plan (SAMP) being prioritized over the Part 150 Study? There is evidence that the FAA's own noise analyses contained in its April 2018 Categorical Exclusion Report to the City of Burien recognizes that 5.2% of the study area measured noise that exceeded 65 dB DNL. The FAA could not use Sea-Tac's 2013-2018 Part 150 Study because it was already outdated⁴. By not updating the Part 150 Study now, hundreds of homes will not be sound insulated for another decade at the Port's pace and noise abatement procedures will continue to be an illusory goal. Why should people continue to suffer based on noise at Sea-Tac Airport 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? Why are speakers and agendas set solely by the Port? Why are "new" policy decisions announced by the Port even when the group had not taken a vote or reached consensus on specific issues? Why are alternatives such as slower growth in operations not considered as a means to address community concerns?

6. Page 40 of 50 of the March 27, 1996 Final Report of the Expert Arbitration Panel's Review, (Commissioned by WSDOT and PSRC) directs the Port as follows: "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. The Port argues that there is room on the airfield for a new maintenance campus.

³March 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 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 that was approved by the FAA in June 2014, yet the Port didn't solicit an insulation contractor until late 2018.

⁴ See pages 34-35 in Section 5.2.7 Noise and Noise-Compatible Land Use in the CATEX documentation released by the FAA on April 16, 2018.

How can this be the case, when a GRE, that would improve livability for people living closest to the airport, cannot be accommodated?

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 confine its air quality analysis to airport property when 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?

9. Why is the Port unwilling to stand up for the health and concerns of residents of surrounding communities, many of whom work to support Sea-Tac Airport operations? Why does the Port often use the excuse that its hands are tied because of FAA regulations rather than working with the communities to change procedures that may cause harm to your [employees and our residents](#)?

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." The Port of Seattle appears to have little willingness to consider compatibility with surrounding communities. Noise analyses and meaningful noise abatement and mitigation are not occurring, while billions of dollars are being expended for increased operations at Sea-Tac Airport. The Port of Seattle has acted slowly and without accountability for more than 20 years, placing profits and business interests above environmental, health, and economic well-being in surrounding communities. The small grants offered to communities, along with invitations to participate in committees that offer no real options or solutions, are subterfuge to actually doing something meaningful with and on behalf of our communities.

We ask for the opportunity to have an honest discussion with the Port and others about how much growth at Sea-Tac Airport is really sustainable when the health and quality of life in surrounding communities is at stake. We would welcome such a conversation. We look forward to your responses to our questions and requests. Thank you.

Sincerely,

Burien City Council

CC: City managers/mayors – NP, DM, FW, Tukwila, ST; state legislators – Orwall, Keiser, Fitzgibbon, Nguyen, ??; Federal legislators – Jayapal, Smith, Larsen, Murray, Cantwell, ??

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Dear Mr. Metruck, Commissioners Bowman, Calkins, Cho, Fellerman, and Steinbruck:

Besides offering free trees to communities surrounding the airport and supporting the use of recycled "gray water" for some local businesses, could the Port administration and Commissioners relate to local cities how they intend to address health issues of residents who were already suffering deteriorating health effects from noise and emissions before the arrival of Covid 19?

Many of us have read multiple articles describing the citizenry hardest hit by the corona virus: minorities with underlying medical conditions and the elderly. Burien has a large minority population and growing number of retirees already plagued by sleep deprivation, asthma, lung disease and cancer. What is notably *missing* from the Airport's web pages describing their Covid 19 safeguards for travelers is what mitigation is planned for the vulnerable environmental justice population and others with compromised health conditions in Burien? Of course, the City is concerned about all its residents, but knowing that some people are more susceptible to the virus *because* of these *existing* conditions is very troublesome to us.

Consequently, the Burien City Councilmembers, along with our Burien Airport Committee, would very much like to have a conversation with Port Commissioner(s) to share ideas about this timely topic of mitigating the deleterious risk factors now, and especially when the Airport resumes normal levels of operation.

Sincerely,