

Detailed Responses to City of Burien Questions

1. Question: "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. 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?"

The 2014 Part 150 update assessed noise impacts from all three runways and showed a smaller impacted Area; the SAMP Environmental Review will also evaluate noise from all three runways.

- The 2013-2018 Part 150 Update, completed in 2014, did in fact include traffic on all three runways and all flight traffic. We believe that the misperception that the study only included the third runway stems from the fact that we scheduled the Part 150 update in order to ensure that all operations were included so as to maximize the accuracy of the study – including but not limited to third runway use.
 - The Federal Aviation Administration (FAA) requires airports to model noise exposure using the Day Night Level (DNL) metric; the FAA finds a level higher than 65 DNL incompatible with unmitigated residential uses.
 - With the inclusion of Third Runway operations, the 2014 Part 150 update showed a *smaller* existing geographic area that was experiencing airport noise above the level appropriate for residential uses without mitigation as compared to the previous update. As was discussed in the June 2019 StART meeting, the main driver of this change was improvements in aircraft noise-reduction technologies.
 - Finally, the Sustainable Airport Master Plan (SAMP) Near-Term Projects (NTP) environmental review will also evaluate noise impacts. If the SAMP NTP environmental review noise contours indicate that there is a substantial change, the Port plans to work with the FAA to update the official Part 150 Noise Exposure Maps (see the answer to Question 4 for additional details).
2. Question: "The Expert Arbitration Panel's Review of Noise (Final Report) recommendations in 1996 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?"

We believe it is incorrect to characterize the Port as having ignored community concerns over the past several decades. The Port has been recognized nationally for its innovative leadership on both noise abatement and noise mitigation.

- Sea-Tac Airport's noise abatement flight procedures have been in place since 1990 when the Federal Aviation Administration (FAA) implemented the "Four Post Plan," which sets geographic boundaries for aircraft departure and arrival profiles. The Port monitors these procedures and meets regularly with the FAA to discuss adherence rates. Approximately 99% of aircraft fly within the defined noise abatement corridors.
- Federal law does not allow the Port to mandate the complete elimination of reverse thrust. Therefore, to address this concern, the Port has included language within the pilot approach charts for Sea-Tac Airport to limit the use of reverse thrust to what is necessary for safety during the nighttime hours.

- The work of StART to move forward on analyzing additional noise abatement procedures is further evidence of our continuing commitment to continue to push for even greater responsiveness to community concerns, to the best of our abilities, legal constraints, and available technology.
 - Finally, as announced on September 12, 2019, Sea-Tac has secured a revised Runway Use Agreement with the FAA and has begun a new voluntary Late-Night Noise Limitation Program with the airlines serving Sea-Tac.
3. Question: *“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 its own internal review) and exceedingly slow implementation of noise mitigation programs, 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.”*

The FAA audits all grants when they are closed out to ensure that all grant obligations have been fulfilled. The Port has used airport revenues for residential noise mitigation programs in the last decade and until very recently there have been no new grants to audit. The state audits the Port annually to check for compliance with state law and determines which programs to review.

- The Port’s own internal audit function operates independently to ensure transparency and accountability of all Port programs. Of the two findings from the recent internal audit report on the noise program, one was mostly addressed through updates in 2015 and the other was a recommendation to enhance our oversight going forward to avoid any potential future issues.
 - Again, the Port’s noise program is nationally recognized for its leadership and innovation and has spent over \$300 million on sound insulation projects over the last few decades. To date, we have insulated more than 9,400 single-family homes and 5 condominium complexes (246 units), made financial contributions to the rebuilding of 8 schools within the Highline School District with a commitment for 7 more, and made contributions to the renovation of 14 buildings at Highline College. We also handled acquisition and relocation for 359 mobile homes and 1,469 single-family homes.
 - Because the Sea-Tac sound insulation program is so much larger and in place for so much longer than King County Airport’s program, the comparison is misleading. A better comparison would be to look at the overall percentage of impacted homes near each airport. Because of our dedicated efforts, only about 140 single-family homes remain eligible. The pace at which these remaining homeowners decide to participate is one of the driving factors of the program speed, and many of those residents are purposefully choosing not to participate.
 - The Port is also continuing work on additional programs including 3 condominium complexes comprised of 133 units, apartment complexes starting with 1 pilot project followed by up to 17 more complexes comprised of 877 units, places of worship starting with 1 pilot project followed by up to 6 more structures, and voluntary acquisition of 22 residential structures immediately south of the 3rd Runway.
 - The Port also strives for program transparency through regular presentations to the Port of Seattle Commission, as well as in various community forums.
4. Question: *“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 outdated. By not*

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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?"

The SAMP environmental review will include an assessment of airport noise impacts.

- As mentioned above, the SAMP NTP environmental review will include an assessment of noise impacts using methodology and noise modeling that is similar to what is used for a Part 150 study.
 - If the SAMP NTP noise contours indicate that there is a substantial change, the Port would expect to undertake an update to the Part 150 study, including updated official Noise Exposure Maps and a revised Noise Compatibility Program. This work will determine whether noise exposure contours will change and whether new areas will be eligible for noise mitigation.
 - The FAA has not deemed our Part 150 study to be outdated. The FAA's April 2018 Categorical Exclusion states that: "As part of the FAA's noise evaluation, FAA also compared the result of the All Arrival and Departure Operations noise analysis to the Part 150 Noise Compatibility Update for SEA, dated October 2013... Geographically, the noise exposure levels in the All Arrival and Departure Operations noise analysis and Part 150 Study are reasonably close, which indicates that the results of the All Arrival and Departure Operations noise analysis is accounting for the cumulative impacts from all flights."
 - The 65 DNL noise contour models noise on an average annual level, weighted extra for nighttime noise. While individual noise events may exceed 65 decibels, federal and airport noise mitigation is restricted to the FAA-approved contour.
5. Question: "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?"

StART's meeting procedures are transparent and were developed in collaboration with all airport cities, including Burien.

- StART's operating procedures and areas of focus were developed in close collaboration with all six airport cities. They are the product of a series of working meetings in 2017 between the Sea-Tac managing director and the six city representatives, which included the Burien city manager, and were endorsed by all participating entities.
- Any decisions related to the structure and operating procedures are open to changes based on consensus among all parties; we welcome a discussion with StART member jurisdictions about how to improve our efforts.
- Transparency, collaboration and information sharing are key attributes of the operating procedures along with the strong desire to identify possible solutions for the neighboring communities.
 - Summaries of all StART meetings are developed and made available on the Port's website and full StART meetings are open to the public.
 - StART members regularly provide input on topics for StART meetings. In fact, the Part 150 panel discussion that occurred at the August 28 StART meeting was the direct result of an inquiry made by several StART members, including representatives from Burien. Unfortunately, Burien representatives were not at the August meeting, since it was after your decision to suspend participation.

- StART is not a formal decision-making body, but its programs and efforts that were recommended for implementation by StART were based on a process defined by consensus. Similarly, new initiatives can be developed at any time based on collaborative discussion by StART members.
 - For further detail on meeting summaries, agenda-setting, consensus-based actions and StART's operational structure, please refer to StART's operating procedures, included in StART's annual report, at <https://www.portseattle.org/sites/default/files/2019-02/StART-2018-Annual-Report.pdf>.
6. Question: *"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. How can this be the case, when a GRE, that would improve livability for people living closest to the airport, cannot be accommodated?"*

Engine testing run-ups have decreased with newer aircraft and procedures. Sea-Tac will be working with StART to do a comprehensive study to identify ways to reduce ground noise.

- Recent changes to aircraft operations and maintenance procedures have significantly reduced the need for engine run-ups on the ground. Newer aircraft, including the predominant Boeing 737-800/900 series, do not have the same requirements for substantial maintenance. In 2018 there were fewer than one engine testing run-ups per day, including only 15 in the entire calendar year between the hours of 10 pm and 7 am; these run-ups each lasted two minutes or less.
 - As part of the ongoing work of StART, the Port has contracted with a consultant to conduct a comprehensive ground noise study to identify sources of airport ground noise. The findings of this study will be essential to determining how to best focus our ongoing ground noise reduction efforts, and we look forward to working with all cities engaged in StART to successfully deliver on this work.
7. Question: *"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?"*

The Port is financially supporting and engaged with the study of UFP emissions and is working on ways to reduce emissions with sustainable aviation fuels.

- Determining whether and how aircraft activity contributes to ultra-fine particulate emissions and any associated health impacts has been a top priority for the Port over the past several years.
- This which is why we contributed financially to the University of Washington (UW) study that you referenced; the Port also participates on the study's advisory committee. The Port has publicly endorsed legislation from U.S. Representative Adam Smith that would require a federal study of ultra-fine particulates related to aircraft.

- To this point, the science around ultrafine emissions from aircraft is still developing; therefore, there is not a regulatory basis at this time for determining an impact that would require mitigation. The SAMP NTP environmental review will include an analysis of the potential air quality impacts for the broad range of regulated pollutants associated with airport operations.
- Finally, we are encouraged by research that shows how Sustainable Aviation Fuels (SAF) might significantly reduce a wide variety of emissions from aircraft, including ultra-fine particulates. That is one of the many reasons that we are moving as quickly as possible to achieve the Port Commission's goal of implementing SAF for all flights fueling at Sea-Tac. We welcome your partnership in achieving this vision.

8. Question: *"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?"*

Sea-Tac's air quality analysis is not "confine[d] to airport property" and is done by an independent agency.

- The air quality analysis used by the Port is not confined to airport property and, in fact, extends to several miles outside the airport. Requirements for evaluating air quality impacts include analyzing emissions from airport property to the "mixing layer height," which is typically about 3,000 feet above the ground. Aircraft usually enter the mixing layer approximately ten miles away from the runways during aircraft landings and go above it approximately seven miles away during takeoffs.
 - The Port partners with the Puget Sound Clean Air Agency, an independent body, to conduct air quality monitoring. We work with them and several federal agencies to ensure our compliance with air quality requirements. There are no current Clean Air Act violations associated with the Sea-Tac Airport.
 - The SAMP Environmental Analysis will contain a complete air quality analysis consistent with regulatory standards. The City of Burien will have the opportunity to review and comment on that analysis.
9. Question: *"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 our residents?"*

The Port is driving new measures to address health and community concerns.

- The current Port of Seattle Commission is more focused on addressing community concerns, ensuring sustainability and addressing quality of life than at any point in our organization's history.
- Over the last three years, we have looked beyond regulatory requirements to achieve those goals, including with the following actions:
 - Working with Congressman U.S. Representative Adam Smith to ensure eligibility of Highline schools for noise insulation;
 - Working with U.S. Representative Pramila Jayapal on an amendment to the 2018 FAA Reauthorization to study health impacts in the Sea-Tac Airport area;
 - Prioritizing resources for sustainable aviation fuels;
 - Establishing the Airport Community Ecology (ACE) fund and the South King County Fund;
 - Establishing StART, which has already resulted in several promising initiatives like the revised runway use plan and the late-night noise limitation program.

- These are only some of the examples of how the Port is continuing to invest in our communities, and we are unflinchingly committed to this work. For example, there are several new items that have been identified throughout the StART process – many of which are referenced above such as the ground noise study – that we believe will do even more to achieve our goals.
- The Port has also explicitly rejected the idea of our hands being tied by FAA regulations, which is why StART formed a Federal Policy Working Group to actively advocate for changes to federal policies and regulations that we believe unnecessarily hinder our ability to maximize our efforts to address community concerns.
- We are excited to work closely with all of the cities engaged in StART to ensure the success of this work over the coming months. We are proud of the achievements to-date and look forward to continuing to be deeply engaged on these issues.

City of Burien's Comments Addressing the Port's Responses to City of Burien Questions

1.A. The Port's Part 150 Study website reads, "The purpose for conducting a Part 150 Study is to develop a balanced and cost-effective plan for reducing current noise impacts from the airport's operations, where practical, and to limit additional impacts in the future;" and "To address noise issues related to the third runway."

The Port's 2013-2018 Part 150 Study was neither balanced¹ nor limited to the third runway as stated above. How is it possible that while the Part 150 Study was being developed and implemented, the Port increased operations by 33% and planned to add more than a dozen new gates and new terminals, which is not reflected in the very modest—almost incidental--growth of airline operations portrayed in the 2013-2018 Study? How is it possible that the "planning" side of the airport and the "noise" side of the airport did not collaborate on its massive expansion contained in the SAMP that would undoubtedly add more aircraft noise? The Port would have us believe that the two initiatives were stand-alone, not interrelated, and having no material impact on the other!

1.B Airport watchers are well acquainted with noise metrics; and it is unnecessary to repeat this fact as if it's unknown.

1.C. The argument that aircraft are quieter and therefore the noise contours (noise exposure maps) are smaller is grossly misleading since the airport's added operations raised its national ranking from 14th to 8th busiest airport during the time the Part 150 Study was being implemented. It appears to the City of Burien that the Port intentionally underestimated the anticipated volume of increased operations until it was forced to reveal its true intentions in the environmental analysis of pending projects contained in their Sustainable Airport Master Plan, or SAMP. It's called incrementalism; a segmented approach to expansion and development that avoids comprehensive environmental scrutiny mandated by NEPA!

Apparently the 9th Circuit Court also agrees with the City of Burien since it's November 27, 2019 decision concluded that, "We agree that the FAA acted arbitrarily and capriciously by failing to consider all 'reasonably foreseeable' future actions at Sea-Tac in its analysis of whether a cumulative impacts extraordinary circumstance existed. 40 CFR, Section 1508.7." This declaration was in response to FAA's *failure* to include appropriate environmental analysis of pending projects contained in their SAMP.

1.D. What is becoming well-known to airport watchers is that the Port avoids EIS analyses that would thoroughly examine the true environmental impacts of increased and projected operations by employing an incremental, segmented approach and conducting the least amount of environmental mitigation.

¹ Balance in this context is the difference between livability to outright incompatibility with neighborhoods of families, retired folks living on fixed incomes, and economically-challenged populations that qualify as eligible for environmental justice. The FAA's Report to Congress on its National Plan of Integrated Airport Systems (2019-2023) describes balance as, "Airports should be compatible with surrounding communities, maintaining a balance between the needs of aviation, the environment, and the requirements of residents;" (Page 1).

The Port's consistent denial of environmental impacts are most in evidence in their 2013-2018 Part 150 Study that was wholly inadequate and timed to occur before the SAMP was revealed; followed very quickly by Port noise personnel with the promise to do a full Part 150 Study afterwards! Let's be clear, this process was carefully planned to unfold in this manner and it is shameful! The residents in surrounding cities must endure the full impact of the Port's calculated strategy to out-manuever public resistance. One look at recent King County Department of Health Maps illustrating that the highest level of poverty, health disparities, disproportionate health impacts, low income and language barriers in King County reveals that the area around Sea-Tac Airport is undesirable. It is undeniable that there is a direct correlation between airport impacts and environmental health and well-being!

2.A. Veteran airport watchers are familiar with the "Four Post Plan," and its existence has not reduced noise impacts to an extent that can be analyzed or proved. If wrong, please provide statistics that deny this claim. By contrast, opportunities to reduce noise, such as a Ground Runup facility, reverse thrust, and night-time flights have been discussed, hashed, re-hashed, and have remained untouched by the Port for 20+ years. In fact, the GRE has been dismissed by the Port in its SAMP and is no longer being considered despite being in the most recent two Part 150 Studies; and a consultant was only recently hired to deal with airfield ground noise issues.

The nighttime flight agreement touted as a major accomplishment by StART (a fact denied by StART members who disapproved of it when it was discussed; and further claim they never joined in a consensus) actually diminishes the effective nighttime hours per night when flights are "voluntarily halted" from what was granted by the "Four Post Plan." (In other words, StART members claim they did not agree with the so-called "agreement" and they further acknowledge there are now—because of this new "agreement"--fewer protected hours per night when sleep deprivation might be reduced. No StART member representing Burien is praising this accomplishment!

2.B. As long ago as 1996, the WSDOT/PSRC's Expert Arbitration Panel's Review of Noise and Demand/System Management Issues indicated "That the Port address the impact of ground-related aircraft noise by (i) implementing the thrust-reversal noise impact reduction activities called for in the Noise Mediation Agreement; and (ii) working to minimize the number, level, and duration of daytime engine run-ups, which are likely to increase as operations grow." (Page 39 of 50)

Here it is 23 years later and the Port is saying, "Federal law does not allow the Port to mandate the complete elimination of reverse thrust. Therefore, to address this concern, the Port included language within the pilot approach charts for Sea-Tac Airport to limit the use of reverse thrust to what is necessary for safety during the nighttime hours." Question: When did the Port take this action and will records be maintained of the Port's enforcement to determine whether or not the use of reverse thrust is used "only when necessary"? Does the Port correlate reverse thrust noise incidents with noise monitoring data² to demonstrate to airlines the high decibel levels of these

² A member of the Puget Sound Quiet Skies Coalition, who retired as a medical statistical analyst, reports anecdotally that a number of POS's noise monitors are frequently not working properly (producing no data) or producing unrealistic noise measurements that POS Noise staff refers to as "anomalies," thus making POS noise monitors' measurements unreliable.

events during nighttime hours; and have these noise incidents been reviewed in the context of WAC 173-60-040 that limits noise incidents to “permissible environmental levels”? Will the reduced use of reverse thrust be included as a criteria for the Port’s Fly Quiet Program?

2.C. How does the Port plan for StART to “move forward on analyzing additional noise abatement procedures” when the “suspended” members represent nearly three-quarters of the total population of the cities surrounding Sea-Tac Airport? Active StART members suspended their participation in part because they believe they were manipulated, denied, or their opinions dismissed?

2.D. Finally, the last bullet listed under “2” is a prime example of an “accomplishment” that suspended StART members denied they had provided their “consensus” on and were outraged to read the Late-Night Noise Limitation Program once announced without notice from staff members by the Port!

3. Of course FAA audits all grants once they are closed out—after-the-fact! Programmatic audits do not occur though, only financial audits. However, recent international headlines and Congressional testimony at oversight committee hearings tell the tragic story of FAA’s delegation of regulatory authority over The Boeing Company regarding its 737 MAX crashes that exposed FAA’s too-oft reliance to delegate oversight to the regulated entity! But even these grave facts miss the point of oversight: The crux of the question here is how efficiently, effectively and quickly does the POS sound mitigation occur?

3.A. Perhaps internal “oversight” should occur more frequently than quarterly by a committee of high-ranking professionals at the Port’s headquarters. Ever have a kitchen being remodeled and run into a problem with the contractor? Oh, sorry, but wait until the next quarterly meeting before we can gather to work on a fix! This is not efficiency or oversight.

3.B. What a statement: “the Port’s noise program is nationally recognized for its leadership and innovation...” By whom is it recognized? Some trade organization headquartered across the country whose officers came to Sea-Tac’s defense because of “undue” scrutiny by its home-town populace? Perhaps this is a perfectly good use of national dues paid by the POS to such trade organizations (i.e., to be rewarded with praise when the “natives” are restless).

Research reveals that Sea-Tac was truly “innovative” when it designed a program never ever-used previously by any US airport, known as the “single-parcel” approach method where residents were asked by the Port to choose their own contractors from a list they provided homeowners. This approach was so clever that it has never been used by any other single airport in the nation since because it resulted in inadequate oversight of construction, uneven workmanship that did not meet uniform standards, and a plethora of problems caused by a window manufacturer contracted by the Port that went bankrupt and could not guarantee the performance of their windows. The results were predictable: many windows failed leaving homeowners living with mold, mildew, broken seals, and inadequate ventilation and no recourse. Consequently, it can be said that because of the Port’s “innovative” program, the health of many homeowners was compromised and the condition of their property continues to deteriorate.

3.C. The length of a sound insulation program's existence—especially when the FAA approves and regulates all the activities within the program—is not the crucial issue that determines whether a sound insulation program is successful. Boots on the ground does! Professional management, skilled contractors, trust cultivated between homeowners and program staff, along with constant troubleshooting of construction issues, are all elements of an efficient and effective sound insulation program that sets Sea-Tac's program apart from timely and successful programs. Otherwise, why would there be a database of 160+ homeowners willing to work with Rep. Tina Orwall and Sen. Karen Keiser, who introduced two bills (HB 2315 and SB 6214 respectively) this 2020 legislative session that would facilitate Sea-Tac providing a "second-chance" opportunity patterned after San Francisco's program so that homeowners are eligible to participate in the Port's "award-winning" sound mitigation program under better circumstances, especially since they already signed an Avigation Easement foregoing their legal air rights?

3.D. What the City of Burien does know is that the Port waited from 2014 when FAA approved its 2013-2018 Part 150 mitigation plans to the Fall of 2018 to hire a professional firm to complete sound insulation projects related to noise from the third-runway. Why would any public agency require homeowners to wait *four years* before their homes were even noise-tested for program eligibility, especially when the FAA pays for 80% of the cost? This is a clear violation of environmental and social justice standards for those homeowners to suffer while the Port got its act together. Wouldn't you think that this costly delay to homeowners affected by new and continuous noise impacts could have been avoided because "the Port's noise program is nationally recognized" and existed "so much longer than King County Airport's program?"

3.E. Was it "transparent" for the Port staff to withhold from Port Commissioners all the information just provided in 3-3.D above?

4.A-B. As mentioned already, the Port's piecemeal approach to enormous, billion dollar expansion initiatives without extensive and simultaneous environmental evaluations based upon extraordinary operational growth and their impacts undermine a legitimate EIS analysis required by NEPA. No doubt this is the Port's preferred outcome so that comprehensive analysis of environmental impacts are minimized; this is a pattern repeated by the Port over, and over again; and it should be considered shameful and immoral!

4.C. The Study Area covered by FAA's CATEX issued in April 2018 had previously been within the 45-55 dB DNL noise contour prior to the creation of the "New Route" flown by Alaskan Airlines turbo-props, which was the subject of appeal by the City of Burien in the Ninth Circuit Court. As a result of the FAA's analysis of All Arrivals and Departures, the FAA determined the Part 150 for 2013-2018 noise levels were "reasonably close" to the noise levels of the New Route. The Court's decision discussed in 1.A above covers the FAA's *failure* to conduct an environmental analysis consistent with noise and emissions data forecast into the future as a result of the SAMP.

But even the FAA's own noise analysis contained in the CATEX on Page 38 clearly stated that 5.2% of the Study Area measured 65+dB DNL, which is *ten decibels louder* than the 45-55 dB DNL illustrated in the Port's 2013-2018 Part 150 Study! No doubt, increased operations at Sea-Tac contributed to the increased decibel level along the New Route; but POS insists that it's

unnecessary to conduct an updated Part 150 until the SAMP is completed! So *whenever* a new Part 150 Study is undertaken by the Port after SAMP projects are completed, Burien residents can count on living through 10-12 years of *unmitigated aircraft noise* because of the Port's EIS-avoidance habits!

Here is yet another example of where the Port announced on its Part 150 Study website that "This study identified existing and future flight corridors, developed aircraft noise exposure maps for current (2013) and future (2018) conditions, evaluated air traffic control procedures that could be implemented to reduce noise exposure over residential areas." Lie, lie, and more lies. The CATEX was issued by the FAA in April 2018, yet the Part 150 Study for that identical time period contained no additional flight corridors or altered any flight procedures over Burien, or revealed any increased noise levels over Burien neighborhoods. No wonder Burien residents have to suspend all reasonable levels of belief when the Port says or prints anything!

4.D. The question here is how many years does a Burien resident have *to wait* before the Port conducts appropriate noise analyses that accurately identifies the 65+dB DNL noise contours; and then how many more years do residents have *to wait* until the Port actually gets around to *performing* effective and efficient noise mitigation?

5. This Port response concerns issues related to the StART and these are currently the subject of discussions with representatives from the "suspended" cities.

6. Are there Port records to substantiate the claims made about fewer engine run-ups and their duration? If so, please make them available to the public.

6.A. After testimony before Congress on 10/29-30/2019), is it possible to say that the B737-800, 900 series will require less maintenance? The two-minute engine run-up timing is hard to believe when engine run-ups often last much longer; is there evidence per noise monitoring data to substantiate this claim? If so, please make it available to the Burien residents.

6.B. Please see Burien's response in 2.C. above; same applies here.

7. C. There is an impact that has been identified by the UW-MOV-UP team and the plume model is daily blanketing 200,000 residents. Boston Logan community is out front on this recognizing it is important for people to know where/when/what air impacts are occurring with real time monitoring. Air filtration in homes, HEPA filters, AQ alerts for outdoor recreation will help people make better health choices for themselves and their children. The POS wants to be a national leader in mitigation but are already behind in discussion of public health protection.

The words "regulatory basis" has the appearance from the POS will wait until specific UFP regulation comes from EPA. UFP is regulated as a subcategory of PM-10 and PM 2.5, in other words particulate matter smaller than PM 10 has been recognized as a health hazard and regulated by the NAAQS. It appears the POS would like to rely on the lack of information when they should be analyzing the total particulate PM-10 and smaller. Because the standard airport model EDMS eliminated particulate matter in 1993, no analysis of PM-10 and PM 2.5 from aircraft has been performed for the numbers of aircraft operations beyond 300,000. Prior to elimination of the data by FAA, Department of Ecology in 1991 had estimated violations of the

CAA for PM-10 within the community. Relying on an unknown and waiting for regulation puts people at risk. It is possible for the industry to know the impact with monitoring of total particulate. We now know particulate from overhead jets is being carried directly down by a vortex and is having a ground level impact. We already know there is poor health under the flight paths. Under Significance and Intensity NEPA states: 1508.27 (b)(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The FAA/POS *have failed* to provide a risk analysis in 1996 for the third runway even though PSCAA (Puget Sound Clean Air Agency) asked for one due to the probability of health impacts from airport operations.

7.D. A sustainable source of SAF (Sustainable Aviation Fuels) has yet to be identified. Supply chain has not been identified. SAF may be worse depending on the fuel, its manufacture, transport. SAF may not be sustainable. SAF is only planned as a small part of overall fuel use meaning it will be outpaced by increased aircraft movements and ultimately not represent a reduction of overall Jet A fuel use. This cannot at this time be considered a mitigation.

8.A. An emissions inventory is not the same as a dispersion analysis. Dispersion analysis in the past has been confined to airport property. The inventory values used in the model were far below published emission data. Evidence of false data by the outside consultant in draft inventory preparation for the SAMP has been provided to the EPA. Past analysis predicted NO₂ and particulate violations at operations well below the current numbers. Fleet mix alterations occurred for compliance with the CAA in 1996 which do not represent the typical airport operations of today. Violations have likely been occurring but can only be confirmed with air monitoring. The Port of Seattle has been unwilling to commit to an air quality monitoring program. This puts the communities at risk.

8.B. The Puget Sound Clean Air Agency's monitoring network is nowhere near the flight paths or airport now or historically. The airport is a significant source of criteria and toxic emissions regulated under the CAA (Clean Air Act). All past short term monitoring at and near the airport indicated the potential for CAA violations.

9.A. If it is true that this Port Commission is more environmentally and health-conscious than ever before, then Burien residents deserve more than they've received in the past!

9.B. The actions listed by the Port in their response is pure public relations! Burien residents want to see improvements in *their lives and health conditions* and not read a list of platitudes contrived by the Port!

9.C. This Port response concerns issues related to the StART and these are currently the subject of discussions with representatives from the "suspended" cities.