

Response to Noise Analyses by FAA Contained in Section 5.2.7 Noise and Noise-Compatible Land Use from CATEX on page 34

On page 35 of Section 5.2.7, fourth paragraph that begins “As FAA started preparing NEPA documentation for the Preferred Alternative, the first noise analysis results were compared to the noise contours from the SEA Part 150 Study<sup>1</sup> dated October 2013. FAA discovered that the noise exposure levels in the Turboprop-Only Analysis were not consistent with the Part 150 noise contours. This resulted in FAA conducting a second noise analysis that used all arriving and departing aircraft to account for the noise from all aircraft operating within the General Study Area.” Here, FAA admits that the current 2013-2018 Part 150 Study by the Port of Seattle is inconsistent and requires FAA to conduct its own noise analyses within the General Study Area. This is critical because at the time the CATEX was written in 2018, the Part 150 Study for 2013-2018 was in full force and no noise modeling updates had occurred by SEA. Therefore, FAA is saying that they cannot rely on the SEA Part 150 Study as a determination of decibel contour levels; and it’s important to note that the Part 150 Study demonstrates that the majority, if not all, of the General Study Area was within the 40-45 dB DNL. It’s also important to note that SEA recently announced that its flight operations increased 33% between 2014-2016.

Since SEA’s Part 150 was outdated, FAA conducted two noise analyses they referenced as Baseline and Proposed Action Alternatives. The results of FAA’s Noise Results Using All Arrival and Departure Tracks (Table 6 on page 38) indicates the percentages of noise increases within the General Study Area. The increases range from 5.2% within the 65 dB and greater, 5.6% within the 60 dB DNL, 6.9% in the 55 dB DNL, 8.8% in the 50 dB DNL, 13.8% in the 45 dB DNL, and 59.7 within the 45 dB DNL. This is particularly notable since all of the General Study Area within the existing Part 150 Study was at 45 dB DNL or lower prior to the New Route being implemented. **All but the last category—45 dB DNL—exceed the 1.5 dB DNL Significance Threshold explained at the top of page 35 of Section 5.2.7 of the CATEX.**

**Therefore, FAA’s own noise analyses indicate that the noise levels increased significantly within the General Study Area (as published for the CATEX) from what was forecast and existed after the New Route was implemented.**

Another example of FAA’s declaration that the General Study Area was in the 65 dB DNL contour—fully 20 decibels above the noise levels outlined in SEA’s 2013-2018 Part 150 Study, is on the first page of the CATEX that precedes the signature page. In the last paragraph of that page beginning 5-6.5.i, the sentence includes reference to “procedures below 3,000 feet AGL that do not cause traffic to be routinely routed **over noise sensitive areas;**” (emphasis added).

FAA’s official definition of a noise sensitive area is contained in Paragraph 11-5.b(8) of FAA Order 1050.1F that reads: “An area where noise interferes with normal activities associated with its use. Normally, noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, and cultural and historical sites. For example, in the context of noise from airplanes and helicopters, noise sensitive areas include such areas within the DNL 65 dB noise contour.” **This definition perfectly describes the General Study Area analyzed by FAA in April 2018 and declares it at 65 dB DNL, which is 20 decibels higher than the 2013-2018 Part 150 Study!** (emphasis added)

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<sup>1</sup>Authorized by 14 CFR Part 150, FAA in its 2014 Record of Approval (ROA) for Sea-Tac’s Part 150 Study, Program Element #21 prescribes that, “The NEMs (Noise Exposure Maps) should be updated every five years or when there are significant changes in operating levels and patterns in accordance with the FAA’s guidelines for determining what constitutes a potentially significant increase in operations (1.5 dB DNL increase in the area impacted by 65+DNL).” SEA has conducted four Part 150 Studies since 1985.



## **We need YOU to get involved! Enough is enough!**

The Quiet Skies Coalition is representing you in talks, meetings and researching FAA incongruities with regard to our CATEX pending legal appeal. But we **must** do more! We at Quiet Skies Coalition want to build our membership. We need to call our political representatives, complain and protest. We want to be proactive not just reactive.

The FAA has plans that will ignore our right to environmental quality. It's directing turboprops right through the heart of our city today; tomorrow it **WILL** be jets. The future expansion plans are to double passenger aircraft and triple cargo flights within the next 10 years. We believe there is no greater threat to the Puget Sound.

The FAA has issued a Categorical Exclusion (CATEX) for the 250-degree turboprop turns over the heart of Burien. These are powered by Jet A fuel which means not just more noise but also air quality impacts, both of which are a threat to public health. The FAA and Port have already spent \$400 million mitigating the environmental impact by purchasing real estate and "sound proofing" residences within flight corridors aligned with the runway. This turn is simply an initial attempt to widen the departure dispersal flight path and increase arrivals and departures. This is being done with a categorical exclusion (CATEX). The FAA says there will be no impact, which is **completely false**. Many of us have complained from Shoreline to Federal Way. In fact, noise complaints have gone up by 30% in the past couple of years. For many others whose complaints have fallen on deaf ears, they succumb to resignation and defeat. But that needn't be!

The Port of Seattle and the FAA assume that they possess unrestricted authority and that Seattle is their kingdom. Unless aggressively challenged, that will **not** change. For example, the **turn over Burien** and its CATEX does not comply with environmental law, its justifications are unsubstantiated and their conclusions are arbitrary and capricious. By establishing immediate low level turns after takeoff, the new Boeing 737MAX with a 40% lower noise footprint would be next in line over Burien, Tukwila, Des Moines and Kent. Another example is "reverse thrust." Commercial airplanes are **not** allowed to use reverse thrust in conjunction with its certification (14 CFR 25.125 Landing) or while dispatching a flight. With the exception of abnormal conditions, all that racket upon landing is unnecessary. Yet the Port does **nothing** to mitigate that noise. Instead, "The Port of Seattle allocates gates at Sea-Tac (SEA) according to the seat share among airlines over a nine-month period." (*Seattle Times*, May 22, 2018.) Yes, gate space goes to the noisiest **not** the quietest, good neighbor airline. That's a greedy choice perpetrated by the Port!

The City of Burien has agreed to continue the legal challenge to the CATEX. However, we need to mount community pressure against the Port and airlines, if necessary. Please sign up and be prepared to take an afternoon from work to show up, to protest. We have options and plan to use them, if needed. Please watch for alerts to send coordinated letters to the FAA, our political representatives, the Port, and to news organizations. Also, go to our website and sign up for emails at [quietskiescoalition.net](http://quietskiescoalition.net). We need the biggest groundswell of people we can muster!

Sincerely,

Quiet Skies Coalition Committee

## IMPORTANT POINTS CONTAINED IN FAA'S CATEGORICAL EXCLUSION PAPER

### DESCRIPTION OF ACTION, Page 2

- "Operationally feasible" means whenever weather permits and ATC approves. This is the condition of maintaining a 10 pm to 6 am timeframe when the Preferred Alternative would be suspended. Will FAA make any effort to calculate the number of deviations that occur and report them to the City of Burien?

### X BASIS FOR THIS DETERMINATION, Page 2 *Last sentence*

- First sentence of 5-6.5.i categorical exclusion includes a reference to "noise sensitive areas," a term that FAA inaccurately applies to its basis for determination since its noise analyses of the general study area declares the noise level is not greater than 45 dB DNL which is in conflict with the definition contained in FAA Order 1050.1F, that defines a noise sensitive area as

"An area where noise interferes with normal activities associated with its use. Normally, noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, areas with wilderness characteristics, wildlife refuges, and cultural and historical sites. For example, in the context of noise from airplanes and helicopters, noise sensitive areas include such areas within the DNL 65 dB noise contour."

- Which is it then? A noise sensitive area eligible for mitigation or not?

### BACKGROUND, Pages 6-7

- From 2014-2016, Sea-Tac's operational status rose **from 14<sup>th</sup> to 9<sup>th</sup>** busiest airport in the US.
- Statistics included in this "exclusion analysis" are identical to those used in 2017 by BAC member, Sharyn Parker, to identify reasons why Sea-Tac should initiate new noise modeling for **ALL** flights, not just those contained in this categorical exclusion. The BAC analysis confirmed that Sea-Tac's operations were **51% greater** than what they projected in **their 2013-2018 Part 150 Study**.

### ATC COMPLEXITY AT SEA AND LIMITATIONS PROPOSED BY BFI, Pages 10-14

- It would have been helpful in the FAA's description of conflicts between two airports within five miles of each other that BFI operates in Class D airspace, not in Sea-Tac's Class B airspace (which is higher than Class D airspace).
- Another factor affecting flight efficiencies and flow is that BFI's ATC Tower personnel is a training location for incoming air traffic controllers, and that Green River CC is a "feeder institution" that provides many new air traffic controller students. Both of these elements add to the safety decisions made by Sea-Tac ATC and TRACON (aka S46); and the issue of ATC workload.

- Maybe BFI's Tower should not be a training location, for example, if it slows down, or adds to ATC workload; or maybe FAA needs to hire more air traffic controllers? Also, this analysis does not mention the effects of "missed approaches" at BFI.

## 5.0 ENVIRONMENTAL IMPACT ANALYSIS

### 5.21 Air Quality, Pages 27-30

- It does not appear that FAA did any "new" air quality analysis as part of this categorical exclusion paper, nor does it reference any ongoing air quality studies authorized by the Washington State Legislature or the University of Washington.
- Surprising that FAA does not believe that any "new flights" from the Preferred Alternative will have no impact on parks or playgrounds. How would they know if they have not conducted any measurements in these areas?

### 5.25 Historical, Architectural, Archaeological and Cultural Resources, Pages 31-33

- Because the FAA has, as a result of its categorical analysis, determined there is no noise impact due to the described turbo-prop flights, then the inventory of historical, etc. resources is not relevant at this time, but they don't make this distinction which is a recurring problem with their categorical analyses. For example, once a study area is "noise sensitive," (that is reached a decibel level of 65 decibels or greater), a rigorous and long-term relationship between Sea-Tac and the Washington State Department of Historical Preservation ensues.
- Furthermore, qualifying residential areas adjacent to some of the historical sites FAA listed on page 32 would likely be mitigated as part of a sound insulation program. FAA fails to mention this point, which is very relevant given the number of increased operations at Sea-Tac as evidenced by the use of Sea-Tac's own data that is repeated in this categorical analysis.
- Top of page 33: Sea-Tac's Part 150 Study is presently an "historical" document with no material relevance in today's noise exposure reality! As already stated, Sea-Tac's 2013-2018 Part 150 understates by **51%** (!) current operational levels and therefore **understates** noise and air pollution associated with that gross overage!
- **This is a problem overall with this categorical analysis when FAA misleads readers by referencing recent noise analyses for the turboprops with Sea-Tac's outdated Part 150—a clear case of mixing apples and oranges.**
- Since there is no noise or air quality analyses or projections about Sea-Tac's continued growth, any of FAA's pronouncements about **"no potential air quality or no noise" degradations** is flawed because, in the absence of an updated noise modeling and results of air quality tests to replace Sea-Tac's understated and misleading Part 150, the reader is left to "speculate, guess" and to be continually impacted by air and noise pollution without any Sea-Tac accountability over its impacts **TODAY—not the projections that are clearly WRONG contained in their Part 150 Study!**
- FAA has clearly chosen to ignore the fact that increased operations at Sea-Tac will eventually—in the not too distant future—have detrimental noise and air quality consequences while

focusing only on the turboprop categorical analysis. While this may not have been their mandate, it is the moral equivalent of rearranging the deck chairs on the Titanic!

- It's critical to the environmental health of Burien and surrounding cities to view this turboprop issue in the context of the whole Sea-Tac operational picture, not simply one dimension of the complexity of adjacent airspace. Unfortunately, FAA nor Sea-Tac offer any projections about the growth of the turboprops (or other substitute aircraft that may use this flight pattern in the future if turboprops fade away). Another reason why Sea-Tac should be required to update and replace its current Part 150 Study.

## 5.27 Noise and Noise Compatible Land use, Pages 34-38

### Noise Evaluation

- FAA admits on page 35 that as it began "preparing NEPA documentation for the Preferred Alternative, the first noise analysis results were compared to the noise contours from the Sea Part 150 Study dated October 2013" and that they "discovered that the noise exposure levels in the Turboprop-Only Analysis were not consistent with the Part 150 Study noise contours."
- Later on page 35, FAA also admits that they conducted a second noise analysis in the study area because current conditions "do not reflect the existing cumulative noise environment" that had changed since Sea-Tac's issuance of a Part 150 Study in 2013.
- While neither of FAA's two analyses of the turboprops flight patterns resulted in a noise metric that would be eligible for mitigation of homes **AT THIS TIME**, there is no reason to believe that's a permanent situation! Obviously, Sea-Tac's latest projections for 2018 **are wrong by 51%**, then how much longer will it take for this study area to reach the mitigation point of 65 decibels DNL metric? FAA has failed in this specific categorical analysis because their analyses are out of context with the reality of increased and growing noise and air quality exposure for Burien and surrounding residences within the study area.
- Furthermore, this categorical exclusion analysis contains no flight operational projections for the future and local residents question whether Sea-Tac is compromised to accurately project future flight operations in the study area (and elsewhere) because their priorities appear to be to protect airport financial resources for airline and passenger improvements rather than this community objective of mitigating noise and air quality degradations.

### Table 6: Noise Results Using All Arrival and Departure Tracks

- On page 38, FAA reveals in Table 6 of the recently analyzed "All Arrival and Departure Tracks" that 5.2% of the study area has noise measurements exceeding 65 dB DNL!! While the locations of these "units" are color-coded in red and are visible on the very tiny portions of the maps contained in Figure 21, it is a declaration that some portions of the study area are eligible for mitigation (if they are residential, which is not identified on the maps)! This proves the point that there are places in the study area that are eligible for mitigation, but Sea-Tac has or will not validate this because they choose not to update their Part 150 Study.

5.2.8 Socioeconomics, Environmental Justice, and Children's Environmental health and Safety Risks,  
Pages 39-40

- It is a difficult task to analyze an analysis of an important, but tiny portion, of a growing problem when it coincides with other dynamic and evolving circumstances, such as increased population growth, growth of flight operations, as well as greater exposure to noise and air pollution. Also, this categorical analysis is absent any end in sight (future flight projections contained in an updated Part 150 Study). All these factors combine to diminish the overall effects of these impactful changes on a community's daily lives and livelihoods.
- This analysis appears to meet FAA standards as far as it goes, but it doesn't go far enough. It's too open-ended with no known outcomes. At least when there is an expansion of airport facilities, there is a budget, an end date for construction, and projections for passenger usage. For this analysis, it leaves readers wondering, "What's next?" What must we absorb next and when will it end? Will lives and living conditions be better or worse?
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## Executive Summary

**FAA promotes and facilitates Sea-Tac Airport's wholly inadequate and generally dismissive responses to local residents' higher-than-average life-threatening illnesses- (because they live in proximity to Sea-Tac Airport) is an abdication of its regulatory duty to provide real mitigation services and protection to the public they are supposed to serve. Cases in point:**

- 1. FAA's noise analyses conducted for the CAT EX lack transparency and create many unanswered questions about the rigor and substance of their methodology used to reach the conclusion they wanted, which was "no noise impacts" despite dozens of daily Alaska Airlines Q400 flights beginning in July 2016 in a previously identified 45 dB DNL (quiet) study area.**
- 2. Under the guidance and supervision of the FAA, Sea-Tac Airport has developed methods of circumventing true scientific noise and emissions criteria outlined in many FAA and EPA regulations.**
- 3. FAA's noise analyses and absence of emissions analysis was clumsy, short-sighted, and lacking in scientific rigor that a new flight pattern imposed upon a recently-quiet neighborhood deserves.**
- 4. Residents within the CAT EX study area are sorely disappointed with the caliber of FAA's professionalism exhibited by their poor graphics, overly- technical explanations, and lack of adequate descriptions of their adopted processes that exemplify FAA's casual and hasty behavior toward this new flight pattern described in the CAT EX. As well, FAA failed to identify key issues during their elaboration of the circumstances of new flights, and their unthinkable omission of future projections of environmental impacts that will detrimentally affect our local communities.**

**Noise sensitive areas:** On page 2, the first sentence of 5-6.5.i of the Cat Ex includes a reference to "noise sensitive areas," a term that FAA inaccurately applies to its basis for determination of noise impacts within the study area since both of its noise analyses declare the noise levels are not greater than 45 dB DNL which is in direct conflict with the definition contained in FAA Order 1050.1F, Paragraph 11-5, b (8) that defines a noise sensitive area as:

"An area where noise interferes with normal activities associated with its use. Normally, noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, areas with wilderness characteristics, wildlife refuges, and cultural and historical sites. For example, in the context of noise from airplanes and helicopters, noise sensitive areas include such areas within the ***DNL 65 dB noise contour***." (Emphasis added.)

Homeowners within the CAT EX study area would agree with the definition when Alaska Airlines Q400 turboprop plane fly overhead; however, FAA's own noise analyses declared a noise level of 45 dB DNL or lower. While describing their own noise analyses, FAA's inconsistent determination of noise level is glaring because this failure to understand their own regulations not only sends a mixed message, but denies homeowners eligibility for noise mitigation. The misuse of this definition is at best confusing, and at worst a total misunderstanding of their own regulations. ***FAA's declaration of conflicting noise levels creates a serious credibility problem for accepting any/all of their noise analyses.***

**Baseline noise analysis:** According to the CAT EX, baseline noise analysis was created by selecting 60 "random days prior to the implementation of the July 26, 2016 LOA" (page 34); however, FAA provides no detail about how many flights were contained in the baseline analysis; what criteria for selection was applied during the selection process; and how were these 60 "random days" selected and whether they attempted to compare their noise analysis results to Sea Tac Airport's 2013-2018 Part 150 Study? Residents want to be sure that the number, frequency, and noise level of flights used simulate current conditions and follow the same robust analysis required of a Part 150 Study or a comprehensive NEPA review.

**Turboprops only noise analysis:** The CAT EX does not provide any insight in its description of methodology about how turboprops flight tracks were added to the baseline analysis. For example, were they specifically selected to resemble specific characteristics of rotorcraft aircraft and why aren't they described in numbers and frequency? What were the noise profiles of the flight tracks selected? Many local residents maintain detailed logs of every new turboprop flight over their homes and could easily confirm the validity of FAA's statistical data if it were included; so why isn't it?

**All arrivals and departures noise analysis:** How did FAA calculate or measure the "all" category of arrivals and departures? Was a percentage of all flights to/from Sea-Tac Airport applied? If so, what was the percentage? What types of aircraft (fleet mix), numbers, frequency, etc. was measured or calculated? The narrative of the noise evaluations is heavily laden with technical jargon, but absent quantitative or qualitative data that would ordinarily be included in a robust Part 150 noise evaluation or a comprehensive NEPA review.

All of these questions are critical because FAA states on page 35 of the CAT EX that, "FAA discovered that the noise exposure levels in the Turboprop-Only Analysis were not consistent with the Part 150 Study noise contours" which "resulted in FAA conducting a second noise analysis that used all arriving and departing aircraft to account for the noise from all aircraft operating within the General Study Area."

It's a sad commentary that the latest 2013-2018 Part 150 Study was not used as a baseline because it would have revealed that a major portion of the study area was not even contained within any of the Part 150 Study noise maps because ***the study area was considered too quiet (at 45 dB DNL) for analysis! How realistic and believable is it then, that Sea-Tac's ranking was 14<sup>th</sup> busiest airport in the country when the study was approved by FAA in 2014, but now has risen to the 9<sup>th</sup> busiest in the country in 2018! Yet, the area most impacted by the Q400 Alaska Airlines flights—including some portion of "all arrivals and departures" is still analyzed as only 45 dB DNL? How could that possibly be true when it isn't even logical! The lack of detailed descriptions of flights, frequency, noise profile levels of each flight is a glaring omission and casts real doubt on the credibility of FAA's CAT EX noise evaluation.***

Local residents know the times, frequency, and types of aircraft flying over their neighborhoods and they did not receive assurance that FAA conducted rigorous and robust noise analyses as reported in the CAT EX noise evaluation. Additionally, residents know that Sea-Tac's flight operations have increased 51% above projections in their latest 2013-2018 Part 150 Study, so they seriously question that "All arrivals and departures" and the "Baseline" data. ***A new Part 150 Study or comprehensive NEPA review would provide greater confidence and reveal actual numbers of flights, etc. along with much-needed projections for the future. Absence of those details cause policy-makers to doubt the transparency and substance of the CAT EX.***

**Sea-Tac Airport's demonstrably outdated 2013-2018 Part 150 Study** did not include many of the neighborhoods where hundreds of noise complaints have been filed with Sea-Tac Airport and the FAA since July 26, 2016 when Alaska Airlines began flights over previously quiet neighborhoods according to this Study; particularly since 2018 is still in progress! ***Why then would FAA decide that a better "Baseline" noise test is their own hand-picked "random days" of noise with no accompanying flight frequency or noise data as evidence to prove their analysis? Wouldn't that have been a more accurate picture of a "before and after" noise conditions?***

***It belies logic to believe that FAA's second noise analysis of cumulative noise contained in the "All Arrivals and Departures" category "shows there were no changes in noise exposure levels and no noise impacts" when compared to FAA's own "Baseline." Why wouldn't the noise levels be nearly identical since both***

analyses were based upon data gathered during the same “60 randomly selected days” instead of a *true before-and-after analysis* of what noise conditions existed *PRIOR* to the commencement of Alaska Airlines Q400 flights in the study area that weren't worthy of noise mapping for the 2013-2018 Part 150 noise maps!

Residents within the study area now hear up to 70 flights/day in contrast to the quiet neighborhoods they used to enjoy prior to Alaska Airlines' Q400 flights commencement in 2016.. *For FAA to compare two sets of data (Turbo props' frequency and numbers unknown disclosed) with a smidgen of ambient noise from “all” flights (frequency, fleetmix, and noise profiles undisclosed) during the very same time period is to manipulate residents' understanding, logic, and data in order to claim there was no noise impact—even though flight operations jettisoned the Airport's ranking from 14th to 9th in the country just prior to FAA's noise analyses of the Q400 turboprops...unbelievable!*

Environmental data—including noise and emissions—contained in the CAT EX is not based upon accurate or recently gathered and vetted data, but rather on very outdated information gathered prior to dramatic increases of flight operations at Sea-Tac Airport from 2013-2018. Even the two noise analyses conducted by the FAA and included in the CAT EX “were not consistent” (described on pages 35 and 38) and excluded any future operational projections. What FAA did was to take a “snapshot” of time (60 randomly selected days) and base their entire noise analyses on that small sampling of undisclosed numbers and frequency of flights and with NO future operational projections.

2. Sea-Tac Airport has a history of delaying and obfuscating outreach information to the public—especially those residents within communities surrounding the airport. *For example, Sea-Tac Airport is just now in mid-2018 contracting with a sound insulation provider for installation of sound-proofing products in homes to mitigate noise impacts related to the third runway, despite the fact that FAA approved this mitigation plan in 2014! Sea-Tac's continuous delays and inattention to comprehensive responses to deadly health-related issues is just not acceptable to people living within Sea-Tac's airshed.*

3. Inadequate attention has been forthcoming for hundreds of homes already mitigated by Sea-Tac Airport during the 1990s when ventilation improvements were not part of the “Port's package” for sound insulation, making all these homes vulnerable to poor air quality emanating from aircraft emissions at ever greater levels. For example, Sea-Tac has demonstrated repeatedly that they are not interested in a comprehensive resolution of noise or air quality damage within surrounding communities affected by both these life-threatening environmental causes. *A recent example is when a consultant hired by FAA HQ contacted Sea-Tac Airport about their willingness to participate in a “window replacement” program (which would address the faulty and failing windows and ventilation systems of the past) and the response was “We're not interested!”*

## IMPORTANT POINTS CONTAINED IN FAA'S CATEGORICAL EXCLUSION PAPER

### DESCRIPTION OF ACTION, Page 2

- "Operationally feasible" means whenever weather permits and ATC approves. This is the condition of maintaining a 10 pm to 6 am timeframe when the Preferred Alternative would be suspended. Will FAA make any effort to calculate the number of deviations that occur and report them to the City of Burien?

### BASIS FOR THIS DETERMINATION, Page 2

- First sentence of 5-6.5.i categorical exclusion includes a reference to "noise sensitive areas," a term that FAA inaccurately applies to its basis for determination since its noise analyses of the general study area declares the noise level is not greater than 45 dB DNL which is in conflict with the definition contained in FAA Order 1050.1F, that defines a noise sensitive area as

"An area where noise interferes with normal activities associated with its use. Normally, noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, areas with wilderness characteristics, wildlife refuges, and cultural and historical sites. For example, in the context of noise from airplanes and helicopters, noise sensitive areas include such areas within the DNL 65 dB noise contour."

- Which is it then? A noise sensitive area eligible for mitigation or not?

### BACKGROUND, Pages 6-7

- From 2014-2016, Sea-Tac's operational status rose **from 14<sup>th</sup> to 9<sup>th</sup>** busiest airport in the US.
- Statistics included in this "exclusion analysis" are identical to those used in 2017 by BAC member, Sharyn Parker, to identify reasons why Sea-Tac should initiate new noise modeling for **ALL** flights, not just those contained in this categorical exclusion. The BAC analysis confirmed that Sea-Tac's operations were **51% greater** than what they projected in **their 2013-2018 Part 150 Study**.

### ATC COMPLEXITY AT SEA AND LIMITATIONS PROPOSED BY BFI, Pages 10-14

- It would have been helpful in the FAA's description of conflicts between two airports within five miles of each other that BFI operates in Class D airspace, not in Sea-Tac's Class B airspace (which is higher than Class D airspace).
- Another factor affecting flight efficiencies and flow is that BFI's ATC Tower personnel is a training location for incoming air traffic controllers, and that Green River CC is a "feeder institution" that provides many new air traffic controller students. Both of these elements add to the safety decisions made by Sea-Tac ATC and TRACON (aka S46); and the issue of ATC workload.

focusing only on the turboprop categorical analysis. While this may not have been their mandate, it is the moral equivalent of rearranging the deck chairs on the Titanic!

- It's critical to the environmental health of Burien and surrounding cities to view this turboprop issue in the context of the whole Sea-Tac operational picture, not simply one dimension of the complexity of adjacent airspace. Unfortunately, FAA nor Sea-Tac offer any projections about the growth of the turboprops (or other substitute aircraft that may use this flight pattern in the future if turboprops fade away). Another reason why Sea-Tac should be required to update and replace its current Part 150 Study.

#### 5.27 Noise and Noise Compatible Land use, Pages 34-38

##### Noise Evaluation

- FAA admits on page 35 that as it began "preparing NEPA documentation for the Preferred Alternative, the first noise analysis results were compared to the noise contours from the Sea Part 150 Study dated October 2013" and that they "discovered that the noise exposure levels in the Turboprop-Only Analysis were not consistent with the Part 150 Study noise contours."
- Later on page 35, FAA also admits that they conducted a second noise analysis in the study area because current conditions "do not reflect the existing cumulative noise environment" that had changed since Sea-Tac's issuance of a Part 150 Study in 2013.
- While neither of FAA's two analyses of the turboprops flight patterns resulted in a noise metric that would be eligible for mitigation of homes **AT THIS TIME**, there is no reason to believe that's a permanent situation! Obviously, Sea-Tac's latest projections for 2018 **are wrong by 51%**, then how much longer will it take for this study area to reach the mitigation point of 65 decibels DNL metric? FAA has failed in this specific categorical analysis because their analyses are out of context with the reality of increased and growing noise and air quality exposure for Burien and surrounding residences within the study area.
- Furthermore, this categorical exclusion analysis contains no flight operational projections for the future and local residents question whether Sea-Tac is compromised to accurately project future flight operations in the study area (and elsewhere) because their priorities appear to be to protect airport financial resources for airline and passenger improvements rather than this community objective of mitigating noise and air quality degradations.

#### Table 6: Noise Results Using All Arrival and Departure Tracks

- On page 38, FAA reveals in Table 6 of the recently analyzed "All Arrival and Departure Tracks" that 5.2% of the study area has noise measurements exceeding 65 dB DNL!! While the locations of these "units" are color-coded in red and are visible on the very tiny portions of the maps contained in Figure 21, it is a declaration that some portions of the study area are eligible for mitigation (if they are residential, which is not identified on the maps)! This proves the point that there are places in the study area that are eligible for mitigation, but Sea-Tac has or will not validate this because they choose not to update their Part 150 Study.