

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 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Since SEA’s Part 150 was outdated, FAA conducted two noise analyses they referenced as Baseline and Proposed Action Alternatives.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

proceeds 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)

This Comparing the 2013-18 Part 150 Study and FAA'S CATEX analyses indicates significant noise increases within the General Study Area.

Re: Appeal



Sharyn Parker

5/7/2018 9:31 PM

To Susan Plecko, Linda E Schwaber

Hi Walter,

Think you're being too hard on yourself and the process because you're living and sleeping the details of the CATEX which are technical, complicated, and poorly written. My suspicion is that the judge will have lots of difficulty wading through their morass, which means our response needs to be simple, clear, and understandable. Also, I don't see any reason why we can't repeat the "spirit" of Title 40 in our response by saying that the FAA's CATEX (referencing now CFR 1500.2(b), (e), and (f)) is not:

"Concise, clear, and to the point." Nor is FAA's "alternative" responsive to public comments (700+); and, further the alternative deteriorates, not restores or enhances, the human environment.

Furthermore, the CATEX includes an inadequate environmental analysis of noise and emissions. (Debi can fill in the air quality piece; and I rewrote my analysis of the FAA's flawed noise analyses):

"First, on page 2 of 51, the FAA contradicts its own noise analyses by stating in 5-6.5.i, "Establishment of new or revised air traffic control procedures conducted at 3,000 feet or more above ground level (AGL); procedures conducted below 3,000 feet AGL that do not cause traffic to be routinely routed over noise sensitive areas; modifications to currently approved procedures conducted below 3,000 feet AGL that do not significantly increase noise over noise sensitive areas; and increases in minimum altitudes and landing minima."

In Section 5.2.7, Noise and Noise-Compatible Land Use, of the CATEX, FAA concludes that there is no noise impacts applying two types of noise analyses they conducted; however, in the last paragraph of Page 2 of 51, FAA repeats the phrase "noise sensitive areas" twice. The use of "noise sensitive areas" is defined in FAA Order 1050.1F 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."

Consequently, the use of "noise sensitive areas" in FAA's CATEX implies the study area in question is already a non-compatible land use area which conflicts with its declarations on Page 39 of 51 when FAA states that their noise analyses reveal no noise impacts, meaning the area is "compatible" because it is below 65 dB DNL which is the threshold for noise mitigation.

Secondly, while rejecting Sea-Tac's noise contours from their recent 2013-2018 Part 150 Study as inconsistent (Page 35 of 51, fourth paragraph) with current flight conditions that are already outdated, FAA chose to conduct more noise analyses and modeled the Preferred Alternative Turboprop-Only noise data within the study area using actual flight tracks. FAA's finding was that the results of "the cumulative noise environment show there were no changes in noise exposure levels and no noise impacts." This is a remarkable statement given that the 2013-2018 Part 150 study area did not even include large portions of Seahurst neighborhood in its study area! What this means is that an area that had relatively few flights/year when the Part 150 Study was completed in 2013 and was excluded from noise modeling, there is now modeling for Turboprop flights only data that didn't exist until July 2016; and those results are revealed in Table 6 (Page 38 of 51), where 5.2% is above 65 dB (non-compatible land use), 5.6% is 60 dB, 6.,9% is 55 dB, 8.8 is at 50 dB, 13.8 at 45 dB and 59.7 is below 45 dB.

The point is that a neighborhood that was so quiet as to be excluded from the study area of the Part 150, now has—for 5.2% of the population in the study area—non-compatible land use that deserves mitigation under FAA regulations. On Page 3-52 of the outdated Part 150 Study, it states that any amount of deviation of 10% or less is considered acceptable; however, the City of Burien knows that the 2018 flights projected in the Part 150 Study already have been exceeded by 51%, not 10% or less! Simply stated, for an area not deemed sufficiently irrelevant to noise model in 2013, then fast forward to current conditions that demonstrate non-compatible land use for 5.2% of the population within the study area; and then for FAA to declare "no noise impacts" is implausible.

Thirdly, FAA's noise analysis of Turboprop-Only data claims similar results (even though it was the only noise analysis that FAA modeled for the CATEX) "when comparing the Baseline All Arrivals and Departures (Page 36 of 51 in CATEX) to the Proposed Action, and no noise impacts." Their analysis is flawed because FAA did not model both the All Arrivals and Departures, and the Turboprop-Only noise data; only the Turboprop Only noise data. In addition, there was no noise modeling of the growth (51% increase from projections for 2018) of overall flights (that overlaps arrivals and departures into Sea-Tac airport) in the vicinity of the study area which understates the total noise exposure within the study area.

The growth in increased flight noise alone could account for more population exposure to non-compatible land uses that would cause homes to be eligible for mitigation under FAA regulations and would exceed the +1.5 dB threshold described in first paragraph, top of Page 39 of 51. Same page, paragraph three erroneously suggests that "Geographically, the noise exposure levels in the All Arrivals 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." Not true!... since the 2018 noise data in the 2018 Part 150 is woefully wrong by FAA's own admission (reference second paragraph same page of CATEX). The FAA's noise conclusions are based upon faulty assumptions, "apples-to-oranges modeling data", and continual references to a severely outdated 2013-2018 Part 150 Study. "

Guess I'm out of wind for now, but I think the FAA's description of noise analyses and conclusions is pretty flawed.

Sharyn

> On May 7, 2018 at 9:02 AM Walter Bala <walterbala@mac.com> wrote:

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> I have terribly bad feelings about the process.

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> I don't think that we made the case showing the areas we can contest in the CATEX.

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> If the COB cannot see the points that can be argued, then they may believe there is no hope, no chance, "we're doomed." They cannot vision how we would challenge the poor writeup in the CATEX.

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> They needed to know that we have possibilities, that there are errors and we can offer a path forward.

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> But that conversation with Matt and Lisa did not happen.

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> Walt

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