December 5, 2022

The Honorable Patty Murray
United States Senate

The Honorable Maria Cantwell
United States Senate

The Honorable Adam Smith
United States House of Representatives

The Honorable Pramila Jayapal
United States House of Representatives

The Honorable Rick Larsen
United States House of Representatives

The Honorable Marilyn Strickland
United States House of Representatives

Dear Senator Murray, Senator Cantwell, Representative Smith, Representative Jayapal, Representative Larsen, and Representative Strickland,

On behalf of the Port of Seattle and the six cities surrounding Seattle-Tacoma International Airport (SEA), we are pleased to write to share our aircraft noise and emissions policy priorities for inclusion in next year's Federal Aviation Administration (FAA) Reauthorization legislation.

Prior to the COVID-19 pandemic, SEA was not only the 8th busiest airport in the country in terms of passenger volumes, but also one of the fastest growing – increasing from 31 million passengers in 2010 to almost 52 million passengers in 2019. This growth – and the associated number of operations and overflights in near-airport communities – has elevated aircraft noise and air emissions as one of the highest community priorities for the Port and the cities of SeaTac, Burien, Des Moines, Normandy Park, Tukwila, and Federal Way.

The Port and these six cities work closely together to identify new mitigations and abatements for aircraft noise and emissions in our community; in fact, we have jointly created the SEA Stakeholder Advisory Round Table (StART) to provide a forum for collaborative efforts on this front. We are proud that this partnership has resulted in specific changes which have resulted in measurable changes to-date, such as reduced late night noise and less use of the 3rd runway (closest to the local neighborhoods) for late night landings).

There is only so much we can do on our own, however; the Port is extremely limited in its ability to directly impact these issues, and so we need federal partnership to provide new tools, new authorities, new resources, new approaches and new FAA engagement that can make a tangible difference. To that end, StART has been able to develop a significant list of jointly supported federal policies that we believe will move us toward this vision. The 2023 FAA Reauthorization is the best vehicle for us to make progress in implementing these priorities.

As you begin conversations regarding the development of the 2023 legislation, we ask that you work to include the following seven (7) aircraft noise and emissions policies in the final bill:

I. **Reducing the impact of overflight noise on near-airport communities**: The Port has received an increasing number of complaints from local residents over the last decade regarding overflight noise. In addition to the work of StART to identify voluntary FAA and airline measures to reduce noise, the Port has also doubled down on implementation of its noise program – insulating not only homes and schools but also now apartments, condominiums, and places of worship. Yet, there are additional ways that the federal government can be helpful on this front:

1) *Secondary insulation for "failed" packages:* Over the past 40 years, the Port has installed noise packages in approximately 9,500 homes. However, current FAA policy restricts airports from using federal funds to upgrade or repair noise insulation other than in those homes that received packages pre-1993. We believe strongly that homes located within the airport's current FAA-recognized noise contours that meet broader criteria for "failed" insulation should be eligible for secondary investments – particularly those homes where the warranty has expired, or the product manufacturer is out-of-business and therefore unavailable to honor warranties.

2) *Aviation Noise and Emissions Mitigation Act:* The Port and the airport cities share a belief that the U.S. Environmental Protection Agency (EPA) can play a productive role in addressing community concerns about aircraft noise and emissions. While the FAA is excellent at maintaining the safety and efficiency of the national airspace system, the EPA's core mission around protecting human health and the environment makes them a natural partner in such efforts. US Representative Adam Smith's legislation would support the collection of data and then fund initiatives to mitigate aircraft noise and emissions. These new tools could make a significant difference, particularly in terms of environmental justice.

3) *Deadline for action on FAA Neighborhood Environmental Survey:* In April 2020, the FAA released its report[1] – as required by Sections 173 and 188 of the 2018 FAA Reauthorization – evaluating alternative metrics to the current 65db day-night level (DNL) standard. The conclusion of that report was that "DNL is the recommended metric and should continue to be used as the primary metric for aircraft noise exposure."

   However, in March 2021, the FAA released the results of their Neighborhood Environmental Survey (NES)[2], which found that noise annoyance extends far beyond the current FAA noise contour. In response to the public comment period following the release of the NES, the Port and the airport cities submitted a joint letter stating that "years of additional research to make policy decisions seems both unnecessary and detrimental" and that "[a]t the very least, the FAA should be very clear as to what it considers to be the current gaps in knowledge that prevent immediate policy decisions, and the timeline for completing additional information gathering and analysis before policymaking can be conducted."

[1] https://www.faa.gov/about/plans_reports/congress/media/Day-Night_Average_Sound_Levels_COMPLETED_report_w_letters.pdf
[2] https://www.faa.gov/regulations_policies/policy_guidance/noise/survey

The Port and the airport cities are very aware that any potential changes to the current 65 DNL metric – whether a lower decibel level and/or additional or alternative metrics – require careful consideration of the costs and benefits of various options, including the possibility of billions of dollars of newly eligible investments in noise insulation for homes and buildings outside the current noise contour. Yet, without a clear timeline and deadline for whether and how FAA may act on the results of the NES, airports and communities are stuck in a frustrating limbo of uncertainty. We also believe that FAA could use a wider range of input on this challenging and complicated topic.

To that end, we propose two policies for inclusion in the 2023 FAA Reauthorization:

- *Creation of an Aircraft Noise Advisory Committee (ANAC)*: Congress should direct the FAA to convene – within 60 days of passage – an aircraft noise advisory committee to evaluate existing research on aircraft noise impacts and annoyance; the costs and benefits of a wide variety of noise metrics; and other factors related to this topic. The ANAC should consist of representatives from key federal agencies such as EPA and the National Aeronautics and Space Administration (NASA), airports, airlines, aerospace manufacturers, and community groups from airport cities. Within one year of creation, the ANAC should submit its recommendations on the question of whether and how current aircraft noise policy should change.
- *Deadline for action on ANAC recommendations:* Congress should set a statutory deadline six months after the submission of the ANAC recommendations. During that period, FAA should consult with Congress on the recommendations, conduct a public comment period to solicit stakeholder input, and then make a final determination on next steps.

II. Reducing aircraft emissions: Ensuring continued progress on reducing aircraft emissions of carbon and other air particulates is key to not only preventing the worst impacts of climate change but also protecting human health. A transition to sustainable aviation fuels (SAF) represents the most tangible, near-term opportunity to achieve these goals; SAF not only reduces carbon emissions from aircraft, but also a wide range of additional air emissions including ultra-fine particulates (UFPs). Spurring the development and implementation of SAF must be a top priority for the 2023 FAA Reauthorization.

4) *SAF incentives and investments:* The Inflation Reduction Act contained two key policies that will make a substantive difference in SAF implementation – a SAF Blender's Tax Credit and a SAF infrastructure grant program. The former will help create price parity between SAF and traditional Jet A fuels, while the latter will help ensure the necessary construction investments to refine, blend and transport the fuels; for example, the Puget Sound region could benefit from such funding to invest in any required infrastructure to spur increased adoption of SAF at SEA. We urge the 2023 FAA Reauthorization to direct the FAA to do everything possible to successfully implement these policies in ways that move the United States toward the Biden-Harris' Administration's SAF Grand Challenge goal of producing at least 3 billion gallons per year of sustainable aviation fuels by 2030. Similarly, we support additional, complementary programs, policies, and investments that the FAA can undertake to facilitate progress – including but not limited to collaboration with other federal agencies such as the US Department of Energy, the US Department of Agriculture, and the US Department of Defense.

5) *Environmental Mitigation Pilot Program:* Section 190 of the 2018 FAA Reauthorization directed the creation of this fund, which was implemented as a one-time competitive grant opportunity in 2021. While SEA's application for funding through this program was not successful, we support the permanent authorization of this program at $6 million per year, because of its potential to support innovative technology solutions to reduce aircraft noise and emissions issues.

6) *Protecting Airport Communities from Particle Emissions Act:* While most of the above-listed Port-Cities priorities are actions rather than studies, we understand that additional research at the federal level is necessary to lay the groundwork for future decisions around UFPs from aircraft engines. We strongly support US Representative Adam Smith's legislation, which would bring more federal attention and engagement on the sources, characteristics, dispersion, and potential health effects of UFPs.

III. Addressing regional airport capacity needs: The Port and the airport cities have all publicly recognized that the Puget Sound region needs additional airport capacity beyond SEA, which is why we have endorsed the Washington State Department of Transportation's Commercial Aviation Coordinating Commission (CACC) siting process. The CACC's mission to identify a new regional airport outside of King County and/or expansion of other, smaller airports in the region will not only ensure that our economy can serve future air travel demand, but also that overflights will not be fully concentrated around SEA. However, while the CACC is tasked by the Washington State Legislature with identifying a site outside of King County where future regional air travel capacity should be located, there is no current funding or implementation plan once their work is complete. The federal government can support this process by:

7) *Ensuring FAA support for new regional airport capacity:* We would like to see policy language in the FAA Reauthorization legislation that accomplishes three goals: 1) clarifies the process for FAA regulatory review and agency collaboration with cities and states in high air travel demand regions looking to invest in new airport capacity; 2) dedicates funding for new airport capacity in high demand regions; and 3) provides additional FAA guidance on necessary steps to implement any final decisions from the CACC. While we do not know a specific timeline or strategy for regional airport capacity growth, it is essential to take the steps now that will smooth the path to meeting regional air travel demand over the coming decades.

Thank you again for the opportunity to share our FAA Reauthorization aircraft noise and emissions priorities, and we look forward to working with you over the next year to ensure that these policies are signed into law. We deeply appreciate all that you do for the Port and our communities, and please do not hesitate to contact us if we can provide any additional details.

Yours truly,

Commissioner Ryan Calkins
President
Port of Seattle Commission

Mayor Jim Ferrell
City of Federal Way

Mayor Allan Ekberg
City of Tukwila

Carl Cole
City Manager
City of SeaTac

Adolfo Bailon
City Manager
City of Burien

Michael Matthias
City Manager
City of Des Moines

Amy Arrington
City Manager
City of Normandy Park

Lance Lyttle
Aviation Managing Director
Seattle-Tacoma International Airport