

## REGIONAL COMMISSION ON AIRPORT AFFAIRS

19900 4<sup>th</sup> S.W.  
Normandy Park, Washington  
98166-4043  
(voice) 206.824.3120  
(cell) 206.310.4873

rcaa@earthlink.net  
<http://www.rcaanews.org>

### Scoping comments, pending Part 150 study at Seattle-Tacoma International Airport

20 February 2010

#### **1. Introduction; purpose.**

1.1 Identity of commenter. These are the scoping comments of the Regional Commission on Airport Affairs, as to the pending Part 150 study at Seattle-Tacoma International Airport. See Attachment 1 for more information about the Regional Commission on Airport Affairs

1.2 Subject-matter of comments. Staff at Seattle-Tacoma International Airport have invited the public to attend a workshop on 24 February 2010, & among other matters, the public has been invited to assist in the scoping of the pending Part 150 study. We accept that invitation & submit the following comments, which are based for the most part on our perusal of the following:

The Scope of Work provided by Airport staff as part of the request for statements of qualification from consultants wishing to work on the study

The Scope of Work agreed to between Airport staff and the firm of Landrum & Brown, in the contract ("services agreement") by which the Port of Seattle has employed Landrum & Brown as lead consultants for the study (6 November 2009).

Slide show presentation at the initial meeting of the Port-selected Technical Review Committee for the study (19 January 2010)

Slide show presentation for the workshop to be held on 24 February 2010, as published on the special website created for the study by Landrum & Brown

The agenda for the workshop of 24 February, as published on the study website

News releases & announcements from the Airport staff about the study generally 7 about the workshop of 24 February.

#### **2. General conclusions & comments.**

The scope of the study as presently planned is far too narrow. The opportunities for community participation are inadequate for the stated purposes & do not rise to the level required by the

governing regulation. The detailed part of this comment, following, is divided into three parts: (A) Editorial concerns; (B) Scope of the study; (C) community participation.

### **3. Detailed Comments**

#### **A. Editorial concerns.**

Over the years, our organization has had occasion to comment on several important proposed studies related to airport & aviation matters. In addition, consultants & Board members have participated in a variety of other studies of a public character. There is a predictable group of problems with any such study, & what we write here may sound familiar to some of our readers, for we have made comments on these topics repeatedly in the past.

3 A 1. Topical index. The draft of the final report in this study, & the final published version of that final report, should have complete, professional topical indexes, including all appendices & similar documents that are or ought to be considered part of the final report. A table of contents is NOT an index for this purpose. The reader should be able to find in the index all references in any part of the study to, let us say, property values. It would be especially useful to many readers to have at hand an index that tracks references to a topic in the formal study text, in the comments from commenters, & in the responses to comments.

3 A 2. Format of text & illustrative materials, including tables, photographs, drawings, graphs, & maps – no fold-outs. Every effort should be made to contain all materials within the standard 8.5 x 11 inch format, & in what some people call “portrait” format. The use of color should be minimized. Use of photographs that are not actually relevant to the study should be eschewed (such as the photos on the first page of the final report on the last Part 150 study at Sea-Tac). Readers in government offices likely have access (cost-free access) to printers that can reproduce 8.5 x 14 materials (legal) & 11 x 17 materials (ledger), & in color. Most other readers do not. For the sake of non-governmental readers, we urge that even documents that would be conveniently shown in ledger format (maps of the area surrounding the Airport, e.g.) should be broken into smaller pieces.

3 A 3.1. Citations to authorities – completeness & adequacy. The usual airport environmental or planning document does not meet the tests of a high-school term paper when it comes to citations of authority. Consider this example, taken at random: Table D1 in the prior 150 study at Sea-Tac, titled “Existing Land Use within Existing Noise Contours, 1998” (at . p. D.3 of the final report). This table presents data for various sorts of land use, & numbers of such facilities as schools, in five different DNL contours. The source for these data is given as “Master Plan EIS, Seattle-Tacoma International Airport, BDC Analysis”. Which EIS? There were two for the last Master Plan Update, if that is what is referred to. Where? The two EISes run to 11 volumes. What is meant by “BDC Analysis”?

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 3

---

3 A 3.2. Citations to authorities – reliance on unpublished & unavailable sources. In all-too-many aviation documents statements of fact (often very disputable indeed) are not supported by citations to published authorities. Such support as may be provided is usually to works that are not to be found in the open literature -- too often, not published at all, or are published but proprietary; to sources that cannot be consulted for other reasons; to documents that have not been subjected to peer review: These errors should be avoided in this study. Assertions of fact should, we implore you, be supported by respectable authority. Publish the background documents on which the final report relies before the report itself is published, & *without fail* before the public is invited to comment.

3 A 4. No anonymity, please. In all-too-many documents prepared by or for governmental bodies, the reader is not advised of the authorship of the document. This is sometimes addressed, but only partially, by providing a list of preparers, & such a list is better than nothing. However, we suggest & request that the final report (preferably the interim reports, as well) clearly delineate who wrote what part of the document, & set forth the qualifications of the author(s).

3 A 5. Accuracy. In all-too-many documents in the aviation field, we have seen sloppy work when it comes to pagination, numbering of tables &c., cross-referencing, &, indeed, even in putting the materials in the right part of the document. It is distressing to find that, making up an example that has real-world roots, Table 15 is not found between Table 14 & Table 16, where it belongs. We have had to work with documents where tables or the like are referenced in a text, but no such table is to be found anywhere. This is usually the case on some really salient point. It would be helpful to everyone if an over-all editor were to be hired for this project, someone with professional qualifications to edit & review quasi-technical documents, & with experience in writing about technical matters for lay audiences. The identity of the editor-in-chief should be known.

3 A 6. Obscurity. Don't be obscure. Don't use percentages when real numbers are needed. Take, for example, the four current tables of Sea-Tac runway statistics posted on the Airport's website, which supposedly help the public understand how the third runway is being used. There is not a real number in the lot; instead, one reads, for example, that the third runway was used on South flow for 23.6 percent of arrivals in the period 1 January 2010 to [through?] 6 February 2010. Without knowing how many total arrivals there were, this percentage figure is useless. Don't bury critical matters in tables, or worse yet, in footnotes for tables in appendices: put the important material right out in front in plain English. Don't rely in the final report on documents that are not included in the report itself (an all-too-common failing, or is it a tactic?).

3 A 7. Comment period & final hearing. 3 A 7.1, Do NOT set the final hearing in the period between Thanksgiving and MLK Day. Do NOT provide a 30-day comment period – 60 days would be much preferable. Do NOT follow the practice of the U.S. Army Corps of Engineers, Sea-Tac Airport, the State Department of Transportation, & others, of releasing the documents for comment on the day before Thanksgiving, or on Christmas Eve in a snowstorm, &c. August is

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 4

---

another time period to be avoided. Don't state that questions about the documents should be addressed to named personnel & then allow those folks to go on annual leave so that they are not available to answer the questions in a timely way – this seems to be standard practice, & perhaps it is part & parcel of the pattern of not completing the report(s) until just before the start of the Winter holidays.

3 A 7.2 Access to documents. If you SAY that you will lodge copies of the documents in public libraries, actually do it, rather than following the local practice of saying that you will, but then not following through till it's too late -- & in that regard, have some awareness that libraries have their protocols for putting documents out for public view – you don't just walk in & throw your document on the table & then say that the document was available to the public on that date. If you SAY that a document is available at a physical address, do NOT follow the practice of the Corps of Engineers by providing a fictitious address. Remember that a post-office box is not a physical address. Actually have the document there as promised & have the copy machine nearby (preferably free). Consider that making documents available only during your business hours means that they are not available for most people with actual jobs.

3 A 7.3 Websites. If you post large documents on the web, please post them (as most public agencies are now doing) in a segmented fashion (chapter by chapter is good), so that downloading a few pages doesn't require downloading of a 200 or 400-page document, taking hours. We do strongly support use of the web for distribution of documents. Sea-Tac has made great strides in this regard, & to date, since Landrum & Brown came on board, posting seems to be even prompter & quite comprehensive.

### B. Scope of the study.

#### 3 B 1 General remarks

3 B 1 1 Scope too limited. The scope of the study, as revealed in the two Scope-of-Work documents mentioned in sec. 1.2, above, is far too limited to accomplish the stated purposes of Part 150 studies. This is supposed to be a study of noise at Seattle-Tacoma International Airport – limiting the study to noise from the third runway defeats the purpose. The study team needs to address all airport noise, wherever it is experienced.

3 B 1 1 2 16 key issues. In consultation with other members of the community, we have prepared a document (which appears below) that lists what appear to be the 16 key issues for this study, from the standpoint of the impacted community. The study team will note that most of what appear to us as key issues are not addressed, or are addressed only in small part, in the two Scope-of-Work documents.

3 B 1 1 3 Questions to the study team. To approach the matter from a slightly different standpoint, & again in consultation with others, we have prepared 30-some questions for the study



## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 5

---

team, which relate to various of the key issues. (This is by no means an exhaustive group of questions, & we reserve the right, & expect, to lodge additional questions as needed.) We request written responses to the questions in a timely manner.

### 3 B 2 Sixteen key issues

Here follow what we believe to be the key issues that should be addressed in this study.

Issue 1. Third-runway usage & noise. Even before mapping is begun, the evidence from registered noise complaints shows that there is a lot more noise than expected from the third runway. One way or another, this noise must be mitigated, reduced, or eliminated.

Comment: In order to come to grips with this issue, the public & the study team need to know with certainty how it is proposed to use the runway. What sorts of planes? How big, how often, how noisy? Once these ground rules have been spelled out, they must be adhered to. The community needs predictability.

Issue 2. The planning horizon. The study's planning horizon is now set at 10 years, but for land-use-planning purposes, should be at least 20 years, & longer would be better. There needs to be a full disclosure of the build-out plan for the Airport – what does the Port envision as the eventual size of the Airport, what does the Port envision as the future maximum number of commercial operations (per annum)? The community needs predictability.

Comment: It would be futile for neighboring cities to make revisions in existing land-use plans to accommodate the Airport's five-year or even ten-year planning without there being a clear delineation of the build-out plan. The Port District has made no commitment to cap Airport growth, so one has to consider that in five (or ten) years, the Port will be back in the next Part 150 study, calling for further revisions of other governments' land-use plans. As the Airport expands, it extends its noise contours over land uses that previously would have been considered compatible but now are INcompatible.

Comment: It is particularly important to address a 20 or 30-year planning horizon in light of the release last Summer of the State's forecast of an increase in operations at Sea-Tac by 80 or 85 percent as of year 2030. The Airport was part of the State study, & the Airport has never shown any disagreement with this projection. New operations will mean new noise. The time to make plans for preventing, reducing, and mitigating that noise is now, before the event – not afterward.

Issue 3. Commitment of FAA & Port Commission. The FAA & the Port Commission need to commit to working with the rest of us to find solutions, actively & co-operatively, from the start.

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 6

---

Both of those entities need to commit to results that are enforceable & that will be enforced. The community needs predictability.

Comment: There's not much good that will come from our making suggestions if the FAA won't commit to active, consistent, effective enforcement of the changes, restrictions & requirements that may come out of the work. That commitment needs to come at the earliest stage in the study – six months ago would have been good. That commitment needs include active, co-operative, participation in the study from the start – in the past, the FAA has been content to stand by while citizens cope with hard planning issues, & then at the end, when everyone has essentially gone home, the FAA says, “Oh, you can't do that, Oh we wouldn't care to do this... .”

Issue 4 Community involvement. At present, the study makes inadequate provision for community involvement (a) by the interested public at large, (b) local government – cities & school districts, (c) advocacy groups. With inadequate involvement, we begin with a study with a sharply restricted scope (& other flaws), with very little opportunity to make corrections.

Comment: The present model starts with a set of unchallengeable assumptions about what should be done & how. There is an appearance of listening (small groups meeting for 45 minutes or so for five or six times over two years, & permission granted to send in e-mail comments). But this does not address the key issues that this study should focus on. This does not create any effective way for the public to turn this study in the right direction.

Issue 5. Mapping where the noise actually is -- with other metrics. The consultants need to learn where the real noise is, & not rely on dubious computer models. Even the FAA knows that the 65 DNL noise metric does not tell the whole story when it comes to determining where there is intrusive noise. Noise-exposure maps are needed, showing the DNL contours out to & including the 55 DNL line, but more importantly, showing single-event level (SEL) contours & time above (TA) contours. (This was done last time.) The consultants should be required to propose methods for learning where the noise actually is.

Issue 6. Mapping where the noise actually is – mapping that shows total aviation impacts. The requirement of the regulation is for maps that cover all noise from Sea-Tac Airport. From those maps (& other information) the study is supposed to develop noise-reduction, noise-abatement, & noise-mitigation procedures for the whole Airport – & NOT, as presently planned, only for noise from one runway. All noise must be considered.

Comment: Further to this point – for many areas to the north of Sea-Tac, airport-related noise comes from not one but two major sources: Sea-Tac & Boeing Field. It is unrealistic to pretend to be fixing airport-related noise if Part 150 studies for Sea-Tac only map & consider Sea-Tac noise, & if the studies for Boeing Field only map & consider Boeing Field noise. For those under the noise, the cumulative effect is real & the totality exceeds acceptable limits. It's total noise

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 7

---

that matters, & the mapping for this study should consider all airport-related noise. (This was done in the last Boeing Field study.)

Issue 7. Extent of the study area. The study area should include all the places where excessive airport-related noise is being experienced. That area is far greater than what is defined by the 65 DNL contour, which is the limit according to the current Scope of Work. This greater area includes large parts of Seattle, Federal Way, & other cities that are now not considered be within the study area. Accurate & complete mapping (see points 5 & 6 above) will help to demarcate a more appropriate (larger) study area.

Comment: It should be noted that defining a realistic study area has implications for the public-involvement aspect of the study. At present, the public-involvement plan ignores local governments, advocacy groups (including neighborhood associations & the like), businesses, residents, & the general public in large areas that are affected by Sea-Tac-related noise.

Issue 8. Third-runway noise usage. The general public, & local governments, were told officially that the third runway would be used only under very limited circumstances, but the FAA has chosen to use the runway night & day, good weather or bad. While we cannot hope that the FAA will live up to its earlier word, & use the runway only during bad-weather delays, we can expect that it will be used so as to minimize noise impacts -- How can restricted usage of the runway be achieved & if, achieved, how can it be enforced?

Comment: Mapping will be guesswork unless there is certainty about how the third runway will be used. Certainty requires a real commitment from the FAA, preferably in writing from the top. It is reasonable for the consultants to be gathering information for future use in a run of the computer-based mapping program (INM), but useable maps cannot be prepared till the question of third-runway usage is settled – a set of maps based on alternate scenarios would be interesting but would not be useful as a guide to noise-abatement & reduction measures.

Issue 9. Involvement of schools. The limited public involvement excludes the three most-affected school districts from the process, except insofar as they may send staff or directors to sit in at the handful of public workshops that are planned. (The districts are Highline, Tukwila, & Seattle. The Federal Way schools should be consulted) All school districts with building adversely affected by noise need to be included in this process, & it is particularly important for the school districts to have predictability about airport-related noise for 20 years or more, given the great difficulties & expense incurred when schools must be retrofitted to keep out (new) intrusive noise, & the comparatively easy task of providing proper insulation at the time of construction or major remodelling for other purposes.

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 8

---

Issue 10. Night-time noise. Residents continue to complain about interruptive night-time noise, despite the Airport's voluntary night-time restrictions. A real curfew is probably needed, as well as identification of the handful of flights that wake up so many residents. Once those flights are identified, specific measures can be designed to deal with them.

Issue 11. Zoning & land-use changes. Will the cities be pressured to make changes in their land-use plans & zoning ordinances, to favor Airport-related uses (to the detriment of their other plans, & to the detriment of their tax bases)? The Port needs to be pressured to disclose its desires very early in the process. See Point 2 above. As noted in point 9 above, the local school districts also face possible pressure to change locations of existing schools to accommodate increases in airport-related noise.

Issue 12. Rôle of the Technical Review (Advisory) Committee. The advisory committee that is needed is one that is representative of the wider community, not just a technical committee. (And that committee needs to work in a completely open way.) An advisory committee heavily slanted to aviation interests – most of whom actually have NO stake in noise reduction or mitigation – will not, cannot, work for the interests of the people for whom this process is intended.

Also, the Committee is given too many tasks, most of which are outside the competence of at least a large fraction of the membership.

Comment: It might be more effective to have two or three technical committees. In the last study, there was an Operations Subcommittee (dealing with issues like flight corridors), & a Land Use Subcommittee looking at land-use concerns. That model should be considered for this study; indeed, we see no reason why a broadly representative community advisory committee should not be created now.

We question whether there is much to be gained by having an advisory technical committee concerning itself with the fine details of computer modelling – the consultants & their subconsultants have all the technical computer expertise that is needed, & it is difficult to see how local land-use planners, or someone from the PSRC, or airline pilots, can add anything to that work. Community participation is needed, however, to ensure that the modelling includes the right areas, provides maps for all the needed noise metrics (see Point 5, above), &c. There are policy issues in the general assumptions for the modelling, & broad participation is necessary when policy issues are at stake. The modelling produces noise-exposure maps. Maps from earlier studies show zoning, & show generalized land uses. They do not seem to show schools, medical clinics, hospitals, out-of-doors recreational sites, & other areas that, to the broader public, would seem to be places where noise is particularly intrusive & inappropriate – places where it is especially desirable to reduce noise impacts & to provide mitigation

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 9

---

Issue 13. Breaking out of the 65 DNL illusion. See earlier comments above about mapping & about extent of study area. It is true that the FAA has chosen not to fund mitigation (buy-outs, insulation) outside the official 65 DNL contour. It is NOT true that the Port District is forbidden to use its own money for mitigation wherever it likes. It is NOT true that there are no serious noise problems outside the 65 DNL contour. (This is an indisputable fact, known to everyone.) It is NOT true that the only noise that can be considered is that measured by the 65 DNL. This is the Port's study, & the Port has every right to study whatever it wishes – or whatever we the public can persuade it to study. It is NOT true that proposed noise remedies are to be evaluated only as to their benefits for people & property within the 65 DNL contour.

Issue 14. Following up on last study. This study should build on the work of the last study.

(1) It should re-examine the numerous recommendations from the last study that were rejected out-of-hand by the then-Port Commission. Airport staff have announced that the work of the last study will NOT be considered. This is an erroneous decision.

(2) There should be a process to validate the noise-abatement procedures that have been put in place previously – for example, are the requirements of the four-post plan being followed? What's the situation with the noise-abatement corridors? Comments from the public repeatedly cite instances where overflight noise is experienced in places where (if the official plans were being followed) it would be impossible for significant numbers of jet aircraft to be overhead. This recurrent situation raises questions of enforceability, commitment, and predictability that are central to public belief in this process. See point 3, above.

Issue 15. Costs & benefits. As the consultants develop their proposals for noise reduction, noise abatement, mitigation, & land-use changes, they should simultaneously develop reasonable estimates of the costs & benefits. The Port Commission should be considering how much of its money it will commit to implementation of the final recommendations that come out of the study.

Comment. It would be helpful to have a clearer explanation (if that's possible) of how the FAA balances out-of-pocket costs of noise abatement &c against the non-monetary benefits that are gained if noise is reduced. How much is a good night's sleep worth? It would also be helpful to have more serious discussion of equity – the noise-impacted areas bear a very heavy burden from Airport-related noise, with little discernible benefit. How much of the true costs of Airport-related noise should be borne by people outside the noise zones, who are in fact the great majority of those whose flights originate in the County, & in the State.

Issue 16. Property values, taxes. In weighing the benefits from reducing Airport-related noise, the study should recognize that property values are depressed by aircraft noise. This effect is quantifiable. Depression of property values directly depresses the tax revenues of local governments. This effect is also quantifiable. Thus, serious noise reduction can be expected to lead to higher property values & greater tax revenues. Both of these effects should be quantifiable, & should be calculated as benefits from noise reduction.

*Noisepanel*

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 10

---

### 3 B 3 Thirty questions.

Here follow 30 questions that point to concerns that RCAA has with respect to the study (some of these questions are in several parts). As noted above, p.5, we reserve the right to submit additional questions. In particular, we have technical questions that do not fall into the category of scoping comments.

Question 1. The Aviation Planning Council published a forecast that showed an 85 percent growth in flight operations at Sea-Tac by year 2030. What are the Airport's plans for dealing with the additional volume – 640,000 annual flight operations, as compared to 370,000 operations in year 2009?

Question 2. The Airport, not just a single runway, generates noise. What did the new runway accomplish, other shifting noise substantially to the West?

Inference: If shifting noise back to runways 1 & 2 would reduce noise experienced outside the Airport, would there be any real loss to the Airport?

Question 3. The FAA Part 150 process is about noise reduction & noise mitigation. What is being done about relying on computer-generated noise simulation and going out into the community to find out where the real noise impacts are?

Question 4 Are there any scientific studies used by the FAA to determine that human beings are capable of averaging any “sensory input” (whether it be from noise, light, pain, air temperature, or other sensory input)? Are there credible studies by others on this topic?

Citations to such studies, please

Question 5. Are there any scientific studies used by the FAA to determine the physiological and psychological (emotional) damage that occurs in human beings are the result of repetitive exposure to loud, single-event noise? Are there credible studies by others on this topic?

Citations to such studies, please

Question 6 (a). Are the consultants aware of the various construction projects being planned in areas in or near the existing 65 DNL contour? If so, what are they & where?

Question 6 (b) Are the consultants aware of the planned light-rail extension to Federal Way? What construction is to be expected around the stations along this extension? Estimated completion, 2019.

Question 6 (c) Are the consultants aware of the Waterview Crossing project on Pacific Ridge (mixed commercial and 1,600 residential units, with an estimated value of \$385 million)? Estimated completion, 2023.



## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 11

---

Question 7 (a). How much money has the Port Commission set aside for implementing the mitigation measures that may come out of this study?

Question 7 (b) When did the Commission take that action?

Question 7 (c) Has the Commission set an upper limit on how much it will be willing to spend to implement mitigation measures?

Question 7 (d) When did the Commission take that action?

Question 7 (e) Do senior Port District staff have in mind dollar figures for the amount that they would recommend be made available for implementation?

Question 7 (f) If senior staff have such figures in mind, how much, & on what basis? Is this in writing?

Question 8 (a) Has the Airport provided the consultants with plans showing Sea-Tac at build-out?

Question 8 (b) If not, why not?

Question 8 (c) Has the Airport provided the consultants with plans showing Sea-Tac 10 years from now?

Question 8 (d) If not, why not?

Question 8 (e) Has the Commission approved & adopted the plans provided by Airport staff to the consultants?

Question 8 (f) If so, when & how?)

Question 9 (a) What information has the FAA provided to the study team as to FAA's usage plan for the third runway, as of –

The five-year planning horizon

The ten-year planning horizon

Other dates

(Please provide that information.)

Question 9 (b) Is there information as to third-runway usage since the re-opening of the easterly, or first, runway?

(Please provide that information, using real numbers, not percentages.)

Question 10 (a) Is there some compelling reason why this study should not look to a 20 or 30-year planning horizon?

Question 10 (b) Are the consultants aware of the report of the State's Aviation Planning Council, which projected that about year 2030, flight operations at Sea-Tac will increase by 80 to 85 percent?

Question 10 (c) Will the study team address this projected increase in operations when considering its recommendations?

Appendix 300

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 12

---

Question 11 (a) What measures are under consideration for reducing noise from the third runway?

Question 11 (b) In the opinion of the consultants, what measures have been successful at other major airports with a similar noise problem? (Please describe.)

(Don't overlook the contributions of taxiway D to the issues at hand.)

Question 12 (a) How does the study team expect to recommend noise-abatement & noise-reduction measures with respect to any runway – and especially the third – if you do not get a “read” on traffic forecasts from the FAA first?

Question 12 (b) Mr Adams is requested to clarify his remarks to the Technical Review Committee (19 January) about submitting his traffic forecasts to FAA “for approval” “before it is used to guide the remainder of the ... study) (p.3). What is meant by “remainder” in this context?

Question 13 (a) How are results from temporary monitoring to be used? It is clearly stated at several points in the paperwork that the noise measures will not be based on real-world data but only on computer modelling? So why monitor?

Question 13 (b) We read in the official paperwork that field data will be used to “validate” or “ratify” the results that are obtained from use of the Integrated Noise Model. (See 2nd bullet point, slide 22, Landrum & Brown Powerpoint presentation to Technical review Committee, 19 January). How will that work?

Question 14 (a) Is the Scope of Work document dated 6 November 2009 the present Scope of Work?

Question 14 (b) Should the public rely on that document for a full & accurate description of the study?

Question 15 Does the study team have problems with use of single-event-level (SEL) and time-above (TA) noise metrics? Please explain. (To answer Mr Adams' question at p.2 of the notes of the meeting of the Technical Review Committee on 19 January, most interested members of the public wish to see SEL & TA mapping: if there are other metrics that can be used to produce noise maps, the public wants to see them, too.)

Question 16 (a) Does the study team have problems with mapping of noise related to Sea-Tac and noise related to Boeing Field, both on the same maps?

Question 16 (b) If this is problematic for the study team, why?

Question 17 (a) It is said in several of the presentations that the study will not examine, & will not recommend, shifting noise. Hasn't a significant amount of noise already been shifted to the West as the result of the use of the third runway for many tens of thousands of operations per annum, operations that formerly were first and second runway operations?

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 13

---

Question 17 (b) Statements from Airport staff & from the consultants to the effect that the study will not consider shifting noise “from one area to the next” seem to say that the study will not recommend usage changes for the third runway that would result in fewer operations on that runway, & thus, less noise to the West of the Airport. Please explain.

Question 17 (c) If the study team will not recommend or study the shifting noise back from the third runway to the first & second runways, what measures are left for consideration to reduce impacts of the third runway?

(As to all parts of this question, see slide 33, Landrum & Brown presentation to Technical Review Committee, 19 January 2010)

Question 18 (a) Does the consultant have (or know of) a computer model that will draw contour lines for single-event-level noise as measured by real-world data (actual measured noise in the field)? Please describe any such model.

Question 18 (b) Does the consultant have (or know of) a computer model that will draw contour lines for time-above noise as measured by real-world data (actual measured noise in the field)? Please describe any such model.

Question 18 (c) Does the consultant have (or know of) have any computer model that uses any other field measured noise? Please describe any such model.

Question 19 (a) What does the study team understand to be the meaning of the expression, “preferential runway system”, as used in 14 C.F.R. sec B 150.7 (b)(3) ?

Note that the cited section requires the “airport operator” to “analyze and report on ... the implementation of a preferential runway system”.

Question 19 (b) What such systems are under consideration by the study team for the third runway?

Question 20 (a) Why aren't the local school districts invited to participate?

Question 20 (b) Will the noise-exposure maps show locations of public & private elementary schools, & locations of post-secondary learning sites (such as community colleges)?

Question 21 If the study team were not constrained by the provisions of the FAA's regulation, what noise metrics would you use to create an accurate picture of how Airport-related noise is experienced by the community?

Please explain.

Question 22 (a) Does the study team plan to forecast future aircraft utilization runway by runway, & if not, why not?

Question 22 (b) If the forecast is for all runways lumped together, the resulting contour maps will not be accurate, will they?

Question 23 (a) Please provide a recapitulation of third-runway usage, month by month, from the time that it opened to present, showing not only numbers of arrivals & departures but also

## RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 14

---

plane types, time of day, days of the week, & if available, VFR conditions. Please note that this request is for real numbers, not for percentages.

Question 23 (b) Please provide a companion recapitulation of usage of all three runways for the same time period with the same data.

Question 24 (a) What economic factors will the study team use in providing cost-benefit analysis for the various noise-reduction measures that the team will recommend?

Question 24 (b) How will the team quantify such benefits as a good night's sleep, ability once again to use the out-of-doors portions of one's property without continuous disruptive aircraft noise, lessening of exposure to toxic fumes from jet engines, & the like.

Question 24 (c) Will the team take into account improvements in property values that would result from significant lessening in overflight noise? Provide details & documents.

Question 25 (a) How will the consultants determine the numbers of various kinds of residential zoning within the various DNL contours?

Question 25 (b) In particular, how will the consultants determine the number of apartment buildings (other than condominiums), & the number of apartments within those buildings, in the various DNL contour zones?

Question 25 (c) Will the consultants be able to determine the number of actual residents in single-family homes, low-density multi-family (2 to 4 households), multi-family greater than 4 households, &c, within the DNL contour zones? Please explain.

Question 25 (d) Does the study team have estimates at this time of the number of people resident in multi-family buildings within the various DNL zones who are living in buildings that are not covered by the Port's present noise-insulation program?

Question 26 (a) What is the present policy of the Port Commission as to providing insulation in multi-family residential structures (other than condominiums) with more than four households, within the various DNL contour zones?

Question 26 (b) What is the reasoning in support of the policy?

Question 26 (c) To the consultants: How does the present policy of the Port Commission in this respect compare to the policies of other operators of major airports around the country?

Question 27 (a) Do Airport staff consider that the owners of multi-family buildings within the various DNL contours have a rôle to play in this study, & if so, what?

Question 27 (b) Do the consultants agree?

Question 28 (a) Do Airport staff consider that the residents of multi-family buildings within the various DNL contours have a rôle to play in this study, & if so, what?

Question 28 (b) Do the consultants agree?

Question 29 (a) What efforts have been made, if any, to bring into this study the owners of multi-family residential buildings not covered by the Port's present noise-insulation?

*Health*

*Health study messes  
EIP could in Des Moines*

RCAA

Scoping comments, pending Part 150 study at  
Seattle-Tacoma International Airport 20 February 2010  
Page 15

---

Question 29 (b) What efforts have been made, if any, to bring into this study the residents in multi-family residential buildings not covered by the Port's present noise-insulation?

Question 30. Does the study team have in mind a process for amending the existing Scope of Work, if the public in workshops produce ideas that the team believe should be pursued that are not encompassed in the present Scope of Work? Please explain.

\*\*\*

- o Earthquake change operations shift snow slide
- o more ~~to~~ maintenance than AVG
  - o noise profile sensitivity analysis
  - o multiple scenarios
- o Quiet Glide
- o Acct for new technology - that will allow more operation at different speeds than currently.

6x50 x 24,000