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CITY OF BURIED



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Re: An effective Part 150 noise-mitigation study

Dear Mayor McGilton & Councilmembers:

At the Highline Forum meeting on 18 November, near-by cities & community members were given an overview of the plans of Sea-Tac Airport staff for a Part 150 study. RCAA has this caution for you – be very careful about what you agree to; the study as presently structured shows no signs of being geared to the interests of the near-by cities & their citizens, & almost certainly will NOT be the effective noise-mitigation study that we all hope for. Any participation by the cities in a Part 150 study should benefit the cities & their citizens. At this stage, there is nothing proposed in the study that appears to offer such benefits.

1. What we suggest you do.

We suggest the following immediate actions to all the cities in the Highline district. First, do not sign on with the present Part 150 study. Instead, tell the Federal Aviation Administration that the Port's present plans for the study are not acceptable & your city will not participate. This should be communicated to the regional office and to FAA headquarters in Washington, D.C. Second, tell the Port Commissioners the same thing.

Following that, it would be time for local governments to work on a common strategy to achieve a useful study. We suggest that you create a special committee – perhaps a couple of Councilmembers & a senior staff member – to develop policy on this issue, & to work with other cities & the Port Commission members. The importance of a successful study justifies this commitment of time & resources.

As a part of the strategy, local governments will want to talk directly with the Port Commission in the relatively near future, elected officials to elected officials. The Commission has no idea of what an inadequate plan has been put together by Airport staff.

CFTR: 12/14/09
cc: Scott Greenberg

Affiliates

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2. Why we make these suggestions

Why make a fuss now? It would be foolish to wait till the study runs its two-year course before pointing out to the FAA that the public element is lacking. The time to fix the study is now, before the FAA signs off on the plans of Airport staff. We believe that FAA headquarters will not want the study to go forward in the face of dissent from the people that the study is supposed to help.

How serious are the problems with the study? Very serious, indeed.

The public has no meaningful rôle. Individual cities will be represented only by planning staff. There is not even that level participation available for unincorporated King County or the City of Seattle).

Contrast the plans detailed by Mr Shepherd on the 18th with the last Part 150 study, with its robust public involvement. That study was directed by a committee that included representatives designated by the individual cities & by County Councilmembers). This study will be directed, it seems, by a Technical Review Committee dominated by airport & aviation interests, with NO citizen members, & with city participation limited to a land-use planner apiece. That study recognized that negative impacts from Airport-related noise were being felt far beyond the narrow boundaries of the artificial 65 DNL contour line. This study is disturbingly ambiguous. That study was committed to preparing recommendations that would make real differences in the sound environment in the Airport communities. This study is committed to nothing except data-gathering.

And, the focus of the study is suspect. Why do Airport staff want city land-use planners involved? Not because of their expertise in noise abatement or noise mitigation – those are not the strengths of land-use planners. Consider the following two statements, verbatim from the Powerpoint @ presentation by John Sibold, director of the Aviation Division of WSDOT, to the Highline Forum on 18 November 2009

“Washington’s aviation system is threatened by encroachment from land uses that are incompatible with aviation operations, and existing land use laws are inadequate.”

...

“The State should place a priority of protecting and maximizing the efficiency of the airport system [that] we already have in place before we consider the development of new airports.”

We, the airport neighbors, hear “Part 150 study”, & we think “noise mitigation & prevention”. But the Airport staff & State aviation planners think “land-use noise compatibility”. Thus they do not think about reducing noise at the source nor mitigating the negative

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consequences. Their thoughts are about the neighboring cities “encroaching” on the Airport, & their remedy is to change land uses. Not land use at the Airport, but land use elsewhere – in our cities. The proposed Part 150 study will be centered on changing the land uses outside the airport so that they are compatible with the Airport’s plans. That inevitably means elimination of existing residential & commercial uses, loss of residents, loss of businesses, loss of tax base.

3. Conclusion.

If you want the Airport & the State aviation planners to re-write your land-use rules & plans in the back room, then you should by all means jump into the study as it is now structured. If you want the study to propose measures that actually will reduce noise, measures that will deserve & enjoy public support, & that you can live with, measures that provide mitigation proportionate to the impacts (wherever felt), & especially if you want to see third-runway noise dealt with, then you should not accept the Port’s invitation as it now stands,

A model for this study lies close at hand – the last Part 150 study. As suggested above, the public-participation model was a good one. Let’s go a step further: the new study should be based on, & carry forward from, the previous one. The underlying data from that study should be incorporated into the new work. That study produced important recommendations. Some of those recommendations (such as a hush house) were adopted but then ignored by the Port. Some were vetoed by staff & others by the Commission of that day. But things have changed, & it would be a good thing to take a new look at the results of the last study that fell by the wayside – maybe their time has now come. They do not need to re-invented.

If we all work together, we can persuade the Port Commission to take charge here, overrule their misguided staff, & mandate what we need: a study with effective measures to reduce noise & mitigate negative impacts.

Yours very truly


Stuart J. Creighton
President

cc. Mike Martin, City Manager

The addresses on the following page may be helpful:

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