

Attachment B
Dated October 8, 2002

Society of Professional Engineering Employees in Aerospace
Concerns and Recommendations for Part 150 Noise Study Recommendations

While SPEEA leadership and members endorse the majority of the Executive's recommendations, they are strongly opposed to four recommendations. It is SPEEA's view that these recommendations are likely to have a subtle but very negative effect on The Boeing Company and give further impetus to moving family-wage jobs out of the Puget Sound area. The comments below state SPEEA's concerns and recommendations. Overall, SPEEA recommends that these items be referred back to the Study Advisory Committee (SAC) for further review, study and reconsideration, prior to Council action.

EXECUTIVE RECOMMENDATION FOUR: Implement ban on Stage 2 jets at night.

Just to clarify what is under consideration, this recommendation needs to be restated to clarify that it relates to business jets below 75,000 pounds. It should also refer to "stage two-type" technology since there is technically no classification of stage two business jet.

Comments/Observations

- A Part 161 study to attempt to implement such a restriction at Boeing Field would be expensive, costing from \$1-2 million, take a long time and have virtually no chance of succeeding.
- In the last 20 attempts to put similar bans in effect at airports in other communities, none have been approved by the FAA and one part of one study was partially implemented by court order based on a grandfathered ordinance not applicable at KCLIA.
- Any such attempt will be viewed in the aviation and business community as an anti-aviation attitude and have a negative impact on future plans to attract business, particularly given the reality that Boeing is moving significant activity out of this area.
- In the very unlikely event that a 161 would be successful, only one or two flights per night would be banned.
- As the major tenant at King County International Airport (KCLIA), The Boeing Company would end up providing the majority of funding for an expensive, useless study, taking valuable funding away from much needed airport improvements that benefit all aviation interests. Limited cash flow has forced the airport to bond for capital improvements in recent years, where this practice was never needed in the past.

SPEEA Recommendation: Delete Recommendation Four

EXECUTIVE RECOMMENDATION SIX: Maintain existing curfew on nighttime engine run-ups.

Comments/Observations

- Running of engines at moderate levels above idle is often required for maintenance, new airplane delivery and testing purposes. The economic impacts of restricting this activity hurts the economic competitiveness of The Boeing Company and other aviation interests. It is essential to what we do.
- King County ARFF officers have in the past issued noise citations to The Boeing Company and caused managers to issue restrictive internal procedures that limit engine run-ups and cause inefficiencies in operations.
- The Boeing Company is reluctant to admit that “voluntary restrictions” do affect flight test operations since they want to be a good neighbor and minimize community impacts. The unfortunate outcome may be to move flight test operations to a less densely populated area, depriving this region of much needed jobs.
- Noise levels of engines have dropped considerably over the last few years and are continuing to drop.
- Technology now exists to establish the amount of noise levels at any distance and direction from any site on Boeing Field for any power setting.

SPEEA Recommendation: Allow engine run-ups at night based on specific “reasonable” noise levels that have minimal community impacts. Work with KCIA to quantify “reasonable” noise levels.

EXECUTIVE RECOMMENDATION NINE A: Provide a variety of options for people living in the 65 and 70 DNL KCIA contours, including purchase of avigation (noise) easements, sound attenuation and sales transaction assistance. [This recommendation is intended to prioritize residents who are within the KCIA noise contours only for early/first implementation.]

EXECUTIVE RECOMMENDATION NINE B: Provide variety of options for people living in the 65 and 70 DNL combined KCIA/Sea-Tac contours including purchase of avigation (noise) easements, sound attenuation and sales transaction assistance. [This recommendation is intended to address residences in the combined SeaTac/KCIA noise contours after those in the KCIA contours.]

Comments/Observations

- SPEEA is in agreement to insulate for noise between 65 and 70db contours.
- A clear understanding of what the recommendation means should be broken down to address such questions as:
 - What is to be done about noise above 70DNL?
 - What is the financial exposure to the County and airport users to insulate/purchase avigation easements/provide sales assistance for residences built after 1998? These residences are specifically excluded from FAA funding for any required noise remedy, so the County is assuming an unusual obligation.
 - What is the true number of resident owners?
 - What formal surveys (anonymous, confidential and statistically valid) have been conducted to find out the true preference of the residents and owners for the various options? Many residents would like to sell out, but are afraid to say so in public meetings.

- What constitutes “neighborhood disruption”, per FAA definition?
 - What are the overall economic impacts on the County of the alternative land use options (including possible economic benefits for industrial use)?
- The costs of these actions in Georgetown will also be borne by the tenants at Boeing Field.
 - The business tenants at Boeing Field (including KCIA) are already under severe financial pressure from the effects of Federal restrictions imposed after 9/11.
 - Thousands of SPEEA members’ jobs will be affected by whatever the County recommends to the FAA for their approval. SPEEA hopes an attempt to answer these questions will be made before the County approves the recommendations.

SPEEA Recommendation: Send these two recommendations back to the SAC, airport staff and the consultant to answer the questions so that more informed recommendations can be made.

EXECUTIVE RECOMMENDATION TWO: Implement a public [published] instrument approach procedure with an Elliot Bay ground track to avoid over-flight of residential areas.

Overview/Discussion

SPEEA supports this recommendation, but would like to see it go further. The FAA is steadfastly refusing to approve a Boeing Field visual approach that approximates the SeaTac Elliot Bay visual over water, instead of over neighborhoods. The SeaTac approach has a cloud base limit of 3,100 feet, while the Boeing Field visual approach is 5000 feet. Given Seattle’s inclement weather, this means SeaTac planes can approach over water, while Boeing Field traffic is forced onto the ILS at ~2,200 feet over Magnolia. The FAA’s actions create a constant effort for SeaTac to take over Boeing Field for traffic control purposes and by doing so they want to impose restrictions on Boeing for the benefit of SeaTac. Luckily, a few years ago SPEEA was able to keep SeaTac from such a takeover, which would have been a large threat to SPEEA members jobs.

Furthermore, certified “off-the-shelf” technology (for instance, TLS) now exists that could cut the residential noise pattern of most commercial airports by up to 90 percent. There is a mention of TLS in the report. However, the FAA has been very slow to approve this technology. The national FAA expert on this system resides and works in our community. It is time that knowledgeable County airport officials hear what he has to say. Boeing has a technology that is likely the most important advancement in aviation in the past 40 years and it is certifiable if only the FAA would not be so reticent to change. An internal-to-Boeing announcement of this was made recently about technology that could achieve an Elliott Bay approach and solve noise problems at other

airports in the U.S.¹ The County needs a briefing on this. Jobs will be created in King County if the first applications of these technologies occurs at Boeing Field. This is an unusual opportunity that should not be missed.

SPEEA Recommendation: Add the following sentences to recommendation two: “County elected officials will work with their counterparts at the City of Seattle, State of Washington and Congress to send a joint letter to the FAA urging their prompt but thorough review and certification of new technologies that can provide alternative flight paths that reduce noise on residential neighborhoods. In addition, lowering of the minimums and FAA approach control procedures to accommodate Boeing Field's needs must also be addressed.”

Conclusion

There are other communities who are actively courting The Boeing Company to get family-wage jobs. The company's move to Chicago was a very strong statement that they view themselves as an international company. This also implies that they are becoming less of a Washington State, Puget Sound and King County company. Our workers compete against foreign countries to keep our jobs. As a community, King County must recognize that it too must compete to keep the facilities and the jobs.

The current environment makes it easier to take aerospace jobs out of King County, and for The Boeing Company to entertain potential “suitors”. On a daily basis, SPEEA members are aware of this. Major decisions on off-loading our work to other communities are now being made in Chicago. Bottom line, SPEEA doesn't want to see Boeing leave, and neither does the County.

¹ The Boeing Company's 737 Technology Demonstrator Wins Award: Our Demonstrator (YD501) been chosen to receive a “2002 Best of What's New Award” from Popular Science magazine in the Aviation and Space Category. Each year the publication reviews thousands of products and selects just 100 winners in 10 categories. To win, a product or technology must represent a significant step forward in its category. A statuette will commemorate the achievement, to be publicly announced in November.