Dear Ms. Deem,

With regard to the 26 July 2016 LOA Environmental Review comment period, I am requesting the comment period be extended to a minimum of 30 days, preferably 60 days. Although the FAA has the resources available to process information and conduct investigations and initiate enforcements, the Citizens of Burien have only limited capability unmatched by your expertise. Most may not have access to or any understanding of appropriate references, do not know with whom to consult, and are not versed in the vocabulary associated with Air Traffic Management Procedures, JO 7110.65, Order 1050.1, JO 7210.3, 40 CFR Title 40 or the FIOA process. I was unable to find these references within your Environmental Review, their absence only complicating their research efforts while constructing an adequate response.

I have begun initial discussion with the Environmental Protection Agency (EPA), Seattle office regarding the customary comment window of opportunity. Currently, the time you have allocated to the public is inadequate. A simple research question addressed through the FOIA process can take up to 30 business days. My recent FOIA request #2017-000831WS was submitted on October 18, 2016 and was answered on December 16, 2016, a lengthy period just short of two months. That FOIA include a request for the 26 July LOA which had already been published months before? (Items of Proof attached.)

The current comment period provides no time to prepare an adequate rebuttal – a mere 14 days. By what standard drove this compressed period? Is there guidance directing such a short period or a Quality Management System (QMS) procedure involved? The Office of Rule Making in their QMP#ARM-001-015, page 24 states:

"Comment periods on the ARC recommendations should not be for less than 30 calendar days unless justified. The agency has the option of holding a public meeting on the recommendations in addition to the re-opening of the comment period."

Your response will become a public record and may be evidence documenting/confirming a hostile disposition of the FAA precipitating a deliberate attempt to limit discovery, hinder public comment, and in direct conflict with 40 CFR, Title 40, Part 1, Chapter 6, paragraph 6.100:

The National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. 4321 et seq., as implemented by the Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500 through 1508), requires that Federal agencies include in their decision-making processes appropriate and careful consideration of all environmental effects of proposed actions, analyze potential environmental effects of proposed actions and their alternatives for public understanding and scrutiny, avoid or minimize adverse effects of proposed actions, and restore and enhance environmental quality to the extent practicable. (Emphasis Added.)

I sincerely expect these comments to be given full consideration. It is the sincere hope of the Citizens of Burien that an amiable solution can be found that would both minimize departure delays while still protecting the environment of Burien.
I have added Ms. Jill Nogi, Seattle Office of Environmental Protection to the addressee list above as well as members of the Burien City Counsel and I am asking Mr. Larry Cripe to post this email on the Quiet Skies Coalition website as well as to distribute its content via emails to the citizens of Burien. They need to be immediately appraised of the circumstances associated with this Environmental Review comment period and made aware of the unnecessary burden and limitations imposed by curtailing opportunity for thoroughly researched public comment.

THE POINT: It is a deliberate arrogant attempt to pull the wool over the eyes of Burien. As they say in the flying business of which I have over 40 years of experience: I was born at night, just not last night.

Your immediate attention would be greatly appreciated.

Sincerely,

/w/

Walter Bala