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March 3, 2020

Mr. David Suomi  
Federal Aviation Administration  
Northwest Mountain Regional  
Regional Administrator  
2200 S 216<sup>th</sup> St  
Des Moines, WA 98198

Dear Mr. Suomi,

We request that the Federal Aviation Administration (FAA) conduct a comprehensive cumulative impact<sup>1</sup> assessment as part of an Environmental Impact Statement (EIS) for any future development of capacity at Sea-Tac Airport, including buildout of the Sustainable Airport Master Plan (SAMP).

Growth in operations at Sea-Tac Airport has exceeded most other airports in the nation and all projections developed by the Port of Seattle in recent years. In just four years, (2014 – 2018) operations have grown by nearly 30%<sup>2</sup>, an increase equivalent to another medium sized airport. This growth is resulting in significant impacts to the quality of life in surrounding communities, including noise and air quality degradation, affecting the health of residents.

This growth has been enabled through numerous actions taken by the FAA and Port of Seattle, adding gates and other capacity enhancements resulting in more operations. These actions have been undertaken and analyzed incrementally over the years. While cumulatively, these actions have resulted in more planes, more noise, and more community impacts, no cumulative impact analysis, as called for under the National Environmental Policy Act (NEPA) has been conducted since 1997 (Final Supplemental EIS on the third runway).

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<sup>1</sup> “Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” (NEPA § 1508.7)

<sup>2</sup> Sea-Tac Airport reports 340,478 annual operations in 2014 and 438,391 in 2018.

Below is a listing of a few projects/activities implemented on-site at Sea-Tac Airport in the last several years. In each case, a Categorical Exclusion (CATEX) was filed, indicating no impacts from the project. Estimates are difficult to make of the increased operations enabled by each of these actions, but it is known that cumulatively, 14 new gates have been added between a terminal expansion and hardstand operations. Most of these gates can accommodate one added operation per hour, and were analyzed individually as not significant, but cumulatively have resulted in significant increases in the number of operations.

- 2014 – North Satellite Terminal Expansion (8 new gates)
- 2016 – The Burien “Turn” (new flight path to increase throughput of jet takeoffs)
- 2017 - Hardstand Holdroom (6 new gates)

Additionally, the 2018 509 Gateway Project (freeway extension), adjacent and connected to Sea-Tac Airport will cumulatively increase transportation impacts that have not been considered in light of the SAMP.

Finally, in a recent 9<sup>th</sup> Circuit Court decision on November 27, 2019, City of Burien vs. Federal Aviation Administration, Case No. 18-71705, the Court ruled that the FAA’s CATEX covering an automated mid-runway turn that resulted in planes over the City of Burien failed to address cumulative impacts of reasonably foreseeable projects. Specifically, the Court noted that the FAA must consider the SAMP. The court remanded this procedure to the FAA for further review. Without having conducted a thorough cumulative impact analysis, the court determined that the FAA could not dismiss significance.

We expect FAA to do this analysis and not defer it to another agency. This analysis should combine all cumulative effects of all projects for all environmental categories using a baseline such as 2013 that predates segmented projects and the growth these likely accommodated. We are prepared upon request to provide additional details about these various projects and their likely cumulative impacts.

Thank you for any help you can provide us to secure the proper, court ordered analysis with its accompanying much needed mitigation.

Sincerely,

Members of the Burien City Council:



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Jimmy Matta  
Burien Mayor



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Krystal Marx  
Burien Deputy Mayor



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Sofia Aragon  
Burien Councilmember



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Cydney Moore  
Burien Councilmember



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Pedro Olguin  
Burien Councilmember



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Kevin Schilling  
Burien Councilmember



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Nancy Tosta  
Burien Councilmember

Cc: Senator Maria Cantwell  
Senator Karen Keiser  
Senator Patty Murray  
Senator Joe Nguyen  
Representative Eileen Cody  
Representative Joe Fitzgibbon  
Representative Mia Gregerson  
Representative Pramila Jayapal  
Representative Rick Larsen  
Representative Tina Orwall  
Representative Adam Smith  
City Manager Matthias, Des Moines  
Mayor Ferrell, Federal Way  
City Manager Hoppen, Normandy Park  
City Manager Cole, SeaTac  
Mayor Ekberg, Tukwila  
Lance Lyttle, Aviation Managing Director, Sea-Tac Airport  
Manager Milanese, Port of Seattle  
Director Caminos, Port of Seattle