

December 12, 2024

Mr. Steve Rybolt  
Port of Seattle, Aviation Environment and Sustainability  
P.O. Box 68727  
Seattle, WA 98168

Dear Mr. Rybolt:

Thank you for the opportunity to review and comment on the Seattle Tacoma Sustainable Airport Master Plan Environmental Assessment. As you know, the City of Des Moines is located directly south of SEA and below the concentrated flight paths for arrivals during north-flow conditions and departures during south-flow conditions. Our residents are exposed to overflight activity during all conditions, both day and night. The growth in operations at SEA will result in increased impacts, especially for close-in communities, including Des Moines.

The City recognizes the Port's role in driving the economic growth of our region and we appreciate the airport's importance in facilitating regional, national, and international connectivity. However, as one of the communities directly affected by airport operations and development, we believe it is essential that SEA growth is balanced to sustain the quality of life in the region, particularly for those communities adjacent to SEA.

Most importantly, regardless of legal and regulatory requirements for abatement and mitigation of these impacts, it is our hope that the Port of Seattle will proactively and collaboratively work with the City to understand how our residents are impacted, how those impacts will increase, and how we can work together to plan for SEA's growth while also developing plans to address existing and increasing impacts associated with Sea-Tac operations. Collaboration with airport neighbors will build trust and enable partnership with those most impacted enabling the region to work together on shared economic goals.

Working together we can respond to growing demand at SEA, while acknowledging and addressing the inevitable impacts of that growth, most of which will be experienced by our residents who live closest to the airport.

The City of Des Moines held a community meeting on December 3, 2024, to help the community understand the environmental Review and comment period process, but also to understand the community concerns regarding the SAMP and its impacts on the community and its residents. Approximately, ninety people attended the meeting split between in person and online attendance, we heard concerns and questions for over 45 minutes, and could have gone on for hours longer, had we not needed to limit it to an hour meeting. Additionally, community members held their own meetings gathering support to help their fellow citizens express their concerns and respond to the SAMP. This letter aims to capture and communicate the concerns of

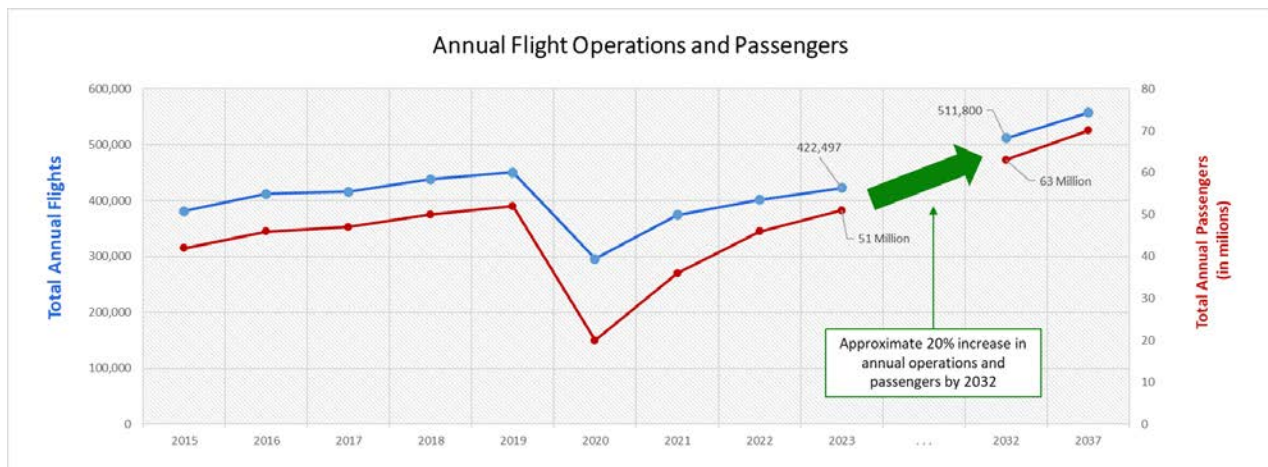
the community who live and work in the City of Des Moines, based on the information provided to the city at the meeting, over email, and through conversations with staff and Council.

### Public Comment Period

A number of residents expressed concern over the time allotted for the public comment period. We understand the Port requested an extension which was granted. However, the amount of information contained in the Environmental Assessment combined with the highly technical nature of the content would require months to review thoroughly. The period, even with the extension, does not provide ample time for staff, let alone the public, to review areas of interest to ensure their concerns are satisfactorily addressed. It is very disappointing that the FAA offered such a short timeframe, especially considering the magnitude of the SAMP and Environmental Assessment. In many ways it seems allowing the public to review the assumptions, analyses, and conclusions, was more about “checking a box” rather than truly seeking input. It is our hope that this is not the Port’s or FAA’s intention, and more time will be put into long-term planning for truly understanding and addressing the impacts that will result in not only the SAMP projects, but also the growth expected over the next ten (10) years. This should not be just about “checking a box” but rather respecting the communities and environment that are directly and indirectly impacted by SEA.

### Aircraft Noise

The expansion of operations at SEA will result in increased impacts, particularly for nearby communities. Residents of our communities are subjected to constant aircraft overflights day and night, irrespective of runway usage or flow. Operational levels have reached pre-COVID levels and are expected to continue to growth through the EA study period. By 2032, annual operations are forecast to reach 511,800. This is an increase of nearly 20%, resulting in more overflights, more noise events, and more disruptions to conversations, learning, working, and sleeping.



Data Source: Port of Seattle Environment and Sustainability & 2023 Annual Report and SEA SAMP DRAFT EA, Appendix A  
Total Annual Passenger data is rounded to the nearest million.

According to the Environmental Assessment, noise exposure will not exceed NEPA thresholds; however, the DNL 65 dBA contour will expand, resulting in “significant” (as defined in CFR Part 150) aircraft noise exposure for more residents and noise-sensitive facilities, including schools and nursing homes.

Mitigation Status / Land Use	2022 Existing Condition DNL 65+ dB	2032 No Action DNL 65+ dB	2032 Proposed Action DNL 65+ dB	Existing (2022) vs. No Action (2032)	Existing (2022) vs. Proposed Action (2032)
<b>Sound Insulation Completed</b>					
Single-Family	3,193	4,146	4,258	953	1,065
Multi-Family	349	388	436	39	87
Mobile Home	0	0	0	0	0
<i>Sub Total</i>	<i>3,542</i>	<i>4,534</i>	<i>4,694</i>	<i>992</i>	<i>1,152</i>
					0
<b>Not Sound Insulated</b>					0
Single-Family	662	1,046	1,089	384	427
Multi-Family	1,887	3,782	3,895	1,895	2,008
Mobile Home	125	156	177	31	52
<i>Sub Total</i>	<i>2,674</i>	<i>4,984</i>	<i>5,161</i>	<i>2,310</i>	<i>2,487</i>

Data Source: Annual Report and SEA SAMP 1

A comparison of the existing noise exposure conditions (2022) indicates the 14,061 total population exposed to “significant” noise exposure conditions will increase to nearly 22,000 in 2032, even in the No Action scenario. This represents an increase of 37%. And the Proposed Action scenario increases this even further. It is clear that the growth in operations at SEA, with or without the Proposed Actions included in the SAMP will have a substantial impact on residents. Worth noting, based on the analysis in the EA, most, if not all of the increased noise exposure (increase in the existing DNL 65 dBA contour) will occur within the City of Des Moines. Again, leaving our residents carrying most of the impacts associated with the growth in operations.

Global research indicates that elevated levels of noise exposure can result in health impacts, sleep disturbance, and impact learning. While we acknowledge the socio-economic benefits the airport brings to the region, it is crucial that growth is sustainable and does not disproportionately burden close-in communities with environmental impacts and reduced quality of life. With no mitigations identified in the Environmental Assessment, it is imperative that the Port’s update of the Part 150 study includes both noise abatement measures to reduce noise exposure and mitigation efforts, such as sound insulation for eligible homes and schools. Additional studies, including but limited to, ongoing monitoring and testing in the City of Des Moines.

A comparison of the existing conditions (2022) versus future conditions with the Proposed Action will result in an increase in daily arrivals of 14% and a 25% increase in nighttime arrivals. Nighttime operations are particularly impactful for close-in communities as this results in sleep-disturbance and awakenings which add to the health effects of aircraft noise exposure. And while the DNL 65 dBA threshold may not be exceeded for all close-in communities and residents, the effects will extend far beyond those contours and should be considered when planning for impact mitigation.

	ARRIVALS DAY	ARRIVALS NIGHT	DEPARTURES DAY	DEPARTURES NIGHT	TOTAL OPS
<b>2022 Existing Condition</b>	469	82	456	97	1,100
<b>2032 Proposed Action</b>	545	108	500	100	1,303
<b>Difference</b>	14%	25%	9%	3%	16%

The DNL noise metric does not adequately reflect residents’ experiences with aircraft noise. This is particularly true given the current conditions within the NAS, characterized by a significantly higher number of aircraft operations/overflights and quieter aircraft (per event). Supplemental metrics, including the Number-of-Events-Above (NA) and NA night, should be utilized in the FAR Part 150 study to provide decision-makers and the public with a comprehensive understanding of both existing conditions and future changes, including those projected for the SAMP (2032). These metrics should also be considered when evaluating potential noise abatement strategies that can be applied beyond the DNL 65 dBA contours, as practiced at other airports in the United States.

The FAA’s Neighborhood Environmental Survey confirmed that community noise annoyance is significantly higher than historically recorded. According to the study, 60-70% of residents are “highly annoyed” at noise exposure levels of DNL 65 dBA, and 27-37% are “highly annoyed” at levels down to DNL 55 dBA. While federal regulations mandate the use of DNL 65 dBA for certain policy decisions, impacts on residents outside this exposure level should be considered during noise compatibility planning. For SEA to truly support “sustainable” growth, it must consider the impacts on neighboring jurisdictions and the quality of life in those communities.

### **Health Effects**

Global research indicates elevated levels of noise exposure can lead to health impacts, sleep disturbance, and impacts to learning. While we acknowledge the socio-economic benefits the airport brings to the region, it is important that growth is sustainable and does not benefit the region with only those close-in communities bearing the burden in terms of environmental impacts and reduced quality of life. The increase in aircraft operations will result in an increase in aircraft noise and emissions, both of which are known to have health effects in nearby communities. The concentration of operations over Des Moines results in greater exposure to aircraft noise and emissions for residents of Des Moines resulting in an unfair burden for our community.

### **Impacts on Education and Learning**

Under the existing conditions (2022) there are nine (9) schools within the DNL 65 dBA. This will increase to 12 schools in both the 2032 No Action and 2032 Proposed Action scenarios. Almost half of those schools are in Des Moines. Again, federal regulations characterize this level of noise exposure as not compatible with noise-sensitive development which includes schools. Research indicates that aircraft noise exposure can impair classroom learning. And while federal

regulations cite DNL 65 dBA as the threshold of what is “compatible”, the growth in daily aircraft noise events

are likely to be disruptive and to impede learning, affecting many more than the 12 schools within the DNL 65 dBA contours. Health and well-being for our communities, as well as our children’s education should all be carefully considered as the Port plans for growth in SEA operations and strives to sustainability when collaborating with neighboring communities.

### **Air Quality**

Air quality is another major concern for communities surrounding the airport. The Environmental Assessment indicates increases in all critical air pollutants. Although these increases do not exceed significance thresholds according to federal guidelines, they will impact our residents, particularly vulnerable populations such as those with asthma, other respiratory conditions, and the elderly. With Des Moines located directly south of SEA, our residents are overflowed by nearly all aircraft arriving or departing the airport, depending on which flow is in use. The result is ongoing and growing emissions and air pollutants from the vehicular traffic, as well as the increased ground-service equipment (GSE) and aircraft. Air pollutants including air toxins, carbon monoxide, nitrogen dioxide, ozone, and ultrafine particulate matter are negatively impacted our community by the airport according to health study results by University of Washington (MOV-UP 2019).

### **Surface Transportation and Congestion**

Total passengers are forecast to reach 63 million annually by 2023. The 20% increase in passengers will mean a significant increase in vehicular traffic on local roads for arriving and departing passengers as well as the increase in support services such as concessionaires, vendors, employees, etc. This will result in additional impacts for our communities including more roadway congestion, increased air pollution and noise. The EA indicates the Port will mitigate these impacts through the funding of local improvements to roadways and intersections. Mitigation plans should be developed in collaboration with impacted jurisdictions.

### **Third Runway**

While the 3<sup>rd</sup> Runway (16R-34L) is outside the scope of the Environmental Assessment, it is worth noting that the runway increased overflights of Des Moines and residents have expressed concerns with this increase. While we understand the FAA can (and does) use it as needed, we hope you will consider limiting the growth in operations and use of that runway, especially during nighttime hours. A preferential runway-use program or preferential nighttime runway-use program could limit the growth in impact for residents of Des Moines with little or no impact to airfield capacity, particularly if applied as nighttime only.

### **Airspace and Flight Procedure Changes**

The increase in total operations will result in more aircraft noise including overnight as well as increased emissions. Ultimately, airspace and flight procedures/patterns will likely change to accommodate the increased operations in the existing airspace. Airspace and flight

procedure/noise abatement changes should be thoroughly explored. These can help mediate the increase in impacts while improving efficiency and safety. The Environmental Assessment identifies specific impacts on airport-adjacent communities, and specific mitigation plans should be developed in collaboration with these communities. Sustainable growth requires adequate and effective mitigation to offset or reduce impacts, which should be identified and prioritized in collaboration with affected communities, including the City of Des Moines.

### **Alternative Airports**

Continued growth at SEA will result in increased impacts for more and more residents. There have been discussions and studies of expanding capacity and commercial service at other airports as well as siting a new airport as a reliever to SEA. The only truly sustainable approach to meeting demand through 2032 and beyond will be to leverage other existing facilities and/or to build another airport to provide additional capacity for commercial aviation rather than continuing to increase operations at SEA. While capacity on the landside, terminal, and airside can be expanded to improve service, this growth has a reciprocal effect on the quality of life to residents of communities including Des Moines. True sustainability cannot be accomplished solely by meeting the needs of SEA and its customers. True sustainability requires consideration and ultimately limiting the negative impacts for the cities, communities, and residents surrounding SEA.

### **Moving Forward**

The Port should collaborate with local jurisdictions as the airport expands to ensure mutual prosperity for both the airport and its neighbors. In addition, as the FAR Part 150 moves forward to review noise contour changes, SEA should incorporate that review and findings into community communication and educations to remove silos of review and possible impact.

As previously noted, the time allotted for the public review and comment on the draft EA was grossly inadequate. Reviewing the thousands of pages of technical documentation and providing meaningful comment requires ample time and is a critical part of NEPA. Public input and input from affected jurisdictions should be a high priority for both the Port and FAA. We ask that a proper review/comment period be offered as part of the SEPA process.

In light of the recent ruling by the DC Circuit Court, which invalidated the authority of the CEQ to issue binding regulations under NEPA, and because FAA relies on CEQ's baseline for their environmental analysis related to SAMP, the City of Des Moines requests that FAA reevaluate the finding of no significant impact outside of CEQ's NEPA regulation. Alternatively, FAA is asked to take no further action until there is clarity on what is the proper environmental assessment in relation to SAMP.

While we recognize and value the economic and connectivity benefits provided by the airport, we remain committed to advocating for our communities to ensure that any negative impacts are fully considered and mitigated to the greatest extent possible.

Thank you for the opportunity to continue a productive dialogue. We look forward to your response and further discussion.

Sincerely,

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*Rebecca Deming*  
*Community Development Director*  
City of Des Moines