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23 August 1996

~~General Counsel
Port of Seattle
Pier 69
P. O. Box 1209
Seattle, WA 98111~~

Attention : General Counsel

Subject : Appeal of Port's Resolution No. 3212, Commonly Referred to as the
"Third Runway" Vote, Thursday, August 1, 1996

References : Enclosure 4

This is an appeal of Resolution No. 3212 regarding your Thursday, August 1, 1996, vote "adopting the Master Plan Update for Seattle-Tac International Airport, approving development of a new dependent air carrier runway (commonly referred to as the "third runway")..."(ref. (tt)). It is requested the Port reverse that decision. Instead, a Supplemental Environmental Impact Statement (SEIS) to the Final Environmental Impact Statement (FEIS) (ref. (d)) that examines other alternatives is requested. These alternatives should include technology such as Localizer Directional Aid (LDA) and Global Positioning Satellites (GPS). These technology options should be examined both with and without demand management because Sea-Tac's load factor is less than 30. (PSRC Correspondence package). With Demand management aimed at penalizing carriers with less than 20 passengers combined with technology, the capacity of Sea-Tac would be GREATER than the maximum in the existing 1996 FEIS (ref. (d)). In addition, alternative sites should be reevaluated.

The Port should take advantage of the long delays that occurred to "approve" the Third Runway. During that period, technology has matured so much that the Third Runway is no longer needed. Washington actually saved money by spending well over \$ 4 million on studies PROVIDED we change direction NOW and go down the cheaper, new technology path instead.

The Port needs to consider the Air Transport Authority's March 20, 1996 statement (ref. (rr)):

"The key lies with the air traffic control system, not our airports. System delays are overwhelmingly the result of inefficient ATC capacity"

After spending hundreds of hours reviewing the DEIS (ref. (b)) individuals then spent hundreds of hours reviewing other related material including, but not limited to, the FEIS (ref. (d)), the SIP (ref. (a)), SEPA, King County Road Adequacy Standards, and conducting a literature search using the King County Library on-line services. CASE and RCAA members have contacted public officials, technical experts, and testified at various Expert Panel, FAA and PSRC public hearings.

NEPA, RCW's, WAC's,
Plan, PSATC,
Flight SASA, ALL DNS,
proposals etc,
etc, ...

It is our opinion that the FEIS (ref. (d)) is noncompliant with SEPA, SIP (ref. (a)), and the Flight Plan obsolete with respect to the Third Runway issue. In addition, critical points made by the Arbitration Board both in their official reports, public hearings, and in their *Final Noise Decision* (ref. (e)), appear to be misinterpreted by some government personnel.

It is crucial that decisions be made on **1996** data. To build the world's most expensive runway (on a per passenger or per pound of cargo basis even using the incomplete \$ 500 million estimate), when technology can provide the same capacity for much less money and sooner is a clear violation of SEPA economic practicality as well as other regulations (see enclosure 1). Building the Third runway impacts over 100 acres of wetlands, endangers Highline's drinking water source, and creates significantly more air pollution in a non attainment zone than the technology option. This clearly violates the Clean Air Act and is inconsistent with other environmental regulations. It is contrary to Federal, State, and local environmental policies.

The number of omissions and mistakes in the FEIS (ref. (d)) are so significant that even if they are ignored now, we believe a jury will conclude later that they are substantive and an SEIS is needed. Members of CASE and RCAA have relevant educational and work background that when combined with the data, we believe

will be sufficient for a court to find our concerns substantive and as injury-in-fact. These concerns are shared by outside consultants that have also submitted comments to various government agencies as we progressed through the Third runway deliberations.

It would take years to write up all the problems with the Flight Plan FEIS and Master Plan FEIS (ref. (d)) and we recognize your time is valuable so it is hoped that there are enough examples in the enclosures to persuade you to reconsider your decision. Most of A. Brown's comments in the approximately 100 page response to the DEIS are still applicable to the EIS (references (c) and (d)). Even when the 1996 FEIS agrees that A. Brown is correct, it generally does not bother to update its analyses. For example, we don't live in cold climate homes so the noise mitigation boundaries are all grossly underestimated.



You are requested to distribute copies of this appeal to the Port commissioners and include it in the Record of Decision. This supplements prior correspondence and is not intended to replace it.

As outlined in Port Resolution Section 1.4, item 2 , you are also requested to supply notices of decision on underlying proposals related to Sea-Tac International Airport, to the following:

- RCAA, 19900 4th Ave, Normandy Park, WA 98166 Phone (206)824-3120
- CASE, 19900 4th Ave, Normandy Park, WA 98166 Phone (206)824-3120
- A. Brown, 239 SW 189 PL, Seattle, WA 98166 Phone (206)431-8693

Sincerely,

CASE

RCAA

Pork Patrol

A. Brown

cc: DOT: Sid Morrison, FAA : Dennis Ossenkop, EPA : Chuck Clark, PSABCA: Dennis McLerran
Puget Sound Regional Council Executive Board : Doug Sutherland
City of Burien : Fred Stouder for HOQ (Burien Study Group)

PSA PCA
H.O.K.



Enclosures : Enclosure 1: Table 1 Regulatory Compliance Issues Partial Summary, Enclosure 2 :
Examples of Issues, Enclosure 3 : Comments Focusing on Technology and Economics ref. (s)),
Enclosure 4 : References

Enclosure 1

SEPA Regulatory Issues Summary

Enclosed is a partial summary of SEPA regulatory issues discussed in the body, enclosures, and references of this appeal. The majority of Table 1 covers the same items as discussed in "Table 2" of prior correspondence (references (c) and (s)). Some key items added to this prior correspondence include:

- (1) LDA technology
- (2) GPS technology
- (3) Final Noise Decision on Noise Issues
- (4) Kludt litigation
- (4) Akers Flight Path litigation appeal?
- (5) PSRC process
- (6) Port process

Table 1: Regulatory Compliance Issues Partial Summary

Issue	SEPA Regulation
FULLY address other REASONABLE alternative sites	WAC 197-11-070 (1) WAC 197-11-060 (4) c& d WAC 197-11-030 item g WAC 197-11-440 (5) b WAC 197-11-786
The "weighing and balancing" with respect to economics and the logistics of the <u>additional</u> off-site fill now required for Sea-Tac must be compared to the other Alternative sites.	WAC 197-11-448 (1) first sentence
Fully address Demand Management alternative	WAC 197-11-786
Address probable impact from 4th & 5th runways	WAC 197-11-060 (4) c, d
Address impact of "reserving for some future time" the implementation of this project	WAC 197-11-440 (5) viii
Add cost-benefit analysis. Considering cost estimate tripled over several months and will be the most expensive US runway, and has a limited capacity (too short for cargo planes in warm weather)	WAC 173-806-125 WAC 197-11-726 WAC 197-11-055 (6) WAC 197-11-600 (4) c)ii
Need to address LDA technology similar to that used in San Fransisco <u>without</u> a Third Runway	WAC 197-11-070 (1) WAC 197-11-060 WAC 197-11-030 item g WAC 197-11-440 (5) b WAC 197-11-786

Table 1: Regulatory Compliance Issues Partial Summary

Issue	SEPA Regulation
Need to address GPS technology scheduled for implementation in FY 2001 <u>without</u> a Third Runway	WAC 197-11-070 (1) WAC 197-11-060 WAC 197-11-030 item g WAC 197-11-440 (5) b WAC 197-11-786
Need to address technology combined with some form of demand management (Note, Ref. (dd) clearly states "unconstrained demand " is assumed in the 1996 FEIS)	WAC 197-11-060
Need to address LDA technology similar to that used in San Fransisco <u>with</u> a third runway closer to the existing runway alleviating the need for over 24 million cubic yards of fill and <u>acreas</u> of wetland construction	WAC 197-11-070 (1) WAC 197-11-060 WAC 197-11-030 item g WAC 197-11-440 (5) b WAC 197-11-786
Need to address GPS technology scheduled for FY 2001 implementation <u>with</u> a third runway closer to the existing runway alleviating the need for over 24 million cubic yards of fill and <u>acreas</u> of wetland construction	WAC 197-11-070 (1) WAC 197-11-060 WAC 197-11-030 item g WAC 197-11-440 (5) b WAC 197-11-786

acreas →

→

Table 1: Regulatory Compliance Issues Partial Summary

Issue	SEPA Regulation
Address Property devaluation of ALL significantly impacted locations - Burien, Normandy Park, Des Moines , Sea-Tac, Tukwila	WAC 197-11-600 (b) i, and (d), ii WAC 197-11-440
Significant litigation should be addressed such as Kludt and Akers Flight Path charges	
PSRC members recieved direction to vote "For the Third Runway" prior to public testimony/hearings	
Address the ACTUAL transportation plans for the about 1,000,000 haul loads of fill. Is it possible to be economically practical? Barges are NOT fully addressed in DEIS.	WAC 197-11-660 (2) WAC 191-11-440 (6) c, iv
Acquire missing critical data such as erosion, landslide & earthquake hazards, air toxins, ground water movement/quality, etc.	WAC 197-11-080 (1) WAC 197-11-660 WAC 197-11-444 (c),iv WAC 197-11-600 (b), ii and (d), ii
Investigate noise projections, Noise contour maps not substantiated by noise measurements.	WAC 197-11-600 (b) ii, (d) ii
Address impact on existing "brown-out" problems related to electric utilities	WAC 197-11-600 (b), ii and (d), ii

Table 1: Regulatory Compliance Issues Partial Summary

Issue	SEPA Regulation
<p>Address pollution and safety impacts of aircraft crashes</p> <p><i>Barbara's trying to get air rate 21% on the ground potential (probably underestimated due to overall minimizing of departure use)</i></p>	<p>WAC 197-11-794</p> <p>WAC 197-11-600 (b), ii and (d), ii</p>
<p>Address air toxin levels in Chapter V, item 4. Data suggests it already exceeds annual safety levels and will not be mitigated</p>	<p>WAC 197-11-080 (1)</p>
<p>Revise misleading calculations such as carbon monoxide levels</p> <p><i>(add taxi + queues for 3rd runway, estimate for 14' elevation difference [higher thrust])</i></p>	<p>WAC 197-11-080 (1)</p>
<p>Add SPECIFIC mitigation measures</p>	<p>WAC 173-806-100 (c)</p> <p>WAC 197-11-660</p>
<p>Proposed mitigation measures UNREASONABLE</p> <p>(feasible ones could double construction schedule and some aren't feasible)</p>	<p>WAC 197-11-660 (1) f ii</p>
<p>Fully address mitigation using the "appropriate technology". No mention of new technology like infrared hangers for deicing ¹ and concrete barriers for running off runways ².</p>	<p>WAC 197-11-768</p>
<p>Suggest REASONABLE and feasible mitigation measures. Example: Can over 3000 trucks per day really avoid rush hour near businesses and an airport that are open 24 hours a day? If it is hauled in at the same rate as the current south airport construction rate which is creating havoc, it will take about 50 years.</p>	<p>WAC 191-11-440 (6) b, i and (6) b, iv</p> <p>WAC 197-11-660</p>
<p>Address "Economic Practicability" of mitigation measures. Note, some required mitigation for the 2nd runway completed in 1973 are still incomplete.</p>	<p>WAC 11-440 (6) c iv</p> <p>WAC 197-11-660 (2)</p>

¹ Aviation Week, "FAA Tests Infrared Deicers", May 1, 1995, pg. 38

² Aviation Week, 1995

Table 1: Regulatory Compliance Issues Partial Summary

Issue	SEPA Regulation
Provide mitigation schedule and bonds considering the decades old mitigation agreements still have not been fulfilled (pollution and noise related)	See King County Rules in addition to SEPA rules
FULLY address monitoring of environmental impacts	WAC 197-11-660
Publicly retract published misleading information - see Forum	WAC 197-806-130
Revise conclusions not supported by data for which the data is readily available from court house records, government documents, and libraries.	WAC 197-11-080 (1)
Revise ES Summary to reflect the data in the report such as Chapter V disturbance-sensitive species perishing (see Biological Appendix K)	WAC 197-11-440 (6)
Address other related documents such as the Arbitration Panel data and reports including the Final Noise Decision on Noise Issues (ref. (e)). Do not quote things out of context.	WAC 197-11-055 (6) WAC 197-11-402 (8)
Identify all those impacts which will not be fully evaluated further because regulations governing "on-site" construction are significantly different. Evaluate, conduct tests, and assess these before EIS approval. Example: Excavation and repositioning of contaminated fill that then can contaminate creeks leading into Puget Sound/regulation is permitted unless EIS requires mitigation.	WAC 197-11-660 (2)b
Determine if the term "on-site" is appropriately used for sites that are geographically separated by public roads. Identify differences in policies and regulations for on-site compared to off-site.	WAC 197-11-660

→ ?

Table 1: Regulatory Compliance Issues Partial Summary

Issue	SEPA Regulation
<p>Determine the correct Lead and Cooperating agency relationships. SEPA requires DOE to be Lead agency when over 1,000,000 gallons of fuel are involved. Not all agencies provided adequate review of DEIS because they each thought another agency had prime responsibility for that section and they wanted to avoid duplication.</p>	<p>WAC 197-11-938 (10)</p> <p>Note, WAC 197-11-942 does not apply to items listed under 197-11-938.</p>
<p>Consider a NEPA. Current DEIS contains too many fallacies to use it to justify the Third Runway.</p>	<p>WAC 197-11-610</p>
<p>Include a map identifying ALL the environmental sensitive area issues</p>	<p>WAC 197-11-908</p>
<p>Fully address pollution from aircraft crashes and major fuel spills</p>	<p>WAC 197-11-794 (2)</p>
<p>More fully address aircraft parts falling onto school grounds now that even more schools are in the "fall-out" zone</p>	<p>WAC 197-11-794 (2)</p>
<p>EITHER DENY THE PROPOSAL or require a SEIS to identify feasible, technically adequate, and economically practicable mitigation measures. Present DEIS mitigation measures are TECHNICALLY INADEQUATE such as the water pollution control methods, not all Significant Unavoidable Impacts have been addressed such as the homeless endangered species and (3) inadequate information regarding fill source locations which will certainly create a "Significant Adverse Impact".</p> <p>Significant Adverse Impacts needs to address loss of eligibility for low income housing</p> <p>The SEIS needs to address Alternative Sites, technology and assess current traffic at other local airports such as Bellingham, WA</p> <p>Traceability to questions inadequate and answers unsubstantive</p>	<p>WAC 197-11-600 (4)d ii</p> <p>WAC 197-11-660</p> <p>WAC 197-11-330</p> <p>WAC 173-806-100 (c)</p> <p>WAC 11-440 (6) c iv</p> <p>See Alternative Site rules first Table 1 entry</p> <p>WAC 197-11-550</p>

Enclosure 2

Examples of Inadequately Addressed Issues

Economic Issues Not Adequately Considered

(Note, even though SEPA does not require a detailed cost-benefit analysis, it does require economic practicality and a weighing of issues)

- (1) Increased pollution compliance costs to businesses in the Clean Air Act Non-attainment zone to compensate for increased airport construction pollution (3000 haul truck trips a day, 6 days a week for years)
- (2) Diverts air traffic to other airports because it increases Sea-Tac's enplanement fees (Ref. (kk) and (s))
- (3) Downgrading of bond's that has occurred over the last year as the projected costs of the Third Runway skyrocketed
- (4) Significant increase recently in Port's long term debt (Is this increase in debt because there was a reluctance to raise property taxes prior to Third Runway approval ?)
- (5) Study area was so small that cities like Normandy Park that are being economically devastated by the real estate tax revenue losses, were not considered. ←
- (6) Cost of flooding and cost of flood insurance, now required by mortgage companies because of a change in flood maps, not addressed. Increased impervious surfaces cause additional flooding.
- (7) Source, transportation routes, and total quantity of fill needed to be determined because they are so significant it could drastically alter the schedule and costs for the project
- (8) See Enclosure 3 for a discussion of enplanement fees, constructions costs and return on investment comments
- (9) Even greater property devaluation, and subsequent loss in real estate tax revenue, if FAA proposed 1976 noise policy addendum is approved this December requiring disclosure during real estate transactions for all property within 55 dB DNL noise contours (ref. (ll.)). Note, 1996 FEIS noise contour maps such as Exhibit IV.1-12 don't even show 55 DNL !
- (10) Funding sources for all Port activities if cities become new counties thereby greatly reducing the size of King County

Economic Advantages Overstated

Based on misleading comments publicized by some of the misinformed media, most citizens believe the Third Runway will increase the number of aircraft flying in and out of Sea-Tac as well as employment at the airport. This is totally contrary to the 1996 FEIS (see (d), (s), (dd)). The employment issue is addressed in the PSRC response to SEIS requests (ref. (dd)).

Failure to Follow Proper Administrative Notification Procedures

As outlined in Cutler & Stanfield (ref. (j)), the Federal Land managers were NOT provided an opportunity to review the air pollution documentation as required by the Clean Air Act.

As outlined by the Ravenna-Bryant (ref. (y)) several government bodies were not coordinated with as required by the HUD regulations and the Executive Order.

Unreasonable Procedures

The Port's NEW appeal process, Resolution 3211, dated 8 February 1996 is unrealistic and appears to be designed to preclude high quality appeals. It appears to be an obstruction of justice. To allow only 15 CALENDAR days to appeal a major controversial item such as the Third runway is unethical and should be illegal. A. Brown began requesting copies of the appeal process at least one week prior to the August 8 public notice, yet did not receive a copy until 12 August 1996, with a mere nine days left to respond. Had the call not been made until the day of the public notice, the time to repond would have been even less than nine days, including weekends.

The time period should be extended and a submittal of revised comments permitted without additional charge.

The appeal charge of \$300 is also high considering it is not a judicial appeal and the short time to appeal. There is only a little over a week to put together the funding for the appeal during prime vacation season. This makes it very difficult, if not impossible, for some community groups to arrange a meeting to authorize funding an appeal.

Realistic Schedule is needed

What year will the Third Runway open considering the following issues: ←

- a) Third Runway related Litigation *env. justice appeal*
- b) Current Flight Path litigation (Akers) ←
- c) Kludt Litigation *declaration - agreement -*
- d) Obtaining permits for 3000 haul truck trips a day is not a trivial task. The trucks will cause traffic jams and damage many roads & highways all over Puget Sound.
- e) Significant civil engineering challenges are being treated as "standard practice" such as the earth retaining wall about 3 times the standard height
- f) The soft soil in the airport area needs to be removed yet the amount hasn't even been determined yet. It is not part of the 24.6 million cubic yards.
- g) Schedule slides should be required to mitigate construction pollution each time a new receptor location violates the Clean Air Act
- h) Schedule slides should be required to comply with the Endangered Species Act each time the bald eagles have eggs in their nests

Key Comments Missing From PSRC Correspondence Packages

A critical Environmental Protection Agency (EPA) letter to the Federal Aviation Authority (FAA) (ref. (w)) was not any of the PSRC correspondence packages A. Brown obtained directly from the PSRC . The letter states the "Draft conformity analysis does not support your conclusion that the project conforms to the State Implementation Plan". Unless overturned, this means that the **Third Runway is ineligible for any Federal funding.** ← *1/5*

request for and SEIS ← Cutler and Stanfield (ref. (j)), hand delivered to PSRC 6 June 1996, was also missing from the PSRC Correspondence packages as of 11 July 1996. It was referenced in "Response to Requests For Supplemental Environmental Review". The Cutler and Stanfield correspondence explains the ramifications of not meeting the Clean Air Act.

Neither of these crucial comments (ref. (j) and (w)) were available in all the PSRC correspondence packages mailed out at the time of the PSRC General Assembly vote, raising the question of the vote's validity if it wasn't just A. Brown's packages that were incomplete. The dates of the packages are continuous beginning with a package dated "April 3 through April 15, 1996" and ending with package dated "July 10-11, 1996".

Useless Public Hearings

The 27 June 1996 morning public testimony was useless considering that as certain individuals voted on that afternoon of the PSRC Executive meeting, they referred to meetings held on PRIOR days that had already decided their vote (ref. (v)). For example, most of the Tacoma City Council members voted, without ever hearing the public testimony, For the Third Runway, at a separate meeting. Their representative then honored that prior direction when voting at the Executive Board meeting. See reference (aa) for additional comments on the procedures used at other meetings and reference (c) for comments regarding Open Houses. *We are sincerely convinced that anyone, except those with an interest in obtaining short term construction work, would be vehemently against the DEPENDENT, PART TIME Third Runway if they understood the total cost, tiny capacity increase, risks, and compared those factors to other alternatives , i.e., new air traffic technology, choosing a different airport to expand, or banking land for a supplemental airport.*

A multi airport system, reliever airport such as Moses Lake for cargo maintenance.

Invitation to Question Constitutionality of Government Agencies

See reference (ff) for some points related to this issue.

Inadequate Technical Review by Cooperating Agency

Some technical experts responsible for commenting on the Draft EIS (ref. (b)) had inadequate time to review it thoroughly because it took so long to reach their desk (routed through managers then eventually to the technical expert) (ref. (c)). Also, for many of the topics, it requires reading the entire DEIS to obtain all the relevant data. It did not reference related sections.

NEPA requires clear & concise 300 pages

Illegibility of Comments Published in 1996 FEIS (ref. (d))

Comments were reduced to fit two pages onto one page. This made the size of the print too small to read in some cases and difficult to read in almost all cases. It was unreasonable to expect anyone to try to read and respond to the comments on the DEIS ((ref. (c)).

Inadequate traceability of response to comments in 1996 FEIS

In the FEIS (ref. (d)) it is only sometimes possible to trace an answer back to the commenter which violates WAC 197-11-550. It is impossible for some to determine if their question was accidentally overlooked, intentionally ignored

because it was unsubstantive, inadvertently misinterpreted, or answered somewhere in the over 5,500 pages but they haven't happened upon it.

Inadequate traceability of comments for Supplemental Review

In the "Response to Requests for Supplemental Review" (ref. (dd)) it is not always possible to trace an answer back to the commenter. It is impossible for some to determine if their question was accidentally overlooked, intentionally ignored because it was unsubstantive, or inadvertently misinterpreted so although the PSRC considers it answered, the commentor does not.

For example, some unanswered questions from reference (s) are:

How can the FEIS rely on "best or standard commercial practices" or "standard procedure" as a substantive answer when the engineering and environmental aspects of the task are far more difficult than "standard or best commercial practices"? and much is yet to be planned? (Haul, conveyor,

Considering reinforced earth walls typically have a maximum height of 50 to 60 feet, how will the over 100 feet heights be handled? Will the 160 feet area need an earth wall? (FEIS R-11-2) Where are the design specs, borrow pits, berms, retention, etc)

How much soft /low grade soil must be excavated? drawings, aesthetics in EIS?

Where will all the fill come from? Can permits to mine and haul it be obtained in a timely manner?

How can you have over 3000 haul trucks a day without decreasing safety, particularly considering current accident rates on those roads? Considering most routes haven't been defined how can safety be adequately addressed? (FEIS R12-28)

The study boundary is much too small from both environmental and economic aspects and needs to be expanded. Normandy Park is being hurt more than any other city but was not evaluated in the FEIS. For example, my 7 years of house sale data was ignored. but shows greatest % SFH depreciation

What is the real air capacity increase if consider the weather during peak season? direct higher % of residential neighborhoods surrounding Sea-Tac.

What is the pollution impact from the aircraft if all their engines are running and realistic landing/take-off cycle times are used?

Inaccurate answers in Response to Requests for Supplemental Review

For example, in the "Response to Requests for Supplemental Review" (ref. (dd))

→ it states on page 10 that "The over-statement of pollutant levels occurred by using worst case weather conditions..." yet the FEIS states that it did not. The FEIS R10-2, page R-112 explains that the reason the FEIS shows less pollution than previous studies is because the FEIS uses "actual historic meteorological conditions". The pollution is not overstated. If this was the same wrong weather data that the poor weather estimate came from used in delay calculations, i.e., the 10 summers but 11 winters, the pollution would be even more underestimated than the original question suggested.

Some critical criteria pollutants such as O₃ + NO₂

CO is higher in winter

Misinterpretation of Final Noise Decision (Ref. (e))

The PSRC has misinterpreted the "Final Noise Decision on Noise Issues". At the December 1994 Expert Panel Public Testimony meeting (ref. (t)), the Arbitration Board went to great lengths to explain they were only addressing second runway mitigation and would take no comments on the Third runway. If they changed this position, then the public comment sessions were incomplete and need to be redone.

→ The Noise decision indicates that noise has definitely increased according to actual measurements, questions the validity of noise contour maps, and suggests that although it might be feasible to mitigate noise from the second runway, its probably unrealistic to believe the Port would mitigate noise from a Third runway in a timely or meaningful manner.

Alternatives Not Adequately Addressed

Global Positioning Satellite (GPS) technology was not addressed even though **FOURTH GENERATION GPS** is scheduled for implementation in fiscal year 2001. The contract for 33 satellites has already been awarded to Rockwell (ref. (ss)). See enclosure 3 for a discussion of LDA technology and GPS technology.

Airport Location and Size Incompatible with Significant Growth

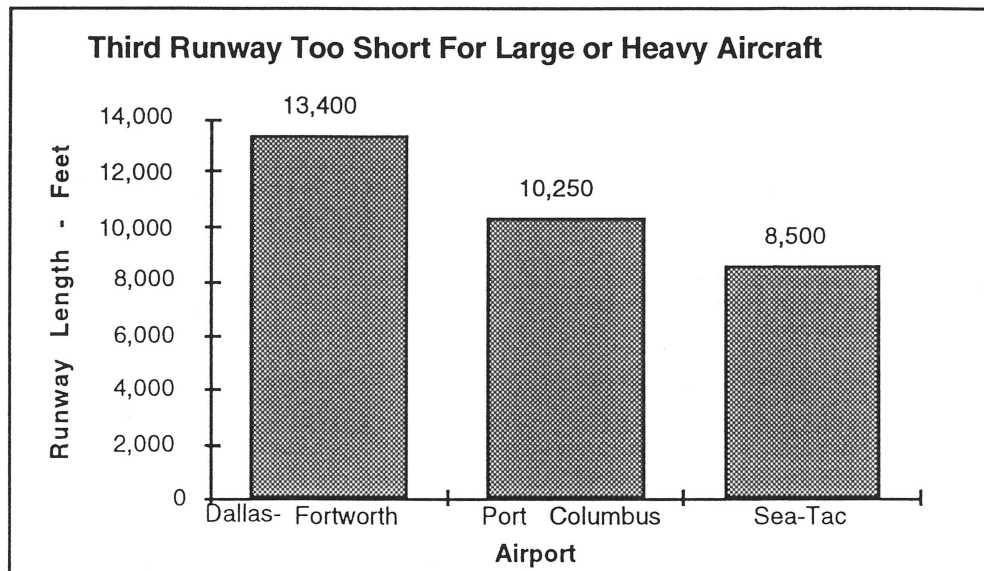
Port Columbus is obtaining 240 acres to build a new 10,250-foot third runway (ref. (p)). Compare that to Sea-Tac basically taking several blocks of a residential street with houses lining one side of it.

When other small U.S. airports don't have room to expand because of heavily populated areas, they use another airport or technology to increase their capacity. For example, Charlotte with 5,000 acres and San Francisco with 5,400 acres opted for Localizer Directional Aid technology instead of additional runways. It is the airports with large acreage that can afford to add runways or those with large buffer zones. Comparing airport sizes, runway lengths and capacities, using data in the FEIS (ref. (d), page R-201), it becomes obvious that even with the proposed land acquisition, Sea-Tac's proposed expansion is too small to be cost-effective and safe.

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AB 18
pages 18+19 out of
order*

Runway Length Incompatible with Significant Growth

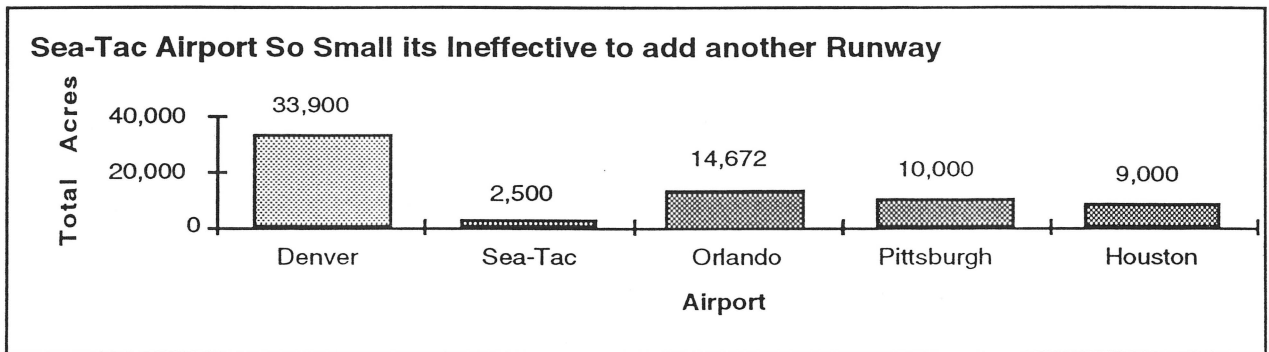
The proposed runway is too short to handle fully loaded cargo planes. The FEIS states the 8,500 foot runway is too short for B-747, DC-10, MD-11, L-1011 or B-767 (Ref. (d), page R-126). Compare the proposed Third Runway short length to other U.S. new runways. The other airports have considered the new, larger airplanes that will be in use by the time the Third runway is built as well as the existing large passenger and cargo jets. *The industry preferred runway length is about 40 % longer than Sea-Tac's proposed part time arrival runway length of 8,500 feet !!*



Airport Location and Size Incompatible with Significant Growth

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When other small U.S. airports don't have room to expand because of heavily populated areas, they use another airport or technology to increase their capacity. For example, Charlotte with 5,000 acres and San Francisco with 5,400 acres opted for Localizer Directional Aid technology instead of additional runways. It is the airports with large acreage that can afford to add runways or those with large buffer zones. Comparing airport sizes, runway lengths and capacities, using data in the FEIS (ref. (d), page R-201), it becomes obvious that even with the proposed land acquisition, Sea-Tac's proposed expansion is too small to be cost-effective and safe.



Traffic Hazards Dismissed and/or Not considered in FEIS (ref. (d))

How many accidents will there be as unsuspecting drivers suddenly see what looks like an explosion near-by? When the dirt associated with permit PWD0115-96 (ref. (gg)) at the south end of the airport is dumped, it creates a huge sudden thick dust storm. While driving down 188 St., it is extremely distracting since your initial reaction is to think there has been an explosion due to the incredible size and density of the dust.

The FEIS (ref. (d)) says that you can put over 3000 trucks per day on the roads around Sea-Tac, even ones with an unusually high accident rates and not impact safety (ref. (d)). That defies logic if you are familiar with the particular roads.

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The FEIS response R-28 that "increased truck traffic on any leg does not impose any increased traffic risk" contradicts the Dept. of Transportation conversations with me the summer 1995. The conversations resulted in Department of Transportation sending me the SR 509/SR 518 interchange data because they said it was the most hazardous traffic location. One haul truck has already been seen running a red light as he turned onto SR509 from SR518.

states, locales, or a one of the

Now that there are many haul trucks taking that route, the community has additional concerns based on data and it is a standard topic of conversation. It is much more difficult to merge onto north SR509 using the 160 St. entrance when the haul trucks are present. A. Brown already knows someone involved in an accident on 188th that blames the recent construction hazards. In addition, there was also a fatal accident there recently involving a car and truck (it was early evening so presumably when there were no haul trucks present) (ref. jj).

←
←

**The commute is not only longer now,
but also more HAZARDOUS,
as a direct result of hauling
a TINY FRACTION of the amount that will be
needed for the Third runway !!!!!!!!!!!!!!!**

The FEIS (ref. d)) also says you won't impact safety on roads that have yet to be defined, in cities yet to be selected. How can the FEIS be sure safety won't be impacted? This is not a "standard practice" hauling job. Over a million double haul trucks is difficult to conceive. Considering Sea-Tac PWD0115-96 (ref. (gg)) usually has 5 double haul trucks in a row, with one car in between each, even

though it "only" requires hauling less than 2% of the dirt in 1/4 the time than the Third Runway, what will things be like if the Third Runway construction begins?

If you ratio the amount of dirt to the number of months needed for the current permit work and assume the same rate for the Third runway,

it would take over 32 years to haul

the 24.6 million cubic yards of dirt

even if you hauled year round

which is contrary to the FEIS required mitigation !!!!

Revamp.

Reducing the hauling period to the maximum permitted by the FEIS (210 to 270 days per FEIS page R-156) increases the 32 years to about **50 years**.

To avoid taking about 50 years, the traffic jams from the Third Runway and associated additional pollution will have to be much worse than the currently unacceptable south end airport construction traffic congestion and construction pollution.

Traffic Congestion Inadequately Addressed in FEIS (ref. (d))

The 3000 haul truck trips a day will severely impact transportation. Sea-Tac permit PWD0115-96 (ref. (gg)) for double haul trucks currently traveling to the south Sea-Tac airport construction site are traveling about 15 mph below the speed limit and come to a full stop to turn on the roads around Sea-Tac. The FEIS (ref. (d)) transportation assessment does not address the 3 or more years of traffic jams in an air pollution non-attainment zone that has intersections already exceeding the CO levels. Permit PWD0115-96 (ref. (gg)) is for less than 2% of the dirt required for the Third Runway project but has already increased my commute time by about 2 hours per week.

The current construction site has speed limit signs that are 10 mph below the street's customary speed limit and signs that read "**Be Prepared to Stop**".

This reduced speed was not considered in the traffic analysis.

*^
and full stops*

These traffic and pollution concerns are shared by many as illustrated by the multiple complaints being phoned into Bruce Rayburn, Sea-Tac Public Works Representative, the local newspaper publishing complaints (ref. (hh)), and the Highline school district has said the construction is "expected to cause delays when students return to school in September" (ref. (ii)).

The number of just double haul trucks is about equivalent to all the vehicles that travel over a busy section of Interstate-5 over about a week's time (based on data from FEIS page R-153 (ref. (d))).

Background Ground Pollution Levels Too Low

Pollution calculations should use Sea-Tac pollution as their background level when available, such as ^{The} intersection at the Red Lion (S. 188th and Pacific Highway South). Additional pollution monitoring is needed around the airport because data in the DEIS (ref. (b)) suggests it ^{CO exceeds NAAQS} doesn't meet air toxin standards now. The results from the additional EPA testing that has been funded should be obtained prior to proceeding with ANY Third Runway funding, ^{certification or approval.}

Construction Pollution Inadequately Addressed

The complete impact of over 3000 truck trips per day plus all the associated construction equipment and traffic for YEARS in an non-attainment zone also needs to be fully addressed. These calculations need to be done using the actual pollution levels and then adding the trucks/equipment using pollution parameters (emissions in grams per mile) consistent with the age of the trucks and a realistic speed (typically 15 mph below the speed limit except on highway exit ramps). Cumulative impacts from other projects in the area need to be included in the calculations.

Haul truck pollution was in the DEIS was estimated far below the current Fed. standard emission indices for new trucks mfg. in the U.S. Realistically, doubling the particulate levels presented in the draft EIS would still be too low, but when added to construction dust, would exceed the PM₁₀ short term standard every day.

Ground Vehicle Pollution after Construction Underestimated

The carbon monoxide calculations in the DEIS and 1996 FEIS offer a good example of the degree of engineering soundness. They take a location that already exceeds safety limits (by the Red Lion) and ADD more pollution BUT end up with LESS pollution than it has now. Most people would expect it to show an increase in pollution which would still exceed safety standards. The trick to adding pollution but having calculations show a reduction is that instead of using the REAL pollution values for that location, you use "accepted levels in other studies" according to FEIS R-10-60. Note, these other studies use numbers for attainment zones. Ironically, if the DEIS hadn't reported the real current values elsewhere in the report, I wouldn't have realized how misleading the analysis was.

Cumulative Particulate Pollution Inadequately Addressed in FEIS

Permit PWD0115-96 (ref. (gg)) for double haul trucks currently traveling to the south Sea-Tac airport construction site has resulted in a dust storm making it difficult to breath particularly on the "Smog Alert" days. The accumulation of dust and dirt on vehicles that drive by there a few times appears worse than a year's standard urban environment. This is causing wear and tear on property as well as an increased use of water for cleaning. Impacts from significant projects such as this must be considered in conjunction with those in the FEIS (ref. (d)). What is the impact on the children swimming in the outdoor YMCA pool or on the play toys outside Kindercare, both a short walk from the airport's dust storm construction site? Considering this current construction is nothing compared to the Third Runway construction, how can the FEIS treat this subject as so trivial?



Underestimated Aircraft Pollution Calculations

The calculations of the aircraft need to be redone using a realistic fleet mix, all aircraft engines being used in flight, and a REALISTIC landing/takeoff cycle time. To assume only 11 minutes as the FEIS does is absurd (ref. (d) Table R-10). If this number was true there would be no discussion about building a part time runway that ultimately will cost more than the new 5 runway Denver airport. Considering it will have dependent flight paths with two airports and requires taxing in and out across two active runways, 11 minutes is a gross understatement. Eleven minutes is much shorter than prior Sea-Tac studies. At

No part. in entire jet aircraft model (EDHS 944) so no realistic levels estimated in (L/T/O) the EIS as additive

for an entire L/T/O cycle

least 30 to 40 minutes should have been used for the pollution calculations and the DC-10 calculations should assume two engines are used in flight.

Higher engine thrust will be required for the 141' up gradient slope from all 3rd runway landings. No calculations for additional taxi time or slope have been added for time or distance from the 3rd runway.

Air Traffic Safety Issues Dismissed

FEIS (ref. (d)) states in one place the Third Runway is safer but page R-43 states there is a 21 % increase in incursion rate. How can it be safer to taxi across two active runways?

Highline Water Source Risks Identified in FEIS (ref. (d))

The response to comments in FEIS (ref. (d)) indicated a significant risk to the Highline aquifer but did not offer any real mitigation. Isn't a fact that Highline's current source of water is already contaminated with jet fuel and the construction of the Third runway virtually guarantees an even higher pollutant level? Isn't a permanent water source other than Highline's needed for the area or are we all to buy bottled water for the rest of our lives ?

aquifer

20% Seattle drinking water supply aquifer

slope distance from the 3rd runway

Impact on Salmon and other Fish

The impacts to salmon and other fish were not adequately addressed. Studies such as the DNA ones in reference (mm) are needed (see also references (nn) and (oo)).

Increased Flooding Inadequately addressed

The recent construction at the airport increased the area of impervious surface which caused 1996 flooding in areas that historically have ~~not had~~ not had flooding problems. Flood maps have been revised and mortgage holders ^{will} be notified that they now must carry flood insurance. The 1996 FEIS (ref. (d)) seriously underestimates flooding impacts. The area has had several



"100 year" floods in recent years.

Seatac City appeal outlines the lack of 100 yr. flood capacity of the current

Statistically Significant Health Data Inadequately Addressed

Miller Creek Reba detention facility despite agreements to comply.

The high incidents of diseases, particularly rare ones, around Sea-Tac airport are not given serious consideration in FEIS (ref. (d)).

Likewise, the ongoing high infant mortality rates in South King County contrast dramatically with the 61% decline in deaths for Seattle from 1988 to 1994 (ref. (qq)) ^{and} is not considered in the 1996 FEIS. See separate list of health references.

This proposed expansion has heightened the awareness of some citizens of the significant pollution risks. Can the taxpayers really afford the lawsuits that will advertise that the "current airport operations are likely responsible for formaldehyde levels 23 times the WDOE's Acceptable Source Impact Level ..." (ref. (ee)) ? 173 460 150

Ethylene glycol deicer is being released untreated into our water. Some children waded in that contaminated water !!! The FEIS (ref. (d)) will be corrected to reflect the ethylene glycol contamination when the Record of Decision is issued but agencies such as the Seattle Water Department have not been notified of this important critical change.

Existing Noise Contours too Small

April 15, 1996, aviation easement contradicts the 1996 noise contour models (ref. (x)). It indicates that the noise contour model lines should be at least 5 DNL larger. There are whole neighborhoods even closer than that home to the airport. Therefore, there are still many people living in high DNL contours that the Expert Noise Panel was told had been removed (ref. (e)). This removal was sited by the panel as being why the noise mitigation was impressive, however, this removal hasn't actually happened.

Predicted Noise Contours too Small

The current projections are even more unrealistic than the current noise contours. Actual noise measurement data shows that the existing contours are too small. See references (y), (aa) and Expert Panel report (ref. (e)) as well as the panel's supporting data.

Mitigation Boundaries Too Small

Noise boundary analysis assumes we live in cold climate homes but we don't according to the FEIS. Therefore, more homes should be eligible for noise insulation and/or buy-out (ref. (d) and (z)).

Actual noise monitoring, by the Port as well as RCAA, indicates that the noise contours are incorrect. See references (y), (z), (aa), and Expert Panel report (ref. (e)) as well as the panel's supporting data.

It appears that the noise model has not been updated to handle the different type of noise patterns caused by Stage 3 aircraft. Vibrations from Stage 3 have not been addressed. Also, according to the FEIS the noise model

of .007
45/m³
@ .063ppb
mean monitored
@ 3ppb 2.9905
(high @ 6.90ppb)

?

23
007

.161

doesn't consider the increased noise from the reflections from the new buildings, walls and pavement around the airport.

"Significant" Number of Homes Insulated Misleading

Sea-Tac residents, deprived of their rights under the Federal Relocation Assistance Act, have been forced by economic circumstances to live in areas that other airports would have paid to remove them from. Sea-Tac has more people living in areas that should have been condemned so we have more homes needing insulation. Also, the geographical location, i.e., close proximity to cities without the advantages of over the water flight paths, creates far more homes, daycares, hospitals, businesses, etc., in high noise and air pollution areas than any other U.S. major city. The FAA in other regions wanted a "residential no-build zone" inside the 60 dB DNL boundary (ref. (ll)), compare that to Sea-Tac with homes and schools adjacent to the airport both before and after the Third Runway.

Ramifications from Flight Path Changes and Noncompliance with Routes

The noise measurement data has been compromised by both unintentional and perhaps intentional flight path changes. Numerous flight path violations are a matter of record. In addition, changes to a Flight Manual suggest flight paths were also intentionally changed. A court may need to determine if the change in the Flight Manual should have required an Environmental Impact Statement in accordance with 1992 U.S. Court of Appeals, SCCF vs. FAA . See Mr. R. Akers correspondence including, but not limited to reference (bb), his court case. See also reference (y), and Reference (aa). These route changes have extremely serious ramifications with regard to availability of Federal funding for three low income housing developments which, based on actual noise measurements, appear to no longer be eligible for federal money (ref. (w)) and ref. (y)).

Ramifications from Fleet Mix Changes Uncertain

Realistic current and future fleet mix is needed to predict noise contours. Changes in Alaska Airlines operations to Boeing Field impacted recent noise measurement data. Impact of the new larger airplanes, still on the drawing

board, do not appear to be fully considered in the projected noise contour maps.

Peak Season Corresponds to Less than 3% Poor Weather

The FEIS claims the benefit from the Third Runway is that it decreases arrival delays in poor weather. However, peak season coincides with less than 3 % poor weather (ref. (i)).

According to the FEIS R10-14, page R-124,
***"..the possibility of a peak hour of airport activity
and worse case meteorology occurring at the
same time is
rare if not highly improbable."***

Enclosure 3

Extracted portions from Ref. (s), "Comments on Public Comment Meeting June 27, 1996 - Topic : Proposed Addendum to the 1995 Metropolitan Transportation Plan (MTP) to include the Third Runway", dated 7 July 1996

References : see Enclosure 4 references (a) through (r)

During the formal PSRC discussions after the public comment period, one of your own executive council members said that until the public testimony on that day they were unaware of the technology options. According to G. Brogan & Associates report, Localizer Directional Aid (LDA) technology can **"accomplish 98 % of the DEIS year 2020 Hourly Forecast"** (ref. (k)). A paragraph taken from a letter (ref. (l)) submitted recently to the PSRC summarizes this option:

"LDA"

The **Expert Panel** recommended in its December 18, 1995 decision that the Port investigate the use of **LDA** as a navigational aid. The which can be obtained for a cost less than 1% of the cost of the proposed runway, and which has been implemented at other airports including St. Louis and San Francisco. A supplemental EIS should look at LDA as an option and also look at global positioning Satellite technology, which has been recently endorsed by the Air Transport Association in a press release this March." (bolding added for emphasis)

San Francisco's runways are 50 feet CLOSER together than our existing runways and they are using LDA ! See the RCAA web page for more information. address: <http://www.rcaa.news.org/rcaa>

The LDA and GPS technologies in use now were not mature when the initial Third Runway was proposed. The Global Positioning Satellite (GPS) used in aircraft is more precise than the type you can purchase for cars and as hand devices. **Today's technology can save us Billions** plus preserve wetlands and endangered species.

Considering the number of aircraft leaving Sea-Tac with less than 20 passengers (ref. (h)) and the low passenger load factor, wouldn't just a small increase in load

Brogan?

is this a new term for a sentence I have not seen before?

factor combined with technology accomplish 100 % of the Third Runway arrival delay objective for a tiny fraction of the cost? Other large airports are facing a similar dilemma as Sea-Tac and their solutions will probably include increased load factors (ref. (m)) which will help increase Sea-Tac's load factor.

On a per passenger or per pound of cargo basis, the Third runway will be more expensive than any other airport project. The Third Runway provides a 0% increase in landings and takeoffs per the FEIS (see Table 1). It will be used for arrivals a mere 12 .1 % of the time and even less for departures (see Table 2). It allows less than a handful of additional daytime flights (see Table 3).

Chek Lap Koc (Hong Kong) cost 21 billion but expects 35 million passengers. This total island/airport/bridge/town/railway cost amortizes to \$ 600 per passenger over the first year. Compare this with Sea-Tac's \$1,500,000,000 plus price tag that provides ZERO additional flights per year.

then → Denver spent \$ 3.2 billion to construct an airport with 5 runways that resulted in 530,839 operations (ref. (n) and FEIS Table R-12). If you amortized this over just one year than it's equivalent to \$ 6028 per operation. Compare this to Sea-Tac's \$1,500,000,000 for 0% additional operations (see Table 1).

then → 3.3 → If you use the Denver's \$ 4.9 Billion figure (ref. n) which includes all costs of money, rental car facilities, etc., than the equivalent Sea-Tac figure exceeds the partial cost of 3.5 billion in Tech Report 8. The \$ 3.5 billion doesn't include toxic and hazardous clean-ups, excavation or replacement of soft soil at Sea-Tac, loss of Federal HUD housing (or noise mitigation to avoid losing HUD funding, etc.)

People are driving out of their way to use Colorado Springs airport because it's cheaper than the new Denver airport (ref. (l)). How much business will Sea-Tac lose if we help pay for the Third runway with enplanement fees? How much do our taxes go up if we don't pass the costs of the new part time runway onto the airlines? Even bonds cost money ultimately. Ask Denver about their junk bonds if you doubt this (ref. (o)). Or, ask United Airlines if they want us to spend as much on a part time arrival runway as was spent on the new Denver Airport. United pays \$ 35 million to operate out of Stapleton. They pay "\$ 195 million to operate

at the new airport -- after realizing a \$ 15 million savings from efficiencies. " (ref. (p))

Don't let Denver's high cost scare us away from a new airport. Denver spent \$7.5 million in art and \$ 232 million on their baggage handling system (ref. o). A well-planned airport can cost much less than Denver's new one **IF we set aside the land NOW.**

Even Mirabel in Montreal is a good deal comparatively. They spent about a billion in Canadian dollars but at least they have cargo traffic even though the passenger traffic didn't materialize. Can you blame the passengers for not using it? There is no highway connecting Dorval to Mirabel and "the high speed rail from downtown never got on track" (ref. (q)). Mirabel airport also has over 35 times more acres than Sea-Tac so it has growth capacity.

The Third Runway is incredibly expensive compared to other projects no matter what cost number you use:

\$ 500 million (some construction cost),

\$ 1.5 billion (related construction),

\$ 3.5 billion (includes some cost of money and operating expenses but still doesn't include all construction costs), or

a higher cost figure than \$ 3.5 billion that includes the costs that government documentation says have not been computed yet such as soft soil excavation, toxic clean up, litigation costs, etc.

To further evaluate the Third Runway at SEA-TAC a **Supplemental Environmental Impact Statement (SEIS) is REQUIRED.** The existing Final Environmental Impact Statement of the Sea-Tac Master Plan Update (FEIS) (ref. (d)) does not properly respond to comments and contains substantive errors that greatly influence Third Runway decision (references c, d, e, f, i, j, r). The Flight Plan Project EIS had a different scope. Neither had the benefit of the 1996 Arbitration Board noise findings (ref. (e)) or the latest pollution calculations (ref. (j)). Perhaps most importantly, the **existing EIS's do NOT adequately address technology options that have matured in recent years and are being implemented elsewhere.**

The FEIS claims the benefit from the Third Runway is that it decreases in arrival delays. The bad weather figures are based on the average of 10 summers and 11 winters so they are inflated. Peak season coincides with less than 3 % poor weather (ref. (i)).

The Final EIS mentions the **21% INCREASE in incursion rate**. *Will your family feel it's trivial if they are the ones involved in an accident while taxing across two active runways?*

If you take the time to study all the references they do NOT support a Third Runway from an environmental, engineering or economic point of view. As time goes on, more and more data keeps accumulating from that supports my original comments to the Draft EIS (references c, f, i, j, r).

**Table 1 : Zero Increase in the Number of Aircraft
(Dependent Flight Paths & Taxiing)**

Key Data for Return on Investment	"Benefit" from the "Third" Runway	Environmental Impact Statement (Government Position) Reference
# Additional Arrivals	0	R 10-57, pg. R-146
# Additional Departures	0	R 10-57, pg. R-146
Fleet Mix	0	R10-18, pg. R-128

If you add the last column in FEIS Exhibit II.2-3 pg. II-35A correctly, it indicates more total operations without the runway than with it. Note shading was omitted from the "with project size" on Exhibit II.2-3 so do not use shading to compare the alternatives

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Table 2 : "Third" Runway used for only 12.1 % of the Arriving Flights

Real Growth?		Comments & References
"Third" Runway Departures	Use Only 3-5%	"To use the proposed new runway for departures, aircraft would have to cross two active runways resulting in added delay (time) and safety considerations" from FEIS R10-15. pg. R-126, 3 % per DEIS pg. xi
"Third" Runway Arrivals	Use Only 12.1%	12.1 % per DEIS pg. xi, Dependent air space with Boeing Field and <u>both</u> existing Sea-Tac runways limits usage (Feb. 1993 FAA report "Impact of Boeing Field Interactions on the Benefits of the new proposed runway.."). Note: Aircraft wake vortices will still limit capacity even if new improved radar is invented

Above FEIS Numbers Optimistic:

FEIS numbers assume 44% poor weather even for peak season when it's "as little as 3%" poor weather (June through August). See 3/18/96 Dr. Hockaday Congressional testimony

According to the FEIS R10-14, page R-124,

"..the possibility of a peak hour of airport activity and worse case meteorology occurring at the same time is rare if not highly improbable."

(Font size reduced from original to fit within appeal's document margins)

Table 3 : Only a Few Aircraft Flights in the Day instead of Night

Real Growth? <input checked="" type="checkbox"/>		References & Comments
Airport Daytime Arrivals instead of night	Only 4 aircraft	FEIS Exhibit II.2-3, pg. II-35A Dependent air space so limited capacity
Airport Daytime Departures instead of night	Only 3 aircraft <input checked="" type="checkbox"/>	FEIS Exhibit II.2-3, pg. II-35A Dependent air space & taxiing so limited capacity

Note aircraft wake vortices will still limit capacity even if new improved radar is invented

There are some math errors in FEIS Exhibit II.2-3 pg. II-35A so the above aircraft numbers may need to be reduced by 1 making the "Third Runway" even less "advantageous". Note, also the shading was apparently left off the with projects alternative portion of the table so be careful when using the table.

Above FEIS Numbers Optimistic: (see previous page for comments)

Bottom Line

**We want a man's size 13 shoe,
We are PAYING for a man's size 13 shoe,
We're getting a baby bootie.**

It just doesn't fit

(Font size reduced from original to fit within appeal's document margins)

Enclosure 4

References

- (a) Supplement to the State Implementation Plan for Washington State, Plan for Attaining and Maintaining National Ambient Air Quality Standards for Ozone in Central Puget Sound, January 1993, Amendments June 1994
- (b) Sea-Tac Airport Master Plan Update Draft Environmental Impact Statement (DEIS), 1995
- (c) Engineer's Personal Assessment of the Sea-Tac Airport Master Plan Update Draft Environmental Impact Statement (DEIS) - Proposed Third Runway, The United States' Most Expensive, Limited Capacity Runway, incorporated into FEIS response appendix.
- (d) Sea-Tac Airport Master Plan Update Final Environmental Impact Statement (FEIS), 1996
- (e) "State of WA Puget Sound Regional Council Final Noise Decision on Noise Issues", dated 27 March 1996 (bolded by author to emphasize legal title)
- (f) Comments on the Draft General Conformity for the Sea-Tac Airport Runway and Associated Development Projects, A. M. Brown dated April 30 1996
- (g) Technical Report #8 prepared by P&D Aviation for Port of Seattle.
- (h) Testimony at the Congressional Aviation Subcommittee Hearing by nationally known economist Dr. Lynn O. Michaelis, held March 18, 1996
- (i) Testimony at the Congressional Aviation Subcommittee Hearing by air transportation expert, Dr. Stephen Hockaday, held March 18, 1996
- (j) Study submitted to FAA by Envirometrics, Dr. Ruby, Smith Engineering & Management, Cutler & Stanfield, dated 6 June 1996
- (k) Implementation of an LDA/DME Approach to Runway 16R in lieu of a Third Runway at Sea-Tac, prepared by G. Brogan & Associates, Inc. dated 26 June 1995 (presumably submitted as comment to Draft EIS)
- (l) Letter To PSRC President Doug Sutherland, From Pork Patrol, Al Furney, Chair, dated 12 June 1996 - in June 3-19, 1996 PSRC correspondence package
- (m) "City, State Forces Wrangle over Third Chicago Airport, Aviation Week & Space Technology, 8 April 1996
- (n) GAO/RCED-95-35BR (Government Accounting Office)
- (o) "Finally ! It's Here (Denver International Airport Opens), Newsweek, 6 March 1995
- (p) "Denver International Airport - Economic aspects", Travel Weekly, 2 February 1995 v54 n9 p4
- (q) "Montreal Airport never got quite off the ground" Times 15 April 1996 - in PSRC Correspondence package dated June 21-26, 1996

Brogan?
 which is right?

- (r) Comments regarding adding the part time dependent runway to the MTP. To D. Sutherland PSRC, From A. Brown, dated 15 June 1996 - in PSRC Correspondence package 3-19 June 1996. Special Note the cover letter enclosed a copy of 25 pages of comments dated 11 June, 1996. These comments were hand delivered to the PSRC with the CASE comments on June 11, 1996 so the July 19, 1996v date is incorrect with respect to the pages labeled 1/25 and so on.
- (s) "Comments on Public Comment Meeting June 27, 1996 - Topic : Proposed Addendum to the 1995 Metropolitan Transportation Plan (MTP) to include the Third Runway", To D. Sutherland & PSRC Executive Board, From A. Brown, dated 7 July 1996 - in PSRC Correspondence package July 10-11, 1996 (enclosure 3 in this Port Appeal letter of August 1996)
- (t) Expert Noise Arbitration Panel Hearing December 1994
- (u) FAA Hearing June 1995
- (v) PSRC Executive Boarding Meeting and Public Testimony, June 1996
- (w) Letter (Supplement to FEIS Comments, "Draft conformity analysis does not support your conclusion that the project conforms to the State Implementation Plan"), To D. Ossenkop of FAA , cc Hinkel of Port, From U.S. Environmental Protection Agency, dated 6 June 1996
- (x) Letter To PSRC, From D. DesMarais, dated 8 July 1996 - in PSRC Correspondence package June 26 - July 9, 1996
- (y) "Executive Board Order, dated April 25, 1995", To PSRC, From Ravenna- Bryant Community Association, dated 8 May 1996 - in PSRC Correspondence package June 21-26, 1996
- (z) Letter, To PSRC, From A. Brown, dated 10 April 1996 - in PSRC Correspondence package April 3-15, 1996
- (aa) "Draft Amendment to MTP -- Third Sea-Tac Runway, June 10, 1996 Order", To PSRC, From North East District Council, dated 28 June 1996 - in PSRC correspondence package June 26 - July 9, 1996.
- (bb) Letter, To D. Hinson of FAA, From R. Akers, dated 28 May 1996 - in PSRC correspondence package May 23-29, 1996.
- (cc) ECO-088, To D. Ossenkop of FAA, From R. Parkin of U. S. EPA, dated 18 March 1996 - in PSRC correspondence package April 3-15, 1996.
- (dd) Response to Requests for Supplemental Review, Addendum to the Flight Plan Project FEIS (1992) and Proposed Master Plan Update Development Actions at Seattle-Tacoma International Airport Final EIS (1996), PSRC, 10 July 1996.
- (ee) Letter, To PSRC, From City of Normandy Park, dated 9 April 1996 - PSRC correspondence package April 3-15, 1996.
- (ff) "PSRC's Resolution (A-93-03) and it's Impact on Related Legislation", To PSRC, From H. J. Frause, dated 1 April, 1996 - in PSRC correspondence package April 3-15, 1996.

- (gg) City of Sea-Tac Public Works Permit PWD0115-96, Parcel 282304-9016, Issued 6/20/96, Expiration 12/17/96, Contractor Segale, Signed by Bruce Rayburn
- (hh) "Number of Dirt Trucks Will Increase, Third Runway", by V. Nordstrom, Highline News, 10 August 1996
- (ii) "Study : Bigger airport means more poor kids", Highline News, 7 August 1996, page A7
- (jj) "Three Killed, 2 Hurt in Sea-Tac Wreck", Highline News, 7 August 1996. page A1
- (kk) "Enplanement Fees" (Alaska Airlines) , Seattle Times, June 1996
- (ll) "FAA Plans to Publish Draft Addendum to 1976 Agency Noise Policy by September", Airport Noise Weekly, Volume 8, Number 11, dated 10 June 1996, page 81-82.
- (mm) "Briefing Book", Environmental Conservation Division, Northwest Fisheries Science Center, National Marine Fisheries Service, NOAA, January 1994 (entire book but special attention to page 24)
- (nn) "Programs and Accomplishments", Utilization Research Division, Northwest Fisheries Science Center, National Marine Fisheries Service, Seattle, WA, May 1995.
- (oo) "Our Living Oceans, Report on the Status of U.S. Living Marine Resources", United States Dept. of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, 1995
- (pp) "Transfer of Land for Runway Underway", Airport Noise Report, Volume 8, Number 12, 8 July 1996, page 94.
- (qq) "Dramatic Drop in our infant mortality rate", Post-Intelligencer, 2 August 1996, pages C1, C4
- (rr) "ATA Questions Validity of Airport Construction Needs Study; Says Adequate Funds Exist for Necessary Airport Projects", ATA News, Air Transport Authority of America, 20 March 1996
- (ss) "Rockwell has won back the Global Positioning System (GPS) satellite contract", The Composites & Adhesives Newsletter, July-September 1996, page 3.
- (tt) "Notice of Decision by the Port of Seattle", Public Notices, Seattle Times, 8 August 1996

Note: This is only a partial list of references. Typically, the same information appears in multiple locations. All correspondence to the FAA, Port of Seattle, PSRC, Corp. of Engineers, Dept. of Ecology, Environmental Protection Agency, Expert Noise Panel, PSABCA, and Dept. of Transportation on current airport operations as well as the Third runway are applicable.

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