

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

Dear Mr. Rybolt:

On behalf of the residents of Burien, Normandy Park, SeaTac, and Des Moines, Washington, we are writing to express our collective comments and observations regarding the Seattle Tacoma International Airport (SEA) Sustainable Airport Master Plan Environmental Assessment (EA).

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

To that end, our cities have engaged in work to review the EA in the limited time given and wish to provide the following comments related to the following tenants of the Environmental Assessment. Regardless of legal and regulatory requirements for abatement and mitigation of these impacts, it is our sincere desire that the Port of Seattle will proactively and productively engage with leadership in our four cities to address these concerns, within and alongside of the NEPA process. This collaboration will build trust and partnership with impacted communities so that the region can work together on shared economic goals and respond to growing capacity needs at SEA, while simultaneously recognizing and addressing the inevitable impacts of that growth.

Airport Noise

The expansion of operations at SEA will result in increased impacts, particularly for nearby communities. Residents of our communities, located adjacent to SEA, are subjected to constant aircraft overflights day and night, irrespective of runway usage.

According to the environmental assessment, noise exposure will not exceed NEPA thresholds; however, the DNL 65 dBA contour will expand, leading to "significant" aircraft noise exposure for more residents and noise-sensitive facilities, including schools and nursing homes.

Global research indicates that high levels of noise exposure can lead to health impacts, sleep disturbances, and learning disruptions. 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.

Comment [LS1]: In Burien south our most recently adopted comp plan and an ill art code we have defined sensitive uses as child are, schools, nursing homes. would be good o recognize that there are additional sensitive uses beyond o d schools and homes

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 high 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.

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, they will impact our residents, particularly vulnerable populations such as those with asthma, other respiratory conditions, and the elderly.

Procedural Changes

Proposed airspace and flight procedure changes should be thoroughly explored. 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.

Environmental Review

The Port should collaborate with local jurisdictions as the airport expands to ensure mutual prosperity for both the airport and its neighbors. The City of Des Moines has concerns about the segmentation of the environmental review. Currently, the review is limited to “Near-Term” projects only, yet SEPA intends to review potential impacts as early as possible. This should include projects identified in both the “Near-Term” and long-term vision.

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.

While we highly 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.

Comment [LS2]: I believe all of the participating jurisdictions share these concerns