

No. _____

In the
UNITED STATES COURT OF APPEALS
For the Ninth Circuit

CITY OF BURIEN, CITY OF DES MOINES, and CITY OF SEATAC,
Washington municipal corporations,
Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION, BRYAN BEDFORD, in his official
capacity as Administrator, Federal Aviation Administration, U.S. DEPARTMENT
OF TRANSPORTATION and SEAN DUFFY, in his official capacity as Secretary
Respondents

PETITION FOR REVIEW OF AGENCY ORDER
[Federal Rules of Appellate Procedure, Rule 15]
[49 U.S.C. § 46110(a)]

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Washington*

Pursuant to 49 U.S.C. § 46110, Rule 15(a) of the Federal Rules of Appellate Procedure, and Circuit Rule 15-1, Petitioners, the City of Burien, Washington, the City of Des Moines, Washington, and the City of SeaTac, Washington, (the collectively, the “Cities”) hereby petition the United States Court of Appeals for the Ninth Circuit for review of the Federal Aviation Administration’s decision signed on September 24, 2025, to issue an “Finding of Significant Impact/Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport” (“FONSI/ROD”). A copy of the FONSI/ROD is attached as Exhibit A to this Petition.

As stated in 49 U.S.C. § 46110(a), a person “may apply for review of the order by filing a petition for review in the United States Court of Appeals for the District of Columbia Circuit or in the court of appeals of the United States for the circuit in which the person resides or has its principal place of business.” Because the Cities are located within the Ninth Circuit, this Court has jurisdiction over this Petition for Review.

This Petition is timely filed under 49 U.S.C. § 46110(a), in that Federal Rule of Appellate Procedure 26(a)(1) provides that “[i]f the last day [of a filing period] is a Saturday, Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.” Since the 60th day

after September 24, 2025, fell on a Sunday, the filing period under § 46110(a) continues to run until Monday, November 24, 2025.

Dated: November 24, 2025 LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber
Steven M. Taber

Attorneys for City of Burien, City of Des Moines, and City of SeaTac

RULE 26.1 DISCLOSURE STATEMENT

Petitioners City of Burien, City of Des Moines, and City of SeaTac are municipal corporations and not a “nongovernmental corporate entity.” Therefore, Petitioner is not required to file a corporate disclosure statement pursuant to Federal Rule of Appellate Procedure 26.1(a).

Dated: November 24, 2025 LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber
Steven M. Taber

Attorneys for Vashon Island Fair Skies

Exhibit A

U.S. Department of Transportation

Federal Aviation Administration

Northwest Mountain Region

Finding of No Significant Impact/
Record of Decision

For the Sustainable Airport Master Plan Near-Term
Projects at the Seattle-Tacoma International Airport

Seattle, Washington

EAXX-021-12-ARP-17297535477

September 2025

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I. Introduction

This document serves as the Federal Aviation Administration's (FAA) Finding of No Significant Impact/Record of Decision (FONSI/ROD) and provides the final agency determinations and approvals for the federal actions necessary to implement the Sustainable Airport Master Plan (SAMP) Near-Term projects (NTPs) at the Seattle-Tacoma International Airport (SEA). This FONSI/ROD is based on the information and analysis contained in the Final Environmental Assessment (FEA) dated September 2025, which is hereby incorporated by reference. The FEA has been prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA) and in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*¹ and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. The FEA documents the evaluation of the reasonably foreseeable environmental impacts associated with the proposed improvements.

II. Background (Section 1.2 of the FEA)

SEA is a commercial service airport located primarily within the City of SeaTac in southern King County, Washington, approximately 12 miles south of downtown Seattle and 20 miles north of the City of Tacoma (Exhibit 3-1 of the FEA). SEA is generally bound by SR 99 to the east, SR 509 to the west, S. 142nd Place to the north, and S. 200th Street to the south. Additional land owned by the Port for runway protection and noise compatibility extends northward to S. 136th Street and southward to S. 216th Street.

In 2015, SEA initiated the SAMP, which identified a Long-Term Vision (LTV) to accommodate future passenger levels and address identified needs for SEA over the 20-year planning horizon (through 2034). One of the overarching needs identified was to improve the experience for passengers at SEA. The current passenger processing functions, such as on-site parking, check-in hall, security screening, holdrooms, and the number of gates, were limited or undersized for the number of passengers SEA served in 2018 and continue to be undersized. The results of these limitations are crowded spaces, long lines, and delayed flights. These problems are expected to worsen as passenger demand increases.

The SAMP ultimately concluded that even with the implementation of the LTV, unconstrained 20-year demand would result in airfield congestion and high levels of delay. This congestion and delay would occur primarily due to limitations in the airfield/airspace system. The Port of Seattle (Port) and FAA determined that addressing these long-term airfield/airspace limitations is outside of the scope of SAMP and that a more comprehensive airfield and airspace planning study is needed to understand if additional actions would be required before the LTV could be implemented. Because additional planning is needed, the FAA determined that the LTV was not yet ready for environmental review.

The Port developed the NTPs to address near-term needs. The NTPs include 31 projects that improve the efficiency and safety of SEA, access to SEA, and support facilities for the airlines and SEA. Because the NTPs focus on a more immediate timeframe and address needs that are distinct from what may come from future planning, the NTPs are independent from the LTV. The FAA determined that the NTPs were ready for environmental review.

¹ FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, was published on July 3, 2025. Projects that commence after July 3, 2025, are required to comply with FAA Order 1050.1G, while those projects already underway by that date may follow FAA Order 1050.1F. This EA relies upon FAA Order 1050.1F, the Fiscal Responsibility Act of 2023, Executive Order (EO) 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, EO 14154, *Unleashing American Energy*, and the Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County*, 605 U.S. __ (2025).

III. Proposed Action (Section 1.3 of the FEA)

The NTPs are collectively referred to as the Proposed Action, which are described in Table 1-2 and shown on Exhibit 1-1 of the FEA. The Proposed Action also includes the construction and operation of associated program support projects, operational infrastructure improvements, and stormwater drainage system and industrial wastewater system improvements necessary for the implementation of the NTPs. The Proposed Action includes:

- A01 – Extension of parallel Taxiways A and B by approximately 1800 feet.
- A02 – Construction of Runway 16R/34L blast pads.
- A03 – Taxiway C/D reconfiguration and Runway Incursion Mitigation (RIM).
- A04 – Relocation of portion of Taxiway B to meet standards.
- A05 – Construction of a north holding pad (approximately 90,000 square feet).
- A06 – Construction of a new high-speed exit for Runway 34L arrivals between Taxiways J and E.
- A07 – Taxiway D extension of approximately 500 from Runway 16C/34C west to Taxiway T.
- A08 – North cargo hardstand construction (approximately 360,000 square feet).
- A09 – Construction of a central hardstand (approximately 292,000 square feet).
- A10 – Taxiway fillets construction.
- T01 – Construction of a multi-level terminal concourse and aircraft apron (up to 19 gates).
- T02 – Construction of an additional multi-level passenger terminal and parking garage.
- C01 – Cargo 4 warehouse construction to replace Cargo 6 warehouse demolished for T01.
- C02 – Construction of a cargo warehouse north of State Route (SR) 518.
- C03 – Cargo warehouse construction north of SR 518.
- L01 – Relocation of North Airport Expressway southbound lanes for the construction A09 and T01.
- L02 – Elevated busway and stations at the Main Terminal, Second Terminal, and Rental Car Facility.
- L03 – Construction of a loop ramp and split-level curbsides for the Second Terminal.
- L04 – Northeast ground transportation center construction on north side of existing parking garage.
- L05 – Relocation of the ground transportation holding lot displaced by L02 north of SR 518.
- L07 – Construction of employee parking garage north of SR 518.
- S01 – Fuel farm expansion (four new settling tanks and one blending tank).
- S02 – Relocation of ARFF facility for construction of T01.
- S03 – Construction of secondary ARFF facility.
- S04 – Relocation of the fuel rack from Cargo 6 to Cargo 3 for construction of T01.
- S05 – Triculator relocation to north cargo area for construction of A09.
- S06 – Relocation of deicing tanks to a northern and southern location.
- S07 – Construction of westside maintenance campus.
- S08 – Airline support building construction in north cargo for construction of T01 and A08.
- S09 – Expansion of the AMB/AFCO III building to replace displaced airline support facilities.
- S10 – Construction of centralized receiving and distribution center north of SR 518.
- Expansion of stormwater/industrial wastewater infrastructure.
- Construction of stormwater management facilities and storm drainage vaults.
- Installation of utilities (sewer, water, natural gas, fuel, and IT).
- Central mechanical plant upgrades.

Section 163 of the FAA Reauthorization Act of 2018, H. R. 302, (Public Law (P.L.) 115-254) and Section 743 of the FAA Reauthorization Act of 2024, H.R. 3935 (P.L. 118-63) limited FAA's approval authority to portions of Airport Layout Plans (ALPs) that meet certain statutorily defined criteria and prohibited the FAA from directly or indirectly regulating airport land use unless certain exceptions exist. While the Proposed Action details the Port's intended development at SEA, only some of these development components now are subject to federal approval and/or funding. However, the entire Proposed Action is analyzed in the FEA.

The airfield projects (A01-A10) would require the FAA to relocate FAA-owned equipment (including navigational and visual aids (NAVAIDs)) and associated infrastructure. These relocations would also require modifications to existing procedures. The extent of these relocations and modifications are not known at this time and would be determined during the design of the Proposed Action. The analysis in the FEA includes details that are currently known.

IV. Purpose and Need (Section 1.6 of the FEA)

The purpose and need for the Proposed Action is to accommodate 56 MAP (million annual passengers) at an optimal level of service (LOS) and projected cargo levels; provide airfield infrastructure that meets current FAA airport design standards; enhance the efficiency of the overall taxiway layout; and meet projected fuel storage demand including SAF initiatives.

The Proposed Action addresses five independent needs that affect the future ability of SEA to maintain its essential function as the primary commercial airport in the Pacific Northwest (Section 1.6.2 of the FEA). The five needs are:

1. Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS.
2. Insufficient facilities to accommodate projected cargo levels.
3. Portions of the airfield no longer meet current FAA airport design standards.
4. Inefficient / inadequate taxiway layout.
5. Lack of fuel storage to meet projected demand and the Port's SAF initiative.

Based on these needs, the purposes of the Proposed Action are to provide (Section 1.6.3 of the FEA):

1. Passenger processing facilities and gates to accommodate projected 56 MAP at an optimal LOS.
2. Cargo facilities to accommodate projected cargo demand.
3. Airfield infrastructure to meet current FAA airport design standards.
4. Improvements to enhance the efficiency of the overall taxiway layout.
5. Additional fuel storage facilities to meet projected demand and the Port's SAF initiative.

V. Agency Actions and Approvals (Section 1.4 of the FEA)

The FAA actions, determinations, and approvals necessary for the Proposed Action to proceed include:

- Unconditional approval of the ALP to depict those portions of the Proposed Action subject to FAA review and approval pursuant to 49 U.S.C. § 47107(a)(16)(B).
- Approval and construction/relocation of FAA-owned equipment and associated infrastructure as well as any resulting flight procedures updates from the relocation of navigational aids.
- Release of federal obligations to use property for non-aeronautical purposes, including any obligations under 49 U.S.C. § 47107, in accordance with FAA Order 5190.6B.
- Approval of changes to the airport certification manual pursuant to 14 CFR Part 139.
- Determination of project eligibility for Airport Improvement Program (AIP) funding and to impose Passenger Facility Charges in accordance with 49 U.S.C. §§ 47101-47144.

VI. Alternatives (Chapter 2 of the FEA)

The FEA identified and evaluated reasonable alternatives that may meet the purpose and need in accordance with NEPA and FAA Orders 1050.1F and 5050.4B. In addition, in accordance with FAA Order 1050.1F Section 6-2.1(d), the No Action alternative was carried forward as a baseline for comparison to the other action alternatives. Chapter 2 of the FEA presents the alternatives analysis.

Section 2.3 of the FEA explains the alternative evaluation process and provides the alternatives that were considered, which were derived from the SAMP process and from public input provided during the scoping process. The first level screening examined whether the alternative met the Purpose and Need. If the alternative satisfied the Purpose and Need, it moved to the second level. The second level screening evaluated which alternatives were reasonable and feasible based on a qualitative evaluation of factors related to operational impacts and cost. Alternatives that were determined to be reasonable and feasible were carried forward for detailed environmental impact analysis.

Based on the analysis of the alternatives for the individual needs, the FEA evaluated three alternatives:

Alternative 1 - No Action (Section 2.4 of the FEA):

The No Action Alternative assumes none of the federal actions or physical improvements included in the Proposed Action would occur. The No Action includes projects that have recently been constructed, or would be constructed by 2032, as part of the future base case. This includes the North Satellite Redevelopment program, International Arrivals Facility, Terminal Renovations, C Concourse Expansion, A Concourse Building Expansion, Widen Arrivals Drive project, and Runway Renumbering. These projects are independent from the Proposed Action and have received or will receive separate environmental reviews and approvals.

Alternative 2 - Proposed Action (Section 2.6 of the FEA):

Alternative 2, Proposed Action, represents a composite of Alternative 1-A (T01 and T02), Alternative 2-A (A08, C01, C02, C03, S07, S08, and S09), Alternative 3-A1 (A02), Alternative 3-B (A03 and A10), Alternative 3-C1 (A04), Alternative 4-A (A01), Alternative 4-B (A06 and A07), and Alternative 5-A (S01).

Alternative 3 - Hybrid Terminal Option (Section 2.6 of the FEA):

Alternative 3, the Hybrid Terminal Option, includes the same elements as Alternative 2: Proposed Action except for the terminal and gate location (Alternative 1-E instead of Alternative 1-A).

VII. Affected Environment (Chapter 3 of the FEA)

SEA is located primarily within the City of SeaTac in southern King County, Washington on approximately 2,800 acres of land. Cities nearest to SEA include Burien, Des Moines, Normandy Park, SeaTac, and Tukwila, as well as portions of unincorporated King County. The area around SEA has the highly developed character of a mature suburban community. Land uses directly adjacent to airport property include park land, residential, industrial, and commercial.

The General Study Area (GSA) (Exhibit 3-2 in the FEA) represents the area where reasonably foreseeable direct or indirect impacts may occur due to the implementation of the Proposed Action or alternatives. The GSA includes an area encompassing 3,692 acres (5.8 square miles). The GSA is loosely bounded by S. 140th Street to the north, 33rd Avenue S. to the east, S. 20th Street to the south, and Des Moines Way to the west. The study area for certain resources varies from the GSA. Where that occurs, the applicable study area is explained in the resource section.

The GSA and Endangered Species Act (ESA) Study Area (Figure 3-3 in the FEA) is composed primarily of developed areas (buildings and paved surfaces) with areas of vegetated habitats (managed strips adjacent to runways and taxiways, open fields and shrublands, forested areas, stormwater ponds, and wetlands). Vegetated habitats are actively managed to prevent flight corridor obstructions and wildlife hazards. Common bird species present within the GSA include waterfowl (geese and ducks), gulls, pigeons, starlings, and raptors (hawks and owls). Common animals include coyotes, mice, rabbits, racoons, beavers, and several fish species. Several ESA-listed species and designated critical habitat have the potential to occur within the ESA Study Area (Table 3-5 of the FEA).

Current activities at SEA that generate or involve the use of hazardous materials include aircraft fueling; maintenance of aircraft, GSE, motor vehicles, buildings, and Airport grounds; various Port maintenance shop operations; and construction activities. SEA is considered a federal Small Quantity Generator by the US Environmental Protection Agency (EPA) and a State of Washington Medium Quantity Generator, generating 19,891 pounds of hazardous waste in 2022. Based on a review of the WSDE's *What's in My Neighborhood* mapping tool, there have been 58 documented incidents of contamination within the GSA, of which 22 are within SEA property (Table 3-13 in the FEA). Per- and polyfluoroalkyl substances (PFAS) at SEA were primarily found in aqueous film-forming foam (AFFF), a Class B firefighting foam used to fight aviation and other chemical fires. A review of the Port's records indicates a total of 16 areas where AFFF has been deployed for an incident, used for training purposes, stored, or identified in water sampling (Sites H-59 through H-75 in Table 3-13).

SEA uses a centralized waste collection system divided between terminal and support areas and airfield areas. Municipal Solid Wastes (MSW or garbage) collected from terminal and support areas are transported to central collection sites on SEA, where MSW vendors who are under contract with the Port collect them for offsite disposal. Flight kitchens, some cargo operators, and airline maintenance hangars manage their waste separately from the Airport system. Each centralized waste collection site has at least one compactor for comingled recyclables and one compactor for garbage. Additional containers for compostable material, used cooking oil, scrap metal, construction debris, and garbage are located at various terminal loading docks and remote collection sites. Multiple service providers haul garbage, recyclables, compostable waste, and other waste from compactors, drop boxes, and dumpsters in the Port's central waste collection sites.

Stell Environmental Enterprises, Inc completed a cultural resource survey of the Area of Potential Effect (Exhibit 3-6 in the FEA) in February 2021 and documented four archaeological sites and 12 historic properties. None of the sites were determined to be eligible for listing on the National Register of Historic Places (NRHP). Fieldwork Studio LLC (Fieldwork) completed a focused reconnaissance survey in December 2023 and an evaluation of the Washington Memorial Park Cemetery in March 2024. None of the properties documented were determined to be eligible for listing on the NRHP.

The 65 DNL noise contour of the Existing (2022) Condition encompasses 8.8 total square miles within the cities of Burien, Des Moines, and SeaTac, and unincorporated King County (Exhibit 3-9 in the FEA). The 65 DNL contour extends approximately 3.4 miles to the north and 2.8 miles south of SEA and is made up of a mix of residential, commercial, and industrial land uses.

The surface transportation study focused on 108 traffic intersections where direct or indirect traffic impacts may occur due to implementation of the Action Alternatives (Exhibit 3-15 in the FEA). The study measured average vehicle delay (in seconds) and LOS at each intersection. The intersection LOS was ranked from A to F, with A representing a free flow condition, and F representing a high level of congestion. Intersection LOS results were compared to mobility standards to identify intersections that do not meet mobility standards. Of the 108 existing study intersections analyzed, 102 currently meet mobility standards (LOS).

The GSA is in King County, within the nearshore sub-watershed of Washington's Water Resource Inventory Area 9 and within the State of Washington's Coastal Zone Management Program. The GSA contains portions of the Miller Creek / Walker Creek, Gilliam Creek / Lower Green River, and Des Moines Creek drainage basins (Exhibit 3-17 in the FEA). There are 31 wetlands (approximately 68 acres), five streams, and seven ditches (tributaries) within the GSA (Exhibits 3-18 through 3-21). SEA's stormwater drainage system (SDS) and industrial wastewater system (IWS) are separate systems that operate independently of each other. The SDS collects stormwater from approximately 1,200 acres while the IWS collects stormwater from the approximately 375 acres where industrial activities are conducted, primarily in the area surrounding the Main Terminal and cargo complex. The 100-year and 500-year floodplains are associated with Miller Creek and are located west and north of Runway 16R (Exhibit 3-22 of the FEA). Several regional aquifers underlie the GSA, the shallowest of which is about 50 to 60 feet beneath ground surface near the terminal. Portions of three Well Head Protection Areas are located within the GSA. PFAS levels in the Tyee Well were found to exceed the State Action Level and this well was removed from service.

The Proposed Action would occur in an area considered in attainment for all criteria pollutants.

The following resources were determined not to be present and were not analyzed in the FEA:

- Farmlands
- Natural Area Preserves or Natural Resource Conservation Areas
- Section 6(f) funded properties
- State listed or sensitive species
- Wild and Scenic Rivers

VIII. Environmental Consequences (Chapter 4 of the FEA)

Environmental impact categories identified in FAA Orders 1050.1F and 5050.4B were evaluated in the FEA. The reasonably foreseeable environmental effects of the No Action Alternative, the Proposed Action, and the Hybrid Terminal Option are included in Chapter 4 of the FEA. Below is a summary of the findings.

A. Air Quality (Section 4.3.1 of the FEA)

SEA is in an area that is considered in attainment for all National Ambient Air Quality Standards (NAAQS). The air quality analysis included criteria air pollutants carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), particulate matter less than or equal to ten microns aerodynamic diameter (PM₁₀), and fine particulate matter less than or equal to 2.5 microns aerodynamic diameter (PM_{2.5}). Because emissions of ozone (O₃) cannot be calculated directly, volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) (precursors to O₃ formation) are used as surrogates. Lead was not included because Avgas fueling ceased at SEA in 2018 and the Proposed Action does not involve any potentially significant source of lead emissions.

Emissions of all pollutants are expected to be greater with the Future (2032 and 2037) Proposed Action and Hybrid Terminal Option than the Future (2032 and 2037) No Action due to the increased aircraft operations, taxi times, and motor vehicles. The largest increase would be to CO and NO_x. The Hybrid Terminal Option would have slightly higher construction emissions than the Proposed Action due to changes in the construction schedule but would have the same operational emissions. Based on coordination with the Puget Sound Clean Air Agency, the potential increase in criteria pollutant emissions would not be expected to create any new violation of the NAAQS.

B. Biological Resources (Section 4.3.2 of the FEA)

A Biological Evaluation (BE) was prepared to evaluate the Proposed Action's potential effects on ESA-listed species and critical habitats that potentially occur in the ESA Study Area. The FAA determined the Action Alternatives would not result in direct effects on ESA-listed species or critical habitat. Indirect effects could result from delayed consequences associated with operational treated stormwater runoff and industrial wastewater discharges generated by the Action Alternatives but would likely not adversely affect ESA-listed species (Table 4-11 of the FEA). The Action Alternatives were also evaluated for potential effects on essential fish habitat (EFH). It was determined that the Action Alternatives may affect, but are not likely to adversely affect, EFH for groundfish, coastal pelagic, and Pacific salmon species in Puget Sound and EFH for Pacific salmon species in the Duwamish River and tributaries that drain to Puget Sound from SEA. Any effect to EFH would result from delayed consequences associated with operational treated stormwater runoff and industrial wastewater discharges that are generated by the Action Alternatives.

FAA initiated Section 7 and EFH consultation with the National Marine Fisheries Service (NMFS) and the US Fish and Wildlife Service (USFWS) on June 30, 2025. NMFS responded by issuing a Biological Opinion on July 28, 2025. The USFWS responded by issuing a Biological Opinion on September 23, 2025. The Biological Opinions include information regarding the Proposed Action, species information, effects of the Proposed Action, and conservation recommendations. See Appendix D of the FEA for the BE and Biological Opinions.

Migratory birds and non-listed species may be impacted by the proposed removal of vegetation and trees. Approximately 56.4 acres of land that currently has trees, shrubs, and maintained grassy areas would be cleared for the construction of the C02, C03, L05, L07, S07, and S10. Some migratory birds and non-listed species may be displaced due to loss of habitat; however, it is likely that these species would relocate to surrounding areas providing similar habitat. For this reason, the reasonably foreseeable impacts to migratory birds and non-listed fish and wildlife species would not be significant. No impacts on bald eagles or golden eagles are anticipated, because no nests or roosting sites have been documented within the GSA.

C. Greenhouse Gas Emissions (Section 4.3.3 of the FEA)

The Action Alternatives would increase GHG emissions as compared to the No Action Alternative. The Proposed Action would increase Scope 1, 2 and 3 GHG emissions by 152,703 (2.1 percent) CO₂e MT over the No Action Alternative in 2032 and by 539,569 (7.4 percent) CO₂e MT in 2037. The Hybrid Terminal Option would increase Scope 1, 2 and 3 GHG emissions by 156,611 (2.2 percent) MT over the No Action Alternative in 2032 and by 539,569 MT (7.4 percent) in 2037. The majority of the GHG emissions increase comes from Scope 3 sources, which are not under the direct control of the Port.

D. Coastal Resources (Section 4.3.4 of the FEA)

Four of the airfield projects (A01, A02, A04, and A06) would require the FAA to relocate FAA-owned equipment (including navigational and visual aids) and associated infrastructure. Relocations of equipment would occur on the airfield. The FAA determined that the proposed FAA activities would be undertaken in a manner so as not to affect the coastal resources or uses of the Washington State Coastal Zone Management Program and submitted a Negative Determination to the Washington State Department of Ecology (WSDE) Federal Consistency Coordinator on July 2, 2024. WSDE did not have any concerns about the Negative Determination. Therefore, the Proposed Action would not result in significant effects on coastal resources.

E. Department of Transportation Act: Section 4(f) (Section 4.3.5 of the FEA)

Neither Action Alternative would result in a physical use of a Section 4(f) property. The assessment of potential constructive use impacts focused on changes in noise exposure and concluded that none of the Section 4(f) resources would experience a substantial impairment due to increases in noise from operations or construction of either Action Alternative. Therefore, the Action Alternatives would not result in significant impacts to Section 4(f) resources.

F. Hazardous Materials, Pollution Prevention, and Solid Waste (Section 4.3.6 of the FEA)

The Action Alternatives would utilize construction equipment containing hazardous substances such as oil, fuel, solvents, batteries, or other similar products. All hazardous materials used during construction would be handled, stored, and disposed of in accordance with federal, state, and local requirements.

Eleven documented incidents of hazardous materials contamination, including five potential PFAS contaminated sites, are located within the limits of disturbance of one or more elements of the Action Alternatives (Table 4-21 of the FEA). All work within an area of contamination would be conducted in accordance with the Port's Construction General Requirements for handling contaminated soil. These general requirements include utilizing an approved Contaminated Soils Management Plan identifying disposal facilities and appropriate BMPs. The Port would ensure work is conducted in accordance with all applicable regulations, including PFAS regulations, in place at the time of construction.

All material excavated from within the project area would be tested prior to disposal. Any material found to be contaminated would either be removed and disposed of in accordance with federal, state, and local requirements, encapsulated on-site to minimize any human health or environmental exposure risk, or remediated below established cleanup levels. As is standard for Port construction projects, all excavations would be monitored by a trained environmental professional for evidence of unanticipated contaminated soils under SEA's Environmental Agent Work Plan. None of the hazardous materials known to potentially be encountered are uncommon and the Port would comply with applicable rules and regulations to handle and dispose of the materials safely.

The Action Alternatives include the demolition of 12 existing buildings. Nine of these structures have the potential to contain regulated building materials including, but not limited to, asbestos-containing materials, lead paint, and mercury (commonly found in fluorescent light tubes and thermostats). Previous surveys of four of the buildings confirmed varying amounts of regulated building materials in three out of the four buildings (167A, 170A, and 170W). No regulated building materials were found in Building 161A. In addition, because most of these structures have been used for maintenance or storage of equipment, each has the potential for underground fuel lines, utility lines, or areas of subsurface contamination.

Port construction requirements require the development of a pollution prevention plan that includes an inventory/inspection of known hazardous materials in the buildings and on the site, a hazardous material cleanup and disposal plan, and a site-specific plan outlining administrative, operational, and structural BMPs that would be implemented to minimize risks and respond to any incidents should they occur. A Contractor's Safety Plan is also required by the Port to document site-specific emergency procedures and safety requirements. These requirements would avoid or minimize risks of exposure or offsite pollutant transport. Therefore, the Proposed Action would have no effect on hazardous materials and significance thresholds would not be exceeded.

Construction activities associated with the Action Alternatives would generate additional solid waste, such as construction debris, building materials, and other materials commonly associated with construction. The selected contractor would be responsible for managing and disposing of construction generated waste in accordance with a Waste Management Plan. The Port's existing Waste Diversion and Recycling Program would also apply, and the selected contractor would be expected to meet the goal of diverting at least 90 percent of construction debris from the landfill.

The additional passengers utilizing the new facilities would result in an increase in solid waste being generated. Waste generation forecasts for the Action Alternatives were based on passenger projections, historic data on waste generated per passenger, past analysis of increases in square footage of food service concessionaires, and modeling related to increases in square footage of facilities. The additional waste would not be significantly more than the No Action. There is sufficient landfill capacity to accommodate the additional solid waste. Because neither alternative would result in appreciably different quantity of waste; different methods of collection or disposal; exceedance of disposal capacity; or changes in waste diversion and recycling, no significant impacts related to solid waste would be expected.

G. Historical, Architectural, Archeological and Cultural Resources (Section 4.3.7 of the FEA)

There are no NRHP-eligible properties located within the APE. However, there is the potential to locate resources during ground disturbing activities. Therefore, FAA and the Port agreed to prepare an Inadvertent Discovery Plan for all projects, and to have an archaeological monitor on-site during ground disturbing activities for C03, S10, T02, L03, L05, L07, and the southern half of C02 given the potential to locate resources in these areas. FAA submitted a finding of No Adverse Effect to DAHP on August 3, 2021. DAHP concurred with the finding on August 30, 2021. The FAA initiated government-to-government consultation with ten Native American Tribes on July 28, 2021. Three tribes responded (two did not have comments and one requested the inclusion of an Inadvertent Discovery Plan as part of the Proposed Action).

The FAA updated the APE to include potential visual impacts from C02 and C03 and DAHP concurred with the updated APE on November 16, 2023. FAA submitted an updated finding of No Adverse Effect to DAHP on July 11, 2024, and DAHP concurred with the updated finding on July 12, 2024. The FAA submitted an updated finding of No Adverse Effect to clarify previous eligibility determinations on July 16, 2025, and DAHP concurred with the updated finding on July 21, 2025.

H. Land Use (Section 4.3.8 of the FEA)

The Action Alternatives would occur entirely on Port-owned property and would be consistent with the conditionally approved ALP. Each of the local land use plans for jurisdictions adjacent to or in the vicinity of SEA have recognized airport operations, including in some cases specifically addressing the potential for additional development of Airport property or property in the vicinity of SEA for Airport related operations. The State Growth Management Act, RCW 36.70.547, further protects airport development and operations from inconsistent or incompatible land uses being developed adjacent to the airport. Therefore, the Proposed Action would not significantly impact land uses within the study area.

I. Natural Resources and Energy Supplies (Section 4.3.9 of the FEA)

The new facilities proposed as part of the Action Alternatives would result in an increase in demand for energy and water, but that increase can be met by available supply. The Action Alternatives would address the jet fuel storage concerns, improve resiliency for emergencies as well as day-to-day operations, and would provide storage and blending infrastructure to support the Port's SAF goal to power every flight fueled at SEA with at least a ten percent blend of SAF. The increased use of SAF would reduce the demand for Jet A fuel. Anticipated increases in diesel and gasoline usage would not result in a significant impact because diesel and gasoline are not in short supply in the region.

The construction of the Action Alternatives would require the use of other natural resources such as sand, gravel, concrete, asphalt, and water, in addition to construction materials such as steel, wood, and glass. Metal wiring and plastic insulation would be used for new lighting. These construction materials are not in short supply in the Seattle-Tacoma area and construction of the Action Alternatives is unlikely to exceed the available supply of these materials.

Therefore, there would be no significant impacts to natural resources or energy supply.

J. Noise and Noise-Compatible Land Use (Section 4.3.10 of the FEA)

The 65+ DNL of the Future (2032) Action Alternatives noise exposure contour encompasses approximately 10.25 square miles, which is 0.15 square miles larger than the Future (2032) No Action noise exposure contour (Exhibit 4-2 of the FEA). The 65+ DNL contour extends approximately 3.7 miles to the north and 3.3 miles south of SEA and includes a mix of residential, commercial, and industrial land uses. The Future (2032) Action Alternatives would increase the total number of housing units by 337 and population by 824 within the 65+ DNL as compared to the Future (2032) No Action. This increase corresponds to the increase in operations between the two alternatives. The Future (2032) Action Alternatives would not increase noise by 1.5 DNL or more for a noise sensitive area at or above the 65 DNL or that would be exposed at or above the 65 DNL level due to a 1.5 dB or greater increase, when compared to the Future (2032) No Action.

The 65+ DNL of the Future (2037) Action Alternatives noise exposure contour encompasses 9.82 square miles, which is 0.66 square miles larger than the Future (2037) No Action noise exposure contour (Exhibit 4-3 of the FEA). This area is smaller than the 65+ DNL of the Future (2032) Action Alternatives due to the increase in the number of Boeing 737-7/8/9 MAX aircraft. The 65+ DNL contour extends approximately 3.7 miles to the north and 3.2 miles south of SEA and includes a mix of residential, commercial, and industrial land uses. The Future (2037) Action Alternatives would increase the total number of housing units by 1,851 and population by 4,439 within the 65+ DNL as compared to the Future (2037) No Action. The Future (2037) Action Alternatives would not increase noise by 1.5 DNL or more for a noise sensitive area at or above the 65 DNL or that would be exposed at or above the 65 DNL level due to a 1.5 dB or greater increase, when compared to the Future (2037) No Action. Therefore, no significant noise impact would occur because of implementing the Action Alternatives.

Based on a screening analysis, a detailed construction noise assessment was completed for NTPs C02 and C03 as the projects are directly adjacent to residential properties. The residential properties are located east of 24th Avenue S., west of 30th Avenue S., and south of S. 148th Street. Construction for C02 would start in 2026 (lasting approximately 18 months) and construction for C03 would start in 2028 (lasting around 16 months). The assessment determined noise from construction may occasionally exceed ambient noise levels and be noticeable to residential properties. The short-term increase in noise during construction would be temporary.

For C02, there are 13 residential properties that would experience a noticeable increase (over 3 dB) in construction noise intermittently during construction. The longest continuous duration would be

approximately 18 weeks. For C03, there are eight residential properties that would experience a noticeable increase (over 3 dB) in construction noise periodically during construction. The longest duration would be approximately 26 weeks.

Construction-related noise increases would be minimized through strict adherence to the Port's Construction General Requirements, by meeting the State of Washington and City of SeaTac requirements and utilizing BMPs. In addition, most of the residential properties adjacent to the C02 and C03 sites that would experience a noticeable temporary noise increase have received sound insulation through the Port's Sound Insulation Program which reduces the noise that enters the interior of the structure.

K. Socioeconomic and Children's Environmental Health and Safety Risks (Section 4.3.11 of the FEA)

The Action Alternatives would support long-term economic growth for the Puget Sound region and the area near SEA by providing facilities necessary to accommodate future passenger and cargo growth. The proposed Second Terminal would directly create new airline support jobs (such as ticket counter agents, gate attendants, etc.), new restaurant and retail jobs (for the new food and shopping establishments), and new jobs associated with operation and maintenance of the new facilities. Temporary growth in economic activity for local businesses would occur from the creation of construction jobs and supporting businesses. Additional indirect growth in economic activity may occur from passengers using nearby hotels, restaurants, etc. The overall effect on the economic environment of the GSA would be beneficial and no adverse impacts to economic resources are expected.

The construction and implementation of the Action Alternatives would occur on existing Port-owned property. There would be no land acquisition. Construction of C02 and C03 would likely eliminate access to 24th Avenue S. from S. 150th Street. While final design of C02 and C03 would be needed to determine if the access would be eliminated, the analysis in this EA assumed the access was eliminated to disclose the potential impacts. Drivers wanting to access 24th Avenue S. from S. 150th Street would have to utilize S. 152nd Street or S. 148th Street. This would add a maximum of 0.75 miles to the trip compared to the current access. While this would result in slightly longer drives for approximately 60 homes located along the western portion of S. 150th Street, there would be reasonable alternative routes, and this would not be considered a significant division of this community. Therefore, the Action Alternatives would not result in significant impacts related to division of communities.

Neither alternative would result in the relocation of residences. The Doug Fox Lot and PACCAR Aviation would be directly impacted by the Action Alternatives. The Doug Fox Lot, which is a parking business that leases Port-owned property, would be closed due to the proposed construction of the Second Terminal and parking garage. The Port would either not renew the lease (set to expire in June 2026) or would exercise termination rights within the lease. There are numerous other parking options near SEA for passengers to use, including the proposed parking garage. The approximately 25 Doug Fox Lot employees would likely find replacement employment with Port offered employment assistance. While this would result in the loss of revenue for the operator of the Doug Fox Lot, this is not considered a significant economic impact.

PACCAR Aviation, located off Starling Drive, has approximately 14 employees at this location to support the company's corporate aviation functions. This facility would close due to the proposed construction of the ARFF. The Port would either not renew the lease or would exercise termination rights within the lease. It is anticipated that the business and employees would relocate to another airport in the region. While this would result in the termination of the lease for PACCAR at this site, this is not considered a significant economic impact due to the scale of the operation and the ability of the employees to be relocated.

The Action Alternatives would not result in significant changes to children's health and safety risks including air, food, drinking water, recreational waters, soil, or products children may use or to which they would be

exposed. The Action Alternatives could result in non-permanent noise impacts during construction of C02 and C03. Though there are no schools in areas where construction noise impacts were identified, children living in this area may experience temporary increases in noise during construction. No significant noise impacts were identified, and there are no separate noise impact standards for children.

L. Surface Transportation (Section 4.3.12 of the FEA)

The surface transportation study evaluated 114 intersections within the Surface Transportation Study Area for the No Action and 111 intersections for the Action Alternatives to identify roadway intersections that would fail to meet local and agency mobility standards in 2032 and 2037. The analysis assumed the SR 509 Phase 2 extension and transportation and infrastructure projects would be constructed by 2032.

The intersections were sorted into one of four categories depending on the results of the analysis:

- Category 1: Intersection has a LOS deficiency because of additional trips added by the Action Alternatives. Four intersections in 2032 and eight intersections in 2037.
- Category 2: Intersection has a LOS deficiency in No Action and delay increases due to trips generated by the Action Alternatives. Eleven intersections in 2032 and 18 intersections in 2037.
- Category 3: Intersection meets the mobility standard in both No Action and Action Alternatives, but Action Alternatives add delay. Sixty-three intersections in 2032 and 54 intersections in 2037.
- Category 4: Intersection delay improves or does not change with the Action Alternatives. Thirty-eight intersections in 2032 and 36 intersections in 2037.

Category 1 intersections are considered significant impacts. With the proposed mitigation, none of the impacted intersections would have a significant impact. Based on meetings and coordination with the local jurisdictions, the proposed mitigation for Category 1 intersections is shown in Table 4-36 of the FEA and the proposed mitigation for Category 2 intersections is shown in Table 4-37. In addition, mitigation for Category 3 intersections in the City of SeaTac will be provided in accordance with the ILA between the City of SeaTac and the Port. The Port and the local jurisdictions are in the process of formalizing the mitigation commitments in a MOU with each of the jurisdictions. More details on each intersection, improvements recommended and coordination with the local jurisdictions can be found in Appendix L of the FEA.

M. Visual Effects (Section 4.3.13 of the FEA)

The Port's Interlocal Agreement (ILA) with the City of SeaTac regulates land uses differently based on whether the land is within the Airport Activity Area (AAA); within the AAA but adjacent to public right-of-way, public property owned by another agency, or privately owned property (Edge Properties); or outside the AAA. Each category has its own specific requirements related to lighting and visual screening.

The Action Alternatives include new sources of light emissions from the illumination of new buildings and parking areas. Most of the projects would be built inside the AAA and would not be distinguishable from the ambient lighting. NTPs L01, L02, L03, L04, S07, S08, and T02 would be on Edge Properties. The changes in light intensity caused by these elements on Edge Properties within and adjacent to the AAA (Table 4-38 of the FEA) would not have significant impacts. NTPs C02, C03, L05, L07, and S10 would be located on Port-owned property that is outside of the AAA and would be subject to measures within the ILA and City of SeaTac Municipal Code. Changes in light intensity caused by the Action Alternatives would not be considered significant.

The Action Alternatives would include new Airport related development that would affect the viewshed by adding new visual features. Most of the Action Alternatives would occur within the AAA. In those locations, the intensity of this existing land use is such that many of the proposed visual elements of the Action Alternatives would be consistent with the visual character and would not significantly alter the visual setting. Some of the elements would be located on Edge Properties (L01, L02, L03, L04, S07, S08, and T02), with potential to affect adjacent properties (Table 4-40 of the FEA). The impacts from these new elements would be isolated and limited to views from certain angles or vantage points. Certain elements of the Action Alternatives would be located on Port-owned property that is outside of the AAA (C02, C03, L05, L07, and S10). Development in these areas would be subject to measures within the ILA and City of SeaTac Municipal Code. No significant changes to the visual character of the area, noticeable contrasts with existing visual character, or obstructions of important visual resources are expected to occur because of any of these elements of the Action Alternatives.

N. Water Resources (Section 4.3.14 of the FEA)

Wetlands (Section 4.3.14.2 of the FEA)

The Action Alternatives would permanently impact up to 0.79 acres of jurisdictional wetlands and 2.66 acres of wetland buffers (Tables 4-42 and 4-43 of the FEA). Avoidance and minimization of wetlands impacts were incorporated to the extent possible for the Proposed Action. The Airport Sponsor will obtain a U.S. Army Corps of Engineers Section 404 permit for the wetland impacts. As required for the Section 404 permit, the Airport Sponsor will develop and implement a mitigation plan to compensate for all unavoidable wetland and wetland buffer impacts and obtain all applicable permits prior to construction.

The Action Alternatives would result in temporary construction impacts where wetland and wetland buffers would be affected by clearing and ground disturbing work during construction activities. These areas would be revegetated following construction and restored to their pre-construction condition. Temporary construction impacts would total 0.21 acres of wetlands and 3.43 acres of wetland buffers.

No significant wetland impacts would occur with the Action Alternatives.

Surface Waters (Section 4.3.14.3 of the FEA)

The Action Alternatives would permanently impact a total of 0.01 acres of streams and 0.01 acres of potentially jurisdictional ditches. The ditches are considered potentially jurisdictional based on the duration of flow and the fact that they discharge to receiving waters that are under jurisdiction of the USACE. The stream impacts would be associated with a crossing of Miller Creek for an access road for the Westside Maintenance Campus. The Action Alternatives would also result in permanent stream buffer impacts totaling 0.12 acre.

Temporary stream impacts include 0.07 acres to the East Fork Des Moines Creek resulting from construction activities associated with S01. Additionally, construction of the access road for S07 would temporarily impact 0.01 acres of Miller Creek. The Action Alternatives would also result in temporary stream buffer impacts totaling 0.20 acres. These impacts are not considered significant and would only occur during certain construction-related activities. These areas would be returned to their pre-construction condition after construction activities have been completed.

The Action Alternatives would add new impervious areas and replace existing impervious surfaces. The addition of impervious surfaces would be partially offset by the demolition of select impervious surfaces. Overall, the total impervious area at SEA would increase by a net additional 71 acres, of which 50 acres are pollutant-generating impervious surface (a 5.4% increase in pollutant-generating impervious surface area).

The Action Alternatives include improvements to and expansion of the Stormwater Drainage System and Industrial Wastewater System to provide the additional detention and treatment capacity needed to

support NTP development. All new pollutant generating impervious surfaces would be treated prior to draining to the Puget Sound via Miller, Walker, or Des Moines creeks or the IWTP discharge. With the planned measures previously described in place, the Proposed Action would not result in significant impacts to surface waters, nor would it result in an exceedance of water quality standards or contamination of public drinking water supply.

Floodplains (Section 4.3.14.4 of the FEA)

The Action Alternatives would not directly impact any floodplains or adversely affect any beneficial floodplain values. Two of the NTPs, L07 and S10, are near floodplains but would not extend into the adjacent 100- or 500-year floodplain areas. The S. 157th Place access road included as part of the Westside Maintenance Project (S07) includes replacing a culvert and paving within a 100- and 500-year floodplain. The culvert would be designed to maintain the conveyance and storage capacity of the existing floodplain. Therefore, the Proposed Action would not result in significant impacts to the floodplain because they would not result in (1) a considerable probability of loss of human life, (2) likely future damage associated with the encroachment that could be substantial in cost or extent, or (3) a notable adverse impact on the floodplain's natural and beneficial floodplain values.

Groundwater (Section 4.3.14.5 of the FEA)

Groundwater resources include Wellhead Protection Areas (WHPA) and regional aquifers. The Action Alternatives would result in permanent impacts to 43.6 acres and temporary impacts to 2.34 acres within the WHPA for Riverton Heights #1 and Riverton Heights #2. These impacts would be associated primarily with C02, C03, L05, and utility line connections. Note that these two wells are adjacent to each other, and the protection areas almost completely overlap. The impact calculation considers each wellhead protection area separately; thus, the impact is essentially counted twice. The Action Alternatives would permanently impact 6.25 acres and temporarily impact 5.21 acres of the wellhead protection area for Tyee Well AFR835. Operations at this wellhead were voluntarily suspended due to samples exceeding the Washington Department of Health State Action Levels for PFAS. The Action Alternatives would permanently impact 2.24 acres of the wellhead protection area associated with the McMicken Heights well east of the Airport due to a utility line connection.

A Phase 1 Groundwater Study completed in July 2008 determined that groundwater contamination at SEA does not threaten groundwater quality outside of the Aircraft Operations and Maintenance Area (AOMA). This was confirmed through groundwater sampling events from 2011 through 2015. The groundwater sampling delineated the downgradient extents of the modelled contaminant plumes (which were smaller than predicted by the model) and confirmed that the contaminants in the plumes will not impact potential local receptors (surface water bodies or drinking water supply wells), nor extend beyond the AOMA. This is due to the geology, hydrogeology, and hydrostratigraphy of the area. The Action Alternatives are not located within a Critical Aquifer Recharge Area.

Construction and operation of the Proposed Action would abide by all applicable regulations related to spill prevention and control regulations to prevent spills from causing significant adverse impacts on groundwater. These regulations also specify required cleanup/mitigation actions should a spill occur. To document that construction actions have not impacted groundwater quality within or downgradient of the work area, the Port will monitor groundwater during and following completion of construction. Therefore, no significant impacts to groundwater are anticipated.

Because the Proposed Action would not cause impacts to groundwater that would exceed applicable groundwater quality standards, and because the Proposed Action would not contaminate an aquifer used for public water supply, no significant impacts are anticipated.

IX. Mitigation (Chapter 4 of the FEA)

The Port has committed to the following mitigation measures as part of the Proposed Action:

- Complete mitigation for Category 1, Category 2, and Category 3 intersections in accordance with each jurisdiction's applicable regulations, design standards, or agreement in place at the time of construction. Category 3 mitigation is limited to the City of SeaTac based on coordination with WSDOT, Burien, Des Moines, City of SeaTac, and Tukwila.

ID	Intersection	Category	Jurisdiction	Proposed Mitigation	Future LOS with Mitigation
98	Des Moines Memorial Dr. at S. 168 th St.	Category #1	City of Burien	Construct new signal, provide dedicated WB left turn lane, & provide shared WB through/right turn lane. Westside Trail will be maintained/improved with no change in access.	A / B
14	Des Moines Mem. Dr. at S. 144 th St.	Category #1	City of SeaTac	Widen east leg to provide a WB left turn lane, widen south leg to provide a NB right turn lane, & modify traffic signal. Westside Trail will be replaced/improved with no change in access.	D / D
17	24 th Ave. S. at S. 146 th St.	Category #1	City of SeaTac	Install signal & add leading protected NB left turn phase.	B / B
48	8 th Ave. S. at S. 156 th St.	Category #1	City of SeaTac	Shift SB lanes west to add dedicated SB left & right turn lanes, add dedicated NB left turn lane, & modify signal timing with protected left turns for all approaches. Westside Trail will be replaced/improved with no change in access.	D / E
96	16 th Ave. S. at S. 144 th St.	Category #1	City of SeaTac	Construct an eastbound right turn lane.	C / C
102	S. 152 nd St. at Des Moines Mem Dr S.	Category #1	City of SeaTac	Construct single leg roundabout to consolidate Intersections 100, 101, & 102. Westside Trail will be maintained/improved with no change in access	A / A
24	SR 518 WB Off-ramp at Des Moines Mem. Dr	Category #1	WSDOT	Construct single leg roundabout where WB approach would be converted to a left turn lane & yield right turn lane. Westside Trail will be replaced/improved with no change in access.	A / A
42	SR 518 EB Off-ramp & 51 st Ave. S.	Category #1	WSDOT	Mitigation not required - WSDOT	N/A
83	Military Rd. S. at SB I-5 Ramps at S. 200 th St	Category #1	WSDOT	Mitigation not required - WSDOT	N/A
86	Military Rd. S. at NB I-5 Ramps	Category #1	WSDOT	Mitigation not required - WSDOT	N/A
49	1 st Ave S. at SW 160 th St.	Category #2	City of Burien	Pay proportionate share of corridor improvement (Project #22 on Burien's TIP) costs equal to percentage of total trips by NTPs in 2037 (1%).	N/A
ID	Intersection	Category	Jurisdiction	Proposed Mitigation	Future LOS with Mitigation

89	Pacific Hwy S. at S. 216 th St	Category #2	City of Des Moines	See intersection #93	N/A
93	Pacific Hwy S. at SR 516	Category #2	City of Des Moines	Pay proportionate share for delay added by NTP trips based on the total number of PM peak hour trips added & City's traffic impact fee schedule.	N/A
54	Host Rd. at S. 160 th St/SR 518 EB On-ramp	Category #2	City of SeaTac	Construct a signal.	A / A
101	8 th Ave S. at Des Moines Mem Dr	Category #2	City of SeaTac	See Intersection #102	A / A
105	34 th Ave S. at S. 160 th St	Category #2	City of SeaTac	Construct a roundabout.	A / A
106	Military Rd S. at S. 164th St at 42nd Ave S	Category #2	City of SeaTac	Pay proportionate share of roundabout construction costs equal to percentage of total intersection trips generated by NTPs in 2037 (4%). Constructed costs based on project costs identified for Project ST 116 in the City of SeaTac's Transportation Master Plan.	N/A
107	34th Ave S. at S. 170th Street	Category #2	City of SeaTac	Pay proportionate share of corridor improvement costs equal to percentage of total intersection trips generated by NTPs in 2037 (1%). Constructed costs based on project costs identified for Project ST 016 in the City of SeaTac's TIP.	N/A
109	Military Rd S. at S. 216th Street	Category #2	City of SeaTac	Pay proportionate share of channelization improvement costs equal to percentage of total intersection trips generated by NTPs in 2037 (2%). Constructed costs based on costs identified for Project ST 140 in the City of SeaTac's TIP	N/A
21	SR 509 SB Ramps at SW 148th St	Category #2	WSDOT	Mitigation not required - WSDOT	N/A
23	SR 518 EB Ramps and Des Moines Mem Dr	Category #2	WSDOT	Construct roundabout & accommodate West Side Trail connection along east side of Des Moines Memorial Dr S. The Westside Trail will be replaced/ improved with no change in access.	A / A
28	SR 518 EB Off-Ramp at S 154th St	Category #2	WSDOT	Mitigation not required - WSDOT	N/A
33	SR 518 WB Ramp at S. 154th St	Category #2	WSDOT	Construct a signal.	C / C
37	International Blvd at S. 154th St	Category #2	WSDOT	Mitigation not required - WSDOT	N/A
78	NB I-5 Ramps at S. 188th St	Category #2	WSDOT	Mitigation not required - WSDOT	N/A
94	SB I-5 Ramps at SR 516	Category #2	WSDOT	Mitigation not required - WSDOT	N/A

- Minimizing take associated with water quality degradation in Puget Sound from stormwater and wastewater discharges as described in the proposed action.
- Ensuring the project does not exceed the design specifications and creates no more than 51 acres of PGIS, unless otherwise coordinated with FAA, NMFS West Coast Region, and USFWS. The Port will be responsible for tracking development of the Proposed Action and amount of PGIS and notify the FAA if the Proposed Action will exceed 51 net acres of PGIS (for those projects that the FAA has authority over) prior to construction of the excess PGIS. The FAA will be responsible for coordinating with NMFS and/or USFWS if the PGIS exceeds 51 net acres.
- Providing the FAA with an as-built report including the total acres of PGIS within 30 days following project completion. The FAA will be responsible for coordinating the report with NMFS and USFWS. The FAA shall provide an as-built report including the total area of PGIS to NMFS within 90 days following project completion. This report should be sent to projectreports.wcr@noaa.gov including "Attn: WCRO-2025-01881" within the subject line.
- Carrying out the operation and maintenance plans described in the *Seattle-Tacoma International Airport Stormwater Pollution Prevention Plan* (Port of Seattle 2022 or most recent) to ensure that facilities or systems that are used to manage stormwater and wastewater at SEA are properly operated and maintained. The Port shall maintain records of inspection and maintenance to document compliance with the standards provided in the *Seattle-Tacoma International Airport Stormwater Pollution Prevention Plan* (Port of Seattle 2022 or most recent). Records do not need to be provided to NMFS unless requested.
- The Port will submit reports to the FAA and the USFWS each biennium, or as agreed to and documented, for the record. Each report shall document the most recently implemented NTPs (and SDS or IWS improvements) and shall include a quantification of associated new and replaced PGIS. Reports shall be submitted to the Washington Fish and Wildlife Office in Lacey, Washington (WashingtonFWO@fws.gov) and copied to the Assistant Field Supervisor or assigned lead consultation biologist by December 31 of each year that activities are completed.
- Utilizing Best Management Practices (BMPs) to limit impacts during construction. This includes, but is not limited to, utilizing BMPs to minimize surface transportation impacts, protect against sediment and soils entering nearby streams or creeks, reduce construction noise, and minimize increases in air emissions and water usage.
- Implementing strategies outlined in their April 2024 Land Stewardship Plan.
- Having a qualified biologist conduct a pre-construction nest survey 7-10 days before the start of construction and adhering to King County development standards for migratory birds. If nests are found, the USFWS' Nationwide Standard Conservation Measures will be used to develop BMPs.
- Adhering to the applicable FAA Advisory Circulars, including, but not limited to, FAA AC 150/5370-10, *Standard Specifications for Construction of Airports* and FAA AC 150/5200-33, *Hazardous Wildlife Attractants on or Near Airports*.
- Monitoring contaminant levels in groundwater during and following completion of construction.
- Developing and implementing an Inadvertent Discovery Plan during construction.
- Having an archaeological monitor on-site during ground disturbing activities for projects in C03, S10, T02, L03, L05, L07, and the southern half of C02.
 - The archaeological monitor shall work with the FAA and the Port to develop an archaeological monitoring scope and plan at least 60 days prior to construction.

- The archaeological monitor shall provide all monitoring logs, photos, a summary of activities monitored and dates, and a synthesis of any background research that directly addresses the question of prior disturbance in the area to the FAA and the Port within 30 days following the completion of monitoring.
- Developing a compensatory wetland mitigation plan to avoid and minimize wetland impacts.
- Designing the S. 157th Place access road and culvert replacement as part of S07 to maintain the conveyance and storage capacity of the existing floodplain.
- Obtaining all applicable permits prior to construction, including, but not limited to, a USACE Section 404 permit for discharge of dredged or fill material into waters of the US as well as a NPDES permit.
- Ensuring no vehicle or material storage occurs in wetland areas or other sensitive areas.
- Handling, storing, and disposing of hazardous materials in accordance with applicable federal, state and/or local regulations.

X. Public Involvement (Appendix O of the FEA)

The Scoping period opened on July 30, 2018 and lasted for 60 days, closing on September 28, 2018. The Port and the FAA advertised the Scoping period through newspaper advertisements, direct mail, and social media in five languages (English, Somali, Spanish, Vietnamese, and Arabic). The Port held an Agency Scoping Meeting and four Public Scoping Meetings during the 60-day Scoping period. The Scoping Report, comments submitted, and other details can be found in Appendix N of the FEA.

The Draft EA was released for agency and public review on October 21st, 2024, and comments were accepted through December 13th, 2024. The FAA initially planned to circulate the draft EA for a 30-day public comment period upon release on October 21, 2024, but extended the comment period to 45-days prior to the release of the draft EA at the request of the Port based on the complexity of the analysis. On November 8, 2024, the FAA then extended the comment period to Friday, December 13th after taking into consideration community interest and the placement of Thanksgiving within the comment period. Notice of this extension was provided at the public meetings, posted on the project website, and provided to the people who requested the extension. To facilitate comments, four public meetings were held in the Cities of Federal Way, Des Moines, SeaTac, and Burien, Washington. Comments could be submitted in writing (either at a public meeting or by mail), orally to a stenographer at the public meetings, and/or electronically (either by email or through the project website).

The Airport Sponsor received a total of 595 comment submissions on the Draft EA. The FAA and the Port considered and addressed each individual comment provided; however, individual responses are not required as part of the EA process. A copy of the comments and responses to those comments are provided in Appendix O of the FEA.

Several sections of the FEA were updated from the Draft EA in response to comments received and regulatory changes. The revisions are listed in **Table A** of the FEA.

XI. Agency Findings

The FAA makes the following determinations for the Proposed Action based upon a careful review of the attached FEA, comments on the Draft EA, and appropriate supporting information.

The following determinations are prescribed by the statutory provisions set forth in the Airport and Airway Improvement Act of 1982, as codified in 49 USC §47106 and 47107.

i. The project is reasonably consistent with existing plans of public agencies responsible for development of the area surrounding the airport (49 USC §47106(a)(1)).

The determination prescribed by this statutory provision is a precondition to agency approval of project grant funding applications. Construction of the Proposed Action would occur entirely on Airport property and would be consistent with the plans, goals and policies for the area, including the Port and City of SeaTac ILA, City of SeaTac Comprehensive Plan, Des Moines Comprehensive Plan, the Burien Plan, Tukwila Comprehensive Plan, and the Puget Sound Regional Council Vision 2050 (Appendix H of the FEA).

Title 36, Chapter 36.70.547 of the Revised Code of Washington requires every county, city, and town in which a general aviation airport is located, that is operated for the benefit of the public, through its comprehensive plan and development regulations, to discourage the siting of incompatible uses adjacent to such general aviation airport. Thus, local plans and land use regulations have been developed by adjacent jurisdictions to discourage uses incompatible with Airport operations.

ii. The interests of the community in or near which the project may be located have been given fair consideration (49 USC §47106(b)(2)).

The determination prescribed by this statutory provision is a precondition to agency approval of airport development project grant funding applications. The Draft EA was released for agency and public review on October 21st, 2024, and comments were accepted through December 13th, 2024. The FAA initially planned to circulate the draft EA for a 30-day public comment period upon release on October 21, 2024, but extended the comment period to 45-days prior to the release of the draft EA at the request of the Port based on the complexity of the analysis. On November 8, 2024, the FAA then extended the comment period to Friday, December 13th after taking into consideration community interest and the placement of Thanksgiving within the comment period. Notice of this extension was provided at the public meetings, posted on the project website, and provided to the people who requested the extension. To facilitate comments, four public meetings were held in the Cities of Federal Way, Des Moines, SeaTac, and Burien, Washington. Comments could be submitted in writing (either at a public meeting or by mail), orally to a stenographer at the public meetings, and/or electronically by email or through the project website. The Airport Sponsor received a total of 595 comment submissions on the Draft EA. The FAA and the Port considered and addressed each individual comment provided.

iii. The airport sponsor has taken, or will take, actions to restrict land use in the airport vicinity, including adoption of zoning laws, to ensure the uses are compatible with airport operations (49 USC §47107(a)(10)).

The determination prescribed by this statutory provision is a precondition to agency approval of airport development project grant funding applications. As a recipient of AIP funding, the Airport Sponsor has signed grant assurances that require them to take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to, or in the immediate vicinity of, the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft. The most current land uses and zoning designations of the surrounding jurisdictions were

obtained for analysis. The land use analysis considered existing and future land use plans within and surrounding the Airport and evaluated the Proposed Action to determine whether it would be compatible with land use guidelines as well as local noise ordinances within the County.

iv. Determination that the airport development is reasonably necessary for the use in air commerce or in the interests of national defense pursuant to (49 USC § 44502(b)).

The FAA has determined that implementation of the Proposed Action would maintain the safety, utility, and efficiency of SEA. Implementation of the Proposed Action, as described below, would enhance safety at the Airport by meeting FAA Airport Design Standards consistent with the FAA Advisory Circular 150/5300-13B, Change 1, Airport Design, and the FAA's regulations described in, 14 CFR Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace.

XII. Decision and Order

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action, namely the Proposed Action, is consistent with existing national environmental policies and objectives as set forth in Section 101 (a) of NEPA and other applicable environmental requirements and is not a major federal action significantly affecting the quality of the human environment or otherwise, including any condition requiring consultation pursuant to Section 102(2)(c) of NEPA. As a result, FAA will not prepare an Environmental Impact Statement.

This decision does not constitute a commitment of funds under the Airport Improvement Program (AIP); however, it does fulfill the environmental prerequisites to approve applications for grants of AIP funds for the Proposed Action in the future. (49 USC § 47101)

Accordingly, under the authority delegated to me by the Administrator of the FAA, I approve and direct that agency action be taken to carry out implementation of the Proposed Action.

 Digitally signed by ALETA
BEST
Date: 2025.09.24 07:41:15
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Aleta Best
Acting Regional Administrator
Northwest Mountain Region (ANM)

Right of Appeal

This FONSI/ROD constitutes a final order of the FAA Administrator and is subject to the exclusive judicial review under 49 USC § 46110 by the US Circuit Court of Appeals for the District of Columbia or the US Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate US Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 USC § 46110.