



AGENDA
AIRPORT ADVISORY COMMITTEE
City Council Chambers
Monday, November 10, 2025 - 4:00 PM

CALL TO ORDER

AGENDA

Item 1. APPROVAL OF THE OCTOBER 13, 2025 AIRPORT COMMITTEE MEETING MINUTES

[CityCouncil_AirportAdvisoryCommittee_Minutes_10_13_25](#)

Item 2. STEVE EDMISTON - Q & A

[Steve Edmiston - Q & A Handout \(1\)](#)

[Steve Edmiston - Q & A Handout \(2\)](#)

[Steve Edmiston - Q & A Handout \(3\)](#)

[Steve Edmiston - Q & A Handout \(4\)](#)

[Steve Edmiston - Q & A Handout \(5\)](#)

[Steve Edmiston - Q & A Handout \(6\)](#)

Item 3. StART MEETING UPDATE

[StART Meeting Update Handout](#)

Item 4. SAMP UPDATE

Item 5. COMPLAINTS/COMMUNICATIONS

ADJOURNMENT

MINUTES

**DES MOINES CITY COUNCIL
AIRPORT ADVISORY COMMITTEE
City Council Chambers
VIA ZOOM**

Monday, October 13, 2025 - 4:00 PM

CALL TO ORDER

Committee Chair Joe Dusenbury called the meeting to order at 3:59 p.m.

ROLL CALL

Committee Present:

Joe Dusenbury; Steve Reagin; Barton DeLacy; and Jeffrey Bogen

Staff Present:

Community Development Director Rebecca Deming and Administrative Coordinator Laura Hopp

Staff Via Zoom:

Senior Planner Jason Woycke

AGENDA

Item 1: APPROVAL OF THE SEPTEMBER 8, 2025 AIRPORT COMMITTEE MEETING MINUTES

Direction/Action

Motion: made by Barton DeLacy to approve the September 8, 2025 Airport Committee Meeting Minutes; seconded by Jeffrey Bogen. Motion passed 4-0.

Item 2: START REPRESENTATIVE APPOINTMENT

Direction/Action

Motion: made by Barton DeLacy to reappoint Joe Dusenbury as the StART Representative; seconded by Steve Reagin. Motion passed 4-0.

DISCUSSION TOPICS

Airport Advisory Committee Minutes
October 13, 2025

NEW BUSINESS

- Citizens' Complaints/Emails to the Committee
- The Committee discussed reviewing the complaints that were received over the month at the next Airport Advisory Committee Meeting.
- SAMP Update
- Community Development Director Rebecca Deming gave an update to the Committee on the Sustainable Airport Master Plan (SAMP)

Direction/Action

Motion: made by Barton DeLacy to have the Airport Advisory Committee recommend adding legal services to the existing Interlocal Agreement; seconded by Steve Reagin.
Motion passed 4-0.

OLD BUSINESS

- Information Sharing and Distribution
- Committee Goals

ADJOURNMENT

The meeting adjourned at 4:50 p.m.

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The Honorable Richard A. Jones

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, *et al.*,

Plaintiff,

v.

The UNITED STATES DEPARTMENT
OF THE NAVY, *et al.*,

Defendants.¹

NO. 2:19-cv-01059-RAJ-JRC

WASHINGTON'S MOTION FOR
SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR
AUGUST 3, 2021

¹ In accordance with Federal Rule of Civil Procedure 25(d), Washington substitutes Secretary of Defense Lloyd J. Austin III for former Secretary of Defense Mark T. Esper, Acting Secretary of the Navy Thomas W. Harker for former Secretary of the Navy Richard V. Spencer, and Todd Schafer as Acting Assistant Secretary of the Navy (Energy, Installations and Environment) for former Acting Secretary Todd C. Mellon.

WASHINGTON'S MOTION FOR SUMMARY
JUDGMENT -- NO. 2:19-CV-01059-RAJ-JRC

ATTORNEY GENERAL OF WASHINGTON
Environmental Protection Division
800 Fifth Avenue STE 2000
Seattle, WA 98104
(206) 464-7744

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15	Public Health Impacts	10
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17	a. The Navy did not adequately analyze impacts to child learning	12
18	b. The Navy did not adequately analyze non-auditory public health	
19	impacts.....	14
20	c. The Navy’s failure to obtain information about health impacts	
21	violates 40 C.F.R. § 1502.22	19
22	3. The Navy Failed to Take a “Hard Look” at Bird Impacts	22
23	a. The Navy did not analyze species-specific impacts to birds, despite	
24	recognizing that bird species respond differently to noise	23
25	b. The Navy irrationally concluded that increased Growler flights will	
26	not significantly impact birds, despite record evidence to the	
	contrary	25
	B. The Navy’s Section 106 Determination Violated the NHPA and the APA	
	Because It Failed to Rationally Explain Its Mitigation Measures	30
	1. The NHPA Requires Agencies to Consider Meaningful Mitigation	
	Measures and to Rationally Explain Its Decisions.....	30

1 important aspect of the problem, offered an explanation for its decision that runs counter to the
2 evidence before the agency, or is so implausible that it could not be ascribed to a difference in
3 view or the product of agency expertise.” *Greater Yellowstone Coal., Inc. v. Servheen*, 665
4 F.3d 1015, 1023 (9th Cir. 2011) (quoting *Motor Vehicle Mfrs. Ass’n v. State Farm Mut. Auto.*
5 *Ins. Co.*, 463 U.S. 29, 43 (1983) [hereinafter *State Farm*]). In short, “the agency must examine
6 the relevant data and articulate a satisfactory explanation for its action including a ‘rational
7 connection between the facts found and the choice made.’” *State Farm*, 463 U.S. at 43
8 (quoting *Burlington Truck Lines v. United States*, 371 U.S. 156, 168 (1962)). Although courts
9 “typically accord significant deference to an agency’s decisions that require a high level of
10 technical expertise . . . such deference applies only when the agency is making predictions
11 within its area of special expertise.” *Ctr. for Biological Diversity v. Bernhardt*, 982 F.3d 723,
12 740 (9th Cir. 2020) (internal citations omitted) (declining to defer to agency decision that fell
13 outside the agency’s scope of expertise).

14 IV. ARGUMENT

15 A. The Navy’s Failure to Take a “Hard Look” at Public Health and Bird Impacts 16 Violates NEPA

17 The Navy conducted a deficient, arbitrary, and unlawful review of public health and
18 bird impacts from the Navy’s increased Growler operations in violation of NEPA. Each of
19 these defects renders the Navy’s Final EIS and Record of Decision unlawful.

20 1. NEPA Requires a “Hard Look” at Environmental Impacts, including Public 21 Health Impacts

22 NEPA “is our basic national charter for protection of the environment.” 40 C.F.R.
23 § 1500.1.² “NEPA requires a federal agency ‘to the fullest extent possible,’ to prepare ‘a

24 _____
25 ² The Council on Environmental Quality (CEQ) revised its regulations implementing NEPA effective
26 September 14, 2020. Update to the Regulations Implementing the Procedural Provisions of the National
Environmental Policy Act, 85 Fed. Reg. 43,304 (July 16, 2020) (codified at 40 C.F.R. pt. 1500). CEQ’s prior
regulations, promulgated in 1978 with minor amendments in 1986 and 2005, govern Defendants’ Record of
Decision and Final EIS, and all regulatory references in this complaint are to those prior regulations.

1 detailed statement on . . . the environmental impact’ of ‘major Federal actions significantly
2 affecting the quality of the human environment.’” *Ctr. for Biological Diversity v. Nat’l*
3 *Highway Traffic Safety Admin.*, 538 F.3d 1172, 1185 (9th Cir. 2008) (quoting 42 U.S.C.
4 § 4332(2)(C)(i)). In other words, agencies must “consider every significant aspect of the
5 environmental impact of a proposed action and inform the public that it has indeed considered
6 environmental concerns in its decisionmaking process.” *Pit River Tribe*, 469 F.3d at 781
7 (quoting *Earth Island Inst. v. U.S. Forest Serv.*, 442 F.3d 1147, 1153–54 (9th Cir. 2006)); see
8 also 40 C.F.R. § 1500.1(c). “NEPA’s requirements are to be strictly interpreted to the fullest
9 extent possible in accord with the policies embodied in the Act.” *Ctr. for Biological Diversity*,
10 982 F.3d at 734 (internal quotations omitted). “There is no ‘national defense’ exception to
11 NEPA.” *No GWEN All. of Lane Cty., Inc. v. Aldridge*, 855 F.2d 1380, 1384 (9th Cir. 1988).
12 Rather, the Navy, like every other federal agency, must comply fully with NEPA’s procedural
13 mandates even where the action implicates national security. *Concerned About Trident v.*
14 *Rumsfeld*, 555 F.2d 817, 823 (D.C. Cir. 1976), as amended (1977).

15 “The EIS is the linchpin of NEPA’s procedural requirements.” *Ctr. for Biological*
16 *Diversity*, 982 F.3d at 734. To be adequate, an EIS must take a “‘hard look’ at the potential
17 environmental consequences of the proposed action.” *N. Plains Res. Council, Inc. v. Surface*
18 *Transp. Bd.*, 668 F.3d 1067, 1075 (9th Cir. 2011) (quotations and alterations omitted). As part
19 of this “hard look,” an EIS “shall provide a full and fair discussion of significant environmental
20 impacts” that is “supported by evidence that the agency has made the necessary environmental
21 analyses.” 40 C.F.R. § 1502.1. “Agencies [must] insure the . . . scientific integrity[] of the
22 discussions and analyses in environmental impact statements,” *Idaho Wool Growers Ass’n v.*
23 *Vilsack*, 816 F.3d 1095, 1107 (9th Cir. 2016) (quoting 40 C.F.R. § 1502.24), and ensure that
24 EISs “contain high-quality information and accurate scientific analysis.” *id.* (quoting *Lands*

25 _____
26 Implementation of Procedural Provisions, 43 Fed. Reg. 55,978 (Nov. 29, 1978); Incomplete or Unavailable
Information, 51 Fed. Reg. 15,618 (Apr. 25, 1986); Other Requirements of NEPA, 70 Fed. Reg. 41,148 (July 18,
2005).

1 *Council v. Powell*, 395 F.3d 1019, 1031 (9th Cir. 2005)). In addition, agencies must provide
2 “up-front disclosures of relevant shortcomings in the data or models.” *Id.* If relevant data is
3 incomplete or unavailable, the EIS “must disclose this fact.” *Lands Council*, 395 F.3d at 1031
4 (citing 40 C.F.R. § 1502.22).

5 **2. The Navy Did Not Take a “Hard Look” at Public Health Impacts**

6 The Navy’s review of public health impacts from its increased Growler operations
7 violates NEPA’s requirement that agencies thoroughly analyze the human health impacts of its
8 Growler expansion. *See* 42 U.S.C. §§ 4331, 4332. The Navy’s analysis is flawed in three key
9 respects: (a) the Navy did not adequately analyze impacts to child learning and cognition; (b)
10 the Navy relied on an unreasonably high standard to review and dismiss non-auditory public
11 health impacts; and (c) the Navy did not comply with its obligation to either obtain unavailable
12 information or explain why it could not do so under 40 C.F.R. § 1502.22.

13 **a. The Navy did not adequately analyze impacts to child learning**

14 The Navy failed to adequately analyze impacts to child cognitive development and
15 learning from increased noise exposure and classroom interference. Although the Navy
16 acknowledged that children would experience increased noise exposure and classroom noise
17 interference, the Navy did not determine how that increased noise interference would impact
18 cognitive learning of schoolchildren in the action area, particularly those who are already
19 scholastically challenged. *See* GRR150336–37; GRR159320–22. In short, the Navy failed to
20 analyze the effect its Growler operations would have on cognitive development and learning.

21 The Navy’s Growler operations will repeatedly expose school children to noise
22 disruption. The Final EIS estimated that classroom interference at several schools will increase
23 by “up to a third.” GRR161324. Some schools will experience up to two events per hour in an
24 average training year with windows open over an eight-hour period, totaling 16 interference
25 events in a single school day. GRR150633 (Alt. 1), GRR150679 (Alt. 2), GRR150723 (Alt. 3);
26

1 GRR159623–24 (high tempo Alt. 2). With windows closed, four schools will experience one
2 additional interference event per hour, or a total of eight additional interference events each
3 school day. GRR167649 (ROD). Under the adopted alternative, the highest exposure will
4 occur at Oak Harbor High School, Crescent Harbor Elementary School, and Coupeville
5 Elementary School, with Oak Harbor High School experiencing up to six intrusive noise events
6 per hour in an average training year, GRR150681, GRR159194–95 (Appx. A, average year);
7 GRR159623 (Appx. A, high tempo year).

8 As the Navy acknowledged in the Final EIS, scientific studies indicate “that chronic
9 exposure to high aircraft noise levels may impair learning.” GRR159322; *see also* GRR150336
10 (“Several studies suggest that aircraft noise can affect the academic performance of school
11 children.”). A 2009 guide developed by the Department of Defense Noise Working Group
12 explained that scientific studies have demonstrated that “chronic exposure to aircraft noise
13 impaired long-term memory, reading comprehension and problem solving skills in children
14 ages 8 through 14.” GRR42159 (DNWG 2009). The Road-Traffic and Aircraft Noise and
15 Exposure and Children’s Cognition and Health study (RANCH study), which Health described
16 as the “most comprehensive study of noise and cognitive impairment in children to date,”
17 GRR151322, “showed a decrease in reading scores as the noise level increased, identifying ‘a
18 linear exposure-effect association between exposure to aircraft noise and impaired reading
19 comprehension and recognition memory in children.” GRR42159 (DNWG 2009);
20 GRR31608–18 (RANCH). Other studies link aircraft noise and motivational depletion in
21 children, GRR42160, and show that chronic aircraft noise can cause physiological responses,
22 like elevate blood pressure, in children, GRR42160–62 (DNWG 2009). Indeed, after
23 conducting a detailed literature review of noise studies, Health concluded that “[t]here is
24 substantial evidence that noise impairs children’s cognitive function.” GRR151324.

25 Despite the record evidence indicating that children in the action area will experience
26 increased noise disruption and that such noise exposure can cause adverse cognitive impacts,

1 the Final EIS did not connect the dots between the level of noise disturbance from its Growler
2 operations and potential adverse impacts to school children. That is, the Navy did not analyze
3 whether and to what extent the level of classroom interference events from its Growler
4 operations will impair learning for schoolchildren in the action area. *See* GRR150336–37;
5 GRR159320–22. Because the Navy did not analyze the connection between known risks to
6 cognitive impairment in school children and the harm that could flow from its Growler
7 operations, the Navy failed to consider an important aspect of the problem. *See N. Plains Res.*
8 *Council, Inc.*, 668 F.3d at 1075 (an agency must rationally “explain the conclusions it has
9 drawn from its chosen methodology, and the reasons it considered the underlying evidence to
10 be reliable.”) (quotation and citation omitted); *Hausrath v. United States Dep’t of the Air*
11 *Force*, No. 1:19-CV-00103-CWD, 2020 WL 5848094, at *12–*13 (D. Idaho Oct. 1, 2020) (Air
12 Force’s analysis of noise impacts on sleep and sleep disturbance was inadequate when the Air
13 Force did not “conduct any analysis of the project’s effects upon sleep disturbance” and did not
14 analyze the impact of multiple training operations on speech disturbance); *see also Oregon*
15 *Nat. Res. Council Fund v. Brong*, 492 F.3d 1120, 1134 (9th Cir. 2007) (an agency “must do
16 more than merely state that past projects contributed to environmental harms”). The Navy’s
17 failure to adequately analyze impacts to child learning and cognitive health renders the Final
18 EIS and ROD unlawful.

19 **b. The Navy did not adequately analyze non-auditory public health**
20 **impacts**

21 The Navy also failed to adequately analyze non-auditory public health impacts because
22 the Navy relied on an irrational and unsupported standard to assess and ultimately dismiss
23 these impacts and failed to rationally justify its conclusion that its Growler operations would
24 not adversely impact public health when evidence in the record indicates such impacts may
25 exist. The Navy’s analysis thus violates NEPA’s hard look mandate and is arbitrary and
26 capricious. *See N. Plains Res. Council, Inc.*, 668 F.3d at 1075; *AquAlliance v. U.S. Bureau of*

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF THE NAVY, *et al.*,

Defendants.

CASE NO. 2:19-cv-01059-RAJ-JRC

REPORT AND RECOMMENDATION

NOTED FOR: December 31, 2021

The District Court has referred this consolidated case to the undersigned. Dkt. 19. The matter is before the Court on cross-summary judgment motions filed by plaintiffs Citizens of the Ebey’s Reserve for a Healthy, Safe, and Peaceful Environment and Paula Spina (collectively “COER”); the State of Washington; and defendants the U.S. Department of the Navy, Mark Esper, Richard Spencer, Todd Mellon, Mathew Army, and the U.S. Fish and Wildlife Service (collectively “the Navy”). Dkts. 87, 88, 92.

Plaintiffs challenge the Navy’s 2018 final environmental impact statement (“FEIS”) and 2019 record of decision authorizing the expansion of EA-18G “Growler” aircraft operations at the Naval Air Station Whidbey Island (“NASWI”) under the National Environmental Policy Act

1 (“NEPA”), 42 U.S.C. §§ 4321 *et seq.*, the National Historic Preservation Act (“NHPA”), 16
2 U.S.C. §§ 470 *et seq.*, and the Administrative Procedure Act (“APA”), 5 U.S.C. §§ 551, *et seq.*
3 These statutes mandate a procedure that an agency must follow before taking an action as
4 significant as the Growler expansion at NASWI.

5 Under NEPA and the APA, the Navy’s decision may be overturned if the Navy acted
6 “arbitrarily and capriciously” and failed to take a “hard look” at the consequences of the
7 proposed action.

8 Here, despite a gargantuan administrative record, covering nearly 200,000 pages of
9 studies, reports, comments, and the like, the Navy selected methods of evaluating the data that
10 supported its goal of increasing Growler operations. The Navy did this at the expense of the
11 public and the environment, turning a blind eye to data that would not support this intended
12 result. Or, to borrow the words of noted sports analyst Vin Scully, the Navy appears to have
13 used certain statistics “much like a drunk uses a lamppost: for support, not illumination.”

14 When reporting on the environmental impact of Growler fuel emissions, the Navy
15 underreported the true amount of Growler fuel emissions and failed to disclose that it was not
16 including any emissions for flights above 3,000 feet. Even after receiving a comment on the
17 issue, the Navy failed to disclose its underreporting and dismissed the issue with broad
18 generalities.

19 With respect to the impact of this increased operation on childhood learning, the Navy
20 acknowledged numerous studies that concluded that aircraft noise would measurably impact
21 learning but then arbitrarily concluded that because it could not quantify exactly how the
22 increased operations would interfere with childhood learning, no further analysis was necessary.

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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING**

CINDY CODONI and MICHELLE GEER,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PORT OF SEATTLE, ALASKA AIR
GROUP, and DELTA AIR LINES, INC.,

Defendants.

No. 23-2-07049-6 SEA

**AMENDED CLASS ACTION
COMPLAINT**

JURY TRIAL DEMANDED

AMENDED CLASS ACTION COMPLAINT
011150-11/2240798 V1

HAGENS BERMAN
1301 Second Avenue, Suite 2000, Seattle, WA 98101
(206) 623-7292 OFFICE (206) 623-0584 FAX

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10	1. Port of Seattle	9
11	2. Alaska Air Group	10
12	3. Delta Air Lines, Inc.	11
13	IV. FACTUAL ALLEGATIONS	11
14	A. Pollutants, including particulate matter, dangerous gases,	
15	hazardous air pollutants, and toxic heavy metals, are harmful to	
16	human health.	11
17	B. Aircraft emit dangerous pollutants as they fly, and these pollutants	
18	accumulate in places where planes routinely fly below 3,000 feet.	14
19	C. Defendant Airlines' operations, conducted with the consent and	
20	support of the Port of Seattle, have caused these pollutants to	
21	contaminate the Contamination Zone.	15
22	1. Defendants' operations have contaminated the air in the	
23	Contamination Zone.	15
24	2. Defendants' operations have contaminated the soil in the	
25	Contamination Zone.	21
26	3. Nothing else can explain the pollutants in the	
27	Contamination Zone.	22
28	D. Plaintiffs and other Class and Subclass members have been harmed	
	by Defendants' actions.	23
	1. Defendants have increased the health risks faced by	
	Plaintiffs and Class members.	23

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2. Defendants' actions have damaged Plaintiffs' and Subclass members' property by contaminating it with dangerous pollutants.....28

E. Defendants knew or should have known that their activities were harming Plaintiffs and other Class members, and yet they continued to engage in these activities.....28

F. Plaintiffs and Class members will require professional assistance to redress the harm Defendants have caused.32

1. Appropriate diagnosis and treatment of airport-related illnesses among Plaintiffs and other Class members will require ongoing medical monitoring by healthcare professionals.32

2. Decontaminating Plaintiffs' and Subclass members' property will require specialized equipment and skills.....33

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Community Health and Airport Operations-Related Noise and Air Pollution:

The December 2020 Public Health Seattle & King County "Report to the Legislature" - A Citizen Perspective

Commission Member Steve Edmiston

August 26, 2021

1

Context – Guiding Principles

- **Public benefit:** is defined as **benefiting the greater good, or the broader public, over an individual entity or group.**
- **Economic feasibility:** defined as the degree to which the economic advantages of something to be made, done, or achieved are greater than the economic costs. Can we fund it?
- **Environmental responsibility:** defined as the responsible interaction with the environment to avoid depletion or degradation of natural resources and allow for **long-term environmental quality.** The practice of environmental sustainability helps to **ensure that the needs of today's population are met** without jeopardizing the ability of future generations to meet their needs.
- **Social equity:** defined as **fair access to opportunity, livelihood and the full participation in the political and cultural life of a community.** How do we ensure underrepresented individuals have a voice?

2

1

Context – Legislative Mandate

Original legislation (SB 5370)

- Legislative finding: “with the increase of air traffic operations, **combined with the projections for the rapid expansion of these operations** in both the short and long term, **concerns regarding the environmental, health, social and economic impacts of air traffic are increasing** as well.”

3

Context – Our CACC Challenge

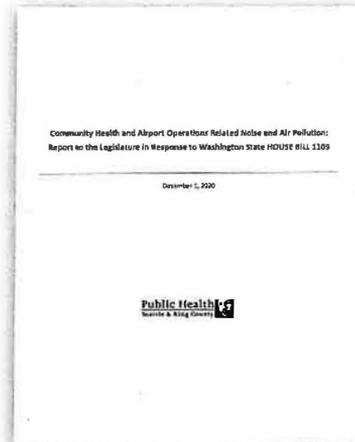
- PSRC – 400,000+ annual flight gap by 2050
- Mission: find a Washington site for a new primary commercial airport (and/or seek expansions).
- SB 5370 “...taking into consideration the data and conclusions of *appropriate air traffic studies, community representatives, and industry experts.*”
- SB 5370 Section 3: “Research must include... potential *environmental, community, and economic impacts.*”
- April 29, 2021, CACC White Paper, 6 airports on soft-list, no greenfields as of now.

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Report: Community Health and Airport Operations

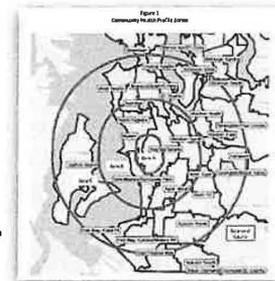
- **The Report:** Public Health's Response to House Bill 1109 Proviso – December 2020
- **The Players:**
 - Public Health Seattle and King County
 - University of Washington
 - Washington Dept of Ecology
 - Washington Dept of Public Health
- <https://bit.ly/3sNJKU1>



5

Why Does Report Matter for Communities Considered By CACC?

- PHSKC Report addresses public health impacts from our existing primary commercial airport.
- Report makes recommendations.
- New. Not available when CACC formed.
- Critical information for communities we consider for siting a new airport / expanding an airport.



6

3

Examples: Why Does Report Matter for Communities Considered By CACC?

- People living within 1, 5, and 10 miles of SeaTac airport face disparities in health, resources, and risk factors.
- Disparities begin at birth.
- Hospitalization rates for asthma, stroke, diabetes, and heart disease higher in airport communities.
- Life expectancy was between 1.7 and 5.0 years lower *and decreases closer to the airport.*

- Report, p. 2

7

Examples: Excess Deaths in Airport Communities

- Deaths from **cancer** were between 1.1 and 1.4 times higher than expected, **heart disease** deaths were between 1.3 and 2.3 times higher, and **stroke** deaths were between 1.4 and 1.9 times higher than expected.
- **“The closer you are to the airport, the higher the number of excess deaths associated with these causes.”**

• Report p. 19

• Report p. 2

8

4

Is There Enough Proof for CACC Action?

- **The PHSKC Report’s literature review:**

“The strength-of-evidence criteria used for this analysis are based on the five-level causal framework that the EPA uses to assess air pollutant effects on health... **A relationship is considered causal when multiple, high quality studies conducted by multiple researchers shows that exposure leads to the health outcome in question, the biological pathways of harm are supported by the evidence available, and alternative explanations have been ruled out.**”

- Report, p. 23

9

Is There Enough Proof for CACC Action?

Table 18

Health outcomes resulting from noise pollution based on evidence to date	
Health outcome	Noise Pollution Impact
Cardiovascular	Causal
Sleep disturbance	Causal
Annoyance	Causal
School performance	Likely causal

10

5

Is There Enough Proof for CACC Action?

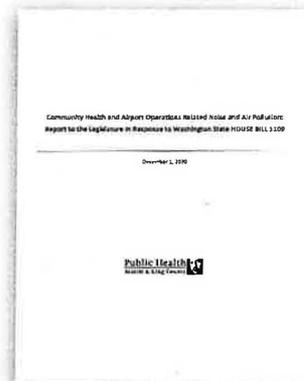
Table 19

Health outcomes resulting from Fine Particulate Matter based on evidence to date		
Health outcome	Short-term Exposure Impact	Long-term Exposure Impact
Cardiovascular	Causal	Causal
Respiratory	Causal	Causal
Nervous System	Suggestive evidence	Likely causal
Birth outcomes	Suggestive evidence	Likely causal

11

How Should Report Inform CACC's work?

- PHSKC Report identifies the public health outcomes related to only primary commercial airport in this region.
- SB 5370 – Our research mandate includes... potential *“environmental, community, and economic impacts.”*
- PHSKC Report a tool to assess public health impacts at new/expanded sites.



12

Recommend: CACC Action

- Amend CACC guiding principles to expressly add “public health” to our “environmental responsibility” and “social equity” principles.
- Add PHSKC Report to: “Studies Informing CACC Analysis.”
- Consider independent experts re: actual public health mitigation costs added to airport site chosen if we add 100,000s of new flights in higher density communities. Authority: SB 5370 Section 2(9).

13

7

APPENDIX O

Agency & Public Engagement

The following Appendix provides a summary of the agency and public engagement activities that occurred during the Environmental Assessment (EA). Additional information on Scoping is provided in Appendix N.

Engagement Summary

Comments and Responses

Submitted Studies and Materials

APPENDIX O

Agency & Public Engagement

Submitted Studies and Materials

- Woodmont Community (Steve Edmiston)
 - 1997 SeaTac International Airport Impact Mitigation Study
 - 2018 World Health Organization Noise Guidelines
 - Community Health and Airport Operations Related Noise and Air Pollution: Report to the Legislature in Response to Washington State HOUSE BILL 1109
 - 2020 SeaTac Legislative Report
- Bethel Public Schools Resolution 15 (22-23): A Resolution of the Board of Directors, Bethel School District #403, to Certify that the Board of Directors Opposes the Construction of an Airport in the Bethel School District Area (E.S.)
- Resolution No. R2023-12s: A Resolution of the Pierce County Council Objecting to the Siting of a New Airport at Any Greenfield Site in Pierce County; Requesting the Commercial Aviation Coordinating Commission (CACC) to Exclude Greenfield Sites in Pierce County from Its Final Preferred Location Recommendation for an Airport; and Requesting the Washington State Legislature Take Specific Actions (E.S.)
- Defenders of Highline Forest Community Forest Consensus (Defenders of Highline Forest)
- Public Signers Defenders of Highline Forest Community Forest Consensus (Defenders of Highline Forest)

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Utilization of other modes of transportation was also considered as an alternative to additional parking facilities. The ability of the Port to incentivize the use of mass transit exists, and the Port is actively exploring initiatives to reduce employee and passenger use of single-occupancy vehicles. The Port of Seattle Commission authorized five new employee commute trip reduction programs for 2025. However, it is unlikely to eliminate the need for additional parking. Therefore, the reliance on incentives on its own was not feasible as an alternative to building additional parking.

General Response #8 – Air Quality Analysis

Several commenters challenged the sufficiency of the air quality analysis. The PSCAA is the agency responsible for monitoring and maintaining air quality for King, Kitsap, Pierce, and Snohomish counties, including compliance with National Ambient Air Quality Standards (NAAQS). Under the Clean Air Act (CAA), the Environmental Protection Agency (EPA) sets NAAQS standards to be protective of sensitive populations (e.g., asthmatics, children, and the elderly).

The FAA and the Port worked extensively with the PSCAA to develop an Air Quality Assessment Protocol (Protocol) to identify the technical assumptions, methodologies, databases, and models that would be used to develop the air pollutant emission inventories and conduct the air quality impact analyses (Appendix C). The Protocol included the best scientific data and methods available to the FAA at the time the Protocol was developed and relied on FAA Orders 1050.1F and 5050.4B, and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1.²

The air quality assessment included an evaluation of the Existing (2022) Conditions; the Action Alternatives and No Action Alternative for the projected future conditions in 2032 and 2037; and construction activities for 2025 to 2032. The analysis included carbon monoxide (CO), nitrogen dioxide (NO₂), coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and ozone precursor pollutants (nitrogen oxides (NO_x) and volatile organic compounds (VOCs). Lead (Pb) was not included because SEA ceased leaded avgas sales in 2018, and the project does not include any new sources of lead emissions.

The air quality assessment did not include the use of Sustainable Aviation Fuel or other biofuels. It also did not include electric ground support equipment or new technology such as electric aircraft. These items were not included due to modeling limitations and/or the speculative nature of the technology. The use of auxiliary power units was based on the current policies in place at the Airport.

After extensive coordination with the PSCAA, the FAA shared the initial air quality modeling results with the PSCAA on December 7, 2023, to get feedback on the potential for the project to cause an exceedance of the NAAQS (Appendix C). Of the projected pollutant increases, CO and NO_x have the biggest change due to the increase in aircraft operations and motor vehicle trips. The PSCAA reviewed the results of the air quality analysis and determined that the Proposed Action would not cause an exceedance of the NAAQS (Section 4.3.1 of the EA). After submitting the preliminary results using Aviation Environmental Design Tool (AEDT) version 3e, the FAA released AEDT version 3f, which introduced several improvements and refinements to air emissions calculations. The air quality modeling was updated utilizing AEDT version 3f and the results showed a decrease in all emissions except for SO_x. Based on the guidance provided by the PSCAA and the reduced emissions calculated by the updated model, the FAA determined that the Action Alternatives would not result in a significant impact on air quality in accordance with the thresholds established in FAA Order 1050.1F. Therefore, and in accordance with the

² The FAA released the Aviation Emissions and Air Quality Handbook, Version 4 in July 2024, after the analysis was completed for the draft EA.

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FAA Orders 1050.1F and 5050.4B and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1; neither dispersion modeling nor mitigation is required. The PSCAA will continue to monitor ambient air emission levels to confirm continued compliance with NAAQS.

General Response #9a – Hazardous Air Pollutants

Several of the commenters requested that the FAA consider emissions of hazardous air pollutants (HAPs) in the air quality analysis. HAPs were not included as part of the air quality analysis. Per FAA guidance provided in the Aviation Emissions and Air Quality Handbook, Version 3, Update 1, a HAPs emissions inventory should be considered if the Proposed Action is considered "major" (e.g., new airport, new runway, major runway extension, etc.); if the Proposed Action is in a nonattainment or maintenance area; and/or if a criteria air pollutant emissions inventory is also prepared. A HAPs inventory analysis was not conducted as part of the air quality analysis because the Proposed Action is not considered a "major" action and is not located in a nonattainment or maintenance area.

General Response #9b – Ultrafine Particles

Several of the commenters requested that the FAA consider emissions of ultrafine particles (UFPs) in the air quality analysis. UFPs were not included as part of the air quality analysis given the existing science on UFPs (including the University of Washington Mobile Observations of Ultrafine Particles (MOV-UP) study) is not fully mature, and the measurement and understanding of UFPs and their related health risks has not been clearly defined. Currently UFPs are not regulated by the EPA or the State of Washington either through rate of emissions or concentrations (other than being a subset component of PM_{2.5}) and are therefore not typically considered in NEPA reviews. Furthermore, since UFPs are not specifically listed as a criteria pollutant, air toxic, or HAP, an analysis of UFPs is not a requirement of NEPA, the CAA, or FAA Order 1050.1F. Therefore, no analysis or discussion of UFPs was included in the air quality analysis.

General Response #9c – Soot or Black Carbon

Several of the commenters requested that the FAA consider soot as part of the air quality analysis. Soot is a black substance produced by the incomplete combustion of wood, oil, coal, etc. Sources of soot include mobile sources (especially diesel engines), open burning (including wildfires), and residential heating (including fireplaces/woodstoves). In response to public concern, studies regarding soot/particle deposition have been conducted at several airports across the country, with the uniform result that samples collected on and/or near the Airport bore little chemical resemblance to either unburned jet fuel or soot from jet exhaust.³ Instead, the collected material was found to be chemically similar to general urban pollution, particles from burning heavy fuels, diesel, and motor vehicle exhaust. The FAA is currently studying how to measure and predict non-volatile particulate matter emissions (a.k.a. soot or black carbon) from sustainable and conventional aviation fuels.

³ O'Hare International Airport (Findings Regarding Source Contributions to Soot Deposition: O'Hare International Airport and Surrounding Communities, 1999); T.F. Green Airport (Chemical Fingerprinting Analysis completed for the Airport Improvement Program EIS, 2006); and studies associated with environmental reviews for Boca Raton Airport (2011); Fort Lauderdale International Airport (2006); and Los Angeles International Airport (2013).

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General Response #10 – Air Quality and Health Effects

Several commenters requested that the FAA consider including an analysis of health effects as part of the air quality analysis. Some specifically argued for a Health Risk Assessment (HRA). In accordance with FAA Orders 1050.1F and 5050.4B and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1, a HRA is not required as part of NEPA. In addition, an HRA is not required under federal statute or regulation. Moreover, the cause of health issues is complicated because multiple factors often contribute to a person's health including genetics, lifestyle, environmental exposures, socioeconomic status, etc., making it challenging to isolate a single cause for a particular health outcome. This is especially true for chronic diseases where the effects may develop over a long period, making it hard to pinpoint the exact trigger.

Many variables can influence health, so separating the impacts of one specific exposure from other potential contributing factors can be challenging. Relationships between environmental exposures and health outcomes can only be established through well designed epidemiological, toxicological, and clinical studies.

The variability of the airport environment contributes to the difficulty of identifying potential health risks. The operating conditions of the turbine engine, the composition of the fuel, and the structure of the generated particles are just some of the examples of the variability that complicates health studies. In addition, many common air pollutants may have more than one source (e.g., wood-burning stoves, forest fires, cars and other forms of transportation).

Some commenters referenced the 2020 King County Report to the Washington State legislature and the University of Washington study on Ultrafine Particulates. Though these studies provide initial data that can help guide future studies, they do not provide enough data to demonstrate the potential impacts of aviation emissions on public health and fail to account for the effects of the numerous non-aviation emission sources that surround the Airport and other factors that contribute to public health outcomes. In addition, related to UFPs, the science is not fully mature and health impacts due specifically to aviation have not yet been demonstrated.

General Response #11 – Greenhouse Gas Analysis

Several commenters asserted that the assessment of greenhouse gas (GHG) emissions was insufficient. The FAA and the Port worked closely with the PSCAA to develop a Climate Assessment Protocol (Protocol) to identify the technical assumptions, methodologies, databases, and models that would be used to develop the greenhouse gas emission inventories and conduct the climate impact analyses (Appendix C). The Protocol included the best scientific data and methods available to the FAA at the time the Protocol was developed and relied on FAA Orders 1050.1F and 5050.4B, FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1, and the January 2023 Council on Environmental Quality (CEQ) draft GHG guidance.

After the publication of the Draft EA, Executive Order (EO) 13990, which was relied upon for the January 2023 CEQ draft GHG guidance, was revoked. In addition, CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 U.S.C. 4321 *et seq.*, as amended, in response to EO 14154. As a result of these changes, all references to climate and the qualitative climate evaluation that discussed the level of preparedness with respect to the impacts of climate change, the extent to which the alternatives could be affected by future climate conditions, and if the alternatives are consistent with national, state, and local climate goals have been removed from the Final EA.

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The GHG assessment included an evaluation of the Existing (2022) Conditions; projected future conditions in 2032 and 2037 for the Action Alternatives and No Action Alternative; and construction activities for 2025 to 2032. The GHG assessment used the Global Warming Potential (GWP) based on a 100-year period in accordance with the FAA Aviation Emissions and Air Quality Handbook, Version 3, Update 1. Scope 1, 2, and 3 emissions were modeled. Fuel dispensed was used to capture full flight emissions in place of the operations, taxi times, and aircraft run-ups utilized for the air quality analysis.

The GHG assessment did not include the use of Sustainable Aviation Fuel (SAF) or other biofuels. It also did not include electric ground support equipment or new technology such as electric aircraft. These items were not included due to modeling limitations and/or the speculative nature of the development of the technology. The use of auxiliary power units was based on the current policies in place at SEA.

It is noteworthy that the GHG emission inventory results are not compared to the NAAQS nor any other significance criteria. For NEPA-related GHG emission inventories, the emphasis is on “disclosing” the change in GHG emissions with the proposed project (and alternatives) compared to the No Action.

There are no significance criteria for GHG. Mitigation is not required in accordance with FAA Order 1050.1F and the FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1. Minimization measures are identified in Section 4.3.3.3 of the EA. Separately the Port is undertaking a wide variety of efforts such as the procurement of Renewable Natural Gas and facilitating the adoption of SAF by airline partners to reduce GHG emissions.

General Response #12 – Day Night Average Sound Level (DNL or Ldn)

Several commenters contested the reliance on the DNL and 65 DNL threshold for assessing noise impacts. The DNL noise metric is used to reflect a person's cumulative exposure to sound over a 24-hour period. DNL considers both the amount of noise from each aircraft operation as well as the total number of operations flying throughout the day and applies an additional 10dB weighting for nighttime flights between 10 p.m. and 7 a.m. The DNL is the FAA's required noise metric for the assessment of aircraft noise and was adopted through 14 Code of Federal Regulations Part 150 as required to meet the provisions of the Aviation Safety and Noise Abatement Act of 1979.

The FAA was conducting a Noise Policy Review of its noise policy, but the process is now on hold due to the passage of the FAA Reauthorization Act of 2024 by Congress. Pursuant to Section 792 of the Act, the FAA is required to form an Aircraft Noise Advisory Committee (ANAC). The ANAC will advise the FAA on issues facing the aviation community that are related to aircraft noise exposure and existing FAA noise policies and regulations. To follow this direction from Congress, the FAA has revised the Noise Policy Review approach and timelines to allow the ANAC to complete its work and issue its report before FAA makes any decisions on possible noise policy updates (use of DNL as the primary noise metric and DNL 65 dB as the threshold for determining significant impact). The FAA intends to complete the Noise Policy Review once the ANAC has submitted a report to the FAA with any recommended policy changes.

Until the review is completed, the DNL will continue to be the official metric and DNL 65 dB will continue to be the threshold used for determining significant noise impacts in environmental reviews.

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General Response #13 – Noise Analysis and Part 150 Update

Many comments focused on noise associated with the Airport generally and requested changes to flight procedures and other operational issues. The purpose of the noise analysis in this NEPA document is to compare the future Proposed Action and Hybrid Terminal Alternative to the No Action to identify the potential noise impacts with the implementation of either alternative.

A Noise Modeling Protocol was developed as part of the NEPA process to identify the technical assumptions, methodologies, databases, and models that would be used to conduct the aviation noise analysis, which can be found in Appendix J. The Protocol was developed in accordance with FAA Order 1050.1F. The aviation noise analysis included an evaluation of the Existing (2022) Conditions; and the Action Alternatives and No Action Alternative for the projected future conditions in 2032 and 2037.

FAA regulations require that the prediction of aircraft-related noise exposure be generated using the AEDT. Additionally, noise monitoring cannot be used as a substitute for AEDT, nor can it be used to calibrate AEDT. Appendix B of FAA Order 1050.1F provides more details.

FAA Order 1050.1F defines a significant noise impact as an increase of 1.5 dB or more in the 65 DNL. Though the Action Alternatives include an increase in operations, including nighttime operations, there would only be a slight increase in the size of the DNL 65+ dB contour in 2032 and 2037 when you compare the Action Alternatives to the No Action Alternative. There was not an increase of 1.5 dB or more in the 65 DNL. The overall size of the DNL 65+ dB contour for the No Action and Action Alternatives is smaller in 2037 compared to 2032 due to the introduction of quieter aircraft.

The FAA determined there would be no significant noise impacts in 2032 or 2037 with the implementation of either Action Alternative compared to the No Action Alternative. In accordance with the FAA Orders 1050.1F and 5050.4B, mitigation is not required.

Separate from the analysis of noise impacts in the EA, the Port is currently in the process of updating its Part 150 study. Part 150 is a voluntary program that allows airport operators to prepare noise exposure maps and to recommend measures in a Noise Compatibility Program (NCP) to reduce noise and noncompatible land uses. The Part 150 update is a separate program from this EA. For more information on the Part 150 update see: <https://seapart150.com/>

The NCP for SEA was developed in 1985 and updated in 1993, 2002, and 2013. The NCP includes abatement, mitigation, and program management measures designed to reduce or mitigate the impact of aircraft noise upon the surrounding community and enhance the administration of the overall program. Land acquisition, sound insulation, and modifications to flight tracks are just some of the measures considered during the development of the NCP. The Part 150 update process includes numerous opportunities for public involvement and input.

General Response #14 – Noise and Health Effects

Several commenters requested that the FAA consider including an analysis of health effects as part of the noise analysis. The aviation noise analysis included the best scientific data and methods available to the FAA at the time the analysis was completed and relied on FAA Orders 1050.1F and 5050.4B. The Future Action Alternatives would not increase noise by 1.5 DNL or more for a noise sensitive area at or above the 65 DNL when compared to the No Action for either 2032 or 2037. Therefore, no significant noise impact would occur because of implementing either Action Alternatives. The analysis of health effects related to noise is not a requirement of FAA Order 1050.1F nor is it required as part of NEPA. In addition, a noise health effects analysis is not required under federal statute or regulation.

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To the extent that it is argued that the FAA should have analyzed the health effects of noise, the science does not support the conclusion that aviation noise causes reasonably foreseeable adverse health effects. In general, the cause of health issues is complicated because multiple factors often contribute to a person's health including genetics, lifestyle, environmental exposures, socioeconomic status, etc., making it challenging to isolate a single cause for a particular health outcome. The variability of the airport environment contributes to the difficulty of identifying potential health risks.

The Federal Interagency Committee on Aviation Noise (FICAN) published a Research Review of Selected Aviation Noise Issues in April 2018, which notes that learning and health impacts related to aviation noise remain unresolved and that extensive research is needed. The report noted that "while there is evidence to suggest that aircraft noise has adverse learning effects, FICAN concludes there is not sufficient information to quantify the effect in terms of a recommended noise metric or dose-response relationship." As for health impacts, the 2018 report notes "before adopting policies and methodologies for predicting health outcomes, research needs to be conducted to quantify relationships between aircraft noise level (dose) and the health outcome in question (effect). FICAN believes it is premature to adopt quantification methods for computing burden of disease from environmental noise until this fundamental research has been developed and validated." The FAA is currently conducting additional research to further the scientific understanding between aviation noise and cardiovascular disease and sleep disturbance.

The FAA determined they have enough information to determine the reasonable and foreseeable effects from noise exposure in accordance with FAA Order 1050.1F and NEPA.

General Response #15 – Environmental Justice

Since the publication of the Draft EA, EOs 12898, 13985, 14091, and 14096 were revoked on January 20, 2025. On January 21, 2025, President Trump issued EO 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity. In addition, CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 U.S.C. 4321 *et seq.*, as amended, in response to EO 14154. Consequently, it is no longer a legal requirement or policy of the federal government to conduct environmental justice analyses. As a result, this Final EA has removed the prior discussion of, and data/analysis related to, environmental justice (EJ).

Since there were questions about the adequacy of the EJ analysis in the Draft EA, it is worth noting that if the EJ analysis had been retained, the FAA's determinations and decisions would not have changed. The environmental justice analysis determined that neither of the Action Alternatives would result in disproportionate and adverse effects nor significant impacts to minority and/or low-income populations.

The analysis completed included an Environmental Justice Protocol that was developed as part of the NEPA process to identify the technical assumptions, methodologies, and databases that was used to conduct the EJ analysis, which can be found in Appendix K of the Draft EA. The EJ analysis used the study area specific to the resource category being evaluated. All relevant and available socioeconomic and population data for the study area was collected to determine the percentages of minority or low-income populations within each study area, identify potential concentrations of minority or low-income communities, and EJ resources (such as community centers, churches, or areas of cultural significance). Once EJ populations and/or communities were identified, the next step was to determine if any disproportionate and adverse impacts would result from changes in impacts caused by the Action Alternatives compared to the No Action Alternative.

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All resource categories were evaluated for potential disproportionate and adverse impacts to EJ communities. Further analysis was completed for air quality, climate, noise, socioeconomic, and surface transportation to determine if the impacts identified would be disproportionate and adverse. The analysis determined that neither Action Alternative would result in disproportionate and adverse effects nor significant impacts to minority and/or low-income populations.

General Response #16 – Children’s Health and Safety Risks Analysis

Several commenters asserted that the Children’s Health and Safety Risks analysis should have been conducted differently. FAA 1050.1F Order does not define a significance threshold for Children’s Environmental Health and Safety Risks, but it does require that the FAA consider whether the action would lead to a disproportionate health or safety risk to children. There are also no separate noise impact standards for children. The Children’s Environmental Health and Safety Risk analysis documented in Section 4.3.11.3 and the Noise and Noise-Compatible Land Use analysis documented in Section 4.3.10 were completed in accordance with FAA Orders 1050.1F and 5050.4B. Neither analysis identify significant impacts that would warrant mitigation.

The FICAN published a Research Review of Selected Aviation Noise Issues in April 2018, which noted that “while there is evidence to suggest that aircraft noise has adverse learning effects, FICAN concludes there is not sufficient information to quantify the effect in terms of a recommended noise metric or dose-response relationship.” The cause of health issues is complicated because multiple factors often contribute to a person’s health including genetics, lifestyle, environmental exposures, socioeconomic status, etc., making it challenging to isolate a single cause for a particular health outcome. In addition, and in accordance with the FAA Orders 1050.1F and 5050.4B and FAA’s Aviation Emissions and Air Quality Handbook, Version 3, Update 1, a HRA is not required as part of NEPA. In addition, no federal statute or regulation requires an HRA.

General Response #17 – Cumulative Impact

Historically, CEQ regulations required the consideration of cumulative impacts. In 2023, Congress passed the Fiscal Responsibility Act, which directed agencies to consider “the reasonably foreseeable environmental effects of proposed agency actions” (42 USC 4332(2)(C)). Since the publication of the Draft EA, the CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 USC. 4321 *et seq.*, as amended, in response to EO 14154, *Unleashing American Energy*. In addition, the Supreme Court issued the *Seven County Infrastructure Coalition v. Eagle County*, 605 U. S. 975 (2025) ruling on May 29, 2025. As a result of these actions, it is no longer a legal requirement or the policy of the federal government to conduct cumulative impact analyses. In addition, the *Seven County* ruling reinforced the limited scope of NEPA reviews, holding that NEPA does not require an agency to consider environmental effects of other activities and projects “separate in time or place” from the proposed action. Therefore, this Final EA has removed the prior discussion of, and data/analysis related to, cumulative impacts.

Since there were questions about the adequacy of the cumulative impact analysis in the Draft EA, it is worth noting that if the cumulative impact analysis had been retained in the Final EA, the FAA’s determinations and decisions would not have changed. The cumulative impact analysis determined that Proposed Action would not result in significant cumulative impacts.

A cumulative impacts analysis ensures that the incremental impacts of a proposed action are considered in the context of potential impacts from past, present, and reasonably foreseeable future projects on a particular resource. Federal agencies had the responsibility of determining how and the extent to which cumulative impacts were assessed in NEPA documents. The analysis of cumulative impacts in the Draft

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EA followed FAA Orders 1050.1F and 5050.4B and the objectives of the NEPA, at the time of preparation. The FAA considered the available sources of information and the appropriate analytical techniques to predict the cumulative effects of actions on the environment. The ultimate goal was to provide meaningful information to decision makers to allow them to make informed decisions.

The cumulative impact analysis, in the Draft EA, started with the consideration of the direct and indirect effects of the Proposed Action with a focus on those resources impacted by the implementation of the Proposed Action. Next, the geographic scope and timeframe were established. The geographic scope (study area) is resource specific and is defined in Chapter 3. The resource specific study areas adequately captured the impacts associated with the implementation of the Proposed Action, which is why they were selected for the cumulative impact analysis. The timeframe centers on the timing of the Proposed Action and included projects where enough information was readily available to provide a meaningful analysis.

Cumulative impacts also relied on the existing conditions described in Chapter 3 of the EA. The existing conditions refer to the baseline environmental state of a project area and include a description of the current physical environment and any relevant environmental characteristics. The baseline helps one to understand the present effects of past actions and the historical context of the physical, biological, and human environment. The existing conditions accounted for the past growth that has occurred and the projects that have been constructed at SEA through 2022 and the effects of that growth and construction. This included the effects associated with the Third Runway and Stage 1a of the SR 509 project as well as other development that has occurred up until 2022. Stages 1b and 2 of the SR 509 project were included as a future project in the air quality analysis, GHG analysis, surface transportation study, and the cumulative impact analysis.

The analysis focused on if the Proposed Action would incrementally contribute to the cumulative impact for air quality, biological resources, GHG, hazardous materials, solid waste, natural resources and energy supply, noise and noise-compatible land use, socioeconomic, EJ, surface transportation, and water resources. Based on the analysis conducted in the Draft EA, the FAA determined there would be no significant cumulative impacts with the implementation of Proposed Action.

General Response #18 – Tree and Vegetation Removal

Several commenters asserted that the analysis of tree removal associated with several projects was insufficient. Projects C02, C03, L05, L07, S07, and S10 require the removal of approximately 56.4 acres of trees, shrubs, and maintained grassy areas. The total acreage of vegetation removal was reduced with the elimination of project L06 (Employee Parking Surface Lot). To mitigate the loss of vegetation, the Port will meet the requirements identified in the Land Stewardship Plan and Tree Replacement Standards as well as the Airport's Landscape Vision, Design Guidelines, and Standards and any other state and/or local requirements.

The Draft EA was prepared following the policies, procedures, and guidelines outlined in FAA Orders 1050.1F and 5050.4B. These Orders outline FAA-accepted methodologies, models, techniques, and thresholds of significance for the assessment of impacts. Tree and vegetation removal is not listed as a separate environmental impact category in FAA Orders 1050.1F and 5050.4B but is evaluated within the scope of biological and visual analyses.

The FAA determined that the Action Alternatives would not have a significant impact on biological resources in accordance with the thresholds established in FAA Order 1050.1F (Section 4.3.2). Though Project S07 is on the edge of the Airport Activity Area (AAA), it is approximately ¼ mile from residential

**SCHOOLS HAVE BEEN
AWARDED \$38M
FOR JET NOISE MITIGATION!**

**Federal funds being
allocated to help schools in
Oak Harbor, WA begs the
question:**

**If Growler jet noise is not
harmful to the public,
as implied by the Navy
in the past...**

**WHY USE \$38M TO PROTECT
STUDENTS FROM THE NOISE?**



**SOUND DEFENSE
ALLIANCE**



NEWS

Schools awarded \$38M for jet noise mitigation

Grants were awarded through the Community Noise Mitigation Program

By Allyson Ballard • October 3, 2025 1:30 am



Federal funds will help multiple Oak Harbor schools quiet jet noise.

More than \$38 million in federal grants have been awarded to Oak Harbor Public Schools to implement noise mitigation features at three elementary schools, according to documents provided to district board members for a meeting on Monday. The money was awarded Sept. 19, and the board approved its acceptance on Sept. 29.

The Department of Defense allocated \$16 million to the school district for use at Hillcrest Elementary, \$10 million for use at Oak Harbor Elementary and \$11.7 million for Olympic View Elementary.

“It’s a great opportunity for us and they don’t come very often,” Superintendent Michelle Kuss-Cybula said. “And it seems like we’ve had a couple great opportunities in this community in the past couple years.”

EA-18G Growlers and other aircraft from Naval Air Station Whidbey Island may cause disruptive noise in classrooms. The Navy is currently updating an Environmental Impact Statement related to Growler noise. A draft EIS found that Growler operations show “potential impacts on childhood learning.” Specifically, students at both Crescent Harbor Elementary School on North Whidbey and Coupeville Elementary School on Central Whidbey may experience a one-month delay in reading comprehension because of noise exposure, the draft states.

State and local governments and tribal entities affected by “fixed-wing aviation” created by military installations can qualify for these competitive grants as part of the Community Noise Mitigation Program, Kuss-Cybula explained.

“Depending on where the location of the fixed aviation routine or pattern occurs, that’s the decibel reading for the noise level,” she added. “So we have worked with NAS Whidbey to look at that map and then determine which of the schools would qualify for the noise mitigation program.”

Up Next - Farage: BBC has 'gone mad on DEI'

The school district originally applied for noise mitigation grants for these three Whidbey Middle School last January, but wound up declining funds for three Kuss-Cybula said, each requires a 10% local contribution to match the money its budget and ability to do so.

“That’s why we pulled back on the three originally, making sure our impact : some of the impact aid as a match for these or capital projects,” she said.

Aviation Noise Working Group

MEETING SUMMARY

OCTOBER 13, 2025; 5:00 PM – 6:00 PM

VIA ZOOM VIDEOCONFERENCE

Meeting Objective: Update on Aviation Near-term Noise Action Agenda and a discussion regarding the Late Night Noise Limitation Program's established hours.

Meeting Summary:

- I. Facilitator Welcome, Introduction, and meeting agenda, Andres Mantilla, Facilitator, Uncommon Bridges
- II. Aviation Near-term Noise Action Agenda, Tom Fagerstrom, Noise Programs Manager & Paris Edwards, Noise Programs Coordinator, POS
 - **Late Night Noise Limitation Program Q3**
 - Q3 Exceedances: ATI/Amazon – 27, FedEx – 27 (Planning a face-to-face meeting with FedEx to talk about their exceedances and the MD11 aircraft that they have brought back). EVA Airways – 21.
 - Q3 Exceedances: 141; 4% of total Q3 late night operations. Lower than last year at this same time due to fewer 747s
 - Average of 29 operations per late-night in September (24 passenger & 5 cargo); Alaska, Delta, United, Southwest, EVA, Singapore, China Airlines and Starlux using newest generation aircraft. Cargolux, Korean Air Cargo, Asiana Airlines Cargo, AirZeta and FedEx Express using older, noisier 747s and MD11s. Shows the end of summer drop off in passenger operations as predicted.
 - **Late Night Third Runway Usage: 2024** – 4.8 landings per late night; 2025 (to date) – 4.1. Moving in the right direction. Numbers also good in October.
 - **Go-Arounds:**
 - August - Total: 88; Average: 2.8 per day. Higher than normal number of go-arounds on August 6th (11) due to high wind velocity and wind gusts in the evening.
 - September - Total: 95, Average: 3.1 per day. Higher than normal number of go-arounds on Sept 15th (15) due to fog and low visibility operations.
 - **Noise Comment Reports** for August (13,473 total comments from 608 households) and September (11,181 total comments from 666 households): top five cities are generally consistent with previous months, with several hundred comments coming from 1-4 households.
 - *Question: Do you show number of distinct households year to year? Paris will have that in the numbers for the next meeting.*

- requirement. The Working Group's noise consultant explained the origin and history of the 45 DNL interior noise level standard.
- **Part 150 Process & the Next Sound Insulation Program:** A Part 150 study is being conducted to determine the new 65 DNL contour, an updated Noise Remedy Boundary, and potential Noise Compatibility Program (NCP) measures. This may cause some homes to fall within the boundary that weren't before, and some may now be outside the boundary. Program will likely be only for homes that haven't been insulated before.
 - *Question: Boundary is likely to shrink?* Not necessarily. Overall, the area is expanding. But some areas will be out and some in that weren't before.
 - *Question: Is the sound insulation a requirement of the FAA?* No, it is not. Programs are voluntary.
 - *Question: Boundary might shift but will other factors remain such as only insulating homes constructed before 1986/87?* After those dates, local building codes required sound insulation for any new residences.
 - **Sound Insulation Repair and Replacement Program:** Replace sound insulation packages installed prior to 1993 pending eligibility. Prior to 1993, there was uncertainty about previously installed insulation packages and whether they would achieve the up to date standards set in 1993.
 - *Questions: Eligibility here is still under FAA criteria, why is that? We do that so that we can potentially stretch the tax levy money (\$5M) for pre-1993 re-insulation work; FAA would potentially provide grant funding. We are following the Port Commission's direction to focus on acoustic performance.*
 - *Question: What does it mean to fail the acoustic testing?* Homes that acoustically test at, or greater than 45 dBA DNL interior, failed acoustic testing, and, hence, are potentially eligible for the Pilot Program. Homes that test less than 45 dBA DNL interior are not eligible for the Pilot Program.
 - *Question: Potential FAA funding is unlikely currently. Why don't we come up with our own program and criteria?* We only have \$5M so we want to serve the homes that are acoustically impacted.
 - *Question/Comment: There are window failures beyond acoustic failures. And they are a failure, nonetheless. Is there a report that communicates these efforts?* There is a [technical report](#) completed earlier this year. There are conditions where windows are not working properly but they are not eligible based on the Port Commission's direction.
 - *Question: Does FAA eligibility include considerations of leaks, mold, etc.?* No, the FAA does not account for that when determining funding eligibility.
- V. Part 150 Noise Study Workshops, Marco Milanese, Community Engagement Manager, POS
- September 30 – Des Moines; October 2 – Burien; October 4 – SeaTac.
 - 70 people total at the three workshops; 70 individuals signed up for the virtual meeting on October 15

StART Aviation Noise Working Group

10/13/25

JEFF WATSON	NORMANDY PARK	-
NEIL TABOR	TUKWILA	-
MATTHEW BLINSTRUB	FEDERAL WAY	-
SKY LARON	FAA	-
RODNEY LINDBECK	FAA	-
JASON POOLE	FAA	-
SUSAN MCLAIN	KING COUNTY	-
TOM HOOPER	PORT OF SEATTLE (TRC)	-
CONSULTANTS		
ANDRES MANTILLA	UNCOMMON BRIDGES	✓
CHERYL SWAB	UNCOMMON BRIDGES	✓
VINCE MESTRE	CONSULTANT	✓
AUTUMN WARD	ESA	-
SCOTT TATRO	ESA	-

NEXT MEETING: DECEMBER 1, 2025, 5:00 - 7:00 PM
 LOCATION: ZOOM VIDEOCONFERENCE

StART

MEETING SUMMARY

AUGUST 27, 2025; 5:00 PM – 7:00 PM

VIA ZOOM VIDEOCONFERENCE

Meeting Objectives:

- An update on Washington State's Commercial Aviation Work Group's (CAWG) efforts and finalizing StART's 2025/26 priorities

- I. Facilitator Welcome, Meeting Management, Introductions, Opening Comments
Andrés Mantilla, Facilitator, Uncommon Bridges; Arif Ghouse, StART Chair/Interim SEA Managing Director, Port of Seattle (POS)
 - Andrés introduced the agenda and ground rules for meeting participation
 - Arif Ghouse, interim SEA Airport Managing Director commented on the CAWG and his role as a member. He thanked Ann Richart for joining the meeting.

- II. Commercial Aviation Work Group (CAWG)
Ann Richart, Aviation Director, WSDOT
 - Explained the delays in getting CAWG off the ground: change of governors; terms that had expired before the work had begun due to staggered term end dates; only 13 of the 19 slots appointed.
 - Nineteen voting members; 11 non-voting members. Voting members must invite non-voting members to join; 8 slots are filled
 - Ann reminded the group that although WSDOT is responsible for administering the Work Group and reporting on its findings, it is an independent work group created by the State Legislature
 - Had to develop a charter and operating procedures
 - The enacting Legislation directs WSDOT to hire a consultant, but that contractor is accountable primarily to the work group, not the agency. *Question: What type of oversight does the governor or the legislature have?* The Governor independently appoints individual members; the legislature passed a bill enumerating specific groups that must be represented and dictates ongoing funding for the work group's continued operations as part of the State budgeting process. Legislation passed in 2023 created the CAWG. The enacted 2025 operating budget made several changes supported by StART. Legislature has four seats on the CAWG
 - Meetings so far: July 2024; March 2025; September 17, 2025, is the next meeting
 - Hiring a consultant

III. Finalize Strategic Priorities, Andrés Mantilla, Uncommon Bridges

- In April and the following meetings, members discussed what can we prioritize in this space and where we can work together on shared action. Already received good feedback from the Steering Committee. We are doing one more round of feedback from the StART membership; would like to get to agreement to move forward on adopting the shared priorities.
- There were a lot of issues everyone cares about; prioritize areas where StART could address the most pressing challenges while also understanding that there are parameters about what we can do.
- Three areas of strategic priorities:
 - Reducing noise impacts
 - Impact of FAA DNL decision
 - State legislation: pollution and environment
 - Sound insulation
 - Share Action from Steering Committee
 - Presentation from FAA on go-arounds
 - SAMP understanding
 - Spending more time to understand and digest how the Port's sound insulation program and repair and replacement pilot programs are implemented
 - FAA on-line flight procedures portal – suggested flight patterns or routes around SEA
 - *Comment: Biggest impact we've had is the voluntary Late Night Noise Limitation Program to get airlines to use quieter planes.*
 - *Comment: Over decades, we've been trying to fix packages that have failed but haven't succeeded. It seems futile to try to continue doing something that isn't working. Would like to see a new program like what is done around San Francisco Airport.*
 - *Comment: Agreement with what was said above. It's a local issue and needs a local solution. Tying it to the FAA is not working.*
 - Environmental Justice – aviation fuel, fine particulates
 - More conversations and investments in air quality
 - Building out an information hub that can show the progress on outcomes and deliverables and make information available to the public
 - *Comment: Air quality is a critical issue (monitor and study); need to reliably know the health impacts*
 - *Comment: Partner with the UW and make sure UW programs are integrated into our work and continue to be funded.*
 - *Comment: SAF we have that as a priority but not sure we can impact it. What can we do in StART to influence it? Not sure it should be a priority.*

Would like to see support for the bill included in the state legislative priorities. This will be discussed at the October Policy Working Group meeting.

V. Aviation Noise Working Group Activities

Tom Fagerstrom, Noise Programs Manager, POS

- What was covered at the August 11th meeting:
 - Tom and Paris covered the Late Night Noise Limitation Program's 2nd quarter results, Third Runway use to date, the latest monthly averages for aircraft go-arounds and June's totals for noise comments/complaints.
 - A sound insulation update was also provided which included the current work involving single-family homes, places of worship and apartments.
 - The Port's Sound Insulation Repair and Replacement Pilot Program was also covered; 262 homes met the eligibility requirements for acoustical testing and 132 of the 262 applied to participate in the acoustic testing. Interior acoustic testing is ongoing and expected to be complete in the fall. Report is available to review [here](#).
 - The bulk of the meeting was dedicated to the Part 150 Study and the work of the Study's Technical Review Committee (TRC) including the latest involving the submittal of the Draft Noise Exposure Map (NEM) Report to the FAA, the plan to meet with the local jurisdictions to discuss current and future land-use within the 65 DNL, the kick-off the Noise Compatibility Program (NCP) phase of the study where a host of measures to limit aircraft noise exposure on the surrounding communities are explored and the overall public schedule. Tom also shared the dates and locations for Part 150 Study's upcoming public workshops this fall. Information is located at [SEA Part 150](#).
 - The Part 150 Study consultants and the FAA had a meeting with Vashon Island residents to discuss possible noise analysis work to be conducted in conjunction with the Study.
- *Question: Only a few homes are taking advantage of the packages, do homeowners still have to sign away any legal claims?* Requirements remain the same. Port staff described the extensive outreach the Port does to reach those possibly eligible for the program.
- *Question: Can you confirm that you use different types of outreach?* Postcards, letters, multiple languages, door to door when construction is being done on the block. Biggest factor is whether the home was recently purchased. New homeowners are more inclined to apply.
- *Question: Was there an FAA representative with you when you met with Vashon?* No, this was by design. Wanted them to meet with Port staff and ESA to listen to concerns and gather more data.

VI. SAMP

Clare Gallagher, Capital Project Delivery Director, POS

StART Meeting Summary

8/27/25

MICHAEL BRUGATO	FEDERAL WAY – COMMUNITY REPRESENTATIVE	-
MOIRA BRADSHAW	NORMANDY PARK – COMMUNITY REPRESENTATIVE	✓
PETER SCHILLING	TUKWILA – COMMUNITY REPRESENTATIVE	✓
REBECCA DEMING	DES MOINES – CITY (ALT)	-
ROGER KADEG	SEATAC – COMMUNITY REPRESENTATIVE	✓
SARAH COX	PORT OF SEATTLE – CHAIR (ALT)	✓
SCOTT INGHAM	DELTA AIR LINES (ALT)	✓
SCOTT KENNEDY	ALASKA AIRLINES	-
RESOURCES		
PARIS EDWARDS	PORT OF SEATTLE	✓
STEVE VITTNER	PORT OF SEATTLE	✓
MARCO MILANESE	PORT OF SEATTLE	✓
JULIE KINZIE	PORT OF SEATTLE	✓
PRESENTERS		
JOHN FLANAGAN	PORT OF SEATTLE	✓
TOM FAGERSTROM	PORT OF SEATTLE	✓
ERIC SCHINFELD	PORT OF SEATTLE	✓
ANN RICHART	DIRECTOR AVIATION, SDOT	✓
CLARE GALLAGHER	PORT OF SEATTLE	✓
CONSULTANTS		
ANDRÉS MANTILLA	UNCOMMON BRIDGES	✓
CHERYL SWAB	UNCOMMON BRIDGES	✓
VINCE MESTRE	CONSULTANT	-
PUBLIC COMMENT		
BRIAN DAVIS	BURIEN AIRPORT COMMITTEE	✓
DAVID GOEBEL	VASHON FAIR SKIES	✓
AUDIENCE		
ASHLEY ZAYED		✓
ANGELA CHEUNG		✓
DAWSON FRANK		✓
LAURA SCHLADATZKY		✓
RYA BUTTERFIELD	FAA	✓
SUZETTE MOORE		✓
SKY LARON	FAA	✓
ZACK SHIELDS	SEATAC	✓
DAVE KAPLAN	PORT OF SEATTLE	✓
JC HARRIS		✓
ANTHONY HEMSTAD	CITY OF DES MOINES/HEMSTAD CONSULTING	✓

NEXT MEETING: OCTOBER 22, 2025 - 5:00 PM - 7:00 PM

LOCATION: ZOOM WEBINAR

StART enhances cooperation between the Port of Seattle and the neighboring communities of Seattle-Tacoma International Airpo