



September 27, 2018

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

**Re: Scope of Seattle-Tacoma Airport Sustainable Airport Master Plan proposed environmental assessment**

Alaska Airlines submits these comments in response to the Port of Seattle's ("the Port") request for public comment during the scoping process for the proposed actions contained in the Sustainable Airport Master Plan ("SAMP").

Alaska Airlines appreciates this opportunity to participate in the scoping phase of the Seattle-Tacoma ("Sea-Tac") Airport's proposed implementation of the SAMP. Our comments fall into three categories: *how* the Port should proceed with the environmental analysis of the SAMP; *what* that environmental review should include with respect to alternatives; and, *whether* some of the action items are needed so urgently they should be approved while the environmental review of the SAMP is underway.

Alaska Airlines is headquartered at Sea-Tac, and the airline along with its wholly-owned subsidiary Horizon Airlines has more operations at Sea-Tac than any other carrier. Alaska Airlines is firmly rooted in this community and fully committed to the success of Sea-Tac. We are also committed to staying engaged in this process to its conclusion. As the Puget Sound region continues to expand, and projections for airline traffic continue to grow, a smoothly functioning, properly equipped, operationally efficient and environmentally sustainable Sea-Tac Airport is critical for our community, area residents, and the regional economy.



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AA-1  
First, Alaska Airlines asks the Port to reconsider *how* these proposals should be examined in order to ensure compliance with all applicable environmental statutes. We believe the scoping phase of the SAMP is a step in the right direction in preparing Sea-Tac for the implementation of this ambitious program. At the same time, we are concerned that the Port and the Federal Aviation Administration (“FAA”) may be jeopardizing the SAMP’s implementation by proposing to meet the rigorous requirements of the National Environmental Policy Act (“NEPA”) with an environmental assessment (“EA”) rather than an environmental impact statement (“EIS”). Alaska Airlines believes this is a mistake and strongly encourages the Port to reconsider. Instead, we believe it is in the best interest of the SAMP, the community, the environment, and all stakeholders concerned about the future of this airport for the Port to meet its legal requirements under NEPA with an EIS, rather than an EA. Anticipating the heightened scrutiny this project will likely face, we believe that the Port should take the time and effort to develop a full EIS. Making this decision now will help ensure the most rigorous standard of environmental review, and be more cost-effective and efficient over the long term.

While preparing an EIS may require more upfront time and effort than if the Port were to develop an EA, Alaska Airlines believes this additional time would ultimately be an effort well spent. Preparing an EIS eliminates the need to make a finding of no significant impact (FONSI) which in a project of this magnitude could be more difficult than demonstrating procedural compliance with the EIS process. In addition, preparing an EIS could produce more substantive stakeholder feedback and fully effectuate the stated goals of the SAMP projects. As a result, an EIS may ultimately be more cost-effective than generating an EA, as any major litigation delay will almost certainly drive up the total cost of the project as construction deadlines are impacted.

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What is more, if the Port decides to proceed with an EA, there may be a strong likelihood that the Port may only be able to justify a finding of no significant impact if it straps a host of massive mitigation projects to the FONSI. Such mitigation proposals could have the potential to saddle the Port and Sea-Tac operations with numerous, potentially onerous obligations that may never have been contemplated within the SAMP. These obligations may not end with approval of the proposed actions. If project opponents conclude at some point in the future that there has been a failure to continue to honor ongoing mitigation commitments, they could initiate additional litigation risk assailing the effectiveness of mitigation measures adopted in the FONSI. This uncertainty could continue years after project approval, for as long as mitigation measures remain in place. As a result, an EA/FONSI that requires extreme mitigation may well be more difficult to implement than taking the time to prepare an EIS, which would not require such mitigation proposals.

AA-2

Second, Alaska Airlines urges the Port to expand *what* the forthcoming environmental analysis should consider. At present, the range of alternatives slated for detailed consideration is inadequate. In NEPA analysis, if an alternative satisfies the project's Purpose and Need and is feasible, that alternative warrants close scrutiny in the EIS or EA. Here, the Port has stated that the Purpose and Need for the projects identified in the SAMP is to address concerns that are applicable to the entire airport. As a result, the Port's decision to address future airport-wide demands by considering only North Terminal alternatives is both ill-advised and legally inadequate, especially when another feasible alternative is available.



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Alaska Airlines has demonstrated that an alternative involving extensions and/or modifications to existing concourses in the Main Terminal is a viable, feasible alternative that can satisfy the SAMP's Purpose and Need when paired with certain roadway and other improvements considered in the SAMP – and others in the main terminal and transportation access that would be ancillary to this work. The alternative proposed by Alaska Airlines would address inefficiencies in the existing terminal, inadequacies which would be unaffected by the proposals in the SAMP. Alaska Airlines' alternative merits detailed consideration in the NEPA process.

AA-2  
There are at least several benefits that could result if the alternative proposed by Alaska Airlines is given detailed consideration in the NEPA process. Alaska Airlines has shown that the proposal advanced in the SAMP poses a substantial risk of overbuilding. The SAMP ignores already approved construction projects, including the North Satellite Modernization Project, the International Arrival Facility, and Concourse D Annex project. These projects will add approximately 25% more aircraft parking positions by 2022 than existed in 2017. Even with conservative utilization of these additional facilities, this added capacity will accommodate the 2027 demand forecast.

Also, detailed consideration of a more modest alternative would provide the Port and stakeholders with beneficial flexibility in selecting an alternative that meets the SAMP's Purpose and Need without overbuilding. If the concerns of Alaska Airlines are validated and the Port concludes at the conclusion of the NEPA process that the actions proposed by the SAMP are not

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needed, failure to consider a more modest alternative now would require beginning the NEPA process anew, which would be an unfortunate waste of time and resources.

AA-3

Additionally, and separate from the SAMP environmental assessment, the Port plans to conduct an in depth study of the most significant factor contributing to delay at the airport: the limitations on current airspace capacity. Clearly, the overall impact of significant improvement in the region's airspace can play a role in addressing airport delay. The failure to make adequate airspace revisions could compromise the expected benefits of the SAMP. Therefore, it is unclear how the proposed environmental analysis could objectively evaluate the SAMP without incorporating the findings of an airspace study or why the two are not part of the same work stream.

Notably, the timing for conducting the airspace study will preclude its consideration in the SAMP environmental review. This makes no sense. Authorizing the SAMP without linkage to and coordination with the FAA upcoming redesign of the region's airspace is akin to substantially expanding a railroad station without addressing the need for additional train tracks. The Port should not commit to building the proposed terminal facilities for projected growth without some credible plan to make room in the sky for those additional aircraft.

AA-2

Respectfully, Alaska Airlines suggests that when confronted with projections of future growth at Sea-Tac, the Port and the many stakeholders should not be tempted to pursue an overly ambitious response when that response is likely to impose severe operational, customer experience, and financial constraints upon the Port, air carriers, and passengers. It would be especially unfortunate if the burdens of implementing these audacious projects had the effect of

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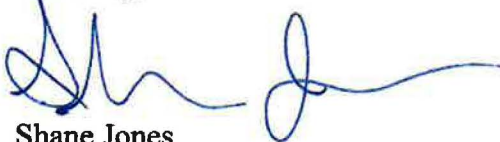
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precluding needed improvements to the Main Terminal where 80% of the airport's passengers will continue to transit, even with a fully-operational new North Terminal. Indeed, using the Port's own data from Leigh Fisher on forecast delay, it is possible that implementation of the SAMP actions could adversely affect the airport's ability to compete with other airports in attracting new carriers and new service.

AA-4  
Finally, Alaska Airlines requests that the Port examine *whether* some of the proposed actions in the SAMP could be implemented in the immediate future rather than waiting for the completion of the NEPA analysis. The FAA has adopted procedures in FAA Order 1050.1F that allow for documented categorical exclusions.<sup>1</sup> Alaska Airlines believes that certain proposed actions, such as the high-speed taxiway for Runway 34L as identified as an airport improvement in the SAMP, has independent utility and could be reviewed through the mechanism of a documented categorical exclusion. Importantly, swift approval of these measures could provide important environmental, customer, and operation benefits, and may not need to be subject to detailed environmental scrutiny.

Thank you for your consideration of these comments.

Sincerely,



Shane Jones

Vice President – Airport Real Estate and Development

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<sup>1</sup> FAA, Order 1050.1F, at 1-6 (July 16, 2015), [https://www.faa.gov/documentLibrary/media/Order/FAA\\_Order\\_1050\\_1F.pdf](https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf).