

## Answer on "LIMITED Update" from FAA

1) Why is the word "limited" used in the title? What are conditions within the "conditional approval" issued for the SAMP NTP?

2) **Description of Action**

"in order to enhance safety and efficiency"

Safety: The FAA has not provided a safety risk analysis as required by their own regulations. The early turn crosses over two active runways and through protected missed approach airspace and poses increased safety risks compared to the previous procedure that included separation and coordination.

The airfield congestion poses safety risks due to a constrained facility on too few acres. No safety risk analysis of airfield or airspace congestion has been provided.

Efficiency: Industry term that means increased airport capacity. The new procedure provides for more throughput of jet takeoffs which produce more noise and emission impacts to predominately environmental justice communities and new impacts to sensitive land uses throughout Burien. FAA has identified environmental justice eligible residential uses below the new procedure in the first CATEX but has failed to analyze for cumulative impacts and failed to consider health, unique and unknown risks, among other categories they are required to evaluate.

3) 2<sup>nd</sup> paragraph: "Noise screening revealed minor expected increases...for turboprops only." This fails to consider the increased noise when added to SAMP noise and previous incremental build projects and other agency proposed actions such as the 509 free extension. The overall noise rises to significant in the project area. Mitigation is required but has not been acknowledged. Although we would expect an environmental analysis to include potential alternatives to the SAMP and mitigation we haven't had the analysis.

Why would we trust the FAA has thoroughly analyzed all project impacts when they assert the SAMP is hardly foreseeable let alone the fact they have not started the SAMP EA analysis yet?

4) 3<sup>rd</sup> paragraph: FAA failed to provide responses to public comments as claimed. They have failed to provide an answer to FOIA requests on technical questions regarding safety. They failed to address significant health and welfare impacts in environmental justice communities impacted by the early turns along with existing significant new noise found in their analysis. FAA failed to address the lack of data and wrong data used for Q400 noise impact. FAA failed to address cumulative impacts of air quality such as ultrafine particulate, fine particle emissions and criteria and toxic emissions previously identified to pose a health risk.

5) **SAMP NTP Development Post-April 2018:** In the prior paragraph the FAA admits they had provided funding for development of the SAMP as early as 2015. The court determined the SAMP was foreseeable. FAA is now justifying the new procedure outside of the SAMP analysis once again.

6) 1<sup>st</sup> paragraph: "...and could be implemented approximately in the year 2027." This statement provides false information. The SEPA EIS planned by the Port of Seattle expects a record of

decision from FAA in the 2<sup>nd</sup> quarter 2021. This project is not planned for 2027 but could commence by 2021 and be finished by 2022, five years earlier than what FAA is inferring.

- 7) **CATEX Analysis:** 3<sup>rd</sup> paragraph "Air quality, noise, and noise and compatible land use are the relevant resource categories that may be impacted by the Preferred Alternative." FAA has left out numerous categories that are affected by the turn including environmental justice, health, social detriments, children's health, cumulative impacts of numerous other incremental capacity building projects including adding 14 gates between 2017 and 2021 (Hardstand – 6 gates and North Satellite – 8 gates) and 509 freeway extension adding 6700 vehicles, mostly cargo trucks in the same area in peak hour. For example:
  - a) The air quality analysis relies on lack of site specific data
  - b) The health assessment has not been done
  - c) The noise analysis revealed levels above significance thresholds eligible for mitigation
  - d) The social detriments to environmental justice eligible families with household numbers of children that exceeds the average for the county has not been analyzed
- 8) **Past, Present, and Reasonably Foreseeable Projects – Updated:** The projects list fails to add the Hardstand Holdroom 6 gates and admits 8 gates for #13 North Satellite Expansion. These two projects received a CATEX from FAA and constitute nearly another SAMP and violate NEPA prohibition on segmenting projects over time. FAA failed to do a cumulative impact analysis for these and failed to add the air and noise impacts predicted for 509 freeway extension. All three of these have a federal NEPA analysis that failed to consider cumulative impacts and other foreseeable SAMP impacts.
- 9) **Reasonably Foreseeable Cumulative Effects of Highway Projects:** FAA fails to mention the increased traffic from the 509 freeway extension which adds an access to the south end of the airport, connects to I-5 and increases congestion, noise and air quality impacts in already impacted airport communities. Applicable NEPA requirements for a cumulative impact analysis have been ignored.
- 10) **Reasonably Foreseeable Cumulative Effects of Airport Projects:** FAA admits project 13 "could allow airlines to schedule more flights at SEA-TAC", therefore this is a capacity building project. The purpose of adding gates is so that aircraft don't wait on the airfield which is severely congested. FAA fails to provide adequate information on risk for a crowded airfield. The new procedure allows for more throughput and the gates allow for more hourly operations. There should be no doubt that each aircraft that can be added to the peak hour is being accommodated by an incremental buildout. Again, this cumulative effects analysis fails to consider all relevant categories and all project impacts on noise, emissions, traffic, congestion, etc., on residents living within blocks of these increased operations. Each aircraft is a source of high levels of air and noise pollution. FAA seeks to diminish the significance of cumulative effects on people, property and quality of life.
- 11) FAA fails to mention that there is no room on the airfield for aircraft to wait for a gate. The small size of Sea-Tac at 2500 acres is the smallest footprint in the nation for an airport trying to

accommodate the number of aircraft arriving and departing. FAA ignores their safety mandate to analyze risk of aircraft operating too close to each other and then applies it to alleviating a problem they allowed. Increased hourly throughput is capacity building. Without adding gates, the airfield is TOO CONGESTED to be safe.

12) **Project 14, SAMP NTP:** The FAA is dismissing their court ordered cumulative impact analysis by stating in paragraph #2: "Some of those potential impacts will include construction impacts and ground-disturbing impacts; none of which are relevant to the Preferred Alternative analyzed in the CATEX." It appears they are already determining a FONSI without doing the analysis of impacts in categories required by NEPA.

13) Paragraph #4 "CATEX showed there would be no significant impact." The court ordered a more thorough analysis. FAA is here dismissing their responsibility under NEPA and defying the court. They did not do the proper analysis and cannot dismiss significance without it. They are asserting the same wrong conclusion that they did in the very first instance. This assertion should make one wonder why they are so determined to avoid transparency and scrutiny.

4<sup>th</sup> paragraph: "The preferred Alternative, when combined with the projects of the SAMP NTP, would not trigger a significant increase in noise and noise compatible land use or air impacts." FAA has again dismissed their responsibilities under NEPA using the same flawed process as the one that brought them to court in the first place. They dismiss significance with the new procedure even though they already admitted significance for noise. They assert there be no significant impacts for noise or air quality BEFORE they have done the analysis the court ordered them to do.

This document makes bold and broad statements but lacks substance as in the first iteration, PEA, second iteration CATEX. They excuse themselves from the court ordered cumulative analysis by writing another flawed analysis. FAA even goes so far as to predict the future by saying there will be no cumulative significant impacts in their SAMP EA. They essentially have just issued a SAMP EA FONSI without its analysis.

14) FAA never explores the possibility that without added gates and early turns there would be no ability of airlines to schedule more operations. Airports have a theoretical maximum hourly capacity. Exceeding that capacity causes congestion that can lead to safety risks.

15) **Cumulative Impact Analysis, Air Quality:** "In addition, no projects or proposals have been identified that, when combined with the Preferred Alternative, would have substantial GHG emissions, or would lead to a violation of any Federal state or local air regulation. According to EPA between 2014 and 2017, 75,658 annual aircraft operations have been added at Sea-Tac.<sup>1</sup> with criteria and air toxics increasing by 8,254 tons per year. The highest emission inventory from the last analysis for the third runway EIS completed in 1997 was for a total of 5,385 tons per year for 2020 which has been vastly exceeded in 2017 with a total of actual 13,594 tons per year. The terminal planned in the SAMP was conditioned by FAA based on potential Clean Air Act violations revealed within the third runway analysis EIS. One of the reasons for this almost

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<sup>1</sup> 2014 340,478 with 5310 tons per year from EPA using EDMS model and 2017 is 416,136 with 13,594 tons per year from EPA using AEDT model)

three-fold increase in emissions has been the sunsetting of smaller planes and commuter aircraft and the addition of larger jets for Delta Hub which was not foreseen in 1997. This area has already been monitored to exceed safety limits for air toxics and currently is subject of highly controversial findings by the University of Washington for ground level impacts of jet related ultrafine particulate impacts known to cause negative health effects.

- 16) "...would have substantial GHG emissions" Since 2014, Greenhouse Gas Emissions (GHG) of nitrogen dioxide (NO<sub>2</sub>) have increased by 74,000 tons per year which exceeds the significance threshold of 50,000 tons per year.
- 17) FAA has identified environmental justice eligible communities in their CATEX that have been left off from the list of environmental categories. This population was evaluated within the 509 freeway analysis occurring in the same geographic area, with similar timing, impact categories and admitted increased impacts but also failed to include cumulative SAMP impacts, a site specific analysis of air quality, noise, among others.
- 18) "The Preferred Alternative, when combined with the projects of the SAMP NTP, would not trigger a significant increase in noise and noise compatible land use or air impacts." This statement assumes a future EA FONSI for the SAMP before even writing the EA!