

<https://www.portseattle.org/projects/north-satellite-modernization>

8 new gates

<https://www.portseattle.org/projects/concourse-d-annex>

6 gates

The decision from the 9th Circuit Court has remanded the new flight path through Burien known as the "Burien Turn" to the FAA to analyze for significant cumulative impacts considering the SAMP development. Within the decision the court referred to NEPA 40 CFR § 1508.7 which states:

"Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other

past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes

such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a

period of time.

When considering the CATEX issued by FAA for the Burien Turn, the court referred to NEPA 40 CFR § 1508.4 which states:

"Categorical exclusion" means a category of actions which do not individually or cumulatively have a significant effect on the human

environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of

these regulations (§ 1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement

is required. An agency may decide in its procedures or otherwise, to prepare environmental assessments for the reasons stated in

§ 1508.9 even though it is not required to do so. Any procedures under this section shall provide for extraordinary circumstances in

which a normally excluded action may have a significant environmental effect.

In considering whether FAA should now analyze cumulative effects of the Burien Turn along with other development actions, it is important that the court included the SAMP as a foreseeable future action. However, past and present actions are also equally important in NEPA. The benchmark for finding significance is critical in FAA's decision making on whether the agency will, as a result of looking at

various EA categories, find significance not just in future actions but also past and present actions. This includes not only Port of Seattle and FAA proposals but also other agencies.

Below is a listing of the EA categories FAA must consider:

Table 1: List of Environmental Impact Categories in FAA Order 1050.1Fⁱ

	Environmental Impact Category
1	Air Quality
2	Biological Resources
3	Climate
4	Coastal Resources
5	Department of Transportation Act, Section 4(f)
	Environmental Impact Category
6	Farmlands
7	Hazardous Materials, Solid Waste, and Pollution Prevention
8	Historical, Architectural, Archeological and Cultural Resources
9	Land Use
10	Natural Resources and Energy Supply
11	Noise and Noise-Compatible Land Use
12	Socioeconomics, Environmental Justice, and Children's Environmental Health And Safety Risks
13	Visual Effects
14	Water Resources
15	Cumulative Impacts
16	Irreversible and Irrecoverable Commitment of Resources

https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_n_ea_order/desk_ref/media/desk-ref.pdf

Various projects that may contribute to significance, extraordinary circumstances, high and adverse impacts or known and unknown risks are:

- 1) CATEX Burien Turn (FAA determined that noise exceeds a 1.5 db increase at and above 65 DNL for some of the area of analysis. The corridor of residential uses experiencing impacts as a result of the new flight path is limited but showed an increase in noise to 5% of the population. Because noise has increased above that analyzed for the third runway (Part 150 Update 2013-2018) more population centers may now be affected by a 1.5 db increase at or above 65 DNL but only a limited area was analyzed for the Burien Turn CATEX. The majority of the census tracts analyzed for this CATEX are eligible for environmental justice consideration but no consideration was given because significance was dismissed by FAA. This dismissal was based upon FAA analyzing the Burien Turn as a single project that lacked analyses of past, present and

foreseeable cumulative impacts. The 9th Circuit Court has remanded this issue to FAA for greater cumulative impact analysis consideration.

- 2) North Star Modernization <https://www.portseattle.org/projects/north-satellite-modernization>
This project adds 8 gates and reconfigured gates to accommodate wide-body aircraft. A NEPA CATEX was issued by FAA on 11/24/2014
- 3) Hardstand Holdroom <https://www.portseattle.org/projects/concourse-d-annex>
This project added 6 gates and a Port of Seattle SEPA DNS with FAA NEPA CATEX citation is attached. February 10, 2017
- 4) Extension of 509. Site specific evaluation of emissions was not performed. A NEPA analysis did not include a cumulative impact analysis of 509 wetland/water quality, noise and emissions along with SAMP. SAMP planning through 2034 may need to be analyzed due to the SASA and 509 multiple project impacts through the same planning period, air and watershed.

See Order 1050.1F copied below for significance threshold determination:

7/16/15 Order 1050.1F Chapter 5: Categorical Exclusions 5-1. General. The CATEXs listed in Paragraphs 5-6.1 through 5-6.6 are for types of actions that the FAA has found do not normally have the potential for individual or cumulative significant impacts on the human environment.

a. Scope of CATEX. The responsible FAA official must determine whether a proposed action is within the scope of a CATEX listed in this chapter. If a proposed action is within the scope of a CATEX, but the responsible FAA official determines that extraordinary circumstances exist, an EA or EIS must be prepared. If a proposed action is not within the scope of a CATEX, an EA or EIS must be prepared. The CATEX determination process is described in flowchart form in Exhibit D-1 of Appendix D.

b. Segmentation. A CATEX should not be used for a segment or an interdependent part of a larger proposed action.

Please see attached conversation between FAA and Port of Seattle where the Port of Seattle asserts independence and requests a CATEX. It does not appear FAA independently reviewed this project along with other projects for significance.

5-2. Extraordinary Circumstances.

a. Extraordinary Circumstances. Extraordinary circumstances are factors or circumstances in which a normally categorically excluded action may have a

significant environmental impact that then requires further analysis in an EA or an EIS. For FAA proposed actions, extraordinary circumstances exist when the proposed action meets both of the following criteria (see 40 CFR § 1508.4, CEQ Regulations):

(1) Involves any of the circumstances described in Subparagraph b. below; and (2) May have a significant impact (see 40 CFR § 1508.4, CEQ Regulations). An impact involving one or more of the circumstances described below in connection with a proposed action does not require the preparation of an EA or EIS unless the additional determination is made that the proposed action may have a significant environmental impact (i.e., that the circumstances rise to the level of extraordinary circumstances). The FAA uses screening and other analyses and consultation, as appropriate, to assist in determining extraordinary circumstances (see supporting guidance in the 1050.1F Desk Reference for information to determine the potential for significant environmental impacts and Paragraph 4-3 of this Order for the FAA's significance thresholds and factors to consider in evaluating significance). When extraordinary circumstances exist and the proposed action cannot be modified to eliminate the extraordinary circumstances, an EA or EIS must be prepared. If extraordinary circumstances do not exist or are eliminated, a CATEX may be used. If it is uncertain whether the proposed action involves an extraordinary circumstance, the LOB/SO should consult with AEE and AGC for guidance.

b. Circumstances. An extraordinary circumstance exists if a proposed action involves any of the following circumstances and has the potential for a significant impact: (1) An adverse effect on cultural resources protected under the National Historic Preservation Act of 1966, as amended, 54 U.S.C. §300101 et seq.; (2) An impact on properties protected under Section 4(f); (3) An impact on natural, ecological, or scenic resources of Federal, state, tribal, or local significance (e.g., federally listed or proposed endangered, threatened, or candidate species, or designated or proposed critical habitat under the Endangered Species Act, 16 U.S.C. §§ 1531-1544); (4) An impact on the following resources: resources protected by the Fish and Wildlife Coordination Act, 16 U.S.C. §§ 661-667d; wetlands; floodplains; coastal zones; national marine sanctuaries; wilderness areas; National Resource

Conservation Service-designated prime and unique farmlands; energy supply and natural resources; resources protected under the Wild and Scenic Rivers Act, 16 U.S.C. §§ 1271-1287, and rivers or river segments listed on the Nationwide Rivers Inventory (NRI); and solid waste management; (5) A division or disruption of an established community, or a disruption of orderly, planned development, or an inconsistency with plans or goals that have been adopted by the community in which the project is located; (6) An increase in congestion from surface transportation (by causing decrease in level of service below acceptable levels determined by appropriate transportation agency, such as a highway agency); (7) An impact on noise levels of noise sensitive areas; (8) An impact on air quality or violation of Federal, state, tribal, or local air quality standards under the Clean Air Act, 42 U.S.C. §§ 7401-7671q; (9) An impact on water quality, sole source aquifers, a public water supply system, or state or tribal water quality standards established under the Clean Water Act, 33 U.S.C. §§ 1251-1387, and the Safe Drinking Water Act, 42 U.S.C. §§ 300f-300j-26; (10) Impacts on the quality of the human environment that are likely to be highly controversial on environmental grounds. The term “highly controversial on environmental grounds” means there is a substantial dispute involving reasonable disagreement over the degree, extent, or nature of a proposed action’s environmental impacts or over the action’s risks of causing environmental harm. Mere opposition is not sufficient for a proposed action or its impacts to be considered highly controversial on environmental grounds. Opposition on environmental grounds by a Federal, state, or local government agency or by a tribe or a substantial number of the persons affected by the action should be considered in determining whether or not reasonable disagreement regarding the impacts of a proposed action exists. If in doubt about whether a proposed action is highly controversial on environmental grounds, consult the LOB/SO’s headquarters environmental division, AEE, Regional Counsel, or AGC for assistance; (11) Likelihood to be inconsistent with any Federal, state, tribal, or local law relating to the environmental aspects of the proposed action; or (12) Likelihood to directly, indirectly, or cumulatively create a significant impact on the human environment, including, but not limited to, actions likely to cause a significant lighting impact on residential areas or

commercial use of business properties, likely to cause a significant impact on the visual nature of surrounding land uses, likely to cause environmental contamination by hazardous materials, or likely to disturb an existing hazardous material contamination site such that new environmental contamination risks are created

PUGET SOUND GATEWAY PROGRAM – PHASE 1 OF THE SR 509 COMPLETION PROJECT

Environmental Re-evaluation

Prepared for
Federal Highway Administration
Washington State Department of Transportation

Prepared by
SR 509 Program Team

January 2018

Table 2. Comparison of 2015 AM and PM Peak Hour Traffic Volumes on Study Area F

Measurement Point	Freeway	Location	2015 AM Peak Hour (total in both directions)	2015 PM Peak Hour (total in both directions)
1	SR 509	North of SW 146th St	4,470	5,300
2	SR 509	North of S 188th St	2,320	3,510
3	S 188th St	West of 28th Ave S	1,630	2,450
4	SR 99	South of S 188th St	1,880	2,800
5	SR 518	East of North Airport Expressway/SR 99	7,000	8,490
6	I-5	North of S 188th St	14,040	15,540
7	I-5	North of S 200th St/Military Rd S	12,780	15,280
8	I-5	North of SR 516/Veterans Dr	12,830	15,280
9	I-5	North of S 272nd St	12,170	15,100
10	I-5	North of S 320th St	11,510	14,400
11	SR 509 Extension	Between I-5 and 28th/24th Ave	The SR 509 extension does not exist and there are no traffic volumes reported for 1998 are from the 2003 FEIS.	

Notes: Volume measurement points are displayed in Figure 5. Volumes are in vehicles per hour (vph) for both 2015 and 1998. Volumes reported for 1998 are from the 2003 FEIS.

Table 7. Future (2045) AM and PM Peak Hour Traffic Volumes on Study Area Roads

Measurement Point (Figure 5 shows each measurement point)		AM Peak Hour (vph)			PM Peak Hour	
		No Build	Build	+/-	No Build	Build
1	SR 509 (north of SW 146th St)	6,250	6,460	+	6,820	7,120
2	SR 509 (north of S 188th St)	3,470	4,930	+	4,590	6,100
3	S 188th St (west of 28th Ave S)	2,380	1,990	-	3,140	2,700
4	SR 99 (south of S 188th St)	2,150	1,600	-	3,110	2,800
5	SR 518 (east of North Airport Expressway/SR 99)	8,930	8,700	-	11,230	10,800
6	I-5 (north of S 188th St)	15,890	15,430	-	16,040	15,600
7	I-5 (north of S 200th St/Military Rd S)	14,510	13,600	-	16,030	15,300
8	I-5 (north of SR 516/Veterans Dr)	14,680	17,090	+	16,560	20,400
9	I-5 (north of S 272nd St)	14,490	15,270	+	16,760	18,600
10	I-5 (north of S 320th St)	14,230	14,660	+	16,480	16,800
11	SR 509 Extension (west of I-5)	N/A	3,700	+	N/A	4,600

Notes: Volume measurement points are displayed in Figure 5. Volumes are in vehicles per hour (vph) and include both the north and southbound directions. N/A = not applicable

Table 11. Criteria Pollutants Daily Regional Emission Burden Assessment for Forecast Years 2025 and

Criteria Pollutant (lb/day)	Existing 2015	2025 No Build	2025 Project	2045 No Build	2045 Project	% Change 2015 to 2025 No Build	% Change No Build to 2025 Project	% Change 2015 to 2045 Build
Daily VMT	8,388,569	9,770,869	9,725,661	10,939,599	10,756,165	16%	0%	30%
CO	69,434	40,352	39,804	18,860	18,523	-43%	-1%	-73%
PM _{2.5}	1,370	417	409	215	214	-70%	-2%	-84%
PM ₁₀	1,497	457	449	237	235	-70%	-2%	-84%
VOCs	3,529	1,268	1,223	744	727	-64%	-4%	-79%
NO _x	36,129	11,621	11,542	7,467	7,428	-68%	-1%	-79%

Sources for 2015 conditions: PSRC Travel Demand Model, EPA MOVES Model 2014a

lb/day = pounds per day

VMT = vehicle miles traveled

Table 12. Toxic Air Pollutants Daily Regional Emission Burden Assessment for Forecast Years 2025 and 2045

Criteria Pollutant (lb/day)	Existing 2015	2025 No Build	2025 Project	2045 No Build	2045 Project	% Change 2015 to 2025 No Build	% Change No Build to 2025 Project	% Change 2015 to 2045 No Build
Daily VMT	8,388,569	9,770,869	9,725,661	10,939,599	10,756,165	16%	0%	30%
1-3-Butadiene	10	2	2	0	0	-83%	-3%	-98%
Acrolein	12	4	4	3	3	-66%	-3%	-77%
Acetaldehyde	80	29	28	20	20	-64%	-3%	-75%
Benzene	79	27	26	14	13	-66%	-3%	-83%
Ethyl Benzene	40	16	15	10	9	-61%	-4%	-76%
Diesel PM	1,304	344	336	164	163	-74%	-2%	-87%
Naphthalene	19	7	6	5	5	-64%	-3%	-75%
PAH	9	2	2	1	1	-75%	-3%	-92%

Sources: PSRC Travel Demand Model and EPA MOVES2014a.

lb/day = pounds per day

VMT = vehicle miles traveled

Table 13. Greenhouse Gas Emissions in Terms of CO_{2e} for Forecast Year 2025 and 2045

Pollutant	2015 Existing	2025 No Build	2025 Project	2045 No Build	2045 Project	% Change 2015 to 2025 No Build	% Change No Build to 2025 Project
Daily VMT	8,388,569	9,770,869	9,725,661	10,939,599	10,756,165	16%	0%
Operational MMT CO _{2e} /yr	1.92	2.00	1.98	2.14	2.11	4%	-1%

Sources: PSRC Travel Demand Model and EPA MOVES2014a.

MMT = Million metric tons

ENVIRONMENTAL JUSTICE

8. How would cumulative and indirect effects compare to the 2003 FEIS Alternative C2?

The Alternative C2 analysis concluded that the SR 509 Extension Project would not create cumulative or indirect effects for environmental justice populations. Since 2003, however, there have been several reasonable and foreseeable changes in the study area.

In 2016, Sound Transit completed preliminary engineering and the FEIS for the Federal Way Link Extension. Sea-Tac Airport continues to see increased air traffic and is in the process of developing its Sustainable Airport Master Plan (to be completed in 2018). The Sustainable Airport Master Plan is assuming growth in commercial aircraft taking off from and landing at Sea-Tac Airport.

These plans and projects, combined with the effects of the Phase 1 Improvements, are likely to create a cumulative adverse effect on the neighborhoods in the study area. Specifically, the property acquisitions associated with the Federal Way Link Extension, combined with WSDOT's property acquisitions for the Phase 1 Improvements, would result in a greater loss of housing and commercial space in the study area than Phase 1 alone.

Given that these neighborhoods have substantial minority, low-income, and limited English proficient populations, the cumulative loss of housing and commercial space would affect environmental justice populations and communities, but the impacts would be similar to the general population.

We did not identify any indirect impacts of Phase 1 to environmental justice populations.

Information Item: Regional Air Quality Status

The Puget Sound Region is in attainment for all criteria air pollutants

The US Environmental Protection Agency sets federal standards for a number of criteria air pollutants. Air pollutant monitors track concentrations of air pollutants to determine compliance. EPA periodically reviews the standards to determine if a stricter value is necessary to protect human health.

Exceeding the standard can cause the EPA to designate an area as nonattainment. A state must develop a plan with partners to reduce emissions to come back into compliance.

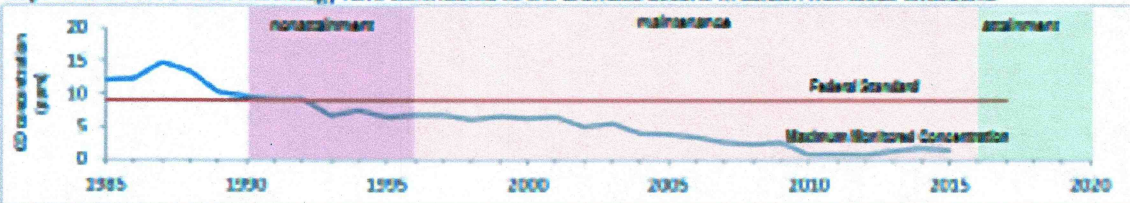
After a period of meeting the standard, an area can apply for attainment status, and a 20-year maintenance period begins. Emissions must be closely tracked during this maintenance period to ensure air pollutant concentrations remain below the federal standards.

After the 20-year maintenance period, MPOs are no longer required to track transportation emissions.

The following charts summarize the status of the air pollutants that PSRC evaluates.

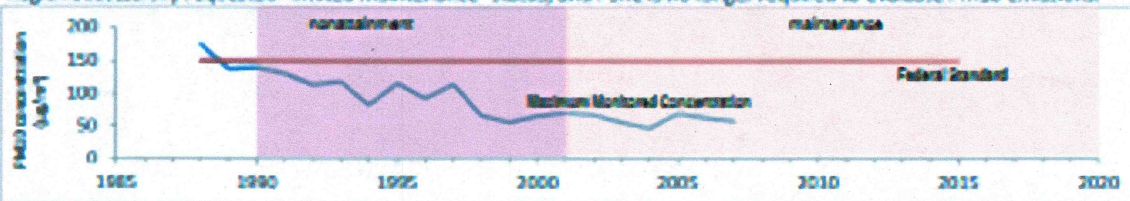
Carbon Monoxide (CO): Puget Sound Region has reached end of 20-year maintenance period.

Improvements to vehicle technology have contributed to the dramatic decline in carbon monoxide emissions.



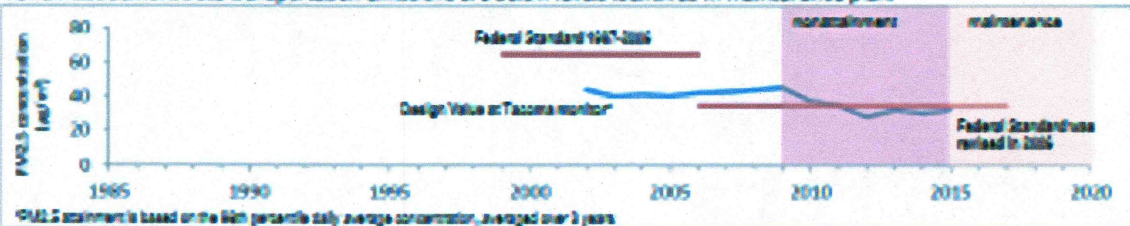
Coarse Particulate (PM10): Puget Sound Region is within 20-year maintenance period.

Region successfully requested "limited maintenance" status, and PSRC is no longer required to evaluate PM10 emissions.



Fine Particulate (PM2.5): A portion of Pierce County is within 20-year maintenance period until 2025.

PSRC must demonstrate transportation emissions are below levels identified in maintenance plan.



Ozone: Puget Sound region is in attainment of the federal standard.

EPA revised the 8-hour federal ozone standard to a stricter value in 2015. Ecology will be recommending the Puget Sound Region be designated attainment to the standard, as summarized in their August 2016 proposal. Ozone is formed when certain pollutants react with sunlight, and this reaction takes several hours and usually occurs downwind of metropolitan areas. The highest ozone concentrations in our region are typically at the Enumclaw monitor in the Cascade foothills.



Footnote: In 1990 the Puget Sound region was designated nonattainment for the 1-hour ozone standard. The area was redesignated attainment in 1996, starting a 20-year maintenance period. EPA revoked the 1-hour ozone standard in 2005, and the standard no longer

<https://www.psrc.org/sites/default/files/air-quality-summary.pdf>

Despite vast improvements in vehicle emissions, aircraft emissions continue to climb rapidly. From the graph above, it appears that regional levels of PM and ozone is approaching the limit of the federal standard. Sea-Tac airport jet aircraft emissions contribute 53 tons per year of particulate to the local airshed and ozone precursors which add 3,448 tons per year of NOx and 1124 tons per year of hydrocarbons.ⁱⁱ The sources at Sea-Tac contribute a higher level of ozone precursors than any other acre in the county.ⁱⁱⁱ A site specific dispersion analysis should have been conducted by WSDOT to characterize current and future build conditions, especially considering an additional 200,000 annual aircraft operations are predicted in the future over the 2015 baseline along with an added 3700 to 4600 daily peak hour vehicles, mostly cargo trucks within the same airshed. And although the regional emission model WSDOT used for their analysis of criteria and toxic air pollution indicates emissions are declining over time, the amount of carbon monoxide for instance, at 6700 tons per year at Sea-Tac has not been considered additive in the geographic area of the build option and the levels of air toxics such as acrolein, benzene, 1,3 butadiene, known to be high and exceeding ASIL levels around Sea-Tac, were never considered in a site specific analysis for their potential human health effects. WSDOT is obligated with their federal funding assistance NEPA responsibilities to evaluate the area of impact. *- but they failed?*

All of these impacts need to be considered cumulatively in a site-specific analysis to determine significance. The analysis should also consider that most of the area exceeds noise levels posing a cumulative risk to health that should be considered along with cumulative emissions. Recent FAA CATEX for the Burien Turn *"study area"* has found that a portion of the analyzed impact within the same corridor for 509 exceeds 65 DNL and all predictions through 2018 from the FAA FAR 150 *part study for* noise analysis 2013-2018. The CATEX therefore confirms that the Sea-Tac Airport noise information that was likely used by WSDOT to characterize existing conditions is inaccurate and mitigation *is compelled* may be necessary. This also means that people have been living potentially for years in an unhealthy environment. *at least 2003 (date of prev. Part 150 study)*

// Rewrite comparing

Don't understand this P

Have operations changed since 2014 and how many have been accommodated by added gates from incremental build operations? (Hardstand Holdroom and North Satellite 14 to 16 added gates [note: POS communication says 10 gates were added for the North Satellite Modernization while the SEPA checklist reports 8]).

In tons per year emissions:

2014 Annual Operations: 340,478 Emissions (EPA EDMS)	2350 NOx 251 SOx-5,310 Tons Per Year Criteria and Air Toxic
2015 Annual Operations: 381,408 2015)	1472 NOX 143 SOx (Elizabeth Leavitt Port of Seattle memo
2016 Annual Operations: 412,170	
2017 Annual Operations: 416,136 Emissions (EPA AEDT)	3448 NOx 480 SOx – 13,594 Tons Per Year Criteria and Air Toxic
2018 Annual Operations: 438,391	

December 18 2019 Puget Sound Business Journal article "Port of Seattle delays environmental review for Sea-Tac airport expansions" says: "Expansion projects include a \$2.3 billion plan to build a

mt

standalone **north terminal with 19 gates, which would allow for hundreds of additional daily takeoffs and landings.** (emphasis added)

statement of fact, true
From this assumption, the 14 gates recently added in two FAA CATEX projects would also allow for hundreds of additional daily takeoffs and landings. In addition, turning turboprop aircraft out of the flight path more quickly would allow more throughput, more takeoffs in a peak period. It is apparent that from 2014 to 2016, a significant number of aircraft operations have been added to annual operations. It is also clear that EPA estimates of emissions shows a significant increase in tons per year of emissions. *33% increase?* It is important to note that the last full environmental review of Sea-Tac Airport emissions in 1996 for the Sea-Tac Airport Third Runway Master Plan EIS included no jet particulate emission information as it was eliminated from the model and included only a fraction of the emissions currently estimated by EPA for the highest number of operations in the forecast period to 2010. For instance, aircraft NOx for 2005 with 445,000 operations was estimated in 1997 SEIS to be 1441 tons per year. The actual level according to EPA is nearly three times that high. *Highlight once clarified*

In conclusion, the airshed is and will be experiencing levels of operations including expanded freeway and airport throughput where emissions have not been monitored, analyzed, or predicted for impacts, significance thresholds, hot spots, etc. Variations on emission predictions are so significant, reliability of any analysis is questionable. Site specific analysis by WSDOT for 509 is unavailable and cumulative impacts for all projects has not been performed by any agency.

Below are emails between FAA and Port of Seattle from a PDR. These indicate that FAA did not do their own analysis but ~~relied on information provided by the Port of Seattle~~ for the North Satellite and Hardstand Holdroom 14 gate expansion.

conduct

delegated decision-making to POS

*Emails as
Appendices?*

From: Cayla.Morgan@faa.gov To: Rybolt, Steven Cc: Tykoski, Robert; Sandy.Simmons@faa.gov; Jennifer.Kandel@faa.gov; Coates, Mark; Kikillus, Robert; Mandi.Lesauis@faa.gov; Joelle.Briggs@faa.gov; Jason.Ritchie@faa.gov Subject: RE: NEPA & Hardstand/Holdroom Projects Date: Friday, February 10, 2017 2:41:39 PM

Steve,

Based upon the information provided, I concur that the Hardstand and Holdroom projects are categorically excluded pursuant to the paragraphs cited below.

Thanks,

Cayla D. Morgan Environmental Protection Specialist Seattle Airports District Office 425-227-2653

From: Rybolt, Steven [mailto:Rybolt.S@portseattle.org] Sent: Friday, February 10, 2017 12:36 PM To: Morgan, Cayla (FAA) Subject: RE: NEPA & Hardstand/Holdroom Projects

Hi Cayla,

I've updated the document per our discussion on 2/10/17.

On January 27, 2017, Jennifer Kandel (FAA Northwest Region ADO Airport Planner) completed the FAA's planning process (see attached email, Action: SEA - Hardstand Document planning complete) for the holdroom and hardstand projects at Seattle – Tacoma International Airport.

The purpose of the hardstand and holdroom projects is to accommodate existing growth and maintain high, but comfortable, enplanements per gate. Per the email from you on January 30, 2017 after reviewing the planning documentation, "it appears the project can be categorically excluded without the need for additional documentation in accordance with FAA Order 1050.1F, paragraph 5-6.4 (e)." Attached is the detailed planning document reviewed and accepted through the FAA's planning process (i.e. PreSAMP_GatePlanning-1-27-17). Per your request, each project is identified below and a categorical exclusion (or existing FAA NEPA finding) per FAA Airports, ARP SOP 5.00, Section 7.1 and FAA Order 1050.1F is proposed:

PROJECTS DESCRIPTIONS
Finding
Holdroom

Proposed Categorical Exclusion or Existing
Concourse B Ramp Level
FAA Order 1050.1F, Section 5

6.4.h Gate D6 Sloping Walkway
56.4.h Concourse D Hardstand Holdroom
Concourse B Narrow Body Gate Adjustments
Satellite Narrow Body Gate Adjustments
STAR

FAA Order 1050.1F, Section
FAA Order 1050.1F, Section 5-6.4.h
FAA Order 1050.1F, Section 5-6.4.h South
FAA Order 1050.1F, Section 5-6.4.h North
Categorical Exclusion (2/3/17)

ADDITIONAL HOLDROOM/GATE PROJECTS

International Arrivals Facility
Holdroom Expansion
and Vehicle Parking

Categorical Exclusion (4/22/15) Gate C3
FAA Order 1050.1F, Section 5-6.4.h Equipment
FAA Order 1050.1F, Section 5-6.4.f

HARDSTAND OPERATIONS

Hardstand 5*
Hardstand 7*
Aircraft Control
FAA Order 1050.1F, Section 56.4.a

FAA Order 1050.1F, Section 56.4.h
FAA Order 1050.1F, Section 56.4.h
Existing Condition Bussing Operations

*Existing condition. No physical changes are anticipated to Hardstand 5 and 7. However, there is a change of use from RON parking to a joint RON parking and hardstand operations at these sites.

The projects noted above fall within Seattle – Tacoma International Airport’s existing fence line and is on previously disturbed ground. Additionally, the projects:

- Do not anticipate to impact any threatened or endangered species; - Will be accommodated through the airport’s existing stormwater management plan; - Will accommodate existing aircraft operations; - Do not anticipate to increase noise over noise sensitive areas; and - Do not involve any other extraordinary circumstances.

Please let me know how you’d like me to proceed, if you have any questions, or what additional information I can provide to you.

Thank you,

Steve Rybolt Port of Seattle, Aviation Environmental Programs P.O. Box 68727 Seattle, WA 98168

O: 206.787.5527 C: 206.554.1235 F: 206.787.6617

From: Cayla.Morgan@faa.gov To: Rybolt, Steven Cc: Peter.Doyle@faa.gov Subject: RE: SEA: NEPA & NSAT Terminal Expansion Date: Monday, November 24, 2014 4:18:07 PM

Thanks for the additional information, Steve. I concur with your determination that this project qualifies for a CatEx pursuant to 310(h) without further documentation.

From: Rybolt, Steven [mailto:Rybolt.S@portseattle.org] Sent: Monday, November 24, 2014 4:09 PM To: Morgan, Cayla (FAA) Subject: RE: SEA: NEPA & NSAT Terminal Expansion

Hi Cayla,

Thank you for the response.

The project is independent and has nothing to do with the International Arrivals Facility (IAF). Either could function without the other.

The drawings I sent over were to show you that 1) it is on our ALP as a future project, and 2) depict the actual footprint of the facility (it is smaller than what we depict on our ALP). I also included both the footprint and gross square foot numbers as an indicator of the extent of the expansion. Overall, I feel that it is a minor facility expansion as it will not change or impact airport functions once complete.

I am seeking your concurrence with a CatEx pursuant to 310(h), specifically for a non-documented CatEx if applicable. I am going off the FAA's ARP SOP 5.0 as the process, but am seeking your help to understand what I need to do otherwise.

Please don't hesitate to let me know what additional information I can provide you.

Thank you,

Steve Rybolt Port of Seattle | Aviation Environmental Programs P.O. Box 68727 Seattle, WA 98168 P: 206.787.5527 C: 206.554.1235 F: 206.787.6617

From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov] Sent: Monday, November 24, 2014 3:34 PM To: Rybolt, Steven

Subject: RE: SEA: NEPA & NSAT Terminal Expansion

Steve,

Just a couple of questions at this time. Can you confirm that this project is independent of the International Arrivals project and of the drawings you sent, two are really to provide perspective and the one showing the "proposed expansion" is what you are seeking concurrence with a CatEx pursuant to 310(h).

Thanks,

Cayla

From: Rybolt, Steven [mailto:Rybolt.S@portseattle.org] Sent: Thursday, November 20, 2014 4:30 PM To: Morgan, Cayla (FAA) Subject: RE: SEA: NEPA & NSAT Terminal Expansion

Hi Cayla,

I apologize for the second email, I wanted to clarify and update the information below and give you more descriptive numbers. The number below are for gross square footage, not the footprint. I've included and updated square footage numbers below and in the original email below.

Scope: Renovate and expand the existing 91,500 square foot (213,500 gross square feet) North Satellite Terminal footprint to 154,500 square feet (395,000 gross square feet)

Please let me know if you have any questions.

Thank you,

Steve Rybolt Port of Seattle | Aviation Environmental Programs

From: Rybolt, Steven Sent: Monday, November 17, 2014 1:23 PM To: cayla.morgan@faa.gov Cc: Rybolt, Steven Subject: SEA: NEPA & NSAT Terminal Expansion

Hi Cayla,

We are in the process of wanting to expand our North Satellite. I am inquiring as to the process you'd like us to follow for NEPA review.

Under your guidance, we'd like to propose a non-documented Categorical Exclusion per FAA Airports, ARP SOP 5.00, Section 7.1. We feel that this project is eligible for a Categorical Exclusion under 1050.1E, 310h* and does not involve any extraordinary circumstances. Below (i.e. Scope) and attached (Proposed project map [2] and

current ALP) is information about the project. We are completing SEPA for this proposed project.

*1050.1E, 310h - Federal financial assistance, licensing, or ALP approval for construction or expansion of facilities, such as terminal passenger handling and parking facilities or cargo buildings, at existing airports and launch facilities that do not substantially expand those facilities.

SCOPE: North Satellite Terminal Expansion - Renovate and expand the existing 91,500 square foot (213,500 gross square feet) North Satellite Terminal. This project includes the following elements:

- Seismic reinforcement;
- Renovation of all impacted infrastructure (i.e. mechanical, electrical, lighting, plumbing, data, communications and security systems);
- Optimization of existing twelve airplane gates and addition of eight new airplane gates in the 63,000 square foot building expansion (181,500 gross square feet), for a total of twenty contact gates;
- Construction of the rooftop shell for AAG's Board Room as a tenant improvement;
- Vertical circulation (i.e. elevator and stair) in the expansion area to support dual-door aircraft operations;
- Construction of in-flight service and ramp operations offices; and
- Incorporation of passenger amenities (i.e. more conveniently located and enlarged public restrooms, electronic charging stations, voice paging, etc.).

Please let me know how you'd like me to proceed, if you have any questions, or what additional information I can provide you.

Thank you,

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ⁱ FAA Desk Reference July 2015 Introduction pages 0-1, 0-2

ⁱⁱ US EPA AEDT Model Sea-Tac Emissions 2017

ⁱⁱⁱ Attachment A Appendix B Comment #5 Draft Conformity 1996