



# AGENDA

## Burien Airport Committee (BAC)

Tuesday, October 16, 2018 - 6:00

Burien Community Center, 14700 6th Ave. SW, Chelsea Room

Page #

**1. CALL TO ORDER**

**2. APPROVE DRAFT MINUTES**

2.a September 18, 2018 3 - 4  
[Draft Minutes](#)

**3. BUSINESS AGENDA**

3.a Review of Recommendations from Federal Way's Quiet and Healthy Skies Task Force Report (All) 5 - 11  
(25 min.)  
[Federal Way Report-Recommend Summary](#)

3.b Review Scoping Comments to Sea-Tac Airport Sustainable Airport Master Plan (SAMP) Environmental Impact Statement (EIS). (All) 13 - 26  
(15 min.)  
[SAMP Comment Letter](#)

3.c Burien Airport Committee Appointment Process.  
(5 min.)

3.d Other Updates:  
(10 min.)  
i. Quiet Skies  
ii. City's Petition for Review of FAA's categorical exclusion on the 250 degree heading over Burien  
iii. Sea-Tac Airport Sustainable Airport Master Plan (SAMP) Environmental Impact Statement (EIS) Process  
iv. FAA funding for dedicated staff to address aviation noise concerns including community engagement.  
v. WA State Dept. of Commerce Airport Impacts Study (Budget Proviso)  
vi. Puget Sound Regional Council (PSRC) – Regional Aviation Baseline Study

3.e Other business?  
(5 min.)

**4. PUBLIC COMMENTS**

**5. NEXT MEETING TIME:**

Tuesday, November 20, 2018 at 6:00 p.m.

Regular meeting time: 3rd Tuesday of each month at 6:00 p.m.

**6. FUTURE TOPICS:**

Presentation by Dept. of Public Health on health issues from airport proximity.

**7. ADJOURNMENT**

**COUNCIL COMMITTEE MEMBERS**

Councilmember Nancy Tosta, Chair Mayor Jimmy Matta Councilmember Pedro Olguin

**BUSINESS COMMITTEE MEMBERS**

Jill Esau Larry Cripe Matthys van Leeuwen

**RESIDENT COMMITTEE MEMBERS**

Debi Wagner Sharyn Parker Vacant



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**Burien Airport Committee (BAC)  
September 18, 2018  
DRAFT Meeting Minutes**

**Present:**

**Council:** Councilmember Nancy Tosta (Chair), Mayor Jimmy Matta, Councilmember Pedro Olguin

**Business Members:** Jill Esau, Larry Cripe, Matthys van Leeuwen

**Resident Members:** Debi Wagner, Sharyn Parker, vacant

**City Staff:** City Manager Brian Wilson, City Attorney Lisa Marshall, Community Development Director Chip Davis, and Carol Allread, staff support.

**Guest Presenter:** Matthew Adams, Dentons Law Firm

1. **CALL TO ORDER:** The meeting was called to order at 6:00 pm.
2. **APPROVE DRAFT MINUTES from July 17, 2018.** Minutes from the July 17, 2018 meeting were approved.
3. **BUSINESS AGENDA**
  - a. **Update on City's Petition for Review of FAA's categorical exclusion on the 250 degree heading over Burien.**  
Matt Adams, Dentons Law Firm and City Attorney Lisa Marshall provided an update on the Petition for Review of the FAA's categorical exclusion on the 250-degree heading over Burien. The litigation is still in the early stages, with the next step the briefing process. The court will be reviewing if FAA's decision-making was reasonable or arbitrary and capricious. Mr. Adams indicated it may be helpful to hear what Burien residents are experiencing with these low flights. City Manager Wilson will explore setting up a mailbox on the City's website.
  - b. **Discuss Action on Sea-Tac Airport Sustainable Airport Master Plan (SAMP) Environmental Impact Statement (EIS) Process.**  
Community Development Director Chip Davis is serving as the City's SEPA public official for the Port's SAMP process. The process is just beginning and is expected to take approximately a year. A final public hearing will be held in SeaTac on September 19, 2018. Updates have been provided at Burien City Council meetings. Additional information on the SAMP process is available on the City's website and other sites. Discussion occurred on making communications in multiple languages to be more inclusive of the community.

**c. Update on WA State Dept. of Commerce Airport Impacts Study (Budget Proviso) – timing and Burien representation on the working committee.**

Six cities (Burien, Des Moines, Federal Way, Normandy Park, SeaTac, and Tukwila) are part of the Budget Proviso – Department of Commerce Impact Study and are providing a \$300,000 match to the Department of Commerce’s \$300,000 funding based on population. The focus of the study is directed by the legislature and is on current impacts of SeaTac Airport’s operations to surrounding communities. The Department of Commerce is seeking citizen representatives with applications due to City Manager Brian Wilson by September 25, 2018. {Note: Rose Clark was selected by the Council on 10/1/18 as the citizen representative for Burien}

**d. Update on Puget Sound Regional Council (PSRC) – Regional Aviation Baseline Study – Burien engagement.**

No update.

**e. Other Updates.**

No updates.

**f. Other business**

No other business.

**4. PUBLIC COMMENTS:** Public comments were limited to two minutes.

**5. NEXT MEETING TIME**

The next meeting of the Burien Airport Committee is scheduled for Tuesday, October 16, 2018, at 6:00 pm at the Burien Community Center.

**6. FUTURE TOPICS**

Future topics were not addressed.

**7. ADJOURN:** The meeting was adjourned at 7:31 pm.

**City of Burien, Washington**

**Burien Airport Committee**

**Summary of Recommendations from  
Federal Way's Quiet and Healthy Skies Task Force Report:**

**k. Recommendations – Flight Operation Noise Impacts (Page 32 of Report)**

1. The City of Federal Way should continue to engage with Rep. Adam Smith and strongly support his Aviation Impacted Communities Act. This legislation would not only expand the definition of an aviation-impacted community (where federal mitigation funds may be spent)<sup>75</sup>, but would also *require* the FAA to:
  - a. work with community boards designated by such communities and attend their board meetings;
  - b. "devise an action plan that alleviates or addresses the concerns brought up in ...  
[a] community report" drafted by a community board that "detail[s] the community's concerns and issues related to disparate impacts"
  - c. collaborate with community boards on scoping and methodology of any community study requested by a community board<sup>78</sup>
  - d. "devise an action plan that alleviates or addresses the concerns brought up in the community study"
  - e. "where effective, consider the implementation of changes to operations and flight paths if the community report or community study indicates that such changes would decrease the impacts on the designated community";
  - f. "explain the rationale" for any determination that "changes to operations and flight paths that a community report or community study indicated would decrease the effects on the designated community would not be effective"
  - g. "[u]pon request of a designated community, and in addition to the annualized average measurement ... provide additional noise measurement instrumentation to measure airplane noise"
  
2. The City of Federal Way should also strongly support the efforts of Congressman Smith and others to ensure that the FAA quickly completes its evaluation of the DNL and alternative metrics.

3. The City of Federal Way should engage with newly-authorized FAA community engagement staff, as soon as they are hired, and should insist that alternatives to DNL be examined. If these efforts are fruitless, the City of Federal Way should support legislation to change the standard.
4. The City of Federal Way should also lobby the FAA, Port of Seattle, and, if necessary, Congress, to change all glide slopes to at least three degrees (or higher) and flight paths so as not to go over populated areas.
5. The City of Federal Way should make the case with the FAA and Port of Seattle that the third runway should only be used for its original purpose, which was inclement weather.
6. The City of Federal Way should purchase a portable noise monitor so as to give data and metrics for objective impacts to lives.

#### **d. Recommendations – Curfew for Cargo Flights (Page 45 of Report)**

In the short-term, the City of Federal Way should address the concerns with cargo flights, particularly during late-night hours, by:

1. Support for the Port's efforts and pressure on the Port to intensify those efforts to get voluntary compliance from the most egregious offenders<sup>141</sup>
2. Pressure on the Port to see if some cargo flights could be voluntarily moved to other airports if feasible (such as Moses Lake or possibly even McChord Air Force Base).
3. Pressure on the Port to cease affirmatively marketing its 24-hour availability for cargo aircraft

The City of Federal Way should consider, if able to retain additional allies and if voluntary compliance proves impossible, pressure on the Port to go through a Part 161 submission, despite the obstacles outlined above.

#### **d. Recommendations – Other Health Impacts of Increased Air Traffic (Page 52 of Report)**

So where does that leave us? At this point, the following are the recommendations for the City of Federal Way:

1. Once the current University of Washington study on the levels of UFPs in areas impacted by Sea-Tac International Airport is completed, support the "second phase" of that study on the health effects of such UFPs.

2. Re-engage with Congressman Adam Smith to support his continued efforts to get passed a bill that would mandate a federal study on the health effects of UFPs.
3. Encourage Port of Seattle officials to continue supporting additional research into the relationship between UFPs and aircraft and into the health effects of UFPs.
4. Ensure that scoping on the Sustainable Airport Master Plan (SAMP) includes an examination of UFPs (as well as other emissions/pollution, general health and quality of life issues) and the need for mitigation of such through, for example, increased use of biofuels. In support of this recommendation, the following points must be made:
  - a. In her July 26, 2017 presentation to the Highline Forum, Port of Seattle Aviation Environmental Sustainability Manager Leslie Stanton noted that "[p]ublished research since 2015 shows ***significant reductions in PM [particulate matter] from aviation biofuels***" and that the Port intended to "[c]ontinue to track research on PM reductions from biofuels."<sup>182</sup> She also stated that between 2008 and 2014, the Port [s]upport[ed] research & development" on biofuels and "[c]hart[ed] a path to commercial scale biofuels".<sup>183</sup> Between 2015 and the present, she said that the Port has "[i]ncentivize[d] biofuel production in WA[shington]."<sup>184</sup>
  - b. In a summer 2017 conversation that City of Federal Way Senior Policy Advisor Yarden F. Weidenfeld had with a Port of Seattle official, Weidenfeld was specifically told, without prompting, that ultra-fine particles (UFPs) could be an item of interest offered by the City of Federal Way during the scoping process.
  - c. Although there do not appear to be environmental health official standards on UFPs, that does not necessarily preclude an examination of their prevalence, potential harm, and mitigation. This should be done through analysis in the SAMP Environmental Impact Statement (EIS). As an example, as noted above, the United States Court of Appeals for the Second Circuit once upheld a requirement that heliport operations be reduced by 47 percent, even though that percentage "was not backed by any study reflecting the appropriate scenario or demonstrating that such specific percentage of noise reduction was the ideal" because "the proprietor was entitled to eliminate a portion of the Heliport's operations upon reaching a conclusion that a problem of excessive noise existed."<sup>185</sup>

**g. Recommendations – Environmental Review of SAMP (Page 62 of Report)**

Given what transpired with the Third Runway environmental review process, coupled with the initial deficiencies in the SAMP documentation, both of which are described above, the City of Federal Way needs to be prepared well in advance for the likely prospect that the Port and its FAA partner may take a similarly problematic analytical approach in the SAMP EIS. The City should therefore obtain the capacity to produce technical data needed to refute unsupported EIS conclusions regarding aircraft noise and health impacts.

The City should also strive for the creation of alternative, objective standards that measure *actual* noise, and available empirical data on current and potential health impacts, in order to counter the non-objective standards and outdated information the Port and FAA are likely to use in the SAMP draft EIS.<sup>220</sup> Without convincing technical data and reference to alternative standards in its comments, the City can expect the type of inadequate responses that it received on the Third Runway EIS.

Finally, the City should continue to advocate for state and federal legislation aimed at raising airport-related environmental impact standards; take advantage of local partnership opportunities to fund the technical capacity required to effectively engage in the SAMP environmental review process; and actively support actions by other entities that may produce valuable overflight impact data and meaningful alternatives to Sea-Tac expansion. In the absence of an aggressive, proactive strategy on the City's part, the SAMP EIS is unlikely to identify mitigations for the intolerable increase in noise and health impacts on Federal Way residents that the proposed Sea-Tac airport expansion inevitably will create.

The following are specific policy actions that the Task Force recommends the Mayor propose for City Council consideration in connection with the SAMP environmental review process:

1. **Closely monitor, and advocate for Federal Way's interests, in connection with the activities and recommendations of the Port Commission's newly formed Regional Airport Capacity/SAMP Committee.** Its members are Commissioners Stephanie Bowman and Peter Steinbrueck. Along with their Commission colleagues Courtney Gregoire, Fred Felleman and Ryan Calkins, they all have publicly declared as "unrealistic and unattainable," due to traffic congestion and noise/health impacts, the expansion of Sea-Tac to accommodate the SAMP's 66 million per year passenger demand projection.

The City should encourage and support the current Port Commission's prospective efforts to explore alternative airport locations in the region and state, in order to help meet future passenger and air cargo demand within the Puget Sound region.



2. **Support, closely monitor and advocate for Federal Way's interests during and after the PSRC's Central Puget Sound Regional Aviation Baseline Study, requested and funded by the FAA, which will analyze the potential capacity of regional airspace and airports in King, Kitsap, Pierce, and Snohomish counties to meet future air travel and cargo demand generated by those counties.**<sup>221</sup> Following informal recommendation of the Task Force, prior to submission of this report, City of Federal Way Mayor Jim Ferrell voted to support this proposed regional aviation baseline study that was approved at the February 22, 2018 PSRC executive board meeting. Importantly, at Mayor Ferrell's urging, additional language was added to the study's scope of work specifically referencing impacts on communities surrounding Sea-Tac and other airports, as well as the region's current capacity ("land side and airside") to absorb future growth.<sup>222</sup> Once this study is completed, the City of Federal Way should support the siting of a new regional airport.
  
3. **Actively support State Rep. Mike Pellicciotti's plan to reintroduce an aircraft noise abatement bill amending RCW 53.54.020 and .030 during the 2019 legislative session.** Introduced at the City's request during the 2018 regular session of the State Legislature, HB 2497 proposed to amend existing state aircraft noise abatement law affecting Sea-Tac. Specifically, this amendment would enlarge the current geographic area within which the Port is authorized to operate an airport noise abatement program, by extending its reach from the current six miles south of Sea-Tac, to 12 miles south into Federal Way. Although HB 2497 was not passed during the abbreviated 2018 legislative session, Rep. Pellicciotti has committed to reintroduce similar legislation next year and seeks needed co-sponsors in the interim. The City should rally local support for this bill and actively lead the lobbying effort that will be needed to help ensure its passage.
  
4. **Engage the technical and legal expertise needed for analysis and response to the forthcoming SAMP DEIS, possibly by joining the other four airport-impacted cities that plan to collectively engage.** The Task Force strongly believes that the City will need to engage outside technical and legal experts with experience analyzing the environmental impact of major airport expansion plans in order to thoroughly review the SAMP Draft EIS (DEIS), which is likely to be hundreds of pages in length. That expertise will be needed to identify and compile written comments related to potential factual flaws, inadequately supported conclusions, and unanswered questions in the DEIS regarding potential future noise and health impacts. Those comments must be submitted within a 30-day period following release of the DEIS, should the Port allow only the minimum response period provided for under SEPA. A combined and coordinated response to the DEIS potentially will be more persuasive to the Port and FAA and is also a more cost-effective method for the City of Federal Way and the other impacted cities to engage in the SAMP environmental review process. Unfortunately, the \$1.50 per capita funding formula in the Inter-local Agreement

(ILA) recently entered into by the Cities of Burien, Des Moines, Normandy Park and SeaTac would disproportionately affect the City of Federal Way.<sup>223</sup> However, the ILA states that this formula applies only to *initial* funding of a joint effort, so the City of Federal Way could mitigate this financial disadvantage by seeking to negotiate a more equitable funding approach as a condition for joining the ILA. For example, the City could propose a funding formula that is based on the resident population of Federal Way neighborhoods identified for needed noise mitigation in the 1997 Sea-Tac airport impacts study. Also, it is vital that consultants with the proper technical and legal expertise be engaged. If this is not the case with the experts hired by the four airport-impacted cities, the City of Federal Way may have to retain its own.

5. **Support the State of Washington study of current Sea-Tac Airport impacts.** The City of SeaTac has committed up to \$250,000 toward a "baseline" analysis, to be conducted by the State of Washington Department of Commerce, "of both positive and negative community and economic impacts"<sup>224</sup> on cities surrounding the airport, in order to equip those cities and community members with objective and relevant data prior to the Port's release of the draft SAMP EIS. The State Legislature approved a 2019 state operating budget "proviso" appropriation of \$300,000 (sponsored by Rep. Mike Pellicciotti), to match an equal local funding amount. The proviso directs the State Department of Commerce to undertake and complete the study by December 2019. Under SEPA, the SAMP EIS must also compare baseline conditions against future impacts of proposed airport expansion projects. However, City of Seatac staff believes that the State study would more broadly quantify baseline conditions and current impacts than will the SAMP DEIS and would provide useful information with which to identify flaws and shortcomings in the Port's environmental impact analysis. Following the Task Force's informal recommendation to Mayor Ferrell and prior to submission of this report, the Federal Way City Council unanimously approved Resolution 18-735 endorsing the proposed state impacts study. The Task Force further recommends and supports the City of Federal Way contributing a share of the funding.
6. **Consider asking the Washington Department of Transportation or other appropriate state agency to request designation as the SEPA lead agency for preparation of the SAMP EIS.** An independent lead agency would help ensure that the SAMP environmental impact analysis is impartial and objective. This alternative would require the Port to agree to transfer the lead agency responsibility to a state agency.<sup>225</sup> Although not required, SEPA Guidelines encourage the two agencies to enter into a written agreement to avoid later confusion. This could be a comment submitted during the SAMP EIS scoping period.
7. **Request the Port to underwrite the technical support needed by airport-impacted Federal Way community-based organizations to conduct their own review of and comment on the SAMP draft EIS.** Although not provided for in SEPA, doing so has precedent in State law that governs the Washington

Utilities and Transportation Commission (UTC). Specifically, the UTC is required to grant "intervener status" to any group or individual that can show it has a legitimate interest in the outcome of a utility rate case or other regulatory matter. Obviously, those neighborhoods in Federal Way that lie directly under the current Sea-Tac flight path and suffer from low-flying aircraft noise and health impacts have a legitimate interest in the outcome of the SAMP.

8. **Form an Aviation Impacts Committee of the City Council to oversee implementation of the City's various policy actions and initiatives related to Sea-Tac existing operations and future growth.** As described and proposed in this report, the City likely will be engaged in several simultaneous and politically challenging inter- governmental efforts to mitigate and limit the adverse effects on Federal Way residents of existing and future Sea-Tac overflights. While the Task Force acknowledges the Mayor's Office has primary responsibility for coordinating this effort, it is recommended that this important and complex responsibility be shared with the City Council. Thus, a three-member committee of the City Council should be formed to monitor implementation of City policies related to aircraft overflight impacts, to keep the full City Council apprised of the status of those efforts, to serve as a "sounding board" for concerns of residents in overflight-impacted neighborhoods, and to keep those residents and the entire community informed of the City's various efforts. Although the Port's SAMP implementation process and related inter-governmental initiatives are expected to take several years, the Task Force envisions this being an *ad hoc* (i.e. limited duration) City Council committee, during which time its members would hold regular public meetings as appropriate and needed.

#### **b. Recommendations – Military Aircraft (Page 67 of Report)**

At this point, the City of Federal Way should:

1. Publicize to its residents the above contact information for complaints with respect to military aircraft.
2. Follow up on the recommendation to contact an FAA controller exclusively assigned to deal with military aircraft at Seattle TRACON (Terminal Radar Approach Control Facilities) to further investigate why military planes are being directed over residential neighborhoods in or near Federal Way.
3. Seek regular (annual?) meetings with 62<sup>nd</sup> Airlift Wing Command leadership to communicate issues of concern raised by residents.





September 28, 2018

Mr. Steve Rybolt  
Aviation Environment and Sustainability  
Port of Seattle  
P. O. Box 68727  
Seattle, WA 98618

Re: Sustainable Airport Master Plan Near Term Projects NEPA EA and SEPA EIS Scoping Comments

The Port of Seattle (the Port) has prepared a Sustainable Airport Master Plan (SAMP) for Seattle-Tacoma International Airport (Airport). It is understood that the purpose of the SAMP is to develop a facilities plan that will allow the Airport to satisfy the region's air transportation needs through 2034 and identify measures that enable the Port to build, manage, and operate the Airport's facilities in ways that meet the Port's sustainability goals and objectives.

The airport has experienced substantial growth in aircraft operations, passenger enplanements, and air cargo. Forecasts for the planning period suggest that growth will continue, exceeding the capacity of the current airfield, terminal, and cargo processing facilities.

The SAMP process resulted in both a vision for comprehensive long-range Airport development and a Near-Term plan, with projects to be constructed by 2027. The planning constraints included using airport-owned property (not acquiring new land) and not adding to the airport's current three runways.

The SAMP addresses five operational areas: airfield (runways and taxiways), terminal, access and parking, air cargo, and airport/airline support functions. The main goals for each, is to improve efficiency, increase airport capacity, reduce delay, and do this while supporting the Port's sustainability goals. The environmental analysis to be conducted needs to address the impacts of proposed improvements for each of these operational areas to the surrounding communities.

The cities of SeaTac, Burien, Normandy Park, and Des Moines, are the closest communities to the airport, and while the airport provides social and economic benefits to the region, our four cities are disproportionately impacted by airport operations. These impacts will only increase with the planned growth in flights, passengers, and air cargo.

Aircraft noise is of primary concern for our communities, especially those located in close proximity to flight paths. We are also heavily impacted by air emissions and reduced air quality, increased traffic congestion, and expanded industrial activity that occurs near residential neighborhoods.

After careful review of the SAMP, with a focus on the Near-Term projects, we have compiled the following comments and concerns related to potential impacts for our communities and areas which must be included in the NEPA and SEPA reviews and considered by the Port as part of managing the long-term operation and growth of Seattle-Tacoma International Airport.

Aviation forecasts call for a 60% increase in aircraft operations and a 75% increase in annual passengers through 2034, and the Port's long-term goals include doubling international passengers, international destinations, and tripling air cargo processed through the airport. The increase in overflights alone will result in a substantial increase in noise exposure to our communities and will be especially impactful for those areas located below arrival and departure paths.

The Port has committed to adopting a "sustainable" airport master plan which includes pledging to be a "responsible environmental steward" and a "good neighbor." In doing so, the Port must objectively assess benefits and impacts, understanding that regional benefits may not offset local community impacts. To fulfill its commitment to be a good neighbor, the Port must carefully analyze and acknowledge both the current impacts, as well as the increased impacts and reduction of quality of life that will result from the planned growth assumed in the SAMP.

### **Joint Comments from the Cities of Burien, Des Moines, Normandy Park and SeaTac**

The issues raised in this letter need to be considered within the scope of the environmental reviews being conducted for the proposed projects derived from the SAMP. Although during the Agency Scoping meeting on September 6, 2018, some of the following issues were characterized as "Long Term" and therefore beyond the scope of the upcoming environmental review process, we find them to be current and relevant. They are not issues for future analysis, but have arisen from recent, ongoing, and planned changes to the facilities and airspace surrounding the Airport in an ongoing effort to enhance airport capacity. These efforts are intrinsically linked to the proposed projects and cannot be ignored by segmenting the environmental review through limiting the analysis to the near term projects, and ignoring the remainder of the SAMP.

These issues are a derivative of the actions taken by the airport and FAA to increase capacity to meet growing demand. More gates, expanded cargo facilities, improved airspace and procedures, etc., have and will lead to more traffic, more overflights, more noise events, and other impacts. Air Traffic Control (ATC) procedures have already changed within the past few years to accommodate the projected increase in air traffic.

#### **General issues:**

1. The environmental analysis must address what has recently been implemented as part of the overall growth planned and projected at the airport to have a true assessment of the impacts to the communities. The cumulative effect of the changes added to the proposed near and long-term changes (including continued double-digit growth in operations) will have substantial and lasting impacts on our cities. The environmental analysis needs to address these impacts as well as reasonable and attainable mitigations measures.
2. The environmental review process must include the entire SAMP rather than only the near-term projects from the SAMP for the following reasons:

- a. Previous project approvals outside of the SAMP are now proposed to be included as part of the baseline. (Reference the attached letter from the City of Des Moines expressing concerns and the Port's response letter assuring the City that no additional capacity projects would be completed outside of the SAMP.) By including only the near term projects in the environmental review, this pattern of increasing capacity outside of the SAMP and associated environmental review is proposed to be inappropriately continued.
  - b. The SAMP has been completed and includes a long term vision, but only the short term projects are proposed to be included in the environmental review. This is an inappropriate use of the phased review provisions of WAC 197-11-60. Phased review could be utilized when the scope is from a broad policy document (the SAMP) to a narrower scope (the near term projects of the SAMP) as provided under state law. The near term projects environmental review is proposed to precede the broader scope policy document upon which the near term projects are based.
  - c. The "proposal" is improperly defined as the SAMP near-term projects, while the SAMP itself is complete. The proposal is the SAMP (which contains the near-term projects) and analysis should occur to the extent feasible.
  - d. Implementing the near term projects outside of the SAMP, would establish the development pattern and preclude consideration of options when the SAMP eventually undergoes environmental review.
  - e. Environmental review is starting late in the process of the development of the SAMP and near-term project list. Reference the entirety of WAC 197-11-400 - Purpose of EIS. Note particularly that, "...An environmental impact statement is more than a disclosure document. It shall be used by agency officials in conjunction with other relevant materials and considerations to plan actions and make decisions." Including the entire SAMP will allow decision-makers more appropriate information related to environmental impacts, options and mitigation on which to base decisions.
3. The baseline activity for environmental assessment and review is proposed to be 2018. Our concern is that the very significant growth that has occurred at Sea-Tac during the period 2012-2018 is relegated to a foregone conclusion without sufficient environmental review or analysis. The baseline impacts need to be from 2012-2018.
    - a. The revisions to agreements that established usage of the third runway, and that now operates at higher capacity levels, have substantially increased operations without sufficient environmental review.
    - b. The most recent Part 150 submitted to the FAA for their Record of Approval (2013), preceded very significant year over year growth. This Part 150 has not accounted for noise impacts occurring in this dynamic, steadily increasing growth environment over the last six years.
  4. The analysis should include as an alternative, the use and/or siting of other airports.

**Operational issues:**

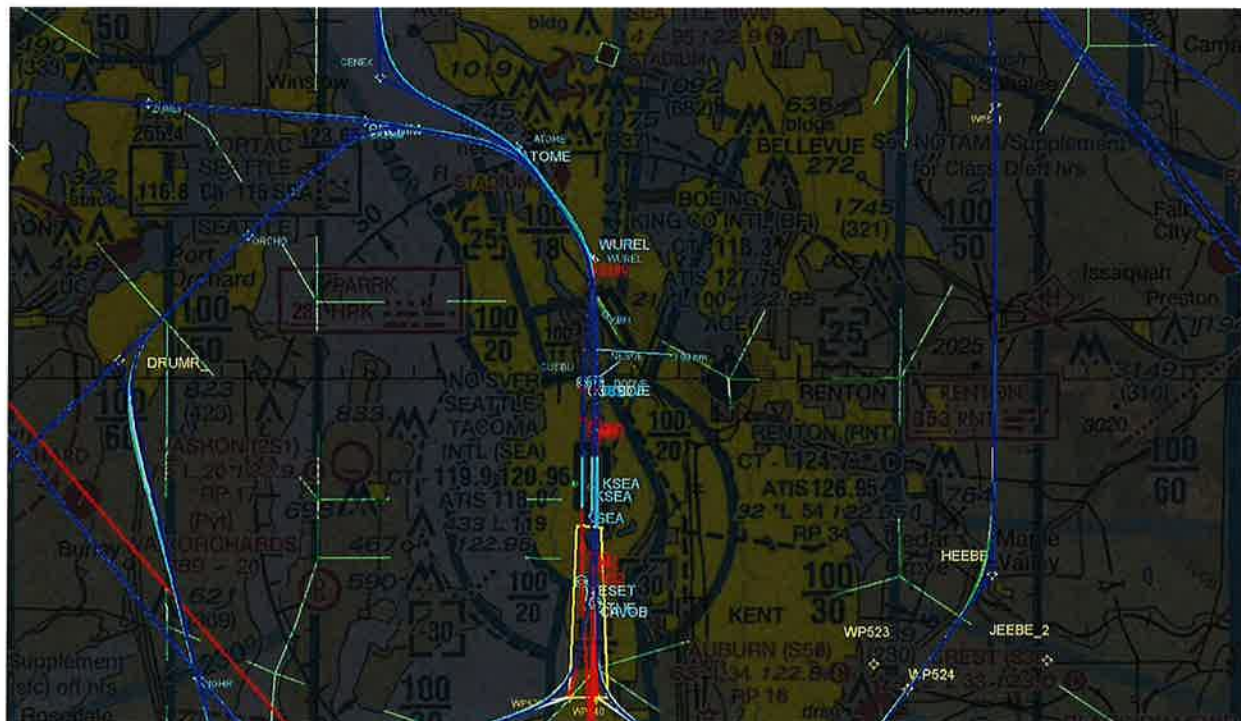
1. Any Airport Modeling Data and TAM Simulation Results from the past ten (10) years needs to be included in the EA/EIS.
2. AEDT Modeling Data also needs to be included.
3. The existence of the current FAA Performance Based Navigation Implementation Process (FAA Order 7100.41A) Full Working Group and the Notional Procedures that were being considered before the suspension of the Working Group in 2017, needs to be included in the EA/EIS. Specifically, the following Notional Procedures:

- a. South Flow proposed departure track changes as depicted below:





b. North Flow Proposed departure track changes as depicted below:



4. The EA/EIS needs to include further evaluation of the "Automated Turnouts" westbound over Burien including alternative headings available, frequency of use, and potential mitigation strategies.
5. The EA/EIS needs to address the impact of Wake RECAT on residents under the flight paths due to increased number of events.
6. Existing and Proposed Run-Up Pads need to be addressed in the EA/EIS due to the ongoing and potential disturbance caused to communities in close proximity to these facilities. Mitigation measures for noise generated by these facilities need to be identified.
7. The Baseline of the EA/EIS should not be the airport configuration in 2018, but rather the airport configuration that existed in 2012, as major changes have been implemented since that time without appropriate environmental analysis. Facility changes at the airport since 2012 need be included in the EA/EIS.
8. The EA/EIS needs to address those ATC procedures that were implemented via a Categorical Exclusion (CATEX) over the last decade. These procedures, including Greener Skies, were implemented based upon existing and projected traffic at the time. Since growth and current traffic levels exceed the projected amounts of traffic when implemented, the impacts due to the number of events has increased and will continue to increase as procedures such as Wake RECAT and Equivalent Lateral Spacing Operations (ELSO) are implemented.
9. The EA/EIS needs to evaluate impacts and measures (such as Point-Merge) to mitigate noise for residents living underneath the final approach course,

#### **Other Issues:**

1. An increase in operations and current levels of congestion suggest an increase in nighttime operations are likely. Additionally, the Port's stated intention to expand cargo operations will likely further increase nighttime operations which are the most impactful for communities, at the time they are most sensitive to noise. Many citizens mention a middle-of-the-night flight to Asia as well as night cargo flights.
2. The increase in operations (close to 70% over the SAMP planning period) will result in significant increases in noise and emissions.
3. The increase in operations will result in an increase in health effects for communities, especially those close-in to the airport. Health impacts have been associated with aircraft noise, air pollution, and water quality affected by aircraft and airport operations. Include the potential for increased jet fuel releases over water and homes.
4. Sustainable growth requires adequate and effective mitigation to offset or reduce impacts. These should be identified and prioritized in collaboration with affected communities.
5. Regarding noise, the EIS needs to specifically analyze ground noise and address mitigation measures, such as sound absorption walls.
6. The document should clearly delineate those impacts the Port can address vs. those subject to FAA purview.

7. Address and mitigate impacts of noise exposure and air emissions on children’s learning and environmental justice populations adjacent to the airport.
8. Address and mitigate congestion impacts associated with increased commercial truck traffic on off-airport roadways as a result of expanded cargo operations at the airport.
9. Quantify and mitigate for climate change impacts resulting from Green House Gas (GHG) emissions resulting from expanded airport operations.
10. Ensure all SAMP documents and review processes conform to the Limited English Proficiency and Environmental Justice provisions of Title VI of the Civil Rights Act of 1964.
11. The EA/EIS needs to specifically address impacts associated with development of the “L-Shaped parcel” for air cargo processing (Site #3 in the table below).

**Figure 5-6  
Cargo Sites Round 1 Screening Matrix  
Seattle-Tacoma International Airport**

Criteria	Site			
	Site #1 North Cargo Area	Site #2 North of Cargo 1	Site #3 L-Shaped Parcel	Site #4 SASA
Potential to meet PAL 4 area requirements	-1	-1	-1	1
Site development cost	1	1	0	-1
Potential direct airfield access	1	1	-1	1
Potential to improve access and congestion	1	-1	-1	1
Potential to promote optimum utilization	1	1	0	1
Site availability	1	0	1	-1
Phasing	0	1	1	0
Reduced engine run time (ground vehicles)	0	0	-1	0
Impact on wetlands/creeks	1	1	-1	-1
Limits addition of impervious surfaces	0	0	-1	-1
Proximity to noise and light sensitive land uses	0	0	-1	0
Consistency with zoning	1	1	1	1
Consistency with public expectations	1	0	1	1
Score summary	7	4	-3	2
	-1	poor/undesirable	1	good
	0	neutral		

Source: Logplan and LeighFisher, 2016.

Although this site scored poorly and was not selected in the final screening, Development of Site #3 is selected for the Near-Term project portfolio.

12. The SAMP notes that off-airport roadways are outside the scope of the SAMP itself, however, SEPA requires consideration of transportation impacts including increased roadway use and congestion. The EA/EIS needs to address congestion and increased traffic on local surface streets.

**Issue: Impacts to NEPA 4(f) areas, including recreational resources.**

There are several parks and recreational resources in proximity to SEA and within the current DNL 65 dBA contours for the airport. The increase in aircraft overflights and resulting increase in noise exposure and air emissions will substantially diminish intended use and enjoyment of these properties. The EA/EIS needs to analyze both indirect and cumulative impacts of the air traffic levels enabled by implementation of the near-term projects, as well as those included in the long-term vision for airport.

**Issue: Maintenance of existing noise abatement program and procedures.**

A number of elements in the Current Part 150 appear to be inconsistent with the plans included in the near-term projects within the SAMP. These include:

1. Voluntary rescheduling of nighttime flights (10PM-7AM). The forecasted operational level, particularly the substantial increase in cargo operations suggests an increase in nighttime operations may be required.
2. Preferential runway system. A preferential runway system was established to minimize community noise impacts during nighttime hours. This program was limited to nighttime hours due to the relatively low(er) volume of operations during this time. Increased operations at night, combined with impacts to the preferential runway system will increase community noise impacts when residents are most sensitive.
3. The EA/EIS needs to evaluate the increased level of operations enabled through implementation of the SAMP Near-Term projects and whether they may result in modification or elimination of the noise abatement corridors. The environmental analysis needs to address impacts to the elements included in the SEA Fly Quiet program and subsequently, the SEA noise abatement program.

**Issue: Include supplemental noise metrics.**

Public annoyance and sensitivity to aircraft noise is changing. This has been acknowledged by the FAA and others and has prompted a great deal of research by the FAA, Airport Cooperative Research Program, and others. Despite the reduction in numbers of people exposed to DNL 65 dBA, noise complaints are skyrocketing across the United States. Though the FAA has recently completed an aircraft annoyance study, the findings have yet to be released. However, most expect the results will confirm annoyance levels are different than they were in the 1970s when DNL was initially adopted as the standard for predicting annoyance.

While DNL remains the federal standard for assessing aircraft noise impacts, supplemental metrics have been used around the country to help the public better understand the expected changes associated with airport projects and procedure changes. This also helps inform decision-makers and public-authorities who participate in the planning process including airport master planning, compatibility planning, and local land-use planning. While DNL is mandated, reporting a change in DNL alone is less informative than supplementing the DNL values with supplemental metrics such as the Number-of-Events-Above and Time-Above metrics, especially for non-industry experts.

The EA/EIS needs to include use of supplemental metrics to include exposure beyond DNL 65 (i.e. down to the DNL 55 dBA levels of exposure), such as Number of Events Above and Time Above.

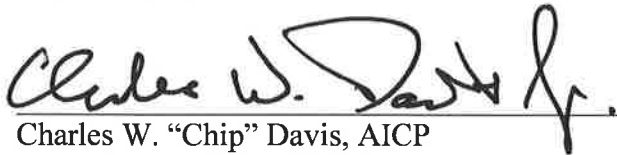
We appreciate the opportunity to comment on the scoping for the near term project environmental review. We look forward to receiving the SEPA Draft EIS and NEPA EA upon issuance of those documents.

Sincerely,



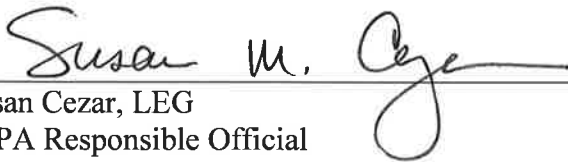
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Steve Pincher, AICP  
SEPA Responsible Official  
City of SeaTac



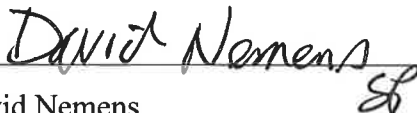
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Charles W. "Chip" Davis, AICP  
SEPA Responsible Official  
City of Burien



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Susan Cezar, LEG  
SEPA Responsible Official  
City of Des Moines



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David Nemens  
SEPA Responsible Official  
City of Normandy Park

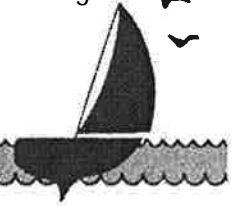




# City of Des Moines

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Agenda Item #3.3.b



June 21, 2017

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

RE: DNS for Concourse D Hardstand Holdroom  
Port of Seattle SEPA File Number 17-02

The City of Des Moines appreciates the opportunity to comment on the SEPA Determination of Nonsignificance (DNS) dated June 6, 2017 for the Concourse D Hardstand Holdroom project.

The project documents indicate that the Concourse D Hardstand Holdroom is intended to serve existing passenger levels, however, the environmental checklist also notes that Sea-Tac airport has experienced rapid growth in both passengers and aircraft operations in the past few years which is maximizing use of terminal holdrooms and airplane gate capacity. The environmental checklist further indicates that current estimates and near-term forecasts of gate capacity and demand show increasing gate short falls. It appears that the facility is anticipated to serve current operations as well as future growth.

It is unclear where this proposal fits in the context of the Sustainable Airport Master Plan in addressing future passenger growth, needed passenger handling facilities, and appropriate mitigation. The DNS should clarify how this proposed enhancement to airport facilities is related to future growth and the Sustainable Airport Master Planning process.

The City of Des Moines experiences disproportionate impacts from aircraft operations because of our proximity to Sea-Tac International airport, and Des Moines residents are constantly challenged by noise and health impacts. As a result, the City continues to request that any enhancements to the airport facilities are thoroughly analyzed in a comprehensive manner for impacts to our residents, and appropriate mitigation provided.

Sincerely,

Susan M. Cezar, LEG  
Community Development Director

Cc: Michael Matthias, City Manager  
Dan Brewer, Chief Operations Officer  
Tim George, City Attorney







P.O. Box 68727  
 Seattle, WA 98168  
 Tel: (206) 787-5388

City of Des Moines  
 21630 11<sup>th</sup> Avenue S., Suite A  
 Des Moines, WA 98198

July 26, 2017

Dear Mayor Pina:

I appreciated the City of Des Moines' work to convene last week's discussion with Normandy Park, Burién, SeaTac and airport staff to review the airport's Concourse D Hardstand Holdroom project and the Determination of Non-Significance (DNS). I understand this was a direct and open conversation about concerns with the project.

We recognize that growth-related projects at Sea-Tac must be evaluated together in the Sustainable Airport Master Plan (SAMP) to assure that cumulative environmental impacts are addressed. The addendum to the DNS issued on July 21, 2017, which Port staff prepared after last week's meeting, provided more specifics related to the Hardstand Holdroom project timing and scope, showing a net reduction of gates in operation until mid-2021.

The SAMP environmental review, which is anticipated to be conducted in 2018, will account for all existing and approved gates and passenger loading facilities. This includes the North Satellite, the International Arrivals Facility, and the Concourse D Hardstand Holdroom. No additional gates are anticipated until the completion and approval of the Sustainable Airport Master Plan and associated environmental review.

At the same time, we recognize the need for increased effective and informative communication with our adjacent cities. I have greatly appreciated the leadership you and your colleagues in the city of Des Moines have shown in working with the Airport on airport issues and regarding the formation of an Aviation Advisory Committee at Sea-Tac Airport. I am currently in the process of seeking input from our city partners and have scheduled a meeting with city managers in August. Input received at that meeting will help determine the best way to proceed in this regard.

I appreciate your concerns and look forward to a stronger relationship in the future.

A handwritten signature in black ink, appearing to be "Lance Lyttle", enclosed in a simple oval outline.

Lance Lyttle  
 Managing Director, Aviation  
 Seattle Tacoma International Airport

Cc: Deputy Mayor Vic Pennington  
 Councilmember Melissa Musser  
 Councilmember Robert Back  
 Councilmember Luisa Bangs  
 Councilmember Dave Kaplan  
 Councilmember Jeremy Nutting  
 Michael Matthias, City Manager  
 Susan Cezar, Community Development Director

