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Via Email to samp@portseattle.org & Online Comment Form

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

Dear Mr. Rybolt:

The City of Burien believes there are significant defects in the Sustainable Airport Master Plan (SAMP) currently under review for Seattle-Tacoma International Airport. It is the City's position that these deficiencies may only properly be resolved through development of an Environmental Impact Statement and not the Environmental Assessment currently in process for the Port of Seattle.

Given the short time frame allowed for study and comment (Oct. 21-Dec. 13, 2024), the objections raised here are not comprehensive but nonetheless reflect our concerns about the SAMP's impact on residents of the City of Burien.

Unrealistically small study boundary

The General Study Area—the Port's boundaries for its Area of Potential Effect—is drawn very tightly around the airport campus. The Port is attempting to force evaluation of the 31 "Near Term Projects" (NTPs) that make up the SAMP largely for impacts that will occur while those projects are under construction. This tactic ignores the impact—noise and other forms of pollution—that would occur in surrounding communities once additional aircraft and vehicles accommodated as a result of the SAMP projects leave the airport grounds.

Tables 4.6¹ and 4.8² of the SAMP document show the NTPs will result in a significant increase in carbon monoxide and nitrogen dioxide emissions. These estimates include approaching and climbing aircraft, whose altitudes are low enough to create emissions issues on the ground below for miles beyond the airport boundaries. Yet the Port's consultants, Landrum and Brown, conclude that "no significant impacts to air quality were identified (and) no mitigation would be necessary."³

¹ Sustainable Airport Master Plan (SAMP), Port of Seattle, October 2024, p. 4-13

² Ibid, p. 4-14

³ Ibid, p. 4-16

Cumulative impact: SR-509

This is especially alarming when taken with one of the most critical omissions from the SAMP: Consideration of cumulative impact from the impending connection of SR-509, which runs through Burien for approximately four miles, southward to Interstate 5. This SR-509 Gateway project will make 509 the primary truck route between the maritime ports of Tacoma and Seattle and bring tens of thousands of additional vehicles through Burien each day.

According to the National Environmental Policy Act: “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.”⁴

Port staff have repeatedly asserted that the 509 Gateway, which is being undertaken by the Washington State Department of Transportation (WSDOT) is not connected to the SAMP. This defies logic, given that the Port and WSDOT have coordinated to such an extent that the 509 Gateway will provide a new southern entrance to the airport.

The Final Environmental Impact Statement issued in 2003 for the 509 Gateway projected up to 6,850 vehicles per hour (both directions) north of SR-518 and up to 8,150 vehicles per hour (both directions) south of SR-518, which terminates on the eastern edge of downtown Burien.⁵ Over a 24-hour period, then, SR-509 through Burien will carry between 164,400 and 195,600 vehicles daily.

WSDOT does not project in 24-hour increments, instead offering estimates for “peak hour” traffic volumes that are dramatic in their own right. Compared to 2015 measurements,⁶ the segment of 509 between S. 188th Street and S. 146th Street will by 2045 will experience an increase of 112.5 percent during morning peak hours and nearly 74 percent during afternoon/evening peak hours.⁷

It is the City of Burien’s position that a new and thorough evaluation must be made of noise and emissions levels that will result in Burien from the opening of this highway extension.

Cumulative impact: Third runway

The SAMP itself forecasts a 28 percent increase in annual aircraft operations, to 540,000 takeoffs and landings, by 2034. This makes more significant the SAMP’s omission of the 2008 opening of the third runway at Seattle-Tacoma International. The Port’s SAMP timeline only goes back to 2017, despite the fact the projected number of takeoffs and landings for 2024—about 423,000 annually—is about 16.5 percent greater than levels in the early 2000s before the third runway opened.

⁴ National Environmental Policy Act, 40 CFR 1508.7

⁵ Final Environmental Impact Statement, SR-509 Corridor Completion, Washington State Department of Transportation et. al., January 2003, p. 2-34

⁶ Environmental Reevaluation, Puget Sound Gateway Program—Phase 1 of the SR 509 Completion Project, Washington State Department of Transportation, January 2018, Table 2, p. 11

⁷ Ibid, Table 7, p. 18

Using as a baseline the 365,000 annual flight operations from that earlier period, people living under the flight path have been and will be exposed to a 48 percent increase in aircraft traffic—with all of its attendant noise and other forms of pollution. There are myriad health consequences linked to these contaminants, along with evidence that people beneath the flight path are experiencing those consequences.⁸ The third runway, then, is a past action the Port of Seattle cannot be allowed to ignore. It must be considered as part of the cumulative impact.

Air quality and noise: SAMP ignores emerging science and policy

The SAMP ignores emerging science and government policy on air quality and noise standards. Of particular concern is the Port's silence regarding a 2020 report to the Washington State legislature that emphasized "people living in airport communities are *disproportionately* more likely to experience poor health"⁹ (emphasis added).

The report, written by Public Health—Seattle and King County, listed an array of air quality-related issues including cardiovascular and respiratory disease. Of particular concern is the alarm the authors raised about the effects of ultrafine particles (UFPs) found in higher concentrations below aircraft flight paths. UFPs are not regulated but the report outlined significant health consequences associated with larger "fine particulate matter"¹⁰ and recommended additional study of UFPs and their effects on human health.

Public Health also recommended development of a robust network of air quality monitors along the flight paths and in other areas near Sea-Tac International. A similar recommendation came in a 2020 report from the Washington Department of Commerce on how operations at SEA affect adjacent cities, including Burien.¹¹

Consultants hired by the Port of Seattle dismissed much of the research on a variety of grounds.¹² It would appear the Port is disinclined to take a hard look at the emerging data on the health impacts of UFPs, which we believe the situation demands.

Noise standards present a different—and also significant—challenge. The FAA Reauthorization Act of 2024 set in motion an "assessment of alternative noise metrics that could be used to supplement or replace the existing Day Night Level (DNL) standard."¹³ Against this backdrop comes a 2022 presentation to the Acoustical Society of America that argued policymakers should factor in the frequency of flights to and from a given airport.¹⁴ (The SAMP currently under consideration would increase operations to and from SEA to nearly 1,500 per day—a 24-hour average of 62.5 flights per hour, or more than one a minute.)

⁸ Community Health and Airport Operations Related Noise and Air Pollution: Report to the Legislature, Public Health Seattle and King County, December 2020

⁹ Ibid, p. 2

¹⁰ Ibid, p. ii

¹¹ Study of the Current and Ongoing Effects of the Operation of the Seattle-Tacoma International Airport, Washington State Department of Commerce, May 2020, Post-Report Update, p. 2

¹² Community Health and Airport Operations Noise & Air Pollution: The King County Health Study, Ramboll Group, undated.

¹³ Airport Noise Report, May 2, 2024 (Volume 36, Number 13)

¹⁴ The FAA's 65 dBA DNL is not a safe noise exposure level for the American public, Daniel Fink, Proceedings of Meetings on Acoustics, March 2024

Further, the World Health Organization in Europe has set 45 Lden—a similar measure to DNL in the United States—as the threshold for adverse health effects.¹⁵ These issues, and the science behind them, also demand a hard look in the context of Seattle-Tacoma International.

Economic consequences: Outdated and unsupported data

We are skeptical of the Port’s estimates of the airport’s economic benefit to Burien.¹⁶ Compiled with data from 2017, the Port’s figures are outdated in any case. Circumstances in local economies and workplaces have changed drastically since the Covid pandemic of 2020. The Port should be required to revise its data accordingly—and also to include information about the negative impacts Burien has sustained because of the continued and substantial growth of Seattle-Tacoma International.

The SAMP ignores these negative impacts—a notable omission because, in 1997, consultants commissioned by the State of Washington outlined significant economic downside to the opening of the third runway. These consultants, led by the firm of Hellmuth, Obata and Kassabaum (HOK), forecast a cycle of “blighting” that would drive down property values and, consequently, municipal tax revenues. HOK estimated that, over a 20-year period following the opening of the third runway, five airport-adjacent cities including Burien would lose \$39.9 million in property tax revenues.¹⁷ The Port is silent to this cost.

Data pertaining to jobs created by Sea-Tac International provide an example of the need to verify. The Port estimates that 540 Burien residents work at the airport. Figures compiled by the watchdog organization Sea-Tac Noise.Info puts the number at 820.¹⁸ However, more than half of those (444) are non-Port workers whose positions do not provide “living” wages.

Further, it would appear actual economic benefit has fallen short of predictions for redevelopment of land vacated to create the so-called “clear zone” for the third runway. The SAMP itself highlights the warehouse complex known as the Northeast Redevelopment Area (NERA), which the Port claims would result in 600-800 new jobs.¹⁹ However, employer data provided to the City of Burien shows that only about 165 people work at the NERA site.

Conclusion

We are compelled to note that a disproportionate number of our residents who live along the flight path are members of communities the State of Washington classifies as vulnerable under a variety of socioeconomic categories. These are people who generally lack the means to move elsewhere and will continue to bear the brunt of the cost, both economic and health-related, for the significant economic growth the SAMP will make possible with volume at Sea-Tac growing to more than 1,100 flights per day.

¹⁵ Environmental Noise Guidelines for the European Region, World Health Organization, 2018

¹⁶ SAMP, Appendix K, p. 30

¹⁷ Sea-Tac International Airport Impact Mitigation Study, Hellmuth, Obata + Kassabaum et. al., February 1997, p. ES-6

¹⁸ Employees in Airport Communities, Sea-Tac Noise.Info, November 2020

¹⁹ SAMP, Appendix K, p. 30

A Finding of No Significant Impact under an Environmental Assessment, especially regarding the areas addressed in this document, would be not only erroneous but spurious. Allowing these projects to proceed without more rigorous study would cause substantial, irreversible harm to the City of Burien—which believes the only proper way to gauge the SAMP’s true impacts on our community, and to develop a comprehensive strategy to mitigate those impacts, would be to conduct a thorough review utilizing an Environmental Impact Statement.

Sincerely,



Kevin Schilling
Mayor, Burien City Council



Stephanie Mora
Deputy Mayor, Burien City Council



Linda Akey
Burien City Councilmember



Alex Andrade
Burien City Councilmember



Hugo Garcia
Burien City Councilmember



Jimmy Matta
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Sarah Moore
Burien City Councilmember