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Comments Regarding the Draft Supplemental Environmental Impact Statement (SEIS)

Referring to comments and their responses in the final EIS was very difficult to follow. The two were printed in entirely different sections and since responses were lumped together, it was almost impossible to know if individual comments were given adequate consideration and treatment. In the final SEIS, please refer to the numbers and letters I use now and in the section where the questions are reprinted, could you also include the responses side-by-side and make a notation in any places in the text of the FSEIS where comments were incorporated into the final analysis and where that can be found. Also, please include in the responses to comments the following consideration:

“Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency’s position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.” NEPA §1503.4(5)

1. (a) The FAA should consider alternatives to the expansion which have not been previously considered such as GPS (see NEPA §1503.4(2)). Paine Field is being used by Horizon. (b) Is there any reason why the air transportation in the region cannot be spread throughout the region? (c) Moses Lake, has a modern facility, 350 VFR days per year, one of the longest runways in the country, and over one million square feet of available hangar space, it makes no sense at all that Sea-Tac needs to expand, extend a runway to be 1500 feet shorter than Moses Lake’s and add a maintenance facility that will be only a fraction of the size. (d) It is completely unnecessary and public money can be better spent on necessary things such as light rail and transportation links to alternative sites such as Moses Lake.

2. (a) The new FAA TAF, should have been used for all the SEIS analyses rather than the lower numbers chosen by the Port of Seattle, especially considering the high number of aircraft operations per year that are possible with three runways plus technology (800,000+) and possibly three runways without technology. (b) Why did the SeaTac Communities Plan say that 260,000 annual operations was capacity for Sea-Tac? (c) If that figure is now known to be inaccurate, what changed?

3. (a) Why did the draft EIS make us believe that Sea-Tac could handle 525,000 annual operations when the SEIS now admits that no more than 460,000 is capacity? (b) What is the real actual capacity of Sea-Tac with a third runway? (c) How many total operations can there be with a third runway and technology combined?

4. (a) How can a parking lot and warehouses be built on City of Seattle Water Department Wellhead Protection area?

5. (a) How can the third runway new flight tracks be drawn without any noise insulation plan for the new corridor? (b) What kind of a degree turn will the large aircraft have to make to reach the old flight corridor noise abatement line when taking off from the third runway and at the south end, for instance, approximately what cross street and at what nautical mile will the turn be completed to reach the old corridor? (c) How far is this from the turn at 3,000 feet? (d) If aircraft cannot make it to the old corridor in time or if they will conflict with other aircraft already in the old corridor when taking off from the third runway, will noise mitigation measures be implemented for the new corridor? (e) If so, how far west will this extend? (f) Why has no plan been discussed so far? (g) There will obviously be more noise further west into neighborhoods should the third runway be build. (h) Why hasn't the FAA and/or Port of Seattle done anything to alert the public that the new corridor will not receive noise abatement? (i) Does the Port still maintain that noise is being reduced even though Stage II aircraft operations are still on the rise and the Expert Noise Panel did not agree with this assumption and in fact, indicated that noise will continue to rise?

#### Section 5-2 Air Quality Summary Section Chapter 1

6. (a) Does the SIP consider all airport area sources such as the 26,000 tons per year of CO from local automobile trips? (b) If not, why not? (c) If so, why does the SIP inventory on page 5-2-4 only seem to include aircraft and airport sources at 5,880 and not the local surface street automobile traffic? (d) Why does the SIP go down in the maintenance plan to 4,442 in the future when there are absolutely no controls for aircraft and airport point sources included in the maintenance plan?. (e) If this scenario includes only airport sources such as aircraft which are a significant contributor to CO in the sources category of EDMS, then why does the SIP go down at all considering that no controls of aircraft emissions are being implemented by or in the SIP and a reduction would reflect mostly automobile improvements for which tons per year of total roadway sources at 20,000 plus are not even reflected in this SIP number?

7. (a) Page 1-9 Summary says that CO AAQS violations will occur but the FAA does not believe they are subject to a general or transportation conformity determination even though this projects impacts can be controlled and are in the jurisdiction of the federal agency or within its control. (b) Why does FAA believe they are exempt from conformity when Clean Air Act NAAQS violations are predicted?

8. (a) Why are there 1,000 less vehicles in the future "with project" scenario compared to the "do-nothing"? (b) It doesn't make sense to me that the parking garage expansion at the airport will draw less surface traffic volumes in the future than the do-nothing, especially since in the do-nothing scenario, there may be no new parking expansion at the airport itself and the fewer cars in the with project ignores the trends of more VMT and SPA in the future, not less? (c) Could you explain why the Hotel will not draw additional traffic over the do-nothing in the future? (d) Could you explain why the North Unit Terminal and a significant increase in passengers in the future will draw 1,000 less cars over the do-nothing? (e) Can you explain why 1,000 less cars will go toward 509/South Access in the with-project over the do-nothing considering this road will or may be built regardless of the runway? (f) Can you explain why SASA will not draw 1,000 more cars, not less, if it is built in the with-project scenario considering SASA was supposed to create 9,000 direct and indirect jobs? (g) Could you also explain how 1,000 of the missing cars in 2010 will use the relocated parking at 154th since it cannot be built on the protected City of Seattle Wellfield?

9. (a) The SEIS admits that more people will be exposed to noise in 2010 over 2000. (b) What will be done about this additional noise and square mile area considering the present noise abatement area is based upon year 2000 peak noise?

10. (a) Why does number of people exposed to noise of 65 DNL and greater in 2000 decrease in 2005?

#### 5-4 Construction

11. (a) Hasn't borrow area one been discussed as a business park or recreational area in the past? (b) With increases in the borrow quantities from this site, could the FSEIS outline how much fill might need to be added to the site to construct a business park or ball field and other recreational and business developments and who would be responsible for filling in the holes? (c) What will the area look like once all this fill is excavated? Who will be responsible for beautification? (d) What kind of a berm will be left once borrow 1 is excavated? (e) Will the project require a mining permit? (f) Why or why not? (g) Since borrow area 1 is located in the City of Des Moines and is under the jurisdictional authority of Des Moines for land use designations, how does the Port plan to turn the area into a mine?

12. (a) Which route will trucks use to transport fill to the airport from this area since no streets within the fenced area are now contiguous? (b) If the trucks go down 24th Avenue South, where will they turn to head west toward the runway site? (c) Since the borrow demand on area 1 has increased, what will the hauling be like within the City of Des Moines as compared to other local jurisdictions? (d) During the comment period on the draft EIS, I asked what was meant by the site survey description of the area of borrow #1 as gently sloping toward the west in comparison to the EIS's account of the mounds that could be leveled. I never received a response to this concern. (e) I wonder now whether



the mounds are the entire hill above Wesley? (f) Especially since borrow area #1 demand has been significantly increased and the previous description of the demand would have devastated the area and left 40 foot cuts. (g) How will this type of excavation impact the Des Moines Creek which is to the north and downslope from these cuts? (h) Will there be greater flows and possible flooding? (i) How will these cuts impact Wesley facilities since they are also downhill? (j) Will the Port provide flood insurance?

#### 5-6 Land Use Impacts

13. (a) Will Sea-Tac Occupational Skills Center be relocated since the increase in noise of 4.41 DNL in 2010 is significantly higher than the 1.5 DNL allowed? (b) Will OSC be a noncompatible land use or not? (c) When will this decision be made? (d) If OSC becomes a noncompatible land use, what will be the cost of relocating this facility? (e) Who will pay and how?

(f) I notice that on page 1-13, 14, the Port mentions considering (possibly for purchase) homes in the Approach Transitional Zone during the current FAR 150 Update. The DEIS had one obscure paragraph asking residents living within this zone to respond if they wished to be relocated. (g) The FEIS also had one paragraph explaining that these people did not respond to the draft and therefore probably would not be relocated. (h) I find it appalling that the FAA would use such an unprofessional approach to what should be a federal relocation requirement for the transitional zone, formerly known as the extended clear or safety zone, formerly known as the crash zone. (i) Why should a safety issue be up to the public to interpret and implement? This does not make any sense. (j) If it is a hazardous zone to live in, then the people should be relocated regardless of their own particular desire since their understanding of aviation safety procedures and requirements is limited and the FAA's public notification process was obscure to say the least.

#### Safety

14. (a) What will be the potential for in the air incursion or incidents if Boeing Field and Renton expand and increase operations along with Sea-Tac?

15. (a) What is meant by a lag in Boeing Field aircraft traffic?

#### Chapter 2

#### Purpose and Need

16. Page 2-1 indicates that poor weather "occurs 44% of the year." (a) What does this mean? (b) Is 44% of the year almost half the time? (c) Didn't an expert dispute this large figure? (d) FAA delay figures published last year covering 1995 operations had Sea-Tac rated one of the best airports in the country for on-time performance. (e) How many aircraft are anticipated to not use Sea-Tac due to the 44% bad weather? (f) Since the third runway cannot alleviate poor weather, what will be the constraints on the airport during

all this poor weather when aircraft operations are significantly higher in the near future? (g) Is it a good idea to put a new, very expensive runway in an area with such a poor weather factor? (h) Moses Lake Airport has 350 VFR days per year. (i) Wouldn't it be a better idea to expand Moses Lake Airport rather than invest more money in Sea-Tac with all the poor weather?

17. (a) Why did the Port chose to use the lower operations numbers rather than FAA TAF? (b) Are the Port figures indicative of worst case as an environmental analysis requires?

18. (a) How will future delay with capacity constraints compare to the delays of crossing two active runways in the with-project scenario?

19. (a) What is the federally imposed rule at JFK that caps peak hour activity? (Page 2-8)

20. (a) Page 2-10 discusses the wake vortex and says the 82.5 operations per hour (41.25 takeoffs and the same in landings) would be reduced by 2% due to a newly enacted rule. (b) Could you explain how one large aircraft takeoff every 22 seconds can occur at O'Hare with this kind of rule in place? (c) How will this affect Sea-Tac if separation is reduced?

#### Construction

21. (a) Page 5-4-39 BMP for hauling activities lists a large number of mitigation requirements for keeping roadways clear, etc. "...the contractor shall remove all debris cluttering the surfaces of such roadways. Trucks and equipment shall have all accumulated dirt, mud, rocks, and debris removed before accessing the site and when leaving the work area. Loads shall be struck flush and secured to prohibit loss of material. If spillage occurs, such roadways shall be swept clean immediately after such spillage to allow for safe operation of vehicles as determined by the Port of Seattle." This list appears to contain a far greater mitigation plan than that used for the runway safety area this past summer and fall. (b) Since the runway safety area (RSA) project is such a small percentage of the entire third runway project dirt requirements (1.7%) I wonder whether these mitigation efforts will actually be carried through since almost none of these were utilized during the RSA project. Dirt height in the haulers exceeded the top of the beds and were not covered, roads were coated with dust and debris, trucks were not cleaned before entering and departing the construction area, etc. (c) If the small scale project is any indication of reality BMP's, the runway construction will be a mess.

22. (a) How will construction noise, combined with aircraft noise and other noise impacts associated with construction, i.e., digging, dumping, hauling, compacting, washing, spraying, vacuum sweeping, street sweeping, etc., affect the environment? (b) People? (c) Animals?

23. (a) Will sedimentation controls be effective considering the RSA has eroded? (b) How will Des Moines Way, 509 and other major roadways be affected once Miller and Des Moines Creeks are relocated and wetlands removed? (c) I am wondering whether it was the RSA's small amount of dirt in comparison to the 3rd runway need that recently caused Miller Creek to divert from its normal course and damage First Avenue South?

24. (a) Map on page 5-4-43 shows an on-site material source at area five and eight, both of which cannot be utilized according to the FEIS. Borrow area 8 has numerous wetlands and borrow area 5 is the City of Seattle wellhead protection area. (b) Why does the SEIS continue to show these two areas as potential material borrow sources?

25. (a) Will on-site soil have to be cleaned of debris? (b) Why or why not? (c) How much high quality fill must be placed? (d) How much soft soil must be removed before any fill can go into the area? (e) What are the seismic anomalies in the area? (f) How will these be handled in the construction plan? (f) Has any engineering plan been approved for the constructed aquifer? (g) Is this aquifer plan still being considered? (h) What kind of slope will the third runway have? (i) How tall in the highest spot? (j) How will this be retained? If at all?

26. On page 5-4-45 a drainage swale is depicted. (a) Where will this drain lead to? (b) Is this a bioswale or ditch with grass? (c) What is the purpose of this ditch at the bottom of the slope of the new runway safety area? (d) Is it to capture fuel, oil, grease and runoff?

27. (a) What kind of slope will be at the west side of the third runway? (b) What is standard? (c) Height?

#### V. Transportation Improvement Projects

28. (a) Which projects on page C-1-21 are federally funded, supported and/or approved? (b) Has the International Boulevard Project Phase I, II received Federal Transit Authority or Federal Highway Administration, or ISTEA funding, support or approval? (c) Was there any federal support involved whatsoever in any of the planned roadway improvements on pages C-1-21-C-2-23? (d) Please identify all sources of funding used by City of SeaTac for each roadway improvement listed along with total costs referenced on pages C-1-21, 25? (e) How many of these road projects are needed due to POS expansion plans? (f) Has the POS committed or provided any funding to these projects? (g) If so, identify the sources of the POS monies and the dates when approved by the Port of Seattle Commission? (h) Has FAA given any monies to these projects? If so, when and how identified? (i) Were any of these projects included in the regional TIP? (j) If so, when PSRC performed modeling, did they identify any exceedances of the NAAQS for CO and therefore, mitigation? (j) Did the lead agency (SeaTac City, WSDOT, FHWA, FTA, and etc., perform a project and site specific transportation conformity analysis? (k) Why or why not? (l) If so, what were the results? (m) If any project receives approval, support and/or funding from any federal agency (or state agency according to the state conformity rule) for any project that does not conform to



the transportation or general conformity provisions of the Clean Air Act, what recourse do local jurisdictions or private citizens have to appeal or challenge these projects and the decisions that supported them?

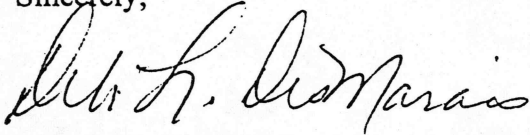
## VI. Future Conditions

29. (a) As mentioned previously in my comments on the draft EIS and during the conformity comment period, I made mention of the need to perform a more detailed air quality, surface water, parking, traffic, land use, stream relocation, wetland impact, and etc., analysis for the SASA site. The SEIS lists SASA on page C-1-32 as a "base maintenance facility" which is somewhat in conflict with other sections of the draft, final and SEIS which discuss SASA as a relocation of existing airport maintenance. (a) Please specify what increase in aircraft maintenance activity, if any, will be accommodated by SASA? (b) In the FSEIS, could you outline the commitments to mitigation that *will be made* for SASA which were only discussed in a cursory manner in the SASA FEIS? For instance, a hush house is included in the narrative on page C-1-32 of the SEIS. However, the SASA FEIS used the words "could" and "might" when discussing constructing a hush-house. The SASA FEIS made no commitment to constructing such a thing and never thoroughly evaluated the feasibility, cost or timing, among others, of constructing one. (c) Will a hush house be constructed or not? (d) When in relationship to SASA build? (e) Additionally, the SASA FEIS proposed the relocation of Des Moines Creek and a mitigation plan which would study the effects of the process over the course of due time. Again, this analysis was only superficial and no real detailed specific process of this type of mitigation has been presented to the public thus far. The same situation exists for air quality modeling analysis which was not performed in the SASA analysis, the conformity review and analysis, parking and traffic impacts, need for a new IWS, the federally required 4(f) Lands Evaluation, the knowledge of a nearby endangered species habitat, cumulative impacts to wetlands and mitigation plans, etc. (f) When will these items be evaluated? (g) Could FAA issue a SASA Addendum or SEIS or include these missing evaluations and their cumulative impacts in the final Supplemental Environmental Impact Statement for the third runway proposal? (h) Is the SASA FEIS still current enough to be used or should a new draft EIS be issued?

30. (a) I have not seen any detailed analysis of the east runway extension by 600 feet. I assume this 600 feet (to 12,500) will need a 500 foot runway safety area and blast pad extension as the existing 11,900 foot runway required to be up to current specifications. The amount of fill needed for the runway safety area is only one half or less that of the runway extension project. The runway safety area required a mitigated DNS, but should have had an EIS since wetlands were filled, Tye Golf Course was impacted, local roadways were affected, surface traffic congestion increased significantly, especially during rush hour, haul truck mitigation was inadequate, i.e., trucks were not covered, streets were not cleaned regularly, dust looked like giant explosions from the street, etc. The runway extension should be evaluated in the SEIS and the FSEIS. (b) Why has it not yet been evaluated in any environmental impact statement? (c) When will it be evaluated?

(d) What will the evaluation include? (e) For example, will there be a multiple project impact analysis for surface traffic congestion and air quality impacts which considers all project construction, timing and mitigation? (f) If not, why not?

Sincerely,



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