

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

Form 7. Mediation Questionnaire

Instructions for this form: <https://www.ca9.uscourts.gov/forms/form07instructions.pdf>

9th Cir. Case Number(s)

Case Name

Counsel submitting this form

Represented party/parties

Briefly describe the dispute that gave rise to this lawsuit.

Feedback or questions about this form? Email us at forms@ca9.uscourts.gov

Briefly describe the result below and the main issues on appeal.

Describe any proceedings remaining below or any related proceedings in other tribunals.

Signature

Date

(use "s/[typed name]" to sign electronically-filed documents)

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

No. 25-7373

VASHON ISLAND FAIR SKIES,
Petitioner,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

No. 25-7439

CITY OF BURIEN, *et al.*,
Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

Petitions for Review of an Order by the Federal Aviation Administration

MOTION TO CONSOLIDATE

Of Counsel:

PATRICIA DEEM

Attorney

Office of the Chief Counsel

Federal Aviation Administration

ADAM R.F. GUSTAFSON

Principal Deputy Assistant Attorney General

ROBERT LUNDMAN

REBECCA JAFFE

Attorneys

Environment and Natural Resources Division
U.S. Department of Justice
Post Office Box 7415
Washington, D.C. 20044
(202) 598-0402
Rebecca.Jaffe@usdoj.gov

Respondent the Federal Aviation Administration (FAA) moves to consolidate two recently filed petitions that both challenge the same FAA decision. Respondent solicited, but was unable to obtain, Petitioners' positions. The two petitions that should be consolidated are *Vashon Island Fair Skies v. FAA*, No. 25-7373 (filed Nov. 21, 2025), and *City of Burien v. FAA*, No. 25-7439 (filed Nov. 24, 2025). Both petitions challenge the FAA's Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport, which the FAA signed on September 24, 2025.

Consolidation would promote judicial economy and prevent duplicative briefing and argument. "Consolidated review . . . avoids inconsistency and conflicts . . . while ensuring the timely and efficient resolution of administrative cases." *Ruud v. U.S. Dep't of Lab.*, 347 F.3d 1086, 1090 (9th Cir. 2003). "[I]t is more efficient for one three-judge panel to consider all the issues arising out of the same record than it is for two or more three-judge panels to review the same record in order to adjudicate the issues separately." *United States v. Reese*, 993 F.2d 254, 256 (D.C. Cir. 1993).

The Federal Rules of Appellate Procedure authorize consolidation. "When the parties have filed separate timely notices of appeal, the appeals may be joined or consolidated by the court of appeals." Fed. R. App. P. 3(b)(2). "Consolidation under Federal Rule of Appellate Procedure 3(b) may be ordered where the court in

its discretion deems it appropriate and in the interests of justice” *United States v. State of Wash.*, 573 F.2d 1121, 1123 (9th Cir. 1978). Although Rule 3(b)(2) references notice of appeal, courts have also applied the rule to petitions for review. *E.g.*, *Legal Env’t Assistance Found., Inc. v. U.S. E.P.A.*, 400 F.3d 1278, 1279 (11th Cir. 2005) (sua sponte consolidating under Federal Rule of Appellate Procedure 3(b)(2) petitions that were “factually similar and procedurally identical”).

This Court has held that “each of the matters to be consolidated must be within the jurisdiction of the court.” *United States v. State of Wash.*, 573 F.2d 1121, 1123 (9th Cir. 1978). The FAA cannot say—at this preliminary stage—whether the Court has jurisdiction over both petitions and all the claims that Petitioners may raise. But the FAA does not challenge the timeliness of the petitions for review, and timeliness is the primary concern of Rule 3(b)(2): “When the parties have filed separate *timely* notices of appeal, the appeals may be joined or consolidated by the court of appeals.” Fed. R. App. P. 3(b)(2) (emphasis added).

The Court should consolidate *Vashon Island Fair Skies v. FAA*, No. 25-7373, and *City of Burien v. FAA*, No. 25-7439, because both petitions challenge the same FAA decision.

Respectfully submitted,

/s/ Rebecca Jaffe

ADAM R.F. GUSTAFSON

Principal Deputy Assistant Attorney General

Of Counsel:

PATRICIA DEEM

Attorney

Office of the Chief Counsel

Federal Aviation Administration

ROBERT LUNDMAN

REBECCA JAFFE

Attorneys

Environment and Natural Resources Division

U.S. Department of Justice

Post Office Box 7415

Washington, D.C. 20044

(202) 598-0402

Rebecca.Jaffe@usdoj.gov

December 6, 2025

90-13-1-18042

CERTIFICATE OF COMPLIANCE

I hereby certify:

1. This document complies with the type-volume limitation of Federal Rule of Appellate Procedure 27(d)(2) because, excluding the parts of the document exempted by Rule 32(f), this document contains 452 words.

2. This document complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Rule 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 2016 in 14-point Times New Roman font.

s/ Rebecca Jaffe
REBECCA JAFFE

Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the Appellate Electronic Filing system. I also used the Appellate Electronic Filing system to serve all registered case participants.

s/ Rebecca Jaffe
REBECCA JAFFE

Counsel for Respondents

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

No. 25-7373

VASHON ISLAND FAIR SKIES,
Petitioner,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
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No. 25-7439

CITY OF BURIEN, *et al.*,
Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

Petitions for Review of an Order by the Federal Aviation Administration

MOTION TO EXTEND ADMINISTRATIVE RECORD DEADLINE

Of Counsel:

PATRICIA DEEM

Attorney

Office of the Chief Counsel

Federal Aviation Administration

ADAM R.F. GUSTAFSON

Principal Deputy Assistant Attorney General

ROBERT LUNDMAN

REBECCA JAFFE

Attorneys

Environment and Natural Resources Division

U.S. Department of Justice
Post Office Box 7415
Washington, D.C. 20044
(202) 598-0402
Rebecca.Jaffe@usdoj.gov

Respondent the Federal Aviation Administration (FAA) moves to extend the administrative record deadline for *Vashon Island Fair Skies v. FAA*, No. 25-7373 (filed Nov. 21, 2025), and *City of Burien v. FAA*, No. 25-7439 (filed Nov. 24, 2025), to February 17, 2026, because of the upcoming holidays and the backlog of projects that accrued during the lapse in appropriations. Both petitions challenge the FAA's Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport, which the FAA signed on September 24, 2025. The administrative record for the two petitions is identical, since both petitions challenge the same action.¹ The administrative record is currently due to be filed in both cases on January 5, 2026. Respondent solicited, but was unable to obtain, Petitioners' positions.

The first petition, *Vashon Island Fair Skies*, No. 25-7373, was filed on November 21, 2025. The Court immediately set a briefing schedule providing that Petitioners' opening brief is due February 12, 2026, and the FAA's answering brief is due March 16, 2026. No. 25-7373, Dkt. No. 3.1. The second petition, *City of Burien*, No. 25-7439, was filed on November 24, 2025, and the Court set a briefing schedule calling for the opening briefs to be filed on February 13, 2026, and the answering brief to be filed on March 16, 2026. No. 25-7439, Dkt. No. 3.1. The Court did not set an administrative record deadline in either scheduling order. But

¹ The FAA is also moving, by separate motion, to consolidate the two cases.

these petitions challenge agency action, and so the Court's review is based on the administrative record. *See* Fed. R. App. P. 17; Ninth Circuit Rule 17-1.

Under Federal Rule of Appellate Procedure 17, the agency must file the record within 40 days after being served with a petition for review. Fed. R. App. P. 17(a). The FAA was served with the *Vashon Island Fair Skies* petition on November 24, 2025, and forty days after that date is Saturday, January 3, 2026. The FAA was served with the *City of Burien* petition on November 25, 2025, and forty days after that date is Sunday January 4, 2026. The administrative record would be due in both cases on Monday January 5, 2026.

The FAA needs more time to prepare the administrative record because of the backlog of projects that accrued during the lapse in appropriations, the long history of the agency action at issue in this litigation, and the upcoming holidays. The FAA therefore seeks an extension of the administrative record deadline to February 17, 2026.

For the foregoing reasons, the Court should extend the administrative record deadline to February 17, 2026.

Respectfully submitted,

/s/ Rebecca Jaffe

ADAM R.F. GUSTAFSON

Principal Deputy Assistant Attorney General

Of Counsel:

PATRICIA DEEM

Attorney

Office of the Chief Counsel

Federal Aviation Administration

ROBERT LUNDMAN

REBECCA JAFFE

Attorneys

Environment and Natural Resources Division

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s/ Rebecca Jaffe

REBECCA JAFFE

Counsel for Respondent

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I hereby certify that on December 6, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the Appellate Electronic Filing system. I also used the Appellate Electronic Filing system to serve all registered case participants.

s/ Rebecca Jaffe
REBECCA JAFFE

Counsel for Respondents

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FILED

DEC 10 2025

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

VASHON ISLAND FAIR SKIES, a
Washington nonprofit corporation,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION,

Respondent.

No. 25-7373

Federal Aviation Administration

CITY OF BURIEN, Washington municipal
corporations; et al.,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION; et al.,

Respondents.

No. 25-7439

Federal Aviation Administration

ORDER

The motion (Docket Entry No. 8 in No. 25-7373; Docket Entry No. 7 in No. 25-7439) to consolidate is granted. Nos. 25-7373 and 25-743 are consolidated. The parties must include both case numbers on all future filings.

The motion (Docket Entry No. 9 in No. 25-7373; Docket Entry No. 8 in No. 25-7439) for an extension of time to file the certified administrative record is

granted. The certified administrative record is due February 17, 2026.

The consolidated opening brief is now due March 30, 2026. The consolidated answering brief is due April 29, 2026. The optional consolidated reply brief is due 21 days after the consolidated answering brief is served.

FOR THE COURT:

MOLLY C. DWYER
CLERK OF COURT

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FILED

DEC 11 2025

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

VASHON ISLAND FAIR SKIES, a
Washington nonprofit corporation,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION,

Respondent.

No. 25-7373

**ORDER SETTING ASSESSMENT
CONFERENCE**

Date: 1/9/2026

Time: 11:00 AM Pacific Time
(DIAL-IN CONFERENCE)

CITY OF BURIEN, Washington
municipal corporations; et al.,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION; et al.,

Respondents.

No. 25-7439

The Mediation Program of the Ninth Circuit Court of Appeals facilitates settlement while appeals are pending. See Fed. R. App. P. 33 and Ninth Cir. R. 33-1.

The court has scheduled a dial-in telephone assessment conference with counsel on the date and time indicated above.

Each participant on the attached list will receive an email with dial-in information. If there are any changes or additions to the list, please notify the Mediation Office at mediation@ca9.uscourts.gov.

Also, please notify Circuit Mediator Paula Raffaelli immediately by email (Paula_Raffaelli@ca9.uscourts.gov) if counsel has an unavoidable scheduling conflict. Please copy all counsel on any such communications.

All communications should include the Ninth Circuit case name and number in the subject line.

All discussions that take place in the context of the conference are confidential. See Cir. R. 33-1.

For more detailed information about the assessment conference, confidentiality, the Mediation Program and its procedures generally, please see the attachment to this order and the Mediation Program web site:

www.ca9.uscourts.gov/mediation.

The briefing schedule previously set by the court remains in effect.

FOR THE COURT:

By: Paula Raffaelli
Circuit Mediator

LIST OF CONFERENCE PARTICIPANTS

VASHON ISLAND FAIR SKIES, a Washington nonprofit corporation; et al. Not Applicable - Petitioners	Steven M. Taber staber@leechtishman.com
FEDERAL AVIATION ADMINISTRATION Not Applicable - Respondent	Brett D. Weingold brett.weingold@faa.gov
FEDERAL AVIATION ADMINISTRATION Not Applicable - Respondent	Courtney Adolph courtney.adolph@faa.gov
FEDERAL AVIATION ADMINISTRATION Not Applicable - Respondent	Rebecca Jaffe rebecca.jaffe@usdoj.gov

UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT
CIRCUIT MEDIATION OFFICE

Website: www.ca9.uscourts.gov/mediation

Email: ca09_mediation@ca9.uscourts.gov

Phone: 415-355-7900

INFORMATION ABOUT ASSESSMENT CONFERENCES

Overview

- The purpose of the assessment conference is to provide an opportunity for counsel and the Circuit Mediator to have a frank discussion about settlement. The mediator will explore the parties' interests in settlement and, if appropriate, work with counsel to design a process to pursue resolution of the dispute.
- The conference will be conducted by one of the eight Circuit Mediators, all of whom are court employees with extensive mediation and litigation experience. The conference typically lasts from 30-60 minutes. The Circuit Mediators are authorized to file orders on most procedural matters, including vacating or moving the briefing schedule.
- Counsel for each party that intends to file a brief in this matter should participate in the assessment conference. The lawyer with the closest relationship to the client should be on the call. Clients are not expected to participate in the assessment conference.
- In advance of the conference, counsel should have a discussion with their clients about their goals in the litigation, its possible costs and outcomes (good and bad), the potential for further legal proceedings, and what issues beyond the litigation might be explored in mediation.
- During the conference, counsel and the Circuit Mediator will discuss the factual and legal background of the dispute, the legal issues involved in the litigation and on appeal, any related legal proceedings, and any other considerations that may affect the parties' willingness to engage in settlement discussions. The scope of discussion is not limited to the issues on appeal: it may include related legal proceedings or any other issues between the parties.

Confidentiality

- Settlement-related information disclosed to a Circuit Mediator will be kept confidential and will not be disclosed to the judges deciding the appeal or to any other person outside the Mediation Program participants. Ninth Cir. R. 33-1.
- All participants in the assessment conference are required to abide by the court's confidentiality rules, which are set forth in Rule 33-1 and can be found at: www.ca9.uscourts.gov/mediation. With limited exceptions, any communication made by the Circuit Mediator or any participant during the conference may not be used in any pending or future proceeding in this court or any other forum and may not be disclosed to anyone who is not a participant. Ninth Cir. R. 33-1.

Likely Outcomes of Assessment Conference

- At the conclusion of the assessment conference, the Circuit Mediator may confirm in an order the agreements of the parties regarding the scope, process and timing of any further settlement efforts. Typical settlement processes include in-person mediation sessions, telephone settlement dialogues facilitated by the Circuit Mediator, or direct discussions between counsel.
- The parties may agree to extend briefing in order to focus on settlement efforts. In most cases, the deferral of briefing will not delay disposition of the appeal because the date of the filing of the notice of appeal controls when an appeal is assigned to a three-judge panel for decision.
- If at any point the parties choose not to pursue settlement efforts, the Circuit Mediator will work with counsel to resolve any outstanding procedural issues and will enter orders effectuating any procedural agreements.

More information is available on the Mediation Circuit link on the Ninth Circuit website www.ca9.uscourts.gov/mediation.

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

VASHON ISLAND FAIR SKIES,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents.

Case No. 25-7373

CITY OF BURIEN, CITY OF DES
MOINES, and CITY OF SEATAC,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents.

Case No. 25-7439

**MOTION OF THE PORT OF SEATTLE FOR LEAVE TO
INTERVENE ON BEHALF OF RESPONDENTS**

Pursuant to Federal Rule of Appellate Procedure 15(d), the Port of Seattle (the “Port”) moves for leave to intervene in the above-captioned consolidated proceeding, along with any subsequently consolidated cases, in support of Federal Respondents, the Federal Aviation Administration, et al. (“FAA”).

Petitioners challenge the FAA’s September 2025 final decision to issue a Finding of No Significant Impact (“FONSI”) and Record of Decision (“ROD”) for the Port of Seattle’s Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport. As the Sustainable Airport Master Plan sponsor and the entity that worked with FAA to conduct the Decision’s underlying Environmental Assessment, the Port is entitled to intervene as of right under this Court’s well-established criteria and Federal Rule of Civil Procedure 24(a). Alternatively, this Court should grant permissive intervention under Federal Rule of Civil Procedure 24(b).

The Port contacted counsel for the parties in this matter. Petitioners Vashon Fair Skies, the City of Burien, the City of Des Moines, and the City of SeaTac do not oppose this Motion. The FAA takes no position.

I. STATEMENT OF INTERESTS AND GROUNDS FOR INTERVENTION

To accommodate anticipated continuing growth in the Puget Sound region, the Port developed and proposed the Sustainable Airport Master Plan for the Seattle-Tacoma International Airport. The Sustainable Airport Master Plan identifies 31 Near-Term Projects at the Airport.

Those projects are intended to improve efficiency, safety, access, and airline support. Implementation of the Near-Term Projects requires several “actions, determinations and approvals” from the FAA, including approval of revisions to the Airport Layout Plan. *See* No. 25-7439, ECF 1.1 at 5 (“FONSI/ROD”). Before the FAA could take those actions, the FAA was required to complete environmental review pursuant to the National Environmental Policy Act (“NEPA”) regarding the Near-Term Projects. The Port, as the sponsor, invested substantial time and resources working with the FAA to prepare an Environmental Assessment under NEPA. Through the Environmental Assessment, the FAA evaluated the reasonably foreseeable environmental impacts of the Near-Term Projects and determined the Near-Term Projects would have “no significant impacts,” as NEPA defines that term. Based on that conclusion, the FAA issued its FONSI/ROD enabling implementation of the Near-Term Projects. Petitioners now challenge the FONSI/ROD and the adequacy of the Environmental Assessment.

II. BACKGROUND

The Port was founded in 1911 by a vote of the people as a special purpose government, similar to a school, fire, or utility district.

Declaration of Stephen Metruck (“Metruck Decl.”) ¶ 2. The Port’s mission is to promote economic opportunities and quality of life in the region by advancing trade, travel, commerce, and job creation in an equitable, accountable, and environmentally responsible manner. *Id.* ¶ 3. Since 1911, the Port has grown from a fledgling harbor to a multi-faceted organization that owns and operates the Seattle-Tacoma International Airport and the Seattle Seaport. *Id.* ¶ 4. Authority of the Port is vested with the Port Commission, comprised of five Commissioners who are elected at large by voters of King County and serve four-year terms. *Id.* ¶ 5.

A. The Sustainable Airport Master Plan

The Puget Sound region is expected to grow by another one million people by 2035. *Id.* ¶ 6. The Seattle-Tacoma International Airport serves as the primary air transportation facility for a multi-state region. *Id.* ¶ 7. However, the Airport’s passenger processing functions, such as on-site parking, check-in, security screening, and the number of gates, are undersized, resulting in crowded spaces, long lines, and impacts to flights. *Id.*; *see also* Declaration of Sarah Cox (“Cox Decl.”), Ex. A at 3-4.¹

¹ Exhibit A contains excerpts from the Final Environmental Assessment and Appendix O, with citations to the PDF page numbers.

These problems are expected to worsen as the region continues to grow and passenger demand increases. Metruck Decl. ¶ 7; Cox Decl., Ex. A at 3-4.

In anticipation of this future need and to implement updated FAA safety standards, the Port spent three years developing the Sustainable Airport Master Plan. The Port worked with a consultant team and internal and external stakeholders, including the Port's Aviation Division, the FAA, airlines, and local governments. Cox Decl. ¶ 4. The Sustainable Airport Master Plan recommends 31 Near-Term Projects focused on safety and efficiency to meet forecasted demand at the Airport with an industry standard level of service. *Id.*; *see also* FONSI/ROD at 3. Highlights of the Near-Term Projects include developing 19 additional gates and a second terminal, additional cargo facilities, extensions of airfield taxiways, and expansion of the fuel facility. Cox Decl. ¶ 5; *id.*, Ex. A at 5-9; *see also* FONSI/ROD at 4. As explained in the Environmental Assessment, the Port hopes to complete the Near-Term Projects by 2032. Cox Decl. ¶ 5.

B. The Environmental Assessment and Decision

On July 30, 2018, the FAA and Port initiated the Environmental

Assessment for the Near-Term Projects and provided a 60-day public and agency scoping period. *Id.* ¶ 6. The FAA and Port held a scoping meeting for agencies on September 6, 2018, which Petitioners the Cities of SeaTac, Des Moines, and Burien attended. *Id.* ¶ 5. The FAA and Port also held a series of public scoping meetings between September 10, 2018 and September 19, 2018, which were attended by members of Petitioner Vashon Island Fair Skies. *Id.* After the scoping period ended, the FAA and Port decided to conduct the NEPA and State Environmental Policy Act (“SEPA”) analyses separately, with NEPA preceding SEPA. Cox Decl., Ex. A at 4; *id.* ¶ 6.

On October 21, 2024, after a delay due in large part to the COVID-19 public health emergency, the FAA published the Draft Environmental Assessment and accepted public comments through December 13, 2024. *Id.* ¶ 9. The Port hosted four in-person public meetings to provide members of the public with opportunities to ask questions and provide comments. *Id.*, Ex. A at 20, 24. Between September and December 2024, the Port held 30 briefings about the Draft Environmental Assessment with various city councils and local organizations. *Id.* at 25-26. The Port also posted notices or ads in local newspapers and news websites and

mailed postcards to more than 126,000 residences near the Airport. Those postcards were translated into six languages and included information about the public meetings. *Id.* at 22-23. In total the Port and FAA received over 580 comments on the Draft Environmental Assessment, including comments from Petitioners. *Id.* at 46-66.

On September 26, 2025, after considering all comments received and making corresponding revisions to the environmental analysis, the FAA issued its Final Environmental Assessment together with its Decision.

C. Ongoing SEPA Analysis

With the FAA's environmental review and FONSI/ROD completed, the Port has resumed its work leading the environmental review process under SEPA. The Port plans to rely heavily in its SEPA process on the technical environmental analysis it prepared in conjunction with the FAA for the NEPA process. Cox Decl. ¶ 12. The Port intends to issue its draft SEPA environmental review documents in the spring of 2026 and issue its final documents in fall or winter 2026. *Id.* ¶ 13. Until the environmental reviews are complete, the Port Commission cannot make a final decision on whether to proceed with the Near-Term Projects.

Metruck Decl. ¶ 10.

The Port has already invested several million dollars in the federal and state environmental review processes to date. Metruck Decl. ¶ 11; Cox Decl. ¶ 9. The outcome of this appeal will directly inform the Port's SEPA review process and, thus, the Port's ability to stay on schedule with its plan to address Airport congestion. Metruck Decl. ¶ 12; Cox Decl. ¶ 14. Any delay in that schedule will cause both practical and financial impacts to the Port, the Airport, and the millions of passengers who utilize the Airport each year. Cox Decl. ¶ 14.

III. LEGAL STANDARD FOR INTERVENTION

A motion to intervene must be filed within 30 days after the petition for review is filed. Fed. R. App. P. 15(d).

Although the Federal Rules of Appellate Procedure contain no explicit standard for intervention, the U.S. Supreme Court in *International Union, United Automobile, Aerospace & Agricultural Implement Workers of America, AFL-CIO, Local 283 v. Scofield* noted that the Federal Rules of Civil Procedure may be a helpful analogy for appellate courts deciding motions to intervene and that “the policies underlying intervention [in the Federal Rules of Civil Procedure] may be

applicable in appellate courts.” 382 U.S. 205, 217 n.10 (1965).

Federal Rule of Civil Procedure 24(a)(2) allows intervention as of right where, as here, the protection of a movant’s interest may be impaired or impeded if the lawsuit proceeds without them. The Ninth Circuit applies a four-part test under Rule 24(a)(2) to determine whether an applicant is entitled to intervene as of right:

(1) the application for intervention must be timely; (2) the applicant must have a significantly protectable interest relating to the property or transaction that is the subject of the action; (3) the applicant must be so situated that the disposition of the action may, as a practical matter, impair or impede the applicant’s ability to protect that interest; and (4) the applicant’s interest must not be adequately represented by the existing parties in the lawsuit.

Sw. Ctr. for Biological Diversity v. Berg, 268 F.3d 810, 817-18 (9th Cir. 2001). The Ninth Circuit construes Rule 24(a) liberally in favor of potential intervenors. *Id.* at 818. This “liberal policy” towards intervention allows “parties with a *practical* interest in the outcome of a particular case to intervene.” *United States v. City of Los Angeles*, 288 F.3d 391, 398 (9th Cir. 2002) (quoting *Forest Conservation Council v. U.S. Forest Serv.*, 66 F.3d 1489, 1496 n.8 (9th Cir. 1995)) (emphasis in original); *see also Cnty. of Fresno v. Andrus*, 622 F.2d 436, 438 (9th Cir. 1980) (noting the practice of granting intervention to “as many

apparently concerned persons as is compatible with efficiency and due process”); *see also Wilderness Soc’y v. U.S. Forest Serv.*, 630 F.3d 1173 (9th Cir. 2011) (en banc) (allowing intervention in NEPA cases).

Federal Rule of Civil Procedure 24(b) allows permissive intervention when the party moving to intervene “has a claim or defense that shares with the main action a common question of law or fact.” Whether to grant permissive intervention is a matter of court discretion. *See Donnelly v. Glickman*, 159 F.3d 405, 411 (9th Cir. 1998). However, the motion must be timely, and the court must “consider whether the intervention will unduly delay or prejudice the adjudication of the original parties’ rights.” Fed. R. Civ. P. 24(b)(3).

IV. ARGUMENT

A. The Port is entitled to intervene as of right.

The Port satisfies the requirements for intervention as of right under Federal Rule of Civil Procedure 24(a): timeliness, a legally protected interest that may be impaired or impeded by this proceeding, and no other party to this litigation adequately represents that interest.

i. The Port’s motion is timely.

Vashon Island Fair Skies filed its petition for review on November

21, 2025. The Cities of Burien, Des Moines, and SeaTac filed their petition on November 24, 2025. This motion is therefore timely.

ii. The Port has a significant protectable interest that would be impaired by disposition of this action.

The Port has a clear, direct interest in the outcome of this proceeding. First, as the Sustainable Airport Master Plan sponsor, the Port has expended substantial time and public resources to develop the Near-Term Projects and work with the FAA to prepare the Environmental Assessment underlying the challenged Decision. The FONSI/ROD also directly informs whether and when the Port may proceed with the Near-Term Projects. Any delay in those projects will significantly and adversely impact the Port. Cox Decl. ¶¶ 10, 12-15.

The Port's environmental team and technical consultants were also heavily involved in developing the Environmental Assessment and the Port intends to rely on the Environmental Assessment's data and analysis as it prepares SEPA documents. An adverse decision from this Court would require the Port to make additional financial and technical investments and would delay the Near-Term Projects. The Port believes the environmental analysis is correct and has an interest in defending it.

Finally, the Port has a protectable interest in addressing the significant and increasing needs of passengers using the Airport. Traffic at the Airport—in terms of total operations and total passengers—currently exceeds capacity. Cox Decl., Ex. A at 3-4. Several of the Near-Term Projects are also necessary to “enhance the efficiency of the overall taxiway layout” and increase safety overall by bringing the airfield infrastructure into compliance with current FAA airport design standards. FONSI/ROD at 5. Any delay resulting from this litigation will exacerbate these ongoing capacity constraints and public safety concerns. Metruck Decl. ¶ 12.

iii. The existing parties do not adequately represent the Port’s interests.

The Port satisfies the fourth prong of the intervention test because none of the current parties adequately represent its interests. “The burden of showing inadequacy of representation is ‘minimal’ and satisfied if the applicant can demonstrate that representation of its interests ‘may be’ inadequate.” *W. Watersheds Project v. Haaland*, 22 F.4th 828, 840 (9th Cir. 2022) (quoting *Citizens for Balanced Use v. Mont. Wilderness Ass’n*, 647 F.3d 893, 898 (9th Cir. 2011)). This Court considers:

(1) whether the interest of a present party is such that it will undoubtedly make all of a proposed intervenor's arguments; (2) whether the present party is capable and willing to make such arguments; and (3) whether a proposed intervenor would offer any necessary elements to the proceeding that other parties would neglect.

Id. at 840-41 (quoting *Citizens for Balanced Use*, 647 F.3d at 897).

The FAA will not adequately represent the Port's interests because the FAA is charged with regulatory oversight responsibilities across the nation, while the Port is responsible for serving the aviation needs of the Pacific Northwest and, specifically, Puget Sound. Metruck Decl. ¶¶ 4, 7. Also, unlike FAA, the Port bears the financial and regulatory burden of implementing the Near-Term Projects, *id.* ¶ 11, and thus has unique proprietary and economic interests in the Near-Term Projects and any mitigation required to address the environmental effects of the Near-Term Projects, Cox Decl. ¶ 15. The FAA is not positioned to make the Port's arguments here.

B. Alternatively, this Court should grant permissive intervention.

In addition to meeting the requirements for intervention as of right, the Port also meets the less burdensome requirements of permissive intervention articulated in Federal Rule of Civil Procedure 24(b). This

motion has set out the common questions of law and fact that the Port shares with the parties, including whether the analysis contained in the Environmental Assessment adequately evaluated the effects of the Near-Term Projects. There is no risk that intervention will unduly prejudice the original parties because the Port's intervention will not delay or increase the cost of resolution of this proceeding. On the contrary, the Port has a significant interest in avoiding delay, and its participation will aid in efficient resolution by making sure all interested parties are involved. The Port is also already intimately familiar with the Environmental Assessment, the operation and management of the airport, the purpose and need for the Near-Term Projects, and the Decision. Accordingly, if this Court does not grant the Port intervenor status as of right, it should grant permissive intervention.

V. CONCLUSION

For the reasons stated above, the Port respectfully asks this Court to grant its motion for leave to intervene.

Respectfully submitted,

/s/ Charlene Koski

Charlene Koski
Molly Lawrence
Van Ness Feldman, LLP
1191 Second Avenue
Suite 1800
Seattle, WA 98101
Tel: 206-623-9372
Email: ckoski@vnf.com
mol@vnf.com

Taylor A. Mayhall
Van Ness Feldman, LLP
2000 Pennsylvania Avenue, NW
Suite 6000
Washington, D.C. 20006
Tel: 202-298-1800
Email: tmayhall@vnf.com

*Counsel for Proposed-Intervenor Port
of Seattle*

Dated: December 19, 2025

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 27(d), I certify that the attached Motion is proportionately spaced, has a typeface of Century Schoolbook, 14-point, and contains 2,556 words, excluding those listed under Rule 32(f), and in compliance with the type-volume requirements of Rule 32(a), 27(d)(1)(E), and Rule 27(d)(2).

/s/ Charlene Koski
Charlene Koski
VAN NESS FELDMAN, LLP
1191 Second Avenue
Suite 1800
Seattle, WA 98101
Tel: 206-623-9372
Email: ckoski@vnf.com

Dated: December 19, 2025

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2025, I electronically filed the foregoing with the Clerk of the Court for the U.S. Court of Appeals for the Ninth Circuit by using the ACMS system. I certify that all participants in the case are registered ACMS users and that service will be accomplished by the ACMS system.

Dated at Seattle, Washington on this 19th of December, 2025

/s/ Charlene Koski
Charlene Koski
VAN NESS FELDMAN, LLP
1191 Second Avenue
Suite 1800
Seattle, WA 98101
Tel: 206-623-9372
Email: ckoski@vnf.com

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

VASHON ISLAND FAIR SKIES,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents.

Case No. 25-7373

CITY OF BURIEN, CITY OF DES
MOINES, and CITY OF SEATAC,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents.

Case No. 25-7439

DECLARATION OF SARAH COX

Pursuant to 28 U.S.C. § 1746, I, Sarah Cox, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

1. I am the Director, Aviation Environment and Sustainability, for the Port of Seattle (the "Port"). I have been in this role since 2022. In this role, I work closely with the leadership and stakeholders of the

Seattle-Tacoma International Airport (“Airport”) to integrate environmental and sustainability initiatives into and across all airport activities.

2. I have worked for the Port for over 20 years, previously serving as Senior Environmental Program Manager and then Senior Manager. I have extensive experience with environmental issues in the aviation industry.

3. In anticipation of future demand at the Airport and to alleviate current capacity and safety constraints, the Port of Seattle developed the Seattle-Tacoma International Airport Sustainable Airport Master Plan, which includes a long-term vision for the facility and recommends thirty-one “Near-Term Projects” focused on improving safety and efficiency in the near term. The Port devoted three years of time and resources to developing the Sustainable Airport Master Plan with a consultant team and internal and external stakeholders, including the Port’s Aviation Division, the Federal Aviation Administration (“FAA”), airlines, and local jurisdictions.

4. Highlights of the Near-Term Projects include a second terminal with nineteen new gates, improvements to ground access and

automobile parking facilities, additional cargo facilities, modifications to the airfield taxiways and blast pads, and expansion of the fuel facility to prepare for future fuel needs. A complete list of the thirty-one Near-Term Projects can be found in Chapter 1 of the Final Environmental Assessment, attached as **Exhibit A** to this declaration. Prior to any lawsuit being filed, the Port planned to complete the Near-Term Projects by 2032.

5. The environmental review processes related to the Near-Term Projects formally kicked off with scoping beginning in July 2018. The scoping period ran for sixty days from July 30, 2018, to September 28, 2018, during which the Port hosted four public meetings to present the Near-Term Projects, explain the anticipated scope of the environmental review, and seek comments from the public and various federal, state, and local agencies. The FAA and Port held a scoping meeting for agencies on September 6, 2018, which Petitioners the Cities of SeaTac, Des Moines, and Burien attended. The FAA and Port also held a series of public scoping meetings between September 10, 2018 and September 19, 2018, which were attended by members of Petitioner Vashon Island Fair Skies.

6. The Port initially anticipated that it and the FAA would issue a joint environmental document containing the environmental analysis necessary to support both the FAA's and Port's decisions related to the Near-Term Projects. After scoping, however, the Port and FAA decided to proceed with two separate documents: the FAA's Environmental Assessment under the National Environmental Policy Act ("NEPA"), and then the Port's environmental documentation under the Washington State Environmental Policy Act ("SEPA").

7. The Port worked with the FAA throughout the development of the FAA's Environmental Assessment. Consistent with FAA NEPA Orders and guidance, the Port engaged environmental consultants with substantial expertise in airport development and modifications to prepare the Environmental Assessment with direction from the FAA.

8. The COVID-19 public health emergency caused a several years delay in the environmental review schedule. On October 21, 2024, the Draft Environmental Assessment was published, with a public comment period lasting through December 13, 2024.

9. After the public comment period on the Draft Environmental Assessment closed, the Port of Seattle and FAA considered over 580

comments received and worked together to respond to those comments and prepare the Final Environmental Assessment. In total, the Port of Seattle committed seven years and significant public financial resources to preparing the Environmental Assessment that underlies the FAA's challenged decision.

10. The FAA issued the Final Environmental Assessment in September 2025. Concurrently, the FAA issued its Finding of No Significant Impact ("FONSI") and Record of Decision ("ROD") (collectively, the "Decision") on September 26, 2025, approving revisions to the Airport Layout Plan and other authorizations needed to enable the Port to advance the Near-Term Projects.

11. With the FAA's environmental review and Decision completed, the Port has resumed its environmental review process under SEPA. For that process, the Port plans to rely heavily on the technical environmental analysis prepared in conjunction with the FAA under NEPA.

12. The Port intends to issue its draft environmental review documents in the spring of 2026 for public comment and hopes to issue its final environmental review documents in the fall or winter of 2026.

13. The outcome of this appeal will directly affect the Port's ability to rely on the technical analysis underpinning the FAA's Environmental Assessment and, thus, the Port's ability to remain on schedule to complete its environmental review and address problems of congestion and safety at the airport, which are worsening as the region continues to grow.

14. A conclusion from this Court that the analysis in the Environmental Assessment is insufficient under NEPA would affect the Port's ability to use that analysis in its SEPA environmental documents. The Port would have to spend additional time and money to revise and/or augment the analysis in the Environmental Assessment and in its SEPA environmental documents, and the Port Commission cannot make a final decision on whether to proceed with the Near-Term Projects until both the NEPA and SEPA environmental review processes are completed. Such delays would cause both practical and financial impacts to the Port, the Airport, and the millions of passengers who utilize the Airport each year.

15. Assuming the Near-Term Projects are approved for implementation, the Port will bear the financial burden of any mitigation required to address environmental effects of such implementation.

Executed on December 18, 2025 in Seattle, Washington.

A handwritten signature in blue ink that reads "Sarah Cox". The signature is written in a cursive style and is positioned above a horizontal line.

Sarah Cox

EXHIBIT A

FINAL

Environmental Assessment for the Sustainable Airport Master Plan Near-Term Projects

Seattle-Tacoma International Airport

Seattle, Washington

PREPARED FOR

Port of Seattle

U.S. DEPARTMENT OF TRANSPORTATION

FEDERAL AVIATION ADMINISTRATION

As lead Federal Agency pursuant to the National Environmental Policy Act of 1969

PREPARED BY

Landrum & Brown, Incorporated

September 2025

This environmental assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA Official.

KANDICE N KRULL

Digitally signed by KANDICE N

KRULL

Date: 2025.09.24 03:34:54 -06'00'

Responsible FAA Official

Date

SEATTLE-TACOMA INTERNATIONAL AIRPORT
 ENVIRONMENTAL ASSESSMENT
 FOR THE SUSTAINABLE AIRPORT MASTER PLAN NEAR-TERM PROJECTS

1 Introduction and Purpose & Need

1.1 Introduction

This Environmental Assessment (EA) for the Seattle-Tacoma International Airport (SEA) Sustainable Airport Master Plan (SAMP) Near-Term Projects (NTPs) is being prepared in accordance with the requirements set forth by the National Environmental Policy Act (NEPA), as amended (42 USC § 4331 et seq.), and Federal Aviation Administration (FAA) Orders 1050.1F, *Environmental Impacts: Policies and Procedures*, and 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.¹ The purpose of this EA is to determine if the development and operation of the Proposed Action has the potential to significantly affect the human environment. Environmental review and approval are required under NEPA because the Proposed Action would require multiple federal actions (see Section 1.4, Requested Federal Actions). **Table 1-1** provides an outline and description of the chapters included in this EA.

The FAA invited the U.S. Army Corps of Engineers (USACE) to participate as a cooperating agency as described under 42 USC § 4336a(a)(3) and USACE accepted.

TABLE 1-1: OUTLINE OF THE EA

Chapter	Description
Chapter 1, Purpose and Need	Describes the background for the project, as well as the purpose and needs for the project
Chapter 2, Alternatives	Describes the process for identifying and evaluating alternatives for further consideration in the environmental review process
Chapter 3, Affected Environment	Describes the baseline conditions for each of the environmental resource categories
Chapter 4, Environmental Consequences	Describes the potential reasonably foreseeable environmental effects, the significance of those effects, and proposed mitigation (where necessary), of the different alternatives for each environmental resource category
Appendices	Provides more detail on individual topics and outreach conducted

1.2 Background

1.2.1 Planning Process

The SAMP² identified a Long-Term Vision to accommodate future passenger levels and address identified needs for SEA over the 20-year planning horizon (through 2034). One of the overarching needs from the SAMP was to improve the experience for passengers at SEA. The current passenger processing functions, such as on-site parking, check-in hall, security screening, holdrooms, and the number of gates, were limited or undersized for the number of passengers SEA served in 2018 and

¹ FAA Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures, was published on July 3, 2025. Projects that commence after July 3, 2025, are required to comply with FAA Order 1050.1G, while those projects already underway by that date may follow FAA Order 1050.1F. This EA relies upon FAA Order 1050.1F, the Fiscal Responsibility Act of 2023, Executive Order (EO) 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, EO 14154, *Unleashing American Energy*, and the Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County*, 605 U.S. __ (2025).

² The SAMP was prepared over a three-year period (2015 to 2018).

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continue to be undersized. The results of these limitations are crowded spaces, long lines, and delayed flights. These problems are expected to worsen as passenger demand increases.

The SAMP ultimately concluded that even with the implementation of the full Long-term Vision, unconstrained 20-year demand would result in airfield congestion and high levels of delay. This congestion and delay would occur primarily as a result of limitations in the airfield / airspace system. The Port of Seattle (Port) and FAA determined that addressing these long-term airfield / airspace limitations is outside of the scope of SAMP and that a more comprehensive airfield and airspace planning study is needed to understand if additional actions would be required before the Long-term Vision could be fully implemented. Because additional planning is needed, the FAA determined that the Long-term Vision was not yet ripe for environmental review.

The Port developed the NTPs, which is a plan to address the near-term needs, whether the Port pursues the long-term projects or addresses the long-term airfield / airspace limitations. The NTPs are the subject of this environmental review and include 31 projects that would improve the efficiency and safety of SEA, access to SEA, and support facilities for the airlines and SEA. Because the NTPs focus on a more immediate timeframe and address needs that are distinct from what may come from future planning, the NTPs are independent from the Long-term Vision. The FAA determined that the NTPs are ripe for environmental review.

The sustainability component of the SAMP focused on the Port's long-standing history of implementing sustainability initiatives to achieve its environmental goals and objectives. Through the SAMP process, the Port focused on what facilities are needed, where these facilities would be located, and how these facilities would be operated from a sustainability perspective.³

1.2.2 EA Timeline

The FAA and Port initiated the EA for the SAMP NTPs on July 30, 2018 with a 60-day public and agency scoping period. The scoping period closed on September 28, 2018 and the FAA and Port reviewed comments received from the public and agencies. Based on scoping comments, the FAA and Port made the decision to complete the NEPA and State Environmental Policy Act (SEPA) analysis separately and sequentially. In March of 2020, the COVID public health emergency resulted in dramatic reductions in passengers and aircraft operations and resulted in a partial deferral of spending by the Port. Due to the reduction in activity between 2020 and 2022 and the partial deferral of spending, the Port reevaluated the opening year for the NTPs. Based on the projections of activity in the 2023 Updated Forecast and the time it would take to construct the NTPs, the Port determined the opening year for the NTPs would be 2032. Updated impact analyses were prepared in 2023 through 2024 based on the revised timeframe.

At the end of this environmental review process, the FAA will either issue a Finding of No Significant Impact / Record of Decision (FONSI / ROD) or determine that the Proposed Action has the potential for one or more significant impacts to the human environment, thereby requiring the preparation of an Environmental Impact Statement (EIS).

³ The SAMP Technical Memorandum No. 9 Sustainability Planning and Management Strategy provides the specific ways the Port would incorporate sustainability into the development process and can be found here: <https://www.airportprojects.net/sampenvironmentalreview/tm-no-9-sustainability-plan-management/>.

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1.3 Proposed Action

In this EA, the NTPs are collectively referred to as the Proposed Action, which are described in **Table 1-2** and shown on **Exhibit 1-1**. Based on the current schedule for environmental review, construction could begin late 2025. If the Port decides to proceed with the project following the environmental reviews, the Proposed Action could be substantially complete and operational by 2032.

Section 163 of the FAA Reauthorization Act of 2018, H. R. 302, (Public Law (P.L.) 115-254) and Section 743 of the FAA Reauthorization Act of 2024, H.R. 3935 (P.L. 118-63) limited FAA's approval authority to portions of Airport Layout Plans (ALPs) that meet certain statutorily defined criteria and prohibited the FAA from directly or indirectly regulating airport land use unless certain exceptions exist. While the Proposed Action details the Port's intended development at SEA, only some of these development components now are subject to federal approval and / or funding. However, the entire Proposed Action is analyzed in this EA.

The airfield projects (A01-A10) would require the FAA to relocate FAA-owned equipment (including navigational and visual aids (NAVAIDs)) and associated infrastructure. These relocations would also require modifications to existing procedures. The extent of these relocations and modifications are not known at this time and would be determined during the design of the Proposed Action. The analysis in this EA includes details that are currently known.

TABLE 1-2: PROPOSED ACTION PROJECTS

Project Element	Description
Airfield Projects	Airfield Projects Description
A01 – Taxiway A/B Extension	<p>Extension of parallel Taxiways A and B by approximately 1,800 feet to provide access to the south end of Runway 16L/34R. Includes:</p> <ul style="list-style-type: none"> • Construction of parallel taxiway connectors from Taxiway B to Runway 16L/34R. • Relocation of Taxiway S 310 feet south. • Relocation of the Runway 34R glideslope antenna and shelter to the southeast. • Adjustment of the Runway 34R glideslope angle and precision approach path indicator (PAPI) to match the glideslope. • Amendments to flight procedures to accommodate change in glideslope angle. • Relocation of a vehicle service road bridge over S. 188th Street <p>Taxiways would have in-pavement centerline lights, elevated taxiway edge lights, hold position markings with in-pavement lights, elevated runway guard lights, and signage.</p>
A02 – Runway 16R/34L Blast Pads	Expansion of Runway 16R/34L blast pads from 200 feet by 200 feet to 220 feet by 400 feet to meet current FAA standards and relocation of NAVAIDs.
A03 – Taxiway C/D Reconfiguration and Runway Incursion Mitigation (RIM)	Modification of existing taxiway geometry of Taxiways C and D to correct non-standard intersection angles and reconfigure non-standard intersections. Includes the extension of Taxiways C and D by approximately 500 feet to intersect with Taxiway A and removal of pavement north of Taxiway C to mitigate the existing RIM location.
A04 - Taxiway B 500-foot Separation	Relocation of Taxiways A and B 100 feet east between Taxiways C and L to provide the required 500 feet runway/taxiway separation. Includes extending Taxiways C, D, E, H, and K to the relocated Taxiway B and relocating NAVAIDs. Taxiways would have in-pavement centerline lights, elevated taxiway edge lights, hold position markings with in-pavement lights, elevated runway guard lights, and signage.
A05 – North Hold Pad	Construction of a new approximately 90,000 square foot hold pad for four aircraft to reduce congestion on the taxiways and at the terminal.

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TABLE 1-2: PROPOSED ACTION PROJECTS (CONTINUED)

Project Element	Description
Airfield Projects	Airfield Projects Description
A06 – Runway 34L High-Speed Exit	Construction of a new high-speed exit for Runway 34L arrivals between Taxiways J and E to allow for more efficient use of the runway by arriving aircraft. The high-speed exit would be equipped with in-pavement centerline lights, elevated taxiway edge lights, hold position markings with in-pavement lights, and taxiway signage. Includes the relocation of the multilateration remote unit.
A07 – Taxiway D Extension	Extension of Taxiway D by approximately 500 feet from Runway 16C/34C west to Taxiway T. Includes in-pavement centerline lights, elevated taxiway edge lights, hold position marking with in-pavement lights, elevated runway guard lights, and signage.
A08 – North Cargo Hardstand	Construction of a new approximately 360,000 square foot (1,200 feet by 300 feet) cargo aircraft hardstand in the North Cargo area east of Taxiway A. The hardstand would accommodate five aircraft for loading and unloading cargo freight and parking cargo aircraft. Construction would require the relocation of the existing United maintenance hangar and Swissport cargo facility (S08), relocation of the Port's aviation maintenance facility (S07), and relocation of ground service equipment maintenance (S09).
A09 – Central Hardstand	Construction of a new approximately 292,000 square foot hardstand for seven aircraft north of Concourse D and east of the North Satellite to accommodate increased demand for passenger hardstand operations and overnight parking of passenger aircraft. Buses would bring passengers to / from aircraft on the hardstand. Construction of A09 requires relocating portions of the North Airport Expressway (NAE) (L01).
A10 – Taxiway Fillets	Construction of new full strength pavement panels and shoulders and the installation of edge lighting and signage to bring taxiway fillets up to current FAA standards.
Terminal Projects	Terminal Projects Description
T01 – North Gates	<p>Construction of a new multi-level terminal concourse and aircraft apron to accommodate up to 19 gates. The new terminal concourse would have a footprint of approximately 203,000 square feet and contain three levels (approximately 609,000 square feet total). The new terminal concourse would include:</p> <ul style="list-style-type: none"> • Ramp level for baggage handling and aircraft support functions. • Concourse level with passenger holdrooms, concessions, restrooms, and other passenger and airline support functions. • Mezzanine level with office space. • Above-ground elevated pedestrian walkway to the passenger terminal. <p>The new facility would be located north of the North Satellite Concourse and would displace the Aircraft Rescue and Firefighting (ARFF) station (S02), Cargo 6 warehouse (C01), deicing tanks (S06), NAE (L01) and fuel rack (S04).</p>
T02 – Second Terminal and Parking	<p>Construction of a new multi-level passenger terminal across the NAE from the proposed terminal concourse (T01). The new terminal would be approximately 575,000 square feet in size, with a footprint of approximately 166,000 square feet. The new terminal would include:</p> <ul style="list-style-type: none"> • Basement level for baggage handling and screening. • Baggage claim level for arriving passengers. • Interstitial (or open) level connected to a new garage that provides commercial curbside space. • Departures level with passenger check-in and security screening facilities. <p>Includes a new multi-level parking garage to provide approximately 1,350 parking spaces. The new facilities would displace the Doug Fox Parking Lot.</p>

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TABLE 1-2: PROPOSED ACTION PROJECTS (CONTINUED)

Project Element	Description
Cargo Projects	Cargo Projects Description
C01 – Cargo 4 South Redevelopment	Construction of an approximately 80,000 square foot building (warehouse and office space, truck terminals, and parking) on the Cargo 4 South site located in the existing central cargo area of the Airport to replace Cargo 6 warehouse demolished for T01.
C02 – Offsite Cargo Phase 1	Construction of a new approximately 330,000 square foot cargo warehouse building (warehouse and office space, truck terminals, and parking) on the Port's L-shaped parcel located north of State Route (SR) 518.
C03 – Offsite Cargo Phase 2	Construction of a new approximately 90,000 square foot cargo warehouse building (warehouse and office space, truck terminals, and parking) on the Port's L-shaped parcel located north of SR 518.
Landside Projects	Landside Projects Description
L01 – North Airport Expressway (NAE) Relocation (southbound lanes)	Construction of approximately 7,300-linear-feet of new NAE to access the Second Terminal and alleviate congestion on existing roadways. The new roadway would replace a section of the existing roadways eliminated for the construction of A09 and T01. The relocated portion of the NAE would also be widened from three lanes to four lanes. The cell phone lot will be relocated to the main parking garage to accommodate the construction of L01.
L02 – Elevated Busway and Stations	Construction of approximately 6,000-linear-feet of elevated busway and three stations to connect the Main Terminal, new Second Terminal, and Rental Car Facility. The busway and stations would be located along the eastern edge of Airport property and would tie into existing bus routes. Displaces existing GT holding lot (L05).
L03 – Second Terminal Roads and Curbside	Construction of a loop ramp from the southbound lanes of the NAE to provide access to the new passenger terminal. The ramp would connect to the existing S. 160 th Street Loop, eastbound SR 518 on-ramp at S. 160 th Street, or the existing northbound lanes of the NAE. Includes construction of split-level curbsides for arriving vehicles, departing vehicles, and commercial vehicles (shuttles, taxis, and ride-share companies).
L04 – Northeast Ground Transportation Center (NE GTC)	Construction of a NE GTC on the north side of the existing parking garage. The NE GTC facility would be approximately 255,000 square feet and would include: <ul style="list-style-type: none"> • Expansion of the existing charter and cruise bus lot on the ground floor level. • Shuttle bus platform on level two serving as the southern terminus of the elevated busway (approximately 87,000 square feet). • Passenger circulation and check-in facilities on level three providing terminal-quality space for passengers arriving / departing on the elevated busway and Link Light Rail at the Airport Station to transition to / from the Main Terminal (approximately 64,000 square feet). • Office space on levels four and five (approximately 52,000 square feet per level).
L05 – North Ground Transportation (GT) Holding Lot	Relocation of the GT holding lot on Port property north of SR 518 and south of S. 144 th Street to replace the parking lot displaced by L02. This lot would be used for ground transportation holding, as drivers await trip requests or passenger arrival.
L07 – Employee Parking Structure	Construction of a new eight-story (i.e., one below grade and seven above-grade) parking structure that would provide approximately 3,500 parking stalls on Port property north of SR 518 and south of S. 144 th Street to accommodate employee parking demand. The structure would have a footprint of approximately 3.3 acres.

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TABLE 1-2: PROPOSED ACTION PROJECTS (CONTINUED)

Project Element	Description
Airport / Airline Support Projects	Airport / Airline Support Projects Description
S01 – Fuel Farm Expansion	Expansion of the existing fuel farm onto the former south employee parking lot. This would include: <ul style="list-style-type: none"> • Four new settling tanks, adding approximately 10-million-gallons storage capacity. • Blending tank (approximately 500,000-gallon) and approximately 100,000-gallon Sustainable Aviation Fuels (SAF) receipt tank. • Additional piping. • Expanded spill containment dike. • New truck fuel rack to support the delivery of SAF for blending.
S02 – Primary ARFF Facility	Relocation of the Primary ARFF station for construction of T01. The new ARFF would be approximately 50,000 square feet and would be located on the south airfield between Runway 16R/34L and Runway 16C/34C.
S03 – Secondary ARFF Facility	Construction of an approximately 10,000 square foot Secondary ARFF to provide ambulatory response to the terminals and concourses, fuel spill and fire response to the concourse ramp areas, and backup emergency response to the airfield. The Secondary ARFF facility would be integrated within the new Concourse (T01) at the southeast end of the concourse and would have both airside and landside access.
S04 – Fuel Rack Relocation	Relocation of the fuel rack from the Cargo 6 area to the Cargo 3 area for construction of T01. The fuel rack is where fuel trucks refill.
S05 – Triculator	Relocation of the triculator building from east of the existing ARFF station to the North Cargo area to clear the site for A09. The triculator transfers aircraft waste to the sewer system.
S06 –Deicing Tanks	Relocation of deicing fluid tanks currently located at Cargo 6 and Cargo 7 to a northern and southern locations to clear the site for the new concourse. Each site would have a containment system and two tanks, one for Type I deicing fluid (for shorter-term protection) and the second for Type IV deicing fluid (for longer-term protection). Each set of tanks would also have a blending station.
S07 – Westside Maintenance Campus	Relocation of the Port’s aviation maintenance facility (AMF) for construction of A08 to vacant land on the west side of the Airport in the Westside Maintenance Campus, co-locating it with other related functions. The AMF facilities would include a vehicle fuel rack, airfield deicer storage, snow equipment storage, multi-bay buildings and associated maintenance facilities. The existing S. 168 th Street access would be reconstructed and a new access road would be constructed from S. 157 th Place to the new facility.
S08 – North Airline Support	Construction of an approximately 15,000 square foot airline support building in the northeast corner of the North Cargo area to accommodate airline support functions displaced by construction of T01 and A08.
S09 – West Airline Support	An approximately 25,700 square foot expansion to the west of the existing AMB / AFCO III building used for cargo operations. The expanded building would accommodate displaced maintenance functions for construction of T01 and A08.
S10 – Centralized Receiving and Distribution Center (CRDC)	Construction of a new approximately 55,000 square foot CRDC on Port property north of SR 518 and south of S. 144 th Street to improve security and efficiency in moving supplies to SEA dining and retail concessionaires in the passenger terminals. The new CRDC would include a warehouse, office space, truck terminals, and parking for visitors and employees.

SEATTLE-TACOMA INTERNATIONAL AIRPORT
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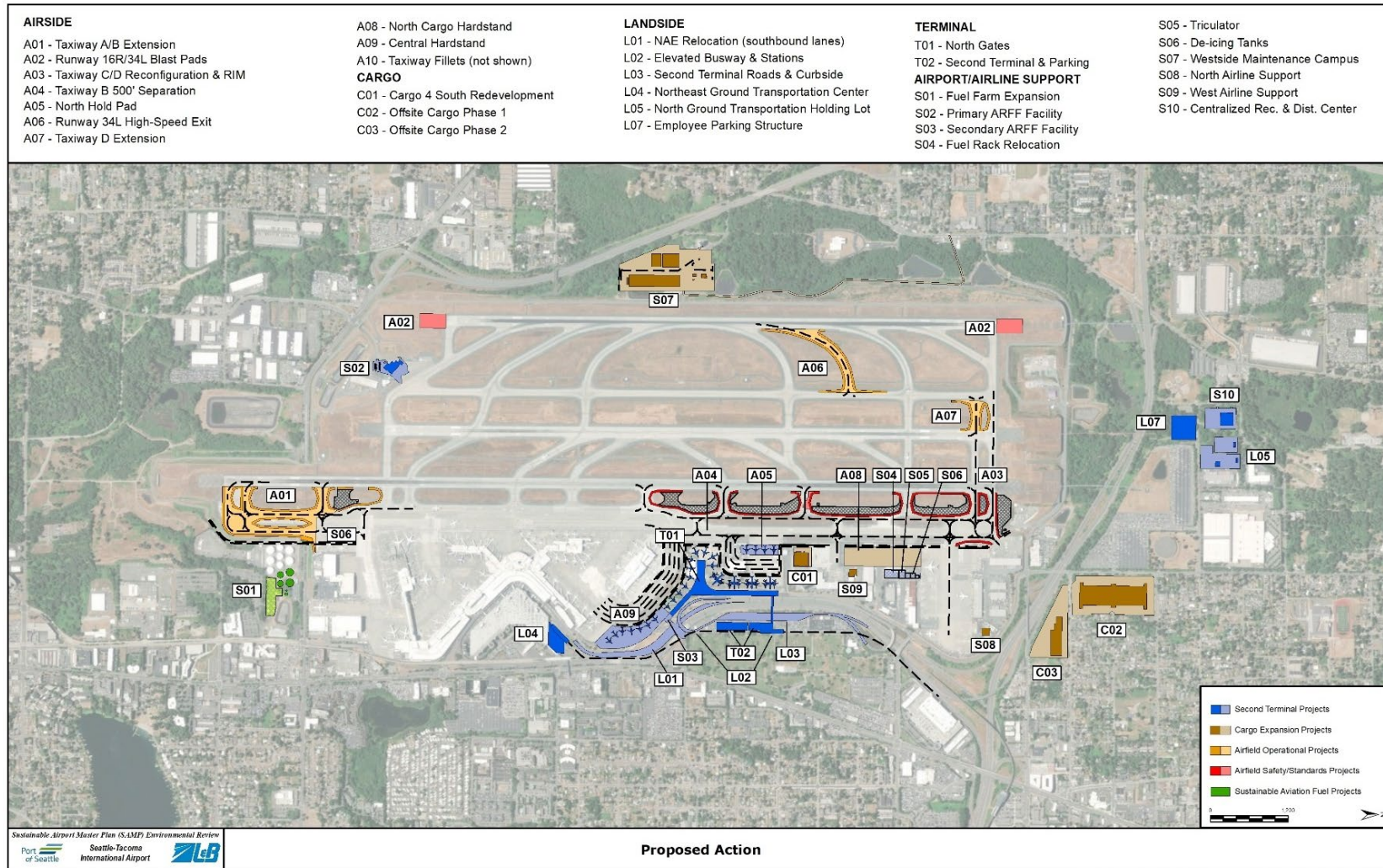
TABLE 1-2: PROPOSED ACTION PROJECTS (CONTINUED)

Project Element	Description
Buildings to be Relocated	Project Requiring Relocation
Fuel Rack	T01 – North Gates
Portion of NAE	L01 – NAE Relocation (southbound lanes)
Triculator	T01 – North Gates
Buildings to be Demolished	Project Requiring Demolition
Primary ARFF Facility	T01 – North Gates
Swissport Cargo Facility (T01)	T01 – North Gates
United Airlines Maintenance / Cargo 4S	C01 – Cargo 4 South Redevelopment
Gate Gourmet Flight Kitchen	T02 – Second Terminal and Parking
Deicing fluid tanks	S06 – Deicing Tanks
Port Maintenance Building	A08 – North Cargo Hardstand
United Airlines Aircraft Maintenance Facility	A08 – North Cargo Hardstand
PACCAR	S02 – Primary ARFF
Doug Fox Payment Building & Office	T02 – Second Terminal and Parking
Guard Shack	A09 – Central Hardstand
Port Westside Field Offices	S07 – Westside Maintenance Campus
Overall Program Support Projects	Overall Program Support Projects Descriptions
Stormwater / industrial wastewater infrastructure	Expansion of existing stormwater / industrial wastewater infrastructure.
Stormwater management facilities	Construction of new stormwater management facilities.
Storm drainage vaults	Conversion of two existing storm drainage vaults (3 and 3A) to industrial wastewater system vaults.
Utilities	Utility connections (sewer, water, natural gas, fuel, and information / communication technology).
Central mechanical plant	Central mechanical plant upgrades.
Construction staging	Construction staging on Port property outside of sensitive areas.

Note: As a result of comments received during scoping, the Port integrated Project L06 (a proposed surface lot for employee parking) into Project L07. Therefore, L06 is not being carried forward.

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EXHIBIT 1-1: PROPOSED ACTION



Note: NAE = North Airport Expressway; GT = ground transportation; ARFF = aircraft rescue and firefighting

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1.4 Requested Federal Aviation Administration Actions

The following are the actions or approvals the FAA must make before the Port can implement the Proposed Action, described in Section 1.3.

- Unconditional approval of the ALP to depict those portions of the Proposed Action subject to FAA review and approval pursuant to 49 U.S.C. § 47107(a)(16)(B).
- Approval and construction, installation, and relocation of FAA-owned equipment (including NAVAIDs) and associated infrastructure as well as any resulting flight procedures updates from the relocation of navigational aids.
- Release of federal obligations to use property for non-aeronautical purposes, including any obligations under 49 U.S.C. § 47107, in accordance with FAA Order 5190.6B.
- Approval of changes to the airport certification manual pursuant to 14 CFR Part 139.
- Determination of project eligibility for Airport Improvement Program (AIP) funding in accordance with 49 U.S.C. §§ 47101-47144.
- Determination of project eligibility to impose Passenger Facility Charges in accordance with 49 U.S.C. § 40117.

1.5 Aviation Activity

Forecasts of aviation activity are projections of aircraft operations and passengers for future conditions. They are useful for determining future facility needs, as well as for determining future environmental impacts. The forecasts prepared as part of the SAMP were completed in 2015 and projected activity through 2034. At the end of the scoping process, the Port initiated and prepared an updated aviation activity forecast in 2019. This forecast was approved by the FAA in January 2020. In March of 2020, the COVID public health emergency resulted in dramatic reductions in passengers and aircraft operations. Due to the reduction in activity between 2020 and 2022, the Port reevaluated the projected passenger and aircraft operations demand for SEA, as well as the opening year for the NTPs. Ultimately in 2022, the Port in collaboration with the FAA, decided to prepare an updated aviation activity forecast (2023 Updated Forecast) to capture the impact of the COVID-19 public health emergency on future passenger and aircraft operations at SEA. The forecast was approved by the FAA in April 2024. (**Appendix A, Forecast and Airport Operational Assumptions**).

Because demand would be constrained with or without the NTPs, the Port also prepared Constrained Operating Growth Scenarios (COGS) using the 2019 forecast as the base forecast that was then modified to reflect the relevant constraints and updated the COGS using the 2023 Updated Forecast. These COGS represent the best projection of how growth would occur over time with and without the NTPs. Therefore, the passenger and aircraft operations from the COGS were used for this EA. The FAA approved the updated COGS (provided in **Appendix A**) for use in this NEPA EA.

Implementation of the NTPs would neither induce regional macro-economic growth nor induce demand for air services to higher levels than expected in the unconstrained forecast. However, the NTPs would increase SEA's ability to accommodate increased aircraft operations and passenger activity at an acceptable level of delay, by adding aircraft gates and passenger processing facilities. As a result, it is assumed that after implementation, the number of aircraft operations and passengers would increase toward the projected unconstrained levels in the 2023 Updated Forecast. This higher growth rate, which is effectively induced demand, is expected to occur for approximately 24 months as airlines adjust their schedules to the additional gate availability. However, it is not anticipated that SEA would be able to accommodate the projected unconstrained aircraft operations and passengers from the 2023 Updated

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Forecast, even with the implementation of the NTPs. Therefore, it is assumed that SEA would again experience constrained growth rates after buildout of the NTPs, as airfield and airspace capacity then become the primary constraining factors.

1.6 Purpose & Need

The purpose and need is essential in establishing a basis for the development of reasonable alternatives. **Appendix B, Purpose & Need and Alternatives Supporting Information** provides additional information on the needs.

1.6.1 Purpose and Need Statement

The purpose and need for the Proposed Action is to accommodate 56 MAP (million annual passengers) at an optimal level of service and projected cargo levels; provide airfield infrastructure that meets current FAA airport design standards; enhance the efficiency of the overall taxiway layout; and meet projected fuel storage demand including SAF initiatives. While the NTPs were designed to accommodate 56 MAP at an optimal level of service (LOS)⁴, the COGS shows a higher passenger demand. The Port acknowledges passenger levels above 56 MAP would be served at a lower LOS.

1.6.2 Needs

The Proposed Action addresses five independent needs that affect the future ability of SEA to maintain its essential function as the primary commercial Airport in the Pacific Northwest (see **Table 1-3**). The five needs are:

1. Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS.
2. Insufficient facilities to accommodate projected cargo levels.
3. Portions of the airfield no longer meet current FAA airport design standards.
4. Inefficient / inadequate taxiway layout.
5. Lack of fuel storage to meet projected demand and the Port's SAF initiative.

TABLE 1-3: NEEDS, DEFICIENCIES, AND RESOLUTIONS

Need	Problem	Resolution Needed
Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS	Passenger check-in areas do not provide the necessary check-in kiosks nor sufficient space for proper circulation around the kiosks.	Need an additional 54 check-in positions and 28,500 square feet of space (total of 66,200 square feet) to accommodate 56 MAP at an optimal LOS.
Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS	Insufficient security screening areas to handle peak passenger volumes in 2022.	Need an additional six screening lanes and 35,100 square feet of space (total of 80,500 square feet) to accommodate 56 MAP at an optimal LOS.

⁴ 56 MAP was identified as a benchmark for what the Airport could serve at an optimal level of service within existing airspace, airfield, and cost constraints. See explanation of "optimal (optimum) level of service" in Advanced Planning Terminal Needs Assessment located in Appendix B.

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TABLE 1-3: NEEDS, DEFICIENCIES, AND RESOLUTIONS (CONTINUED)

Needs	Problem	Resolution Needed
Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS	Terminal ramp is limited and constrained by adjacent facilities, taxilanes, and taxiways. Additionally, adjacent aircraft parking positions can be affected by the type and size of aircraft being parked at a gate. The terminal ramp can accommodate 88 aircraft.	<ul style="list-style-type: none"> • Need 19 additional aircraft parking positions for 56 MAP. • Need 56,000-69,000 square feet of holdroom space and 43,000-86,000 square feet of circulation space for 19 narrowbody equivalent gates. • Need 35 remote parking positions to accommodate remain overnight (RON) aircraft at 56 MAP.
Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS	Existing parking constraints for employees and passengers.	<ul style="list-style-type: none"> • Need 12,440 public parking stalls to accommodate 56 MAP. • Need at least an additional 1,380 employee parking spaces to accommodate future employee parking demand (180 additional terminal garage parking and 1,200 additional remote parking spaces).
Insufficient passenger processing facilities and gates to accommodate 56 MAP at an optimal LOS	Arrival and departure curbsides both experience an overall LOS of F during the peak hour. ⁵	Need at least an additional 100-linear feet of departure curb, 620-linear feet of arrival curb, and one additional lane on the arrival curb to maintain LOS C to accommodate 56 MAP.
Insufficient facilities to accommodate projected cargo levels	Cargo facilities are approaching capacity limits. ⁶	Need up to four additional parking positions ⁷ and an additional 296,100 square feet of cargo warehousing to accommodate the 2032 level of cargo demand. ⁸
Portions of the airfield no longer meet current FAA airport design standards	Blast pads on the ends of Runway 16R/34L are 200 feet by 200 feet.	Need standard blast pads for Runway 16R/34L, which is 220 feet by 400 feet. ⁹
Portions of the airfield no longer meet current FAA airport design standards	Intersection of Taxiway A with Taxiways C and D near the Runway 16L threshold.	Need to meet design standards for taxiway intersections by limiting a pilot to no more than three choices.

⁵ Port of Seattle, Landside Level of Service Analysis, Arrival and Departure Curbside and Roadway LOS (2019).

⁶ As demonstrated by the warehouse utilization and facility requirements calculated in the Air Cargo Growth Potential and Facility Requirements Assessment – Final Report.

⁷ As reported in Appendix A – Aviation Activity Forecast Update, September 2023, Table 6, cargo aircraft operations are forecast to increase by approximately 24% from 2022 (14,851 operations) to 2032 (18,557 operations). A corresponding 24% increased need for cargo parking positions from 18 positions in 2022 results in a need for up to 22 positions in 2032.

⁸ Cargo warehousing space requirements were calculated using Operating Concept #1 as described in SAMP Technical Memorandum No. 5, Facility Requirements, page 5-7. Available for review at: <https://www.airportprojects.net/sampenvironmentalreview/tm-no-5-facility-requirements/>.

⁹ FAA AC 150/5300-13B, Airport Design, Appendix G, Table G-11. Runway Design Standards Matrix, C/D/E – V, 2022.

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TABLE 1-3: NEEDS, DEFICIENCIES, AND RESOLUTIONS (CONTINUED)

Needs	Problem	Resolution Needed
Portions of the airfield no longer meet current FAA airport design standards	Taxiway B has 400 feet of separation from the Runway 16L/34R and operates under a FAA approved Modification of Standards (MOS). Based on the terms of this MOS, any future improvements along Taxiway B must be built to FAA standards.	Need to meet the required separation between the Runway 16L/34R centerline and Taxiway B centerline of 500 feet for any future improvements. ¹⁰
Inefficient/inadequate taxiway layout	A single taxiway (Taxiway B) serves the south end of Runway 16L/34R, which results in a long line of aircraft queuing on Taxiway B during peak departure periods in north flow (departures on Runway 34R). This taxiway layout is inefficient and a contributor to airfield delays.	Need to improve taxiway layout to enhance airfield efficiency and reduce delay.
Inefficient/inadequate taxiway layout	During peak operating periods, the taxiways west of Runway 16C/34C become congested due to a lack of taxiways, holding areas, and taxiways crossing Runway 16C/34C, resulting in delays to taxiing aircraft.	Need to improve taxiway layout to enhance airfield efficiency and reduce delay.
Lack of fuel storage to meet projected demand and the Port's SAF initiative	SEA's fuel storage system has a capacity to hold approximately 17-million-gallons of Jet A fuel. Based on average day peak month operations, the fuel farm has approximately seven days of fuel reserves. ¹¹	<ul style="list-style-type: none"> • Need 22 to 31-million-gallons of fuel capacity to provide approximately 7 to 10 days of fuel reserve, respectively • Need to meet Port goal to power every flight fueled with at least 10 percent SAF.

1.6.3 Purposes

Based on the various deficiencies (needs) discussed previously, the purposes of the Proposed Action are to provide:

- Additional passenger processing facilities and gates to accommodate projected 56 MAP at an optimal LOS.
- Additional cargo facilities to accommodate projected cargo demand.
- Airfield infrastructure to meet current FAA airport design standards.
- Improvements to enhance the efficiency of the overall taxiway layout.
- Additional fuel storage facilities to meet projected demand and the Port's SAF initiative.

¹⁰ FAA AC 150/5300-13B, Airport Design, Appendix G, Table G-12. Runway Design Standards Matrix, C/D/E – VI, 2022.

¹¹ SAMP Technical Memorandum No. 5, Facility Requirements, page 6-2. Available for review at: <https://www.airportprojects.net/sampenvironmentalreview/tm-no-5-facility-requirements/>.

APPENDIX O

Agency & Public Engagement

The following Appendix provides a summary of the agency and public engagement activities that occurred during the Environmental Assessment (EA). Additional information on Scoping is provided in Appendix N.

Engagement Summary

Comments and Responses

Submitted Studies and Materials

APPENDIX O

Agency & Public Engagement

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Regulatory changes since the publication of the Draft EA includes the revocation of the following Executive Orders (EO): EO 11991, EO 12898, EO 13985, EO 13990, EO 14007, EO 14008, EO 14027, EO 14030, EO 14031, EO 14045, EO 14049, EO 14050, EO 14057, EO 14072, EO 14082, EO 14089, EO 14091, EO 14094, EO 14096, EO 14112, and EO 14124. In addition, Council on Environmental Quality (CEQ) revoked its regulations (40 Code of Federal Regulations [CFR] parts 1500-1508) implementing NEPA, 42 United States Code (U.S.C.) 4321 *et seq.*, as amended, in response to EO 14154, *Unleashing American Energy*. This Engagement Summary reflects the public involvement process completed for the Draft EA, which relied upon the NEPA statute (42 U.S.C. 4321 *et seq.*, as amended) and FAA Orders 1050.1F and 5050.4B as well as now-rescinded regulations. FAA's final decision will rely upon FAA Order 1050.1F, the Fiscal Responsibility Act of 2023, Executive Order (EO) 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, EO 14154, *Unleashing American Energy*, and the Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County*, 605 U.S. _ (2025).

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Overview

This document summarizes the public engagement for the Federal Aviation Administration's (FAA) National Environmental Policy Act (NEPA) Draft Environmental Assessment (EA) for SAMP, organized by communications/engagement materials, public meetings, briefings, and media coverage.

Coordination and Public Involvement

This summary discusses coordination and public involvement associated with the EA process. The FAA is the lead federal agency to ensure compliance with NEPA for this project and has the discretion to determine the appropriate level of public involvement. The coordination and public involvement for this project comply with public involvement requirements and policies including NEPA, as amended, Council on Environmental Quality (CEQ), Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1503.1(a) and 1506.6), FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions.

NEPA and the CEQ Regulations, in describing the public involvement process, require federal agencies to: consider environmental information in their decision-making process; solicit appropriate information from the public; fully assess and disclose potential environmental impacts resulting from the proposed action and alternatives; and provide the public with this information and allow it to comment on these findings. While community involvement does not always lead to fully supported decisions, especially where there is a wide diversity of community views, decisions informed by community concerns can better serve the collective public interest and build trust in the FAA by establishing regular communications and involvement with the community throughout a project that has raised community concerns.

The following sections describe the public involvement activities that have been done to consult effectively with the public about their views, concerns, and ideas regarding the EA, the NEPA process and, ultimately, the adequacy of the EA environmental analyses.

The EA process has had several opportunities for public outreach activities that are described in this chapter. The public outreach efforts for this EA have been developed to solicit input from, and provide information to the following groups:

- Community partners
- Tenants/Operators
- Airport users/traveling public
- Agencies and other partners
- Port employees
- Business community
- Elected officials/GR stakeholders
- Underrepresented Communities
- General public

A comprehensive audience breakdown can be found in Appendix A.

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Public Website

At the beginning of the EA process, a public website was developed to keep the general public informed about the EA, the NEPA process, and opportunities for public participation during the EA process. The Project website is linked to the Port of Seattle website and was updated throughout the NEPA process with high-level, easy-to-understand information about the process, the documents (when published), and how to comment.

The Project website was available to translate via Google Translate and all linked materials were translated in the following languages: English, Spanish, Vietnamese, Chinese (simplified), Somali, Amharic and Korean. These materials include an Environmental Review and Airport Master Plan factsheet, FAQs, and a 30-day notice SAMP factsheet. For more details on the Project website's materials, see Appendix B.

Scoping Outreach

- Public Scoping
- Agency Scoping
- Scoping Comments

Outreach Prior to Release of the Draft EA

Several outreach efforts were conducted prior to and following the public release of the Draft EA. A comprehensive list of materials mentioned in the section and related metrics can be found in Appendix B.

30 Day Notice Materials

The SAMP Project website was updated on September 20, 2024 with FAQs, an Environmental Process Factsheet, SAMP Factsheet, and a video highlighting the project and noting that NEPA documents would be released on October 21, 2024. A short write-up about SAMP, the NEPA process, and how the public could engage was included in the Port of Seattle's existing newsletters. A press release was published including the NEPA release date, how to comment, and key information about the NEPA process. Information about the NEPA public comment process and upcoming release date was shared across Port social media pages, including LinkedIn, X, Facebook, and Instagram.

Throughout September 2024, Port staff briefed Port of Seattle Commissioners, local city councils (Burien, Federal Way, Normandy Park, Tukwila, Des Moines, and Federal Way), local transportation boards, and other local stakeholders. For a complete list of briefings, see Appendix C.

Outreach to General EJ Population

As part of the overall community engagement and outreach program for the environmental review of SEA's Sustainable Airport Master Plan Near-Term Projects, the team defined a project goal of engaging underrepresented communities within South King County. To achieve this goal, the team developed strategies to reach underrepresented communities, including multicultural media and partnerships with trusted community-based organizations.

Multicultural media: The Port ran ads in NW Asian Weekly, South Seattle Emerald, Runtanews.com (Somali), Se Habla Media (formerly Univision), and Larazanw.com (Spanish) for 3.5 weeks after the NEPA documents were published.

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Community Partnerships: The Port enlisted The Vida Agency to help engage and provide community organizations with resources to understand the NEPA process and in turn engage with their community about the NEPA EA process. This involved:

- Facilitating meetings between community partners and Port representatives as an opportunity to ask questions, learn about project purpose and confirm partnership with Port.
- Sharing FAA approved outreach materials with community
- Sharing project information with communities where they already are
- Providing resources and support from the Port, including technical support and ongoing relationship development

Availability of the Draft EA

On October 21, 2024 the Notice of Availability of the Draft EA and Notice of Intent to Hold a Public Hearing / Workshop was published, announcing the start of a 45-day public comment period. A press release announcing the availability of the draft was published on October 21, 2024. A notice was also placed on the EA project website. The Port also published the notice through their social media accounts.

The comment period was scheduled to end on December 5, 2024, but was later extended by the FAA to December 13, 2024. Public comment period extension notices were posted on the SAMP Project website, added to all materials posted on the Project website including FAQs, the 30-Day Notice SAMP Factsheet, the Environmental Review and Airport Master Plan Factsheet, and the Community Process Factsheet. These materials were posted in English, Spanish, Vietnamese, Chinese (simplified), Somali, Amharic and Korean. Additionally, notices were sent out to the Port of Seattle's existing newsletters, a press release was published, and the public comment period extension was shared across Port social media pages. A media advisory was sent out on November 11, 2024 and a legal notice was shared on November 14, 2024.

After the public comment period extension, comments were due by Friday, December 13, 2024. Paper copies of the Draft EA were made available for public review at each of the following locations during normal business hours:

- Sea-Tac Airport Office
Mezzanine Level
- Burien Library
400 SW 152nd Street, Burien, WA 98166
- Des Moines Library
21620 11th Avenue S, Des Moines, WA 98198
- Federal Way 320th Library
848 S 320th St., Federal Way, WA 98003
- SeaTac Valley View Library
17850 Military Road S, SeaTac, WA 98188
- Seattle White Center Library
1409 SW 107th St, Seattle, WA 98146
- Tukwila Library
14380 Tukwila International Blvd, Tukwila, WA 98168
- Vashon Library
17210 Vashon Hwy SW, Vashon, WA 98070

Additional overview materials with QR codes to the SAMP Project website with NEPA documents were also available at Pier 69, 2711 Alaskan Way, Seattle, WA 98121.

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Public Meetings

The Port of Seattle hosted four in-person public meetings to share information about the NEPA draft document and receive official public comments. Meetings were designed for members of the public to attend and ask technical team members questions and also provide public comments.

At each meeting, hard copies of all website materials were available. Additionally, each meeting featured over 30 informational boards explaining the EA findings, the NEPA process, and opportunities for public participation during the EA process. These boards were made available on the Project website. Each meeting provided all these materials in English, Spanish, Vietnamese, Chinese (simplified), Somali, Amharic and Korean. Translation services were available upon request.

A video played throughout each public meeting introducing SAMP, explaining the environmental review process, and provided a high-level overview of key findings from the EA.

A comprehensive list of materials available during the public meetings and comment and attendance metrics can be found in Appendix B.

Date	Location
November 12, 2024 6:00–8:00 PM	Wildwood Elementary Federal Way, WA
November 13, 2024 6:00–8:00 PM	Mount Rainier High School Des Moines, WA
November 14, 2024 6:00–8:00 PM	Highline High School Burien, WA
November 16, 2024 10:00 AM–12:00 PM	McMicken Heights Elementary SeaTac, WA

Comments on the Draft EA

Agencies and the public had the following four ways to provide comments on the Draft EA:

- Submit written comments on a comment form at a public meeting;
- Provide comments orally to a court reporter at a public meeting;
- Submit comments electronically during the comment period to samp@portseattle.org; or
- Mail written comments during the comment period to:

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

Responses to Comments on the Draft EA

Comments were reviewed, and responses are provided in Appendix O, Agency and Public Engagement of the Final EA

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Appendix A—Audiences

The audience list below captures a high-level overview of audience groups that were engaged during this process.

Audience category	Individual audiences
Community partners	<ul style="list-style-type: none"> • Congolese Integration Network • Para Los Ninos • Serve Ethiopians • Somali Health Board • SHAG Tukwila • SHAG Federal Way • Environmental Science Center • Duwamish Valley • SR3 – Sealife Response, Rehabilitation, and Research • STACC • Friends of Normandy Park
Tenants/Operators	<ul style="list-style-type: none"> • Taxi drivers • Uber/Lyft drivers • Food service providers
Airport users/traveling public	
Agencies and other partners	<ul style="list-style-type: none"> • Neighboring cities • StART • Highline Forum • School District (Highline, Federal Way, Tukwila, etc.)
Port employees	<ul style="list-style-type: none"> • Via newsletters (This Week @ SEA, Lyttle Update, ED Update)
Business community	<ul style="list-style-type: none"> • Boeing • Microsoft • Amazon
Elected officials/GR stakeholders	<ul style="list-style-type: none"> • Gov. Inslee • Washington State Legislature • King County Executive Dow Constantine • King County Council • Port of Seattle Commission • City Councils (Burien, Des Moines, Federal Way, Normandy Park, SeaTac, and Tukwila)
Underrepresented Communities	<ul style="list-style-type: none"> • Communities of color • Native communities • Immigrant and refugee populations • Low-income communities • English Language Learners • Elders • Persons with disabilities
General public	

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Appendix B—Digital and Printed Materials

Date	Material & Metric
<p>July 25, 2024</p> <p>Pre-notice Preparations</p> <p><i>The website was translated via a Google Translate tool.</i></p>	<p>Project website</p>
<p>September 20, 2024, 30-Day Notice</p>	<p>Project website update (9/21-10/21: 457 website views)</p> <p>Post to the Port's Temp website</p> <ul style="list-style-type: none"> • Under the “Environmental –SEPA/NEPA” section • Temp site hosted by WPPA <p>Email newsletters</p> <ul style="list-style-type: none"> • SAMP Email (1,961 sent) • NEPA Email (1,961 sent) <p>Environmental Review and Airport Master Plan factsheet* FAQs* 30-day notice SAMP factsheet* Press release (3,418 sent) Social media posts</p> <ul style="list-style-type: none"> • Port LinkedIn, Port X, Port Facebook
<p>October 21, 2024</p> <p>NEPA Documents Published; public comment period begins</p>	<p>Project website(10/21-12/13: 14,300 views)</p> <p>Email newsletters</p> <ul style="list-style-type: none"> • SAMP Email (1,955 sent) • NEPA Email (1,955 sent) • Connections Email (6,861 sent) <p>Press release (3,403 sent)</p> <p>Social media posts</p> <ul style="list-style-type: none"> • Port LinkedIn, Port Twitter (X), Port Facebook <p>Community Process Fact Sheet* Updated FAQs* Legal notice Postcard – Mailer (Sent to 126,000+ residences in near-airport communities)</p> <ul style="list-style-type: none"> • Translated in six (6) additional languages • Most received in mailbox either 10/25 or week of 10/28

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Date	Material & Metric
<p>October 23, 2024</p> <p>Ads ran between 10/23 to 11/15</p> <p>A revised second round of social media ads with updated messaging ran from 11/20 to 12/4</p>	<p>Multicultural media ads launch</p> <ul style="list-style-type: none"> • Sound Publishing • South King Media • Westside Seattle • NW Asian Weekly • South Seattle Emerald • Runtanews.com • International Examiner • El Siete Dias <p>SAMP shorter video -3:36 (1,175 views as of 12/10)</p> <ul style="list-style-type: none"> • Six additional translations added to closed captioning <p>Port channel social media ads</p>
<p>November 1, 2024</p>	<p>Narrated PowerPoint video - 35:13 (445 views as of 12/10)</p>
<p>November 6, 2024</p>	<p>Social Media</p> <ul style="list-style-type: none"> • Port LinkedIn, Port Twitter (X), SEA Twitter (X), Port Facebook, SEA Facebook
<p>November 11, 2024</p>	<p>Social Media</p> <ul style="list-style-type: none"> • Port LinkedIn, Port X, Port Facebook
<p>November 12 – 15, 2024</p> <p>Public Comment Period Extension</p>	<p>Project website *</p> <p>Materials update</p> <ul style="list-style-type: none"> • FAQs* • 30-day notice SAMP factsheet* • Environmental Review and Airport Master Plan factsheet* • Community process factsheet* <p>Email newsletters</p> <ul style="list-style-type: none"> • SAMP Email: 11/12 (Public Mtgs – 1,957 sent) and 11/13 (Notice of Extension – 1,958 sent) • NEPA Email: 11/12 (Public Mtgs – 1,952 sent) and 11/13 (Notice of Extension - 1,952 sent) <p>Media advisory 11/12</p> <p>Legal notice 11/14</p> <p>Social media 11/15</p> <ul style="list-style-type: none"> • Port LinkedIn, Port X, Port Facebook
<p>November 19 – 20, 2024</p>	<p>Email and/or call 11/12 and 11/13 public meeting attendees to inform of comment period extension date</p>

Note: Starred materials were translated into Amharic, Chinese, Korean, Somali, Spanish, Vietnamese in addition to email blurb noting translations online

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Public Meetings

Date	Material	Metrics
November 12, 2024 <i>Photos – password: portpress</i>	Public meeting <ul style="list-style-type: none"> 6–8 PM at Wildwood Elementary, Federal Way, WA 	28 attendees <ul style="list-style-type: none"> 6 written comments 5 verbal comments
November 13, 2024	Public meeting <ul style="list-style-type: none"> 6–8 PM at Mount Rainier High School, Des Moines, WA 	83 attendees <ul style="list-style-type: none"> 9 written comments 7 verbal comments
November 14, 2024	Public meeting <ul style="list-style-type: none"> 6–8 PM at Highline High School, Burien, WA 	65 attendees <ul style="list-style-type: none"> 13 written comments 14 verbal comments
November 16, 2024	Public meeting <ul style="list-style-type: none"> 10 AM–12 PM at McMicken Heights Elementary, SeaTac, WA 	55 attendees <ul style="list-style-type: none"> 12 written comments 10 verbal comments

Public meeting outreach materials:

- FAQs
- 30-day notice SAMP factsheet
- Environmental Review and Airport Master Plan factsheet
- Community process factsheet
- Boards
- Open House Station Guide

All of the above materials available in English, Amharic, Chinese (Simplified), Korean, Somali, Spanish, Vietnamese, translation and accessibility services available upon request

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Appendix C—Briefings

Date	Briefing	Type
September 5, 2024	Port of Seattle Commission Special Meeting	
September 9, 2024	Port of Seattle Commission 2:2:1	In-person
September 23, 2024	Burien City Council Federal Way City Council Normandy Park City Council Tukwila City Council SCATBd (South County Area Transportation Board) ETP (Eastside Transportation Board) SeaShore (Seattle-Shoreline Transportation Board) SCA (Sound Cities Association) StART Committee	In-person Email Email In-person Email Email Email Email Email
September 24, 2024	SeaTac City Council	In-person
September 25, 2024	Highline Forum	In-person
September 26, 2024	Des Moines City Council	In-person
October 1, 2024	Federal Way City Council	In-person
October 2, 2024	Serve Ethiopians	In-person
October 3, 2024	Congolese Integration Network	In-person
October 4, 2024	Para Los Ninos Commissioner 2:2:1	In-person In-person
October 7, 2024	Commissioner 2:2:1	In-person
October 10, 2024	Kent Black Action Committee (KBAC)	In-person
October 11, 2024	STACC Meeting	In-person
October 15, 2024	ECOSS Training	In-person
October 17, 2024	SHAG Housing - FW	In-person
October 21, 2024	PSRC (Puget Sound Regional Council)	Online
October 23, 2024	StART Committee Meeting	In-person
October 24, 2024	Des Moines City Council Seattle Chamber's Regional Leadership Conference hosted dinner Seattle Chamber's Regional Leadership Conference panel with Alaska Airlines and Expedia	In-person In-person In-person
October 25, 2024	Tukwila City Council - email	Email
October 28, 2024	Burien City Council	In-person
October 29, 2024	Congressional Staff Virtual Meeting (set up by Eric Schinfeld)	Online
November 1, 2024	SeaShore (Seattle-Shoreline Transportation Board)	In-person
November 6, 2024	Federal Way City Council	In-person
November 7, 2024	Somali Health Board	In-person
November 8, 2024	ETP (Eastside Transportation Partnership)	In-person

Sustainable Airport Master Plan (SAMP)
FAA's NEPA Draft Environmental Assessment (EA)
Engagement Summary

Date	Briefing	Type
November 12, 2024	Normandy Park City Council	In-person
November 15, 2024	Leadership Eastside Group	In-person
November 19, 2024	SCATBd (South County Area Transportation Board) SeaTac City Council	In-person In-person
November 20, 2024	Highline Forum Puget Sound Regional Council Regional Staff Meeting	In-person Online
December 6, 2024	Wesley Homes in Des Moines	In-person

Media Coverage

Date	Story	Outlet
October 21, 2024	Public Comment Period Opens for Port of Seattle's Draft Environmental Assessment on Sustainable Airport Master Plan	SeaTac Blog
October 25, 2024	New terminal, 19 gates eyed for Seattle Tacoma International Airport	Daily Journal of Commerce
November 11, 2024	Share your thoughts on SEA's plans for future development	KIRO 7
November 2, 2024	Airport noise is back on Federal Way's radar	Federal Way Mirror
November 12, 2024	Morning newsclip	KOMO 4
November 13, 2024	SEA's future development: You have more time to share your thoughts	KIRO 7
November 13, 2024	Evening newsclip	KIRO 7
November 21, 2024	Fixing Sea-Tac: Much-Needed Airport Expansion is a Long Way Off	Post Alley
November 30, 2024	Busway for SeaTac Airport	Seattle Transit Blog
December 2, 2024	Evening newsclip	KOMO 4
December 12, 2024	REMINDER: Deadline for Public Comment regarding Sea-Tac Airport SAMP is this Friday, Dec. 13	BTown Blog
December 12, 2024	Sea-Tac Airport says major expansion will do little harm. Neighbors don't buy it	KUOW
Event Page	Deadline for Public Comment regarding Sea-Tac Airport SAMP is Dec. 13	White Center Blog

APPENDIX O

Agency & Public Engagement

Comments and Responses

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Introduction

The public comment period ran from October 21st to December 13th, 2024, and included four public meetings held in the Cities of Federal Way, Des Moines, SeaTac, and Burien, Washington. The public comment period for the Draft Environmental Assessment (EA) began on October 21, 2024, with publication of the Draft EA legal notice. The Federal Aviation Administration (FAA) initially planned to circulate the Draft EA for a 30-day public comment period upon release on October 21, 2024, but extended the comment period to 45-days prior to the release of the Draft EA at the request of the Port based on the complexity of the analysis. On November 8, 2024, the FAA then extended the comment period to Friday, December 13th after taking into consideration community interest and the placement of Thanksgiving within the comment period. Notice of this extension was provided at the public meetings, posted on the project website, and provided to the people who requested the extension.

Comments collected during the Draft EA public comment period were provided through one or more of the following comment-submittal methods:

- In writing, while attending one of the Draft EA public meetings
- Orally to the stenographer, while attending one of the Draft EA public meetings
- Electronically, via the project website
- Electronically, via email
- In writing, by mail

During the review of the comments, the FAA and the Port recognized recurring comments that were raised by numerous people. Consequently, this Appendix begins with General Responses that address the recurring comments and then moves to the individual responses. The FAA and the Port considered and addressed each individual comment provided; however, individual responses are not required as part of the EA process.

This Appendix includes comment letters, e-mails, and public hearing transcripts with individual comments bracketed and numbered. A response to each numbered comment is provided on the right-hand side of the page where the comment appears. When one of the General Responses is applicable, the response will reference the appropriate General Response number (i.e., General Response #1). The FAA and Port encourage readers to review the General Responses along with the FAA's response to specific comments as a reader may find that one or more General Responses not specifically listed are nevertheless responsive to a particular comment. To assist the reader in finding responses to their specific comments, **Table 1** provides an alphabetical list of commenters with the respective assigned comment number.

The public comments received on the Draft EA have resulted in minor edits that improved the accuracy and thoroughness of the Final EA analysis. A list of the edits made can be found in the Errata located at the beginning of the Final EA. The ultimate conclusions of the Draft EA remain the same in the Final EA.

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General Response #1 – Preparation of an Environmental Impact Statement (EIS)

Several commenters argued that the FAA should have prepared an environmental impact Statement (EIS) rather than an EA. The National Environmental Policy Act (NEPA) provides three levels of environmental review and documentation: categorical exclusion (CATEX), EA, or EIS. For FAA funded or approved projects, the appropriate level of NEPA review is determined in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*.

Chapter 5 of FAA Order 1050.1F includes a list of categorically excluded actions. The list identifies actions that the FAA has found do not normally require an EA or EIS except in the case of extraordinary circumstances (Section 5-2). If the proposed airport project is not included in Section 5-6 of FAA Order 1050.1F, an EA or EIS must be prepared. A few components of the NTPs are included in the list of categorically excluded actions. However, some are not and, therefore, an EA or EIS was required.

Chapter 3 of FAA Order 1050.1F states the purpose of an EA is to determine whether a proposed action has the potential to significantly affect the human environment. An EA is a concise public document that briefly provides sufficient evidence and analysis for determining whether to prepare an EIS or issue a finding of no significant impact (FONSI) or finding of no significant impact/record or decision (FONSI/ROD). An EIS is required when any of the impacts of the proposed action, after incorporating any mitigation commitments, remain significant to the human environment. While the regulatory requirements for an EIS are more rigorous than the requirements for an EA, the impact analysis for each resource category is essentially the same for both an EIS and an EA.

The FAA considered the expected project impacts and public comments when determining whether to issue a FONSI/ROD or to prepare an EIS. As documented in the Draft EA and in these responses to comments, the Action Alternatives would not result in any significant impacts that cannot be mitigated below levels of significance in accordance with the thresholds established in FAA Orders 1050.1F and 5050.4B. An EIS, therefore, is not required.

General Response #2 – Study Area

Several commenters argued that the General Study Area (GSA) should have been broader. Section 3.2 of the EA provides information on how the GSA was established. The GSA was developed considering areas of physical disturbance and potential direct or indirect impacts. It encompasses the area containing all components of the Action Alternatives for purposes of assessing potential effects of the Proposed Action on environmental resources in accordance with FAA Orders 1050.1F and 5050.4B. For some resources, the GSA was expanded after the initial analysis identified impacts may extend outside the GSA (such as biological and surface transportation). The air quality analysis used the mixing height (determined in coordination with the Puget Sound Clean Air Agency (PSCAA) to be 3084 feet above field elevation) as the study area.¹ The noise analysis relied on the 65+ Day Night Average Sound Level (DNL or Ldn) contour to determine noise impacts (See General Response #12).

The analysis did not identify impacts that exceeded the significance threshold within the GSA. Impacts outside of the GSA (or relevant resource specific study area) would be further attenuated or reduced compared to those occurring within the GSA. Therefore, extending the study areas would not result in the identification of additional impacts that would likely be significant.

¹ See Appendix C, Air Quality Protocol, Section 1.5.2, footnote 17.

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General Response #3 – Public Outreach

Several commenters indicated that more public outreach was required. The public outreach associated with this EA exceeded the requirements established by the FAA in FAA Order 1050.1F. Appendix O includes more detailed information on all the public outreach efforts. In summary, the outreach efforts included a variety of steps.

At the beginning of the EA process, an external public website was developed to keep the public informed on the NEPA process. Updates on the development of the EA were posted to the website periodically during the NEPA process. The website had approximately 14,300 views and over 5,600 active users during the public comment period.

Thirty (30) days prior to the release of the Draft EA:

- The project website was updated to include a notice of the upcoming release of the Draft EA, responses to frequently asked questions (FAQs), an Environmental Process Factsheet, and a video highlighting the project and noting that the Draft EA would be released on October 21, 2024. Materials on the website were available in English, Spanish, Vietnamese, Chinese (simplified), Somali, Amharic and Korean.
- A short write-up about the Sustainable Airport Master Plan (SAMP), the NEPA process, and how the public could engage was included in the Port of Seattle's existing newsletters.
- A press release was published that included the Draft EA release date, how to comment, and key information about the NEPA process.
- Information about the Draft EA public comment process and upcoming release date was shared across Port social media pages.

Throughout September 2024, Port staff briefed Port of Seattle Commissioners, local city councils, local transportation boards, and local stakeholders on the upcoming release of the Draft EA.

Once the Draft EA was published on October 21, 2024:

- A notice was published in the Seattle Times and Daily Journal Commerce which described the Proposed Action, provided the public meeting dates, times, and locations, informed the public on how to obtain a copy of the Draft EA, and initiated the public comment period.
- Port Staff made a presentation at a Port Commissioners meeting on October 22, 2024, that included a summary of the analysis included in the Draft EA. The meeting had a virtual option as well as the option to attend in person.
- Ads in NW Asian Weekly, South Seattle Emerald, Runtanews.com (Somali), Se Habla Media (formerly Univision), and Larazanw.com (Spanish) ran for 3.5 weeks after the Draft EA was published.
- Postcards were sent to over 126,000 residences near the Airport that were translated into six (6) languages and included information on the release of the Draft EA and public meetings.
- The Port hosted four in-person public meetings. At each meeting there were over 30 informational boards explaining the NEPA process, the EA findings, and how to submit comments. These boards were posted on the project website. Translation services were available upon request at each meeting. Hard copies of all website materials were also available at each meeting. Over 230 people attended the public meetings, and 76 written/verbal comments were submitted.

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- Materials on the website and at each meeting were available in English, Spanish, Vietnamese, Chinese (simplified), Somali, Amharic and Korean.

A hardcopy of the Draft EA was available at seven libraries and the Seattle Tacoma International Airport Conference Center. The seven libraries included the Burien Library, Des Moines Library, Valley View Library, Federal Way 320th Library, White Center Library, Tukwila Library, and the Vashon Library.

For these reasons, the FAA has determined that the public engagement was sufficient.

General Response #4 – Public Comment Period

Several commenters asserted that the comment period was insufficient. The FAA provided a public comment process in accordance with NEPA and FAA Orders 1050.1F and 5050.4B that exceeded minimum regulatory requirements. The FAA received requests to extend the public comment period prior to and after the release of the Draft EA. The FAA considered the rationale and need for each request when determining the appropriateness of an extension. The FAA granted two extensions of the public comment period for the Draft EA.

The FAA initially planned to circulate the Draft EA for a 30-day public comment period upon release on October 21, 2024, which is typical when a Draft EA is circulated for public comment (FAA Orders 1050.1F and 5050.4B). The FAA extended the comment period to 45-days prior to the release of the Draft EA at the request of the Port based on the complexity of the analysis, which was consistent with the FAA Reauthorization Act of 2024. On November 8, 2024, the FAA then extended the comment period to Friday, December 13th after taking into consideration community interest and the placement of Thanksgiving within the comment period.

The Port of Seattle provided notice of the release of the Draft EA on September 20, 2024, 31 days before the release of the Draft EA, to give the public time to prepare for the public comment period. In addition to the extended public comment period, the Port held four public meetings. The extended comment period aimed to balance providing the opportunity for public engagement with the need to move the project forward. The FAA and Port values all the comments received and carefully considered them during the decision-making process.

General Response #5 – Purpose of the National Environmental Policy Act (NEPA)

Several comments were premised on an incorrect understanding of the purpose of the NEPA. NEPA is a procedural, rather than substantive law, that requires federal agencies to assess the potential environmental effects of their proposed actions prior to making decisions.

While input and comments on the merits of the proposal, itself, are welcome and noted, the purpose of the EA is to disclose the potential impacts of the proposal to inform the decision-maker. Therefore, while the FAA notes comments that express an opinion about the merits of the proposals, the FAA's review of comments is focused on those that identify issues related to the adequacy of the environmental review.

Additionally, NEPA does not trigger a requirement to conduct analysis of previously completed actions or to provide mitigation for impacts not resulting from the current Proposed Action. The Draft EA was prepared following the policies, procedures, and guidelines outlined in FAA Orders 1050.1F and 5050.4B. These Orders outline FAA-accepted methodologies, models, techniques, and thresholds of significance for the impact assessment and preparation of environmental documents.

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The analysis completed in the Draft EA compared the future Proposed Action and Hybrid Terminal Alternative to the No Action to identify the expected environmental consequences of implementing the Proposed Action or Hybrid Terminal Alternative. NEPA does not require the selection of the alternative with the least impacts. NEPA does require the FAA to consider the potential environmental impacts and public concerns when making a decision about proposed airport actions. The analysis in the EA relied on the best data available at the time the study was completed and the information presented in the EA is sufficient for the FAA to assess the impacts of each alternative.

The FAA considered the expected project impacts and public comments when determining whether to issue a FONSI/ROD or to prepare an EIS. As documented in the Draft EA and in these responses to comments, the Action Alternatives would not result in any significant impacts that cannot be mitigated below levels of significance in accordance with the thresholds established in FAA Orders 1050.1F and 5050.4B.

The Washington State Environmental Policy Act (SEPA) is a separate state environmental law independent of NEPA. SEPA regulations provide for a public agency to serve as the lead agency when they are the project proponent (WAC 197-11-926). The lead agency for SEPA for this project will be the Port. The FAA does not have a role in the SEPA process. When a proposal is subject to both NEPA and SEPA regulation, the lead agencies can choose to integrate their approach but are not required to do so. At the conclusion of Scoping, the FAA and Port elected to conduct separate reviews, which is allowed under SEPA regulations. This decision was included in the Final Scoping Report (Section III.), dated February 19, 2019.

General Response #6 – Mitigation

Several commenters argued for the identification of additional mitigation. As defined in FAA Order 1050.1F, mitigation includes “avoiding the impact; minimizing the impact; rectifying the impact by repairing, rehabilitating, or restoring the environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and compensating for the impact by replacing or providing substitute resources”. Impacts were avoided whenever possible. When impacts were unavoidable, the impacts were minimized to the greatest extent possible. Mitigation was used when avoidance and minimization was not enough to reduce the impacts below levels of significance.

The effectiveness of a mitigation measure was determined by evaluating the impact remaining after the application of the mitigation and determining either: (1) the mitigation reduced the impact to a less-than-significant level, or (2) no feasible mitigation exists to reduce the impact to a less-than-significant level, and, therefore, the impact was determined to be significant and unavoidable. No mitigation measures were needed or proposed when an impact was determined to be less-than-significant. Implementation of more than one mitigation measure may be needed to reduce an impact below level of significance.

The EA identifies mitigation to reduce impacts below levels of significance and minimization measures that are voluntarily included to further reduce impacts, in accordance with FAA Orders 1050.1F and 5050.4B. In addition, best management practices are included to reduce impacts during construction. A summary of all mitigation measures is included in Table 4-2.

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General Response #7 – Alternative Analysis

Several commenters argued for the consideration of additional alternatives. Neither NEPA, nor FAA Orders 1050.1F or 5050.4B dictate the number of alternatives that must be carried forward for analysis in an EA. FAA Order 1050.1F states that alternatives “must meet the basic criteria for any alternative: it must be reasonable, feasible, and achieve the project’s purpose.” FAA is under no obligation to consider all conceivable alternatives. For alternatives considered but eliminated from further study, the EA briefly explains why these were eliminated.

The extensive alternative evaluation process is detailed in the Alternatives Technical Report in Appendix B. Alternatives from the SAMP process and received during Scoping were evaluated using a two-step screening process. The first level screening examined whether the alternative met the Purpose and Need, while the second level screening evaluated if the alternative was reasonable and feasible based on a qualitative evaluation of factors related to operational impacts and cost. Alternatives that made it past both screening levels were carried forward for detailed review in the EA.

General Response #7a – New Regional Airport

Several of the commenters requested that the FAA consider a new regional airport as an alternative in the EA. As discussed in the Alternatives Evaluation Technical Report in Appendix B, a new commercial service airport to serve the Puget Sound region has been studied for decades and is still currently being studied with no success in identifying an alternate site. Highlights of the process include:

- In 1994, the Puget Sound Regional Council Executive Board (PSRCE) adopted Resolution EB-94-01, which concluded that no feasible sites for a major supplemental airport could be found in the four-county region. The PSRC prepared the Regional Aviation Baseline Study to provide a clear picture of the aviation activities and needs in the region and set the stage for future planning efforts.
- The Commercial Aviation Coordinating Commission (CACC), established by the state of Washington in 2019, was tasked to identify a single preferred location for a new primary aviation facility. The final report submitted on June 15, 2023, identified three greenfield sites with no recommended site.
- In April 2023, Engrossed Substitute House Bill 1791 was signed creating a new working group (Commercial Aviation Work Group) to replace the CACC. This goal of this group is to evaluate the long-range commercial aviation and transportation needs of the state, including alternatives for additional aviation capacity which includes expanding use of existing airports and multi-modal opportunities.

Given that a site for a new regional airport has not been selected and the amount of time it would take to open a new regional airport, this option was not a reasonable or feasible alternative to address the near-term needs at SEA. Therefore, this alternative was eliminated from further consideration.

General Response #7b – Use of Other Airports

Several of the commenters requested that the FAA consider the use of other airports as an alternative in the EA. Since the deregulation of the airline industry in 1978, certificated U.S. air carriers are free to fly routes of their choice and serve airports of their choice. Airports that receive federal funding are considered public-use airports and must be made available for use on reasonable terms for all aeronautical uses, including when a carrier seeks to start service. 49 U.S.C. § 47107(a)(1). Moreover, airports cannot regulate or otherwise control airlines’ routes; airlines are entitled to choose the airports they serve. 49 U.S.C. § 41713(b)(1).

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Neither the Port nor the FAA can direct or place influence upon commercial service providers to provide commercial air carrier services at a particular airport or to require them to shift services from one airport to another. *Id.* Operators of public use airports, such as SEA, cannot deny access to an airline if the aircraft they propose to use can safely operate at that facility. Airport access restrictions must be preapproved by the FAA in accordance with 14 CFR Part 161- Notice and Approval of Airport Noise and Access Restrictions (Part 161). 49 U.S.C. § 47521(2)-(3); 14 C.F.R. Part 161. To date, the FAA has never approved an access restriction under Part 161.

Further, even if activity could be diverted to other local airports or other modes of transportation, there would still be the need to modernize and expand facilities at SEA that have reached their useful life. Therefore, this alternative was eliminated from further consideration.

General Response #7c – Limited Growth

Several of the commenters requested that the FAA consider limiting growth as an alternative in the EA. The volume of air service at an airport is a direct reflection of the population, incomes, economic activity, geographic location of communities using an airport and gate/hardstand availability. SEA, like most hub airports, engages in air service development to accommodate new routes. Regardless of marketing efforts, the new air service needs to have both a sufficient consumer base and gate/hardstand availability to be sustained. The unconstrained forecast is based on predictions of Seattle's socioeconomic trends and incorporates the expectation that new routes will be added in future years. Similarly, the constrained growth scenario also assumes that some new routes could be added in the future if gates or hardstands are available.

Both the Port and FAA have a limited ability to enact growth reduction strategies due to airline deregulation, which allows airlines to set their own routes, service frequency, and type (or size) of aircraft. 49 U.S.C. § 41713(b)(1). The Port has agreed to keep the Airport to be available for public use on “reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport.” 49 U.S.C. § 47107(a)(1). In severe circumstances where there is systemic overscheduling of available hourly runway and airspace capacity, the FAA (but not the Port) has the authority to impose a cap on the number of flights at an airport; however, the FAA does not support flight caps as a long-term solution that is in the public interest. See 49 U.S.C. § 40103. Failure to provide the necessary facilities could effectively constrain air service as well as result in poor overall customer experience and failure to meet industry-established Level of Service (LOS) standards. For these reasons, this alternative was eliminated from further consideration.

General Response #7d – Utilization of Other Modes of Transportation

Several of the commenters requested that the FAA consider utilization of other modes of transportation as an alternative in the EA. Research has shown that other modes of transportation such as rail are viable alternatives to air travel up to approximately 300 to 475 miles depending on the speed of the rail. Beyond this point the use of rail or other modes of transportation either does not connect to the desired destinations or does so inefficiently. Based on this conclusion, the use of other modes of transportation would only address a small portion of the demand for short-distance trips. Of the top 20 markets being served, all but two (Boise and Spokane) are more than 475 air miles from SEA. Therefore, supplementing or replacing aircraft operations with other modes of transportation would not provide the efficient long-distance connections that customers expect from SEA and this alternative was eliminated from further consideration.

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Utilization of other modes of transportation was also considered as an alternative to additional parking facilities. The ability of the Port to incentivize the use of mass transit exists, and the Port is actively exploring initiatives to reduce employee and passenger use of single-occupancy vehicles. The Port of Seattle Commission authorized five new employee commute trip reduction programs for 2025. However, it is unlikely to eliminate the need for additional parking. Therefore, the reliance on incentives on its own was not feasible as an alternative to building additional parking.

General Response #8 – Air Quality Analysis

Several commenters challenged the sufficiency of the air quality analysis. The PSCAA is the agency responsible for monitoring and maintaining air quality for King, Kitsap, Pierce, and Snohomish counties, including compliance with National Ambient Air Quality Standards (NAAQS). Under the Clean Air Act (CAA), the Environmental Protection Agency (EPA) sets NAAQS standards to be protective of sensitive populations (e.g., asthmatics, children, and the elderly).

The FAA and the Port worked extensively with the PSCAA to develop an Air Quality Assessment Protocol (Protocol) to identify the technical assumptions, methodologies, databases, and models that would be used to develop the air pollutant emission inventories and conduct the air quality impact analyses (Appendix C). The Protocol included the best scientific data and methods available to the FAA at the time the Protocol was developed and relied on FAA Orders 1050.1F and 5050.4B, and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1.²

The air quality assessment included an evaluation of the Existing (2022) Conditions; the Action Alternatives and No Action Alternative for the projected future conditions in 2032 and 2037; and construction activities for 2025 to 2032. The analysis included carbon monoxide (CO), nitrogen dioxide (NO₂), coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and ozone precursor pollutants (nitrogen oxides (NO_x) and volatile organic compounds (VOCs). Lead (Pb) was not included because SEA ceased leaded avgas sales in 2018, and the project does not include any new sources of lead emissions.

The air quality assessment did not include the use of Sustainable Aviation Fuel or other biofuels. It also did not include electric ground support equipment or new technology such as electric aircraft. These items were not included due to modeling limitations and/or the speculative nature of the technology. The use of auxiliary power units was based on the current policies in place at the Airport.

After extensive coordination with the PSCAA, the FAA shared the initial air quality modeling results with the PSCAA on December 7, 2023, to get feedback on the potential for the project to cause an exceedance of the NAAQS (Appendix C). Of the projected pollutant increases, CO and NO_x have the biggest change due to the increase in aircraft operations and motor vehicle trips. The PSCAA reviewed the results of the air quality analysis and determined that the Proposed Action would not cause an exceedance of the NAAQS (Section 4.3.1 of the EA). After submitting the preliminary results using Aviation Environmental Design Tool (AEDT) version 3e, the FAA released AEDT version 3f, which introduced several improvements and refinements to air emissions calculations. The air quality modeling was updated utilizing AEDT version 3f and the results showed a decrease in all emissions except for SO_x. Based on the guidance provided by the PSCAA and the reduced emissions calculated by the updated model, the FAA determined that the Action Alternatives would not result in a significant impact on air quality in accordance with the thresholds established in FAA Order 1050.1F. Therefore, and in accordance with the

² The FAA released the Aviation Emissions and Air Quality Handbook, Version 4 in July 2024, after the analysis was completed for the draft EA.

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FAA Orders 1050.1F and 5050.4B and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1, neither dispersion modeling nor mitigation is required. The PSCAA will continue to monitor ambient air emission levels to confirm continued compliance with NAAQS.

General Response #9a – Hazardous Air Pollutants

Several of the commenters requested that the FAA consider emissions of hazardous air pollutants (HAPs) in the air quality analysis. HAPs were not included as part of the air quality analysis. Per FAA guidance provided in the Aviation Emissions and Air Quality Handbook, Version 3, Update 1, a HAPs emissions inventory should be considered if the Proposed Action is considered “major” (e.g., new airport, new runway, major runway extension, etc.); if the Proposed Action is in a nonattainment or maintenance area; and/or if a criteria air pollutant emissions inventory is also prepared. A HAPs inventory analysis was not conducted as part of the air quality analysis because the Proposed Action is not considered a “major” action and is not located in a nonattainment or maintenance area.

General Response #9b – Ultrafine Particles

Several of the commenters requested that the FAA consider emissions of ultrafine particles (UFPs) in the air quality analysis. UFPs were not included as part of the air quality analysis given the existing science on UFPs (including the University of Washington Mobile Observations of Ultrafine Particles (MOV-UP) study) is not fully mature, and the measurement and understanding of UFPs and their related health risks has not been clearly defined. Currently UFPs are not regulated by the EPA or the State of Washington either through rate of emissions or concentrations (other than being a subset component of PM_{2.5}) and are therefore not typically considered in NEPA reviews. Furthermore, since UFPs are not specifically listed as a criteria pollutant, air toxic, or HAP, an analysis of UFPs is not a requirement of NEPA, the CAA, or FAA Order 1050.1F. Therefore, no analysis or discussion of UFPs was included in the air quality analysis.

General Response #9c – Soot or Black Carbon

Several of the commenters requested that the FAA consider soot as part of the air quality analysis. Soot is a black substance produced by the incomplete combustion of wood, oil, coal, etc. Sources of soot include mobile sources (especially diesel engines), open burning (including wildfires), and residential heating (including fireplaces/woodstoves). In response to public concern, studies regarding soot/particle deposition have been conducted at several airports across the country, with the uniform result that samples collected on and/or near the Airport bore little chemical resemblance to either unburned jet fuel or soot from jet exhaust.³ Instead, the collected material was found to be chemically similar to general urban pollution, particles from burning heavy fuels, diesel, and motor vehicle exhaust. The FAA is currently studying how to measure and predict non-volatile particulate matter emissions (a.k.a. soot or black carbon) from sustainable and conventional aviation fuels.

³ O'Hare International Airport (Findings Regarding Source Contributions to Soot Deposition: O'Hare International Airport and Surrounding Communities, 1999); T.F. Green Airport (Chemical Fingerprinting Analysis completed for the Airport Improvement Program EIS, 2006); and studies associated with environmental reviews for Boca Raton Airport (2011); Fort Lauderdale International Airport (2006); and Los Angeles International Airport (2013).

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General Response #10 – Air Quality and Health Effects

Several commenters requested that the FAA consider including an analysis of health effects as part of the air quality analysis. Some specifically argued for a Health Risk Assessment (HRA). In accordance with FAA Orders 1050.1F and 5050.4B and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1, a HRA is not required as part of NEPA. In addition, an HRA is not required under federal statute or regulation. Moreover, the cause of health issues is complicated because multiple factors often contribute to a person's health including genetics, lifestyle, environmental exposures, socioeconomic status, etc., making it challenging to isolate a single cause for a particular health outcome. This is especially true for chronic diseases where the effects may develop over a long period, making it hard to pinpoint the exact trigger.

Many variables can influence health, so separating the impacts of one specific exposure from other potential contributing factors can be challenging. Relationships between environmental exposures and health outcomes can only be established through well designed epidemiological, toxicological, and clinical studies.

The variability of the airport environment contributes to the difficulty of identifying potential health risks. The operating conditions of the turbine engine, the composition of the fuel, and the structure of the generated particles are just some of the examples of the variability that complicates health studies. In addition, many common air pollutants may have more than one source (e.g., wood-burning stoves, forest fires, cars and other forms of transportation).

Some commenters referenced the 2020 King County Report to the Washington State legislature and the University of Washington study on Ultrafine Particulates. Though these studies provide initial data that can help guide future studies, they do not provide enough data to demonstrate the potential impacts of aviation emissions on public health and fail to account for the effects of the numerous non-aviation emission sources that surround the Airport and other factors that contribute to public health outcomes. In addition, related to UFPs, the science is not fully mature and health impacts due specifically to aviation have not yet been demonstrated.

General Response #11 – Greenhouse Gas Analysis

Several commenters asserted that the assessment of greenhouse gas (GHG) emissions was insufficient. The FAA and the Port worked closely with the PSCAA to develop a Climate Assessment Protocol (Protocol) to identify the technical assumptions, methodologies, databases, and models that would be used to develop the greenhouse gas emission inventories and conduct the climate impact analyses (Appendix C). The Protocol included the best scientific data and methods available to the FAA at the time the Protocol was developed and relied on FAA Orders 1050.1F and 5050.4B, FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1, and the January 2023 Council on Environmental Quality (CEQ) draft GHG guidance.

After the publication of the Draft EA, Executive Order (EO) 13990, which was relied upon for the January 2023 CEQ draft GHG guidance, was revoked. In addition, CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 U.S.C. 4321 *et seq.*, as amended, in response to EO 14154. As a result of these changes, all references to climate and the qualitative climate evaluation that discussed the level of preparedness with respect to the impacts of climate change, the extent to which the alternatives could be affected by future climate conditions, and if the alternatives are consistent with national, state, and local climate goals have been removed from the Final EA.

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The GHG assessment included an evaluation of the Existing (2022) Conditions; projected future conditions in 2032 and 2037 for the Action Alternatives and No Action Alternative; and construction activities for 2025 to 2032. The GHG assessment used the Global Warming Potential (GWP) based on a 100-year period in accordance with the FAA Aviation Emissions and Air Quality Handbook, Version 3, Update 1. Scope 1, 2, and 3 emissions were modeled. Fuel dispensed was used to capture full flight emissions in place of the operations, taxi times, and aircraft run-ups utilized for the air quality analysis.

The GHG assessment did not include the use of Sustainable Aviation Fuel (SAF) or other biofuels. It also did not include electric ground support equipment or new technology such as electric aircraft. These items were not included due to modeling limitations and/or the speculative nature of the development of the technology. The use of auxiliary power units was based on the current policies in place at SEA.

It is noteworthy that the GHG emission inventory results are not compared to the NAAQS nor any other significance criteria. For NEPA-related GHG emission inventories, the emphasis is on “disclosing” the change in GHG emissions with the proposed project (and alternatives) compared to the No Action.

There are no significance criteria for GHG. Mitigation is not required in accordance with FAA Order 1050.1F and the FAA’s Aviation Emissions and Air Quality Handbook, Version 3, Update 1. Minimization measures are identified in Section 4.3.3.3 of the EA. Separately the Port is undertaking a wide variety of efforts such as the procurement of Renewable Natural Gas and facilitating the adoption of SAF by airline partners to reduce GHG emissions.

General Response #12 – Day Night Average Sound Level (DNL or Ldn)

Several commenters contested the reliance on the DNL and 65 DNL threshold for assessing noise impacts. The DNL noise metric is used to reflect a person’s cumulative exposure to sound over a 24-hour period. DNL considers both the amount of noise from each aircraft operation as well as the total number of operations flying throughout the day and applies an additional 10dB weighting for nighttime flights between 10 p.m. and 7 a.m. The DNL is the FAA’s required noise metric for the assessment of aircraft noise and was adopted through 14 Code of Federal Regulations Part 150 as required to meet the provisions of the Aviation Safety and Noise Abatement Act of 1979.

The FAA was conducting a Noise Policy Review of its noise policy, but the process is now on hold due to the passage of the FAA Reauthorization Act of 2024 by Congress. Pursuant to Section 792 of the Act, the FAA is required to form an Aircraft Noise Advisory Committee (ANAC). The ANAC will advise the FAA on issues facing the aviation community that are related to aircraft noise exposure and existing FAA noise policies and regulations. To follow this direction from Congress, the FAA has revised the Noise Policy Review approach and timelines to allow the ANAC to complete its work and issue its report before FAA makes any decisions on possible noise policy updates (use of DNL as the primary noise metric and DNL 65 dB as the threshold for determining significant impact). The FAA intends to complete the Noise Policy Review once the ANAC has submitted a report to the FAA with any recommended policy changes.

Until the review is completed, the DNL will continue to be the official metric and DNL 65 dB will continue to be the threshold used for determining significant noise impacts in environmental reviews.

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General Response #13 – Noise Analysis and Part 150 Update

Many comments focused on noise associated with the Airport generally and requested changes to flight procedures and other operational issues. The purpose of the noise analysis in this NEPA document is to compare the future Proposed Action and Hybrid Terminal Alternative to the No Action to identify the potential noise impacts with the implementation of either alternative.

A Noise Modeling Protocol was developed as part of the NEPA process to identify the technical assumptions, methodologies, databases, and models that would be used to conduct the aviation noise analysis, which can be found in Appendix J. The Protocol was developed in accordance with FAA Order 1050.1F. The aviation noise analysis included an evaluation of the Existing (2022) Conditions; and the Action Alternatives and No Action Alternative for the projected future conditions in 2032 and 2037.

FAA regulations require that the prediction of aircraft-related noise exposure be generated using the AEDT. Additionally, noise monitoring cannot be used as a substitute for AEDT, nor can it be used to calibrate AEDT. Appendix B of FAA Order 1050.1F provides more details.

FAA Order 1050.1F defines a significant noise impact as an increase of 1.5 dB or more in the 65 DNL. Though the Action Alternatives include an increase in operations, including nighttime operations, there would only be a slight increase in the size of the DNL 65+ dB contour in 2032 and 2037 when you compare the Action Alternatives to the No Action Alternative. There was not an increase of 1.5 dB or more in the 65 DNL. The overall size of the DNL 65+ dB contour for the No Action and Action Alternatives is smaller in 2037 compared to 2032 due to the introduction of quieter aircraft.

The FAA determined there would be no significant noise impacts in 2032 or 2037 with the implementation of either Action Alternative compared to the No Action Alternative. In accordance with the FAA Orders 1050.1F and 5050.4B, mitigation is not required.

Separate from the analysis of noise impacts in the EA, the Port is currently in the process of updating its Part 150 study. Part 150 is a voluntary program that allows airport operators to prepare noise exposure maps and to recommend measures in a Noise Compatibility Program (NCP) to reduce noise and noncompatible land uses. The Part 150 update is a separate program from this EA. For more information on the Part 150 update see: <https://seapart150.com/>

The NCP for SEA was developed in 1985 and updated in 1993, 2002, and 2013. The NCP includes abatement, mitigation, and program management measures designed to reduce or mitigate the impact of aircraft noise upon the surrounding community and enhance the administration of the overall program. Land acquisition, sound insulation, and modifications to flight tracks are just some of the measures considered during the development of the NCP. The Part 150 update process includes numerous opportunities for public involvement and input.

General Response #14 – Noise and Health Effects

Several commenters requested that the FAA consider including an analysis of health effects as part of the noise analysis. The aviation noise analysis included the best scientific data and methods available to the FAA at the time the analysis was completed and relied on FAA Orders 1050.1F and 5050.4B. The Future Action Alternatives would not increase noise by 1.5 DNL or more for a noise sensitive area at or above the 65 DNL when compared to the No Action for either 2032 or 2037. Therefore, no significant noise impact would occur because of implementing either Action Alternatives. The analysis of health effects related to noise is not a requirement of FAA Order 1050.1F nor is it required as part of NEPA. In addition, a noise health effects analysis is not required under federal statute or regulation.

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To the extent that it is argued that the FAA should have analyzed the health effects of noise, the science does not support the conclusion that aviation noise causes reasonably foreseeable adverse health effects. In general, the cause of health issues is complicated because multiple factors often contribute to a person's health including genetics, lifestyle, environmental exposures, socioeconomic status, etc., making it challenging to isolate a single cause for a particular health outcome. The variability of the airport environment contributes to the difficulty of identifying potential health risks.

The Federal Interagency Committee on Aviation Noise (FICAN) published a Research Review of Selected Aviation Noise Issues in April 2018, which notes that learning and health impacts related to aviation noise remain unresolved and that extensive research is needed. The report noted that "while there is evidence to suggest that aircraft noise has adverse learning effects, FICAN concludes there is not sufficient information to quantify the effect in terms of a recommended noise metric or dose-response relationship." As for health impacts, the 2018 report notes "before adopting policies and methodologies for predicting health outcomes, research needs to be conducted to quantify relationships between aircraft noise level (dose) and the health outcome in question (effect). FICAN believes it is premature to adopt quantification methods for computing burden of disease from environmental noise until this fundamental research has been developed and validated." The FAA is currently conducting additional research to further the scientific understanding between aviation noise and cardiovascular disease and sleep disturbance.

The FAA determined they have enough information to determine the reasonable and foreseeable effects from noise exposure in accordance with FAA Order 1050.1F and NEPA.

General Response #15 – Environmental Justice

Since the publication of the Draft EA, EOs 12898, 13985, 14091, and 14096 were revoked on January 20, 2025. On January 21, 2025, President Trump issued EO 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity. In addition, CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 U.S.C. 4321 *et seq.*, as amended, in response to EO 14154. Consequently, it is no longer a legal requirement or policy of the federal government to conduct environmental justice analyses. As a result, this Final EA has removed the prior discussion of, and data/analysis related to, environmental justice (EJ).

Since there were questions about the adequacy of the EJ analysis in the Draft EA, it is worth noting that if the EJ analysis had been retained, the FAA's determinations and decisions would not have changed. The environmental justice analysis determined that neither of the Action Alternatives would result in disproportionate and adverse effects nor significant impacts to minority and/or low-income populations.

The analysis completed included an Environmental Justice Protocol that was developed as part of the NEPA process to identify the technical assumptions, methodologies, and databases that was used to conduct the EJ analysis, which can be found in Appendix K of the Draft EA. The EJ analysis used the study area specific to the resource category being evaluated. All relevant and available socioeconomic and population data for the study area was collected to determine the percentages of minority or low-income populations within each study area, identify potential concentrations of minority or low-income communities, and EJ resources (such as community centers, churches, or areas of cultural significance). Once EJ populations and/or communities were identified, the next step was to determine if any disproportionate and adverse impacts would result from changes in impacts caused by the Action Alternatives compared to the No Action Alternative.

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All resource categories were evaluated for potential disproportionate and adverse impacts to EJ communities. Further analysis was completed for air quality, climate, noise, socioeconomic, and surface transportation to determine if the impacts identified would be disproportionate and adverse. The analysis determined that neither Action Alternative would result in disproportionate and adverse effects nor significant impacts to minority and/or low-income populations.

General Response #16 – Children’s Health and Safety Risks Analysis

Several commenters asserted that the Children’s Health and Safety Risks analysis should have been conducted differently. FAA 1050.1F Order does not define a significance threshold for Children’s Environmental Health and Safety Risks, but it does require that the FAA consider whether the action would lead to a disproportionate health or safety risk to children. There are also no separate noise impact standards for children. The Children’s Environmental Health and Safety Risk analysis documented in Section 4.3.11.3 and the Noise and Noise-Compatible Land Use analysis documented in Section 4.3.10 were completed in accordance with FAA Orders 1050.1F and 5050.4B. Neither analysis identify significant impacts that would warrant mitigation.

The FICAN published a Research Review of Selected Aviation Noise Issues in April 2018, which noted that “while there is evidence to suggest that aircraft noise has adverse learning effects, FICAN concludes there is not sufficient information to quantify the effect in terms of a recommended noise metric or dose-response relationship.” The cause of health issues is complicated because multiple factors often contribute to a person’s health including genetics, lifestyle, environmental exposures, socioeconomic status, etc., making it challenging to isolate a single cause for a particular health outcome. In addition, and in accordance with the FAA Orders 1050.1F and 5050.4B and FAA’s Aviation Emissions and Air Quality Handbook, Version 3, Update 1, a HRA is not required as part of NEPA. In addition, no federal statute or regulation requires an HRA.

General Response #17 – Cumulative Impact

Historically, CEQ regulations required the consideration of cumulative impacts. In 2023, Congress passed the Fiscal Responsibility Act, which directed agencies to consider “the reasonably foreseeable environmental effects of proposed agency actions” (42 USC 4332(2)(C)). Since the publication of the Draft EA, the CEQ revoked its regulations (40 CFR parts 1500-1508) implementing NEPA, 42 USC. 4321 *et seq.*, as amended, in response to EO 14154, *Unleashing American Energy*. In addition, the Supreme Court issued the *Seven County Infrastructure Coalition v. Eagle County*, 605 U. S. 975 (2025) ruling on May 29, 2025. As a result of these actions, it is no longer a legal requirement or the policy of the federal government to conduct cumulative impact analyses. In addition, the *Seven County* ruling reinforced the limited scope of NEPA reviews, holding that NEPA does not require an agency to consider environmental effects of other activities and projects “separate in time or place” from the proposed action. Therefore, this Final EA has removed the prior discussion of, and data/analysis related to, cumulative impacts.

Since there were questions about the adequacy of the cumulative impact analysis in the Draft EA, it is worth noting that if the cumulative impact analysis had been retained in the Final EA, the FAA’s determinations and decisions would not have changed. The cumulative impact analysis determined that Proposed Action would not result in significant cumulative impacts.

A cumulative impacts analysis ensures that the incremental impacts of a proposed action are considered in the context of potential impacts from past, present, and reasonably foreseeable future projects on a particular resource. Federal agencies had the responsibility of determining how and the extent to which cumulative impacts were assessed in NEPA documents. The analysis of cumulative impacts in the Draft

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EA followed FAA Orders 1050.1F and 5050.4B and the objectives of the NEPA, at the time of preparation. The FAA considered the available sources of information and the appropriate analytical techniques to predict the cumulative effects of actions on the environment. The ultimate goal was to provide meaningful information to decision makers to allow them to make informed decisions.

The cumulative impact analysis, in the Draft EA, started with the consideration of the direct and indirect effects of the Proposed Action with a focus on those resources impacted by the implementation of the Proposed Action. Next, the geographic scope and timeframe were established. The geographic scope (study area) is resource specific and is defined in Chapter 3. The resource specific study areas adequately captured the impacts associated with the implementation of the Proposed Action, which is why they were selected for the cumulative impact analysis. The timeframe centers on the timing of the Proposed Action and included projects where enough information was readily available to provide a meaningful analysis.

Cumulative impacts also relied on the existing conditions described in Chapter 3 of the EA. The existing conditions refer to the baseline environmental state of a project area and include a description of the current physical environment and any relevant environmental characteristics. The baseline helps one to understand the present effects of past actions and the historical context of the physical, biological, and human environment. The existing conditions accounted for the past growth that has occurred and the projects that have been constructed at SEA through 2022 and the effects of that growth and construction. This included the effects associated with the Third Runway and Stage 1a of the SR 509 project as well as other development that has occurred up until 2022. Stages 1b and 2 of the SR 509 project were included as a future project in the air quality analysis, GHG analysis, surface transportation study, and the cumulative impact analysis.

The analysis focused on if the Proposed Action would incrementally contribute to the cumulative impact for air quality, biological resources, GHG, hazardous materials, solid waste, natural resources and energy supply, noise and noise-compatible land use, socioeconomics, EJ, surface transportation, and water resources. Based on the analysis conducted in the Draft EA, the FAA determined there would be no significant cumulative impacts with the implementation of Proposed Action.

General Response #18 – Tree and Vegetation Removal

Several commenters asserted that the analysis of tree removal associated with several projects was insufficient. Projects C02, C03, L05, L07, S07, and S10 require the removal of approximately 56.4 acres of trees, shrubs, and maintained grassy areas. The total acreage of vegetation removal was reduced with the elimination of project L06 (Employee Parking Surface Lot). To mitigate the loss of vegetation, the Port will meet the requirements identified in the Land Stewardship Plan and Tree Replacement Standards as well as the Airport's Landscape Vision, Design Guidelines, and Standards and any other state and/or local requirements.

The Draft EA was prepared following the policies, procedures, and guidelines outlined in FAA Orders 1050.1F and 5050.4B. These Orders outline FAA-accepted methodologies, models, techniques, and thresholds of significance for the assessment of impacts. Tree and vegetation removal is not listed as a separate environmental impact category in FAA Orders 1050.1F and 5050.4B but is evaluated within the scope of biological and visual analyses.

The FAA determined that the Action Alternatives would not have a significant impact on biological resources in accordance with the thresholds established in FAA Order 1050.1F (Section 4.3.2). Though Project S07 is on the edge of the Airport Activity Area (AAA), it is approximately ¼ mile from residential

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properties and the dense tree cover would remain. Therefore, no significant changes to the visual character of the area, noticeable contrasts with existing visual character, or obstructions of important visual resources are expected to occur (Table 4-43). Projects C02, C03, L05, L07, and S10 are outside the AAA and would be subject to the measures within the Interlocal Agreement and City of SeaTac Municipal Code to reduce visual impacts of the development, including setbacks, signage and lighting restrictions, screening for parking, and landscaping. Therefore, the changes would not result in significant changes in the visual character of the area, noticeable contrasts with existing visual character, or obstructions of important visual resources (Table 4-44).

Vegetation may reduce noise by absorbing, deflecting, and scattering sound waves. The effectiveness of trees in noise reduction depends on several factors, including the species, density, and height of the trees/vegetation, as well as their placement relative to the noise source. A 61-meter width of dense vegetation can reduce noise by 10 decibels if the placement of the dense vegetation is appropriate (the vegetation needs to be placed between the receiver and the noise source and block the view of the noise source). The proposed tree and vegetation removal is not expected to alter noise contours given the location of the proposed tree and vegetation removal and density.

Tree and vegetation removal is not considered as part of the air or climate analysis in accordance with FAA Orders 1050.1F and 5050.4B and FAA's Aviation Emissions and Air Quality Handbook, Version 3, Update 1. In addition, tree and vegetation removal is not required under federal statute or regulation to be considered as part of the air or climate analysis. Though tree and vegetation removal could result in the temporary loss of carbon storage and reduced sequestration, not all trees and vegetation store or sequester carbon at the same rate. The FAA currently does not have an approved method of calculating carbon storage loss.

General Response 19 – Connected Actions

Several commenters argued that the Third Runway and projects that have occurred since the construction of the Third Runway should have been evaluated as “connected actions” in the EA. According to FAA Order 1050.1F, connected actions are closely related actions that: (a) automatically trigger other actions; (b) cannot or will not proceed unless other actions are taken previously or simultaneously; or (c) are interdependent parts of a larger action and depend on the larger action for their justification. Connected actions and other proposed actions or parts of proposed actions that are related to each other closely enough to be, in effect, a single course of action must be evaluated in the same NEPA document.

The Third Runway and other development projects that have occurred since the construction of Third Runway, such as the International Arrivals Facility, are not connected actions to the current project and were therefore not required to be evaluated in the same NEPA document. NEPA does not require that all unconnected development proposed in one area be analyzed under one environmental document. These prior and unconnected development projects underwent separate NEPA/SEPA processes. Projects that have been completed outside of the current project were either included as part of the existing conditions or as part of the future conditions analysis in this EA.

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General Response #19a – Third Runway

Some commenters suggested that the environmental impacts of the Third Runway should have been evaluated in this EA, including characterizing the third runway as a connected action. The need for an additional runway for bad-weather operations was first recognized in 1988. The Puget Sound Regional Council and Port launched a "Flight Plan" study in 1989 to analyze regional airport needs, and the Washington State Air Transportation Commission later examined the problem from a statewide perspective. After a public involvement program of unprecedented scale, regional planners ultimately concluded that development of a new regional airport and other alternatives were infeasible and that the addition of a Third Runway was necessary to alleviate delays and congestion at SEA, as documented in the administrative record for the July 3, 1997 ROD. The ROD did not include limitations on how the Third Runway would be utilized. Impacts resulting from the Third Runway are included as part of Existing Conditions in the EA.

General Response #19b – SR 509 Project

Several commenters suggested that the SR 509 Project should have been evaluated in the EA as a connected action. The SR 509 Completion Project is a Washington State Department of Transportation and Federal Highway Administration project that builds a new four-lane expressway between I-5 and SR 509's current end near SEA, builds new I-5 ramps, improves I-5 interchanges in south King County and constructs new bridges. The project is being constructed over three stages. Stage 1a was completed in 2022. Stage 1b is under construction and Stage 2 is expected to be completed in 2029. The SR 509 Completion Project underwent its own NEPA process, which was completed in early 2003. There have been numerous re-evaluations approved since the issuance of the ROD.

The SR 509 Completion Project has independent utility and is not connected to the SEA SAMP NTPs. The purpose of the SR 509 Completion Project is to improve regional highway connections and serve future transportation needs in southwest King County. The SR 509 Completion Project is included in this EA. Stage 1a is included as part of the existing conditions. Stages 1b and 2 are included as a future project in the air quality analysis, GHG analysis, and surface transportation study.

Note that, while the Final EIS for the SR-509 Completion Project studied the construction of a southern access road to and from SEA, that portion of the project is not currently moving forward. The concept of the South Access Expressway (South Access) has been considered in regional transportation planning efforts for over a decade, with discussions involving Washington Department of Transportation (WSDOT), the Port of Seattle, and the City of SeaTac. The SAMP Long-Term Vision incorporates the South Access improvements as a conceptual future project (beyond 2034). Therefore, the South Access is not included as part of the Near-Term Projects and is considered as outside the scope of this EA. Additional planning, environmental review, and coordination would be required if this project moved forward.

General Response #19c – Long-Term Plan

Several commenters argued that projects identified in the Long-Term Projects should have been evaluated in the EA as connected actions. Facility requirements are generally identified during the planning process. When the Port initiated the SAMP planning process in 2013, it identified three goals for the Plan (Tech Memo #1):

- Identify the facility requirements that would enable the Airport to satisfy air transportation demand through the next 20 years in a safe and efficient manner.
- Identify a long-term plan to achieve the Century Agenda and complement the Aviation Division Business Plan.

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- Identify measures that enable the Port to build, manage, and operate facilities in ways that meet sustainability goals and objectives.

Planning Technical Memo No. 6, Alternatives, and Planning Technical Memo No. 7, Facilities Implementation and Financial Feasibility, distinguish between the Near-Term Projects (NTPs) and the Long-Term Projects.⁴ The Long-Term Projects could include additional airside, cargo, landside, terminal, and airport/airline support projects to accommodate future demand beyond the planning horizon used for the NTPs. The Planning Technical Memos can be found on the Sustainable Master Plan website at <https://www.portseattle.org/plans/sustainable-airport-master-plan-samp>

NEPA review is not initiated by FAA until projects are ready to move forward. Projects that are not ready to move forward, either due to lack of funding or the need for additional planning, do not go through NEPA review until they are ready to move forward.

The NTPs were ready to move forward in 2018 and therefore the FAA prepared a NEPA EA for the NTPs. As explained in Section 1.2.1 of the EA, additional studies and planning work must be completed before the Long-Term Projects can be implemented. Therefore, the Long-Term Projects are not ready for NEPA review and they are not included in the EA.

General Response #20 – Property Values

Several commenters requested that the FAA consider including an analysis on how the project would impact property values. Property values are dynamic and influenced by many different factors, including market conditions, neighborhood characteristics, and individual property characteristics (age of the property, size, and amenities). The degree to which a particular factor may affect property values is influenced by many other circumstances that fluctuate widely with time and market conditions. In addition, there are personal reasons for why people purchase a certain home.

The effect of airports on nearby property values is nuanced. Increased job opportunities, improved transportation links, and economic growth can increase demand for housing while the frequency of flights and increased traffic may impact property values. Therefore, since many non-noise-related factors can affect property values, the analysis does not attempt to quantify changes in property values because of the Action Alternatives. In addition, the assessment of property values is not an environmental impact category outlined in FAA Order 1050.1F.

⁴ The Planning Technical Memos can be found on the Sustainable Master Plan website at <https://www.portseattle.org/plans/sustainable-airport-master-plan-samp>

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TABLE 1: SUMMARY OF COMMENTS RECEIVED ON THE DRAFT EA

Comment #	Last Name	First Name	Organization	Date Received	Method Received
001			City of Burien	12/11/2024	Email and website
002			City of Des Moines	12/13/2024	Email
003			Cities of Burien, Normandy Park, SeaTac, and DesMoines)	12/12/2024	Email
004			City Council of DesMoines	12/13/2024	Email
005			City of Federal Way	12/13/2024	Website and mail
006			City of SeaTac	12/13/2024	Email
007			City of Tukwila	12/13/2024	Email
008			Puget Sound Regional Council	12/13/2024	Email
009			SoundTransit	12/13/2024	Email
010			EPA Region 10	12/2/2024	Email
011			Department of Ecology	12/13/2024	Email
012			WSDOT	12/13/2024	Email
013	Keiser	Karen	Senator of 33 rd District of Washington	11/17/2024	Email
014	Negusse	Senayet		12/13/2024	Website – submitted twice
015	Negusse	Senayet	SeaTac City Council Position 1	12/13/2024	Email
016			WA Department of Health	12/13/2024	Email
017	Orwall	Tina	Representative	11/9/2024	Email
018	Orwall	Tina		12/12/2024	Email
019			Alaska Airlines	12/13/2024	Email and website
020			Carnival Corporation	12/11/2024	Email and mail
021			BONNY WATSON/Washington Memorial Park	12/13/2024	Email
022			350 Seattle	12/12/2024	Email
023	Batayola	Marla	STACC4J Steering Committee	10/31/2024	Email
024			STACC4J	12/13/2024	Email and website
025			Duwamish River Community Coalition/EarthJustice	11/7/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
026			Enumclaw Plateau Community Association	12/12/2024	Email
027	Schaefer	Scott	South King Media	12/12/2024	Email
028			Defenders of Highline Forest Steering Committee	12/13/2024	Website
029	Edmiston	Steve		12/12/2024	Website
030			Sea-Tac Noise.Info	12/13/2024	Email
031			Defenders of Highline Forest	12/13/2024	Email
032			EcoTHRIVE Housing Board of Directors	12/12/2024	Website
033	Andrews	Vicki		12/12/2024	Website
034			Cruise Lines International Assoc	12/13/2024	Website
035			Concerned Neighbors of Blakely Manor	12/12/2024	Email
036			EarthJustice/Duwamish River Community Coalition/Beacon Hill Council of Seattle	12/13/2024	Email and website
037			Vashon Island Fair Skies	12/13/2024	Website and mail
038	Batayola	Maria	Beacon Hill Council Chair	11/15/2024	Email
039	Lamphear	Stephen	Defenders of Highline Forest	11/14/2024	Website
040	East	Emelie		10/28/2024	Email
041	Aguila	Matthew		11/1/2024	Email
042	White	Kris		11/1/2024	Email
043	Donovan	Elizabeth		11/3/2024	Email
044	Bowersox-Johnson	Brandon		11/5/2024	Email
045	Fee	Tanis		11/5/2024	Email
046	Monen	Floyd		11/6/2024	Email
047	Rhea	Charmaine		11/7/2024	Email
048	Barnard	Thomas		11/8/2024	Email
049	Cate	Rebecca		11/9/2024	Email
050	Poirier	Jeanne		11/9/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
051	Antman	Iris		11/10/2024	Email
052	Curle/Kim	Deirdre/Steve		11/10/2024	Email
053	Chilson	Kate		11/11/2024	Email
054	Doresy	Ann		11/12/2024	Email
055	Gillespie	Max		11/12/2024	Email
056	Iorio	Nicole		11/12/2024	Email
057	Lampi	Michael		11/12/2024	Email
058	Ward	Delia		11/12/2024	Email
059	Sawatzky	Twila		11/13/2024	Email
060	Paterson	Mary		11/14/2024	Email
061	S	Edmund		11/15/2024	Email
062	Fay	Alex		11/14/2024	Email
063	Klein	Dylan		11/14/2024	Email
064	Olivier	Carol		11/14/2024	Email
065	Siminski	Lawrence		11/14/2024	Email
066	Svete	Irene		11/14/2024	Email
067	Goebel	David		11/15/2024	Email
068	Erickson	Gretchen		11/15/2024	Email
069	Shifley	John		11/16/2024	Email
070	Shifley	Sarah		11/18/2024	Email
071	Meyers	William		11/18/2024	Email
072	Ullmann	Caroline		11/18/2024	Email
073	Olsen	Mary		11/19/2024	Email
074	Whitmyre	Christian		11/19/2024	Email
075	Bo	Maureen		11/20/2024	Email
076		Tareq		11/20/2024	Email
077	Benedict	Derek		11/22/2024	Email
078	Blaski	Mindy		11/22/2024	Email
079	Witte	Jonathan		11/22/2024	Email
080	Singer	Phillip		11/23/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
081	Bustanoby	Collin		11/24/2024	Email
082	Covert-Bowlds	Chris		11/25/2024	Email
083	Olsen	Mary		11/25/2024	Email – sent twice on same day
084	Thom	Jefferson		11/25/2024	Email
085	Rand	Natalie		11/26/2024	Email
086	Aller	Ashley		11/28/2024	Email
087	McClay	Scott		12/2/2024	Email
088	Sanders	Elizabeth		12/2/2024	Email
089	Olsen	Mary		12/2/2024	Email – same comment as 11/19
090	Backus	Frank		12/3/2024	Email
091	Bakkensen	Shauna		12/3/2024	Email
092	Keeley	Linda		12/3/2024	Email
093	McLean	Carla		12/3/2024	Email
094	Ostrer	Allison		12/3/2024	Email
095	Pierce	Laura		12/3/2024	Email
096	Reid	Emma		12/3/2024	Email
097	Callahan	Eric		12/4/2024	Email
098	Khorasani	Nasair		12/4/2024	Email
099	Kick	Nancy		12/4/2024	Email
100	McClear	Patrick and Terri		12/4/2024	Email
101	Wagner	Debi		11/27/2024	Email
102	Saul	Julie		12/4/2024	Email
103	Olsen	Mary		12/4/2024	Email – same comment as 11/19
104	Duncan	Rhonda		12/5/2024	Email
105	Neff	Heidi		12/5/2024	Email
106	Stitzel	Judith		12/5/2024	Email
107	Taylor	Polly		12/5/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
108	Aller	Cynthia		12/5/2024	Email
109	White	Susan		12/5/2024	Email
110	Emery	Jennifer		12/6/2024	Email
111	Martinez	Cindy		12/6/2024	Email
112	Muller	Peter		12/6/2024	Email
113	Tucker	Diane		12/6/2024	Email
114	Lafferty	Carrie		12/7/2024	Email
115	Leipzig	Chloe		12/7/2024	Email
116	Meinhardt	Greg		12/7/2024	Email
117	Staab	Barbara		12/7/2024	Email
118	Indacochea	Izaskun		12/8/2024	Email
119	Rader	Patti		12/8/2024	Email
120	Olsen	Mary		12/8/2024	Email – same comment as 11/19
121	Covert-Bowlds	Chris		12/9/2024	Email
122	Driscoll	Ryan		12/9/2024	Email
123	France	Laureen		12/9/2024	Email
124	Marcus	Lisa		12/9/2024	Email
125	McClay	Scott		12/9/2024	Email
126	McCluskey	Ian		12/9/2024	Email
127	McFarlane/Phinney	Brent/Barbara		12/9/2024	Email
128	Moore	Rosemary		12/9/2024	Email
129	Morton	David		12/9/2024	Email
130	Olmstead	Layla		12/9/2024	Email
131	Pile	Judith		12/9/2024	Email
132	Bell	Stephanie		12/8/2024	Email
133	Cano Villares	Fabian		12/8/2024	Email
134	Baldwin-Bonney	Camille		12/9/2024	Email
135	Cano Villares	Fabian		12/9/2024	Email
136	Claflin	Dawn		12/9/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
137	Prentice	Selden		12/9/2024	Email
138	Antman	Iris		12/10/2024	Email
139	Baily	Joan		12/10/2024	Email
140	Barnard	Cheryl		12/10/2024	Email
141	Birnel	John		12/10/2024	Email
142	Boucher	Thor		12/10/2024	Email
143	Finch	Shawn		12/10/2024	Email
144	Giles	T		12/10/2024	Email
145	Keyes	David		12/10/2024	Email
146	Kucewicz	Leo		12/10/2024	Email
147	Singer	Phil		12/10/2024	Email
148	Singer	Phil		12/10/2024	Email
149	Andrews	Vicki		12/10/2024	Email
150	Corbin	WR		12/10/2024	Email
151	Cornish-Martin	Sharon		12/10/2024	Email
152	Martin	Thomas		12/10/2024	Email
153	Buck	Julia		12/11/2024	Email
154	Campbell	Sarah		12/11/2024	Email
155	Carpenter	Rebecca		12/11/2024	Email
156	Doviak	Tad		12/11/2024	Email
157	Drucker	Jesse		12/11/2024	Email
158	Finch	Shawn		12/11/2024	Email
159	Finkelstein	Ellen		12/11/2024	Email
160	Gilgorea	Mitzi & Calvin		12/11/2024	Email
161	Keller	Sophia		12/11/2024	Email
162	Kennedy	Nancy		12/11/2024	Email
163	Konker	Claudia		12/11/2024	Email
164	Last	BJ		12/11/2024	Email
165	Linscott	Bill		12/11/2024	Email
166	Lytle	Elliott		12/11/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
167	McPherson	William		12/11/2024	Email
168	Olsen	Mary		12/11/2024	Email – same comment as 11/19
169	Parfitt	Clare		12/11/2024	Email
170	Printz	Peggy		12/11/2024	Email
171	Stoltey	Todd		12/11/2024	Email
172	Tran	Trinh		12/11/2024	Email
173	Corbin	Carolyn		12/11/2024	Email
174	Oljar	Kathleen		12/11/2024	Email
175	Thorell	Patrice		12/11/2024	Email
176	Andrews	Victoria		12/12/2024	Email
177	Briggs	Robin		12/12/2024	Email
178	Cysewski	Susan		12/12/2024	Email
179	Fluke	Julie		12/12/2024	Email
180	Gibbons	Laura		12/12/2024	Email
181	Gilbert de Vargas	Sally Jo		12/12/2024	Email
182	Gordon	Kim		12/12/2024	Email
183	Gray	Patricia		12/12/2024	Email
184	James	Patricia		12/12/2024	Email
185	Juhasz	Aniko		12/12/2024	Email
186	Lawrence	Twyla		12/12/2024	Email
187		Patti		12/12/2024	Email
188	Ramsay	David		12/12/2024	Email
189	Ruha	Catherine		12/12/2024	Email
190	Saul	Julie		12/12/2024	Email
191	Shimono	Judith		12/12/2024	Email
192	Stryker	Linda		12/12/2024	Email
193	Zajac	Rorie		12/12/2024	Email
194	Allman/Connelly	Kerry and Janet/Karen		12/12/2024	Email
195	Zeffer	Laura		12/12/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
196	Barnard	Phoebe		12/12/2024	Email
197	Briggs	Rob		12/12/2024	Email
198	Nichols	Lee		12/12/2024	Email
199	Vanderhoeven	Rosanna		12/12/2024	Email
200	Lea	Karen		12/12/2024	Email
201	Seitz	Julie		12/12/2024	Email
202	Bui	Duyen		12/13/2024	Email
203	Dedinsky	Susan		12/13/2024	Email
204	Gaertner-Johnson	Lynn		12/13/2024	Email
205	Heier	Patrick		12/13/2024	Email
206	James	Patricia		12/13/2024	Email
207	K			12/13/2024	Email
208	Kelly	Bonny		12/13/2024	Email
209	Kirshbaum	Zachary		12/13/2024	Email
210	Krejci	Holly		12/13/2024	Email
211	Kresly	Katie		12/13/2024	Email
212	Kroeker	Anne		12/13/2024	Email
213	Kropack	Jennifer		12/13/2024	Email
214	Langley	Erika		12/13/2024	Email
215	Locklear	Jim		12/13/2024	Email
216	Lubrano	Grace		12/13/2024	Email
217	Mutter	Regina		12/13/2024	Email
218	Olsen	Mary		12/13/2024	Email – same comment as 11/19
219	Sweeney	Rosemary		12/13/2024	Email
220	Vargo	Suzanne		12/13/2024	Email
221	Webster	Philippa		12/13/2024	Email
222	Wend	Daniel		12/13/2024	Email
223	Williams	Carrie		12/13/2024	Email
224	Andrews	Doug and Sharon		12/13/2024	Email

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
225	Brooks	Chris		12/13/2024	Email
226	Cadigan	Courtney		12/15/2024	Email
227	Chase	Scott		12/15/2024	Email
228	Brown	Arlene		12/13/2024	Email
229	Burton	Elizabeth		12/13/2024	Email
230	Hartema	Laura		12/13/2024	Email
231	Imbach-Mills	Laura		12/13/2024	Email
232	Jacobson	Brian		12/13/2024	Email
233	Jenner	Stuart		12/13/2024	Email
234	Kadeg	Roger		12/13/2024	Email
235	Leeds	Richard		12/13/2024	Email
236	Mantle	John		12/13/2024	Email
237	Urquhart	Candace and Glen		12/13/2024	Email
238	Sanborn	Liz and Scot		12/13/2024	Email
239			Woodmont Country Club	12/13/2024	Email
240	Anderson	Pamela			Mail
241	Bies	William			Mail
242	Birnel	John		11/14/2024	Mail
243	Bishop	Carol			Mail
244	Biteman	Karen		12/12/2024	Mail
245	Brunso	Joanna			Mail
246	Butz	Danielle			Mail
247			Carnival Corp	12/11/2024	Email and mail
248	Centiolo	Patricia			Mail
249	Cherry	Adina			Mail
250	Corr	Nancy			Mail
251	DePuma	Julian			Mail
252	Duggar	Eleanor			Mail
253	Duggar	Eleanor			Mail

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
254	Ess	Margaret			Mail
255			City of Federal Way	12/13/2024	Website and mail
256	Fox	Anet			Mail
257	Frankferter	Shary			Mail
258	Gaiser	Debra			Mail
259	Gates	Cynthia			Mail
260	Gibson	Debby			Mail
261	Hayden	JoAnn			Mail
262	Jones	Marlene			Mail
263	Kennedy	Nancy		12/11/2024	Mail
264	Kennedy	William			Mail
265	Koch	Gwendolyn			Mail
266	Linscott	Patti			Mail
267	MacDonald	Jim			Mail
268	MacDonald	Margaret			Mail
269	Meyer	Ann			Mail
270		Anonymous1			Mail
271		Anonymous2			Mail
272	Peterson	Joane			Mail
273	Pinney	Rebecca			Mail
274	Rauch	Larry			Mail
275	Reich	Beverly			Mail
276	Russel	James			Mail
277	Rilel	Mary Carole			Mail
278	Selivanoff	K.R.			Mail
279	Sisson	Steven			Mail
280	Snope	Leanne			Mail
281	Spinella	Tracy			Mail
282	Stevens	Stacey			Mail
283	Tocher	James			Mail

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
284	Tollefson	Christine			Mail
285	Vopni	Joyce			Mail
286	Wells	Carole			Mail
287	White	Susan			Mail
288	Wimpress	John			Mail
289	S	Erik		10/21/2024	Website
290	Antich	Martin		10/22/2024	Website
291	Printz	Peggy		10/22/2024	Website
292	Konsak	Chad		10/24/2024	Website
293	Dumas	Ray		10/25/2024	Website
294	Metzger	Travis		10/25/2024	Website
295	Grady	Nolan		10/29/2024	Website
296	B	Tim		10/31/2024	Website
297	Saunders	C		10/31/2024	Website
298	Barrera	Xavier		11/1/2024	Website
299	Briggie	Howard		11/1/2024	Website
300	Frederick	Lauren		11/1/2024	Website
301	Hendricks	Perry		11/1/2024	Website
302	Woehrle	Sara		11/1/2024	Website
303	Fuhrman	Patrick		11/2/2024	Website
304	Onstott	Marilyn		11/2/2024	Website
305	Joy	Diana		11/3/2024	Website
306	McArthur	Douglas		11/4/2024	Website
307	Soni	Rajeev		11/5/2024	Website
308	Gmeiner	Kjersten		11/6/2024	Website
309	Hickok	Kayleigh		11/6/2024	Website
310	Lawrenson	Gary		11/6/2024	Website
311	M	Patricia		11/6/2024	Website
312	Michieli	Barbara		11/6/2024	Website
313	Omenn	Larkin		11/6/2024	Website

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314	Ostrer	Allison		11/6/2024	Website
315	Phan	Jenny		11/6/2024	Website
316	Bank	Valerie		11/7/2024	Website
317	Brooks	Olivia		11/7/2024	Website
318	Bell	Stephanie		11/8/2024	Website
319	Wilt	Karen		11/8/2024	Website
320	Diaz	Marita		11/9/2024	Website
321	Pollock	Nicole		11/9/2024	Website
322	Edgington	Gary		11/11/2024	Website
323	Fellas	Jimmy		11/11/2024	Website
324	Greenland	Jason		11/11/2024	Website
325	Jabin	Peter		11/11/2024	Website
326	Kresly	Katie		11/11/2024	Website
327	Pelzel	Thomas		11/11/2024	Website
328	Hanlon	Robert		11/11/2024	Website
329	Campbell	Jennifer		11/12/2024	Website
330	Ormsby	Lynn		11/12/2024	Website
331	Dove	Debbie		11/13/2024	Website
332	Griffin	Thomas		11/13/2024	Website
333	Mesfin	Jessica		11/13/2024	Website
334	Miller	Anne		11/13/2024	Website
335	Pierce	Anna		11/13/2024	Website
336	Reilly	Stephen		11/13/2024	Website
337	Schloff	Erin		11/13/2024	Website
338	Schwartz	Robin		11/13/2024	Website
339	Schwarzkopf	Kim		11/13/2024	Website
340	Smith-DiJulio	Kathleen		11/13/2024	Website
341	Cutler	Kim		11/14/2024	Website
342	Howland	Lynn		11/14/2024	Website
343	Lucero	Andrea		11/14/2024	Website

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344	Magar	James		11/14/2024	Website
345	Wong	Lynda		11/14/2024	Website
346	Z	Darold		11/14/2024	Website
347	Bratcher	Luz		11/15/2024	Website
348	Gause	Jackie		11/15/2024	Website
349	Valela	William		11/15/2024	Website
350	Bendix	Chris		11/16/2024	Website
351	Nyland	Kelsey		11/16/2024	Website
352	Hays	Matt		11/17/2024	Website
353	Rogers	Vincent		11/17/2024	Website
354	Werle	TJ		11/17/2024	Website
355	Bartley	Nancy		11/18/2024	Website
356	Bailey	Patricia		11/19/2024	Website
357	Mildes	David		11/19/2024	Website
358	Newton	Gabriel		11/19/2024	Website
359	Edwards	Lisa		11/20/2024	Website
360	Kyler			11/20/2024	Website
361	Talal	Forest		11/20/2024	Website
362	Wight	Kendra		11/20/2024	Website
363	Anderson	Erica		11/21/2024	Website
364	Svete	Irene		11/21/2024	Website
365	Brown	Arlene		11/22/2024	Website
366	Ullmann	Caroline		11/22/2024	Website
367	Hirkic	Nada		11/23/2024	Website
368	Partridge	Madison		11/23/2024	Website
369	Wahlstrom	Dan		11/23/2024	Website
370	Donaldson	Jimmy		11/27/2024	Website
371	Flentje	Susan		11/27/2024	Website
372	Aller	Steven		11/8/2024	Website
373	Limric	Brenda		11/30/2024	Website

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374	Mack	Adam		11/30/2024	Website
375	Conner	Barbara		12/1/2024	Website
376	Fluke	Julie		12/1/2024	Website
377	Frieda	Max		12/1/2024	Website
378	Good	Samantha		12/1/2024	Website
379	Harding	Kristin		12/1/2024	Website
380	Hitchens	Amy		12/1/2024	Website
381	Marshall	Bob		12/1/2024	Website
382	McKinney	Marjorie		12/1/2024	Website
383	Pagel	Martin		12/1/2024	Website
384	Pastore	Robert		12/1/2024	Website
385	Phillips	Mathew		12/1/2024	Website
386	Pizzano	Carrie		12/1/2024	Website
387	Reagel	Peter		12/1/2024	Website
388	Rock	Jason		12/1/2024	Website
389	Shettler	Sandy		12/1/2024	Website
390	Sproger	Betsy		12/1/2024	Website
391	Thomas	Shannon		12/1/2024	Website
392	Zamora	Roxy		12/1/2024	Website
393	Barton	Aaron		12/2/2024	Website
394	Mirsepasy	Juliette		12/2/2024	Website
395	Burger	Bruce		12/3/2024	Website
396	Calvo	Janit		12/3/2024	Website
397	Heinrich	Stephanie		12/3/2024	Website
398	Keeley	Linda		12/3/2024	Website
399	Parisi	John		12/3/2024	Website
400	Brindle	Alyse		12/3/2024	Website
401	Ortman	David		12/4/2024	Website
402	Brooke	Cara		12/4/2024	Website
403	Curtis	Jason		12/4/2024	Website

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
404	Deriugin	Alexander		12/4/2024	Website
405	Hopkins	Jon		12/4/2024	Website
406	Rodgers	Henry		12/4/2024	Website
407	Smith	Jenny		12/4/2024	Website
408	Spohn	Jean		12/4/2024	Website
409	Vetter	Robert		12/4/2024	Website
410	Lavrentyev	Mark		12/5/2024	Website
411	Peterson	Steve		12/5/2024	Website
412	Stoltey	Catherine		12/5/2024	Website
413	LaBarre	Linda		12/5/2024	Website
414	Lewis	Michele		12/5/2024	Website
415	Enajibi	Heather		12/6/2024	Website
416	Raykeil	Heidi		12/6/2024	Website
417	Cheslock	Pauline		12/6/2024	Website
418	Hoppet	Mark		12/7/2024	Website
419	E	S		12/8/2024	Website
420	Adamson	Jesse		12/9/2024	Website
421	Hinton	Colleen		12/9/2024	Website
422	Claflin	Dawn		12/9/2024	Website
423	Aristizabal	Sally		12/10/2024	Website
424	Bay	Cody		12/10/2024	Website
425	Brennan	Alec		12/10/2024	Website
426	Davis	Alan		12/10/2024	Website
427	Grady	Nolan		12/10/2024	Website
428	Hanna	Jim		12/10/2024	Website
429	Olivier	Carol		12/10/2024	Website
430	S	Neil		12/10/2024	Website
431	Corbin	Bill		12/10/2024	Website
432	Corbin	Carolyn		12/10/2024	Website
433	Ralph	Alisa		12/11/2024	Website

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Comment #	Last Name	First Name	Organization	Date Received	Method Received
434	Carrel	Dorene		12/11/2024	Website
435	Kennedy	Nancy		12/11/2024	Website
436	Kennedy	William		12/11/2024	Website
437	Luxem	David		12/11/2024	Website
438	Malloy	Andre		12/11/2024	Website
439	Martinez	Mario		12/11/2024	Website
440	McEachern	Laurie		12/11/2024	Website
441	Parfitt	Clare		12/11/2024	Website
442	Rauch	Jody		12/11/2024	Website
443	Saul	Julie		12/11/2024	Website
444	Scalise	Gabe		12/11/2024	Website
445	Thomson	Leslie		12/11/2024	Website
446	Weill	Jason		12/11/2024	Website
447	Ball	Stephen		12/12/2024	Website
448	Barron	Mary		12/12/2024	Website
449	Bauman	Chris		12/12/2024	Website
450	Blake	Olivia and Aidan		12/12/2024	Website
451	Dao	Staci		12/12/2024	Website
452	Evans	Diane		12/12/2024	Website
453	Gallagher	Bridget		12/12/2024	Website
454	Hess-Homeier	Megan		12/12/2024	Website
455	Levshina	Svetlana		12/12/2024	Website
456	Mable	Richard		12/12/2024	Website
457	Mann	Shanin		12/12/2024	Website
458	Massoudi	Darius		12/12/2024	Website
459	Plumlee	Edward		12/12/2024	Website
460	Ragsdale	Albert		12/12/2024	Website
461	Schommer	Robert		12/12/2024	Website
462	Soran	Stephen		12/12/2024	Website

SEATTLE-TACOMA INTERNATIONAL AIRPORT
 ENVIRONMENTAL ASSESSMENT
 FOR THE SUSTAINABLE AIRPORT MASTER PLAN NEAR-TERM PROJECTS

Comment #	Last Name	First Name	Organization	Date Received	Method Received
463	Stapleton	Rebecca		12/12/2024	Website
464	Thompson	Brian		12/12/2024	Website
465	Varey	Jennifer		12/12/2024	Website
466	Westgard	Lisa		12/12/2024	Website
467	Briggs	Robert		12/12/2024	Website
468	Briggs	Robert		12/12/2024	Website
469	McShane	Caroline		12/12/2024	Website
470	Hickey	Tom		12/12/2024	Website
471	Harper	Doreen		12/12/2024	Website
472	Davis	Brian		12/13/2024	Website
473	Ashurst	S		12/13/2024	Website
474	Becker	Alan		12/13/2024	Website
475	Bowering	Ryan		12/13/2024	Website
476	Cai	Michael		12/13/2024	Website
477	Danysh	Irene		12/13/2024	Website
478	Dooley	Annemarie		12/13/2024	Website
479	Featherstone	Sean		12/13/2024	Website
480	Hahn	August		12/13/2024	Website
481	Hanson	Phillip		12/13/2024	Website
482	Hudnell	Efrain		12/13/2024	Website
483	Hunt	Sandra		12/13/2024	Website
484	Lampariello	Jim		12/13/2024	Website
485	Lea	Karen		12/13/2024	Website
486	Millar	Robert		12/13/2024	Website
487	Moser	Mary Beth		12/13/2024	Website
488	Munn	Christopher		12/13/2024	Website
489	Oldham	David		12/13/2024	Website
490	Pagel	Kathleen		12/13/2024	Website
491	Pasek	JoAnn		12/13/2024	Website
492	Ricci	Sharon		12/13/2024	Website

SEATTLE-TACOMA INTERNATIONAL AIRPORT
ENVIRONMENTAL ASSESSMENT
FOR THE SUSTAINABLE AIRPORT MASTER PLAN NEAR TERM PROJECTS

Comment #	Last Name	First Name	Organization	Date Received	Method Received
493	Staggs	Sue Ellen		12/13/2024	Website
494	Sullivan	Donald		12/13/2024	Website
495	Taylor	Janice		12/13/2024	Website
496	Hiltbrunner	Carl		11/9/2024	Website
497	Hunt	Sandy		11/11/2024	Website
498	Lass	Megan		11/8/2024	Website
499	Morenz	Kyler		11/20/2024	Website
500	Gredzens	Lia		11/12/2024	Oral Public Meeting
501	Binns	Jeb		11/12/2024	Oral Public Meeting
502	O'Connor	Kathleen		11/12/2024	Oral Public Meeting
503	Wong	Linda		11/12/2024	Oral Public Meeting
504	Bowersox-Johnson	Brandon		11/12/2024	Oral Public Meeting
505	Cristal	Colleen		11/13/2024	Oral Public Meeting
506	Carnell	Sue		11/13/2024	Oral Public Meeting
507	Brunso	Joanna		11/13/2024	Oral Public Meeting
508	Kropack	Jenn		11/13/2024	Oral Public Meeting
509	Paterson	Mary		11/13/2024	Oral Public Meeting
510	Nichols	Vicky		11/13/2024	Oral Public Meeting
511	Hunt	Sandy		11/13/2024	Oral Public Meeting
512	Veloria	Velma		11/14/2024	Oral Public Meeting
513	Edrozo	Jan		11/14/2024	Oral Public Meeting
514	Konsak	Chad		11/14/2024	Oral Public Meeting
515	Seia	Joseph		11/14/2024	Oral Public Meeting
516	Martin	Candy		11/14/2024	Oral Public Meeting
517	Jorgensen	Pamela		11/14/2024	Oral Public Meeting
518	Jorgensen	Jerry		11/14/2024	Oral Public Meeting
519	Jorgensen	Pamela		11/14/2024	Oral Public Meeting
520	Arevalo	Maria		11/14/2024	Oral Public Meeting
521	Markkanen	Marianne		11/14/2024	Oral Public Meeting
522	Burdine	John		11/16/2024	Oral Public Meeting

SEATTLE-TACOMA INTERNATIONAL AIRPORT
 ENVIRONMENTAL ASSESSMENT
 FOR THE SUSTAINABLE AIRPORT MASTER PLAN NEAR-TERM PROJECTS

Comment #	Last Name	First Name	Organization	Date Received	Method Received
523	Wong	Linda		11/14/2024	Oral Public Meeting
524	Brown	Arlene		11/14/2024	Oral Public Meeting
525	Parfitt	Claire		11/16/2024	Oral Public Meeting
526	O'Ferrall	Andrea		11/16/2024	Oral Public Meeting
527	Wong	Lynda		11/16/2024	Oral Public Meeting
528	Mutter	Terry		11/16/2024	Oral Public Meeting
529	Docekal	Susan		11/16/2024	Oral Public Meeting
530	Brooke	Cara		11/16/2024	Oral Public Meeting
531	Paulson	Jeffrey		11/16/2024	Oral Public Meeting
532	Moore	Sarah		11/16/2024	Oral Public Meeting
533	Kroeker	Anne		11/16/2024	Oral Public Meeting
534		Anonymous1		11/12/2024	Public Meeting
535		Anonymous2		11/12/2024	Public Meeting
536		Anonymous3		11/12/2024	Public Meeting
537		Anonymous4		11/12/2024	Public Meeting
538		Anonymous5		11/14/2024	Public Meeting
539		Anonymous6		11/13/2024	Public Meeting
540	Brooke	Cara		11/16/2024	Public Meeting
541	Brooke	Cara		11/16/2024	Public Meeting
542	Brunt	Camie		11/12/2024	Public Meeting
543	Butler	Laura		11/14/2024	Public Meeting
544	Cate	Rebecca		11/16/2024	Public Meeting
545	Chapin	Alyson		11/13/2024	Public Meeting
546	Cornell	Sue		11/13/2024	Public Meeting
547	Corr	John		11/13/2024	Public Meeting
548	Corr	John		11/13/2024	Public Meeting
549	Corr	Nancy		11/13/2024	Public Meeting
550	Coulter	Chris		11/14/2024	Public Meeting
551	Federa	Jody		11/13/2024	Public Meeting
552	Hartley	Vicky		11/14/2024	Public Meeting

SEATTLE-TACOMA INTERNATIONAL AIRPORT
ENVIRONMENTAL ASSESSMENT
FOR THE SUSTAINABLE AIRPORT MASTER PLAN NEAR TERM PROJECTS

Comment #	Last Name	First Name	Organization	Date Received	Method Received
553	Hulse	T		11/14/2024	Public Meeting
554	James	Pat		11/14/2024	Public Meeting
555	James	Pat		11/14/2024	Public Meeting
556	Kane	John		11/16/2024	Public Meeting
557	Kinney	Dan		11/12/2024	Public Meeting
558	Knickerbocker	Dana		11/16/2024	Public Meeting
559	Moore	Sarah		11/16/2024	Public Meeting
560	O'Ferrall	Andrea		11/16/2024	Public Meeting
561	O'Ferrall	Andrea		11/16/2024	Public Meeting
562	Paulson	Jeffrey		11/16/2024	Public Meeting
563	Roseze	M.		11/14/2024	Public Meeting
564	Sarsfield	Tracie		11/16/2024	Public Meeting
565	Seia	Joseph		11/14/2024	Public Meeting
566	Smith	Justin		11/16/2024	Public Meeting
567	Standridge	Tanis		11/16/2024	Public Meeting
568	Stewart	Janice		11/14/2024	Public Meeting
569	Sykes	DW		11/13/2024	Public Meeting
570	Sykes	Maria		11/13/2024	Public Meeting
571	Tien	Jennifer		11/14/2024	Public Meeting
572	Van Wyk	Meg		11/14/2024	Public Meeting
573	Volkert	Brian		11/14/2024	Public Meeting
574	K			12/13/2024	FAA
575	Cano Villares	Fabio		12/8/2024	FAA
576	Cano Villares	Fabio		12/9/2024	FAA
577	Clafin	Dawn		12/9/2024	FAA
578	Myrick	Alex and Janice		12/13/2024	FAA
579	Rasmussen	Nancy		12/2/2024	Website
580	Goebel	David		11/19/2024	Email
581	Keane	Taria	City of SeaTac, City of Des Moines, City of Normandy Park,	10/25/2024	Email

SEATTLE-TACOMA INTERNATIONAL AIRPORT
 ENVIRONMENTAL ASSESSMENT
 FOR THE SUSTAINABLE AIRPORT MASTER PLAN NEAR-TERM PROJECTS

Comment #	Last Name	First Name	Organization	Date Received	Method Received
			City of Tukwila, City of Burien, and City of Federal Way		
582	Matz	Nicholas	Cities of Burien, SeaTac, Des Moines and Normandy Park	10/29/2024	Email
583	Jordan-Sabo	Marjorie	Ecology	10/24/2024	Email

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

VASHON ISLAND FAIR SKIES,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents.

Case No. 25-7373

CITY OF BURIEN, CITY OF DES
MOINES, and CITY OF SEATAC,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents.

Case No. 25-7439

DECLARATION OF STEPHEN P. METRUCK

Pursuant to 28 U.S.C. § 1746, I, Stephen P. Metruck, am older than 18 years of age and declare under penalty of perjury the foregoing is true and correct, to the best of my knowledge:

1. I am the Executive Director of the Port of Seattle (the “Port”). I have been in this role since 2018. As Executive Director, I am responsible for leading more than 2,500 employees to provide world-class

trade, travel, and logistics services to one of our country's most dynamic and fastest growing regions.

2. The Port of Seattle was founded in 1911 by a vote of the people as a special purpose government, similar to a school, fire, or utility district.

3. The Port's mission is to promote economic opportunities and quality of life in the region by advancing trade, travel, commerce, and job creation in an equitable, accountable, and environmentally responsible manner.

4. Since its founding, the Port has grown from a fledgling harbor to a multi-faceted organization. Today, the Port of Seattle owns and operates the Seattle-Tacoma International Airport (known familiarly as "Sea-Tac" or "SEA"), which consistently makes the list of top twenty busiest airports in the United States based on number of passengers. The Port also owns and operates two cruise ship terminals, a commercial fishing terminal, a grain terminal, four recreational marinas, and conducts other real estate activities. Additionally, the Port operates one of North America's largest maritime cargo shipping gateways through the Northwest Seaport Alliance, a joint effort with the Port of Tacoma.

5. Authority of the Port is vested with the Port Commission. The Commission is comprised of five Commissioners who are elected by voters of King County and serve four-year terms. I report to the Commissioners.

6. Part of my job as Executive Director is to guide the Port in the face of constant change and to meet the needs of the future. Our region continues to attract large numbers of people each year and is expected to grow by another one million people by 2035.

7. The Seattle-Tacoma International Airport is the primary air transportation facility for a multi-state region. However, many of the ways passengers process through the Airport are outdated and undersized. In particular, the on-site parking, check-in hall, security screening, and number of gates are designed to serve less than the number of people the Airport currently receives each year, resulting in crowded spaces, long lines, and impacts to flights. These problems are projected to worsen as passenger demand increases.

8. In anticipation of future demand at the Airport and to alleviate current capacity and safety constraints, the Port developed the Seattle-Tacoma International Airport Sustainable Airport Master Plan, which includes a long-term vision for the facility and recommends thirty-

one “Near-Term Projects” focused on improving safety and efficiency in the near term.

9. The Port worked with the Federal Aviation Administration (“FAA”) throughout the FAA’s review under the National Environmental Policy Act (“NEPA”) and is now in the process of completing environmental review under Washington State’s State Environmental Policy Act (“SEPA”).

10. After the Port has completed its SEPA review, the Port Commission will make a final decision regarding whether to proceed with the Near-Term Projects.

11. So far, the Port has invested almost \$18 million dollars in the Sustainable Airport Master Plan and corresponding environmental review. If the Court determines that the FAA’s Environmental Assessment is legally insufficient, the Port may lose the benefit of past work and would have to expend additional time and financial resources conducting additional analyses. This would also delay the Port’s ability to respond to increasing problems related to congestion and public safety at the airport.

12. The Court's decision in this case will also directly affect the ability of the Port Commission to make a final decision regarding implementation of the Near-Term Projects. Until this appeal is resolved the Port cannot proceed with the Near-Term Projects, which are needed to address capacity constraints and public safety concerns experienced at the Airport.

Executed on December 18, 2025 in SEATTLE, Washington.



Stephen P. Metruck

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FILED

DEC 22 2025

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

VASHON ISLAND FAIR SKIES, a
Washington nonprofit corporation,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION,

Respondent,

PORT OF SEATTLE,

Intervenor - Pending.

No. 25-7373

Agency No. Federal Aviation
Administration

ORDER

CITY OF BURIEN, Washington municipal
corporations; et al.,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION; et al.,

Respondents,

PORT OF SEATTLE,

No. 25-7439

Agency No. Federal Aviation
Administration

Intervenor - Pending.

The motion (Docket Entry No. 14) to intervene is granted.

The consolidated opening brief is due March 30, 2026. The consolidated answering brief is due April 29, 2026. Intervenor's consolidated brief is due May 13, 2026. The optional consolidated reply brief is due 21 days after intervenor's brief is served.

FOR THE COURT:

MOLLY C. DWYER
CLERK OF COURT

In the
UNITED STATES COURT OF APPEALS
For the Ninth Circuit

No. 25-7373
VASHION ISLAND FAIR SKIES,
Petitioner
v.
FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents

No. 25-7439
CITY OF BURIEN, *et al.*,
Petitioners,
v.
FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents

PETITIONERS VASHION ISLAND FAIR SKIES, CITY OF BURIEN,
CITY OF DESMOINES, AND CITY OF SEATAC JOINT MOTION FOR
LEAVE TO FILE SEPARATE OPENING BRIEF OR TO EXCEED TYPE-
VOLUME LIMITS IN CONSOLIDATED BRIEF

Steven M. Taber
LEECH TISHMAN NELSON HARDIMAN, INC.
1100 Glendon Avenue, 14th Floor
Los Angeles, California 90024
Telephone: (424)738-4400; Facsimile: (424)738-5080
staber@leechtishman.com

Attorneys for Petitioners, Vashon Island Fair Skies, City of Burien, City of Des Moines and City of SeaTac.

I. Introduction

Petitioner Vashon Island Fair Skies (“Vashon,” Case No. 25-7373), and Petitioners the City of Burien, the City of Des Moines, and the City of SeaTac (the “Three Cities,” Case No. 25-7439) (collectively, “Petitioners”) through undersigned counsel, respectfully move for leave to file separate opening briefs in this consolidated proceeding, or, in the alternative, for leave to exceed type-volume limits in the consolidated opening brief. This motion is made necessary by the consolidation order entered on December 10, 2025, which merged Vashon’s case (No. 25-7373) with the petition filed by the Three Cities (No. 25-7439) and set a single consolidated opening brief due March 30, 2026.

Although the petitions have been consolidated for purposes of judicial efficiency, Vashon and the Three Cities advance materially different legal claims, factual predicates, and requested relief, such that a single standard-length consolidated brief would necessarily constrain counsel’s ability to fully and fairly present each client’s independent claims. This motion is therefore brought to ensure that consolidation does not functionally operate as a limitation on the scope of judicial review. Vashon and the Three Cities therefore seek the Court’s permission either to proceed with each of the two Petitioners filing their own brief

(up to 14,000 words) or to expand the consolidated brief to *23,500 words*.¹ This request is grounded in good cause and supported by the relevant rules and precedent, as explained below.

II. Statement of Facts

On December 10, 2025, this Court consolidated Vashon’s petition (No. 25-7373) with the petition of the Three Cities (No. 25-7439) by court order. The order directed that petitioners file a single consolidated opening brief by March 30, 2026. Absent further leave of Court, that joint brief would be subject to the usual 14,000-word limit for principal briefs.

Undersigned counsel represents both Vashon and the Three Cities. The request for separate or expanded briefing does not arise from any lack of coordination among counsel, but from the opposite circumstance: counsel’s obligation to ensure that each client’s distinct interests and theories are fully developed and not subordinated within a single, compressed presentation.

Vashon and the Three Cities intend to advance substantially different claims in this litigation. Vashon’s petition for review (filed November 21, 2025) challenges the FAA’s Finding of No Significant Impact/Record of Decision (FONSI/ROD) for the Seattle-Tacoma Airport Master Plan (“SAMP”) on primarily *airspace and*

¹ Reply Briefs will follow the usual rule that they would be one half the number of words in the Opening Brief.

noise grounds. In particular, Vashon contends that the FAA's Environmental Assessment and FONSI/ROD are deficient for failing to address or remedy:

- An improperly narrow cumulative impacts analysis, including the failure to consider the effects of the Third Runway and prior NextGen (Greener Skies) RNAV procedures in the baseline;
- The use of flawed DNL noise metrics (limiting analysis to 65+ DNL contours and ignoring more granular noise impacts);
- The exclusion of Vashon Island from the geographic study area, despite Vashon's location under key flight paths;
- The lack of any Health Risk Assessment for the affected communities; and
- Flawed aircraft noise modeling assumptions in the FAA's Aviation Environmental Design Tool (AEDT), particularly for arriving flights.

See Exhibit A, Vashon's Comments on the Draft EA; Exhibit B, Vashon's Petition for Review; and Exhibit C, Vashon's Mediation Questionnaire.

In contrast, the Three Cities' petition most likely will focus on local ground and community impacts of the SAMP Near-Term Projects. As indicated in their Mediation Questionnaire, the Three Cities (municipalities neighboring Seattle-Tacoma International Airport) will probably principally argue that the FAA's approval should be set aside due to deficiencies in the analysis of surface

transportation impacts (roadway congestion and traffic patterns), land use consistency and planning implications, environmental justice impacts on minority and low-income populations, and operational growth assumptions (e.g. failure to consider alternatives involving growth limitations or use of other airports). These issues are largely distinct from Vashon's airspace and noise-related claims, with little or no substantive overlap. These issue sets are complementary but not overlapping and cannot be meaningfully briefed within a single 14,000-word opening brief without prejudice to one or more petitioners. See Exhibit D, Comments of the City of SeaTac, Comments of the City of Burien, and Comments of the City of Des Moines; and Exhibit E, the Three Cities' Mediation Questionnaire.

Because of this lack of overlap, a single brief must encompass two separate suites of issues – one involving airspace, noise, and NEPA cumulative impacts (Vashon's focus) and another involving groundside and community impacts (the Three Cities' focus). Each set of issues is complex and important in its own right. Attempting to compress all arguments into one 14,000-word brief would force the petitioners to omit or unduly truncate crucial arguments, undermining effective advocacy on each set of issues. In addition, the standing to bring these petitions for review are fundamentally different: Vashon is a not-for profit corporation, and the Three Cities are municipalities.

III. Legal Authority and Argument

Under the Federal Rules of Appellate Procedure and this Circuit's rules, the Court has discretion to allow separate or expanded briefs in consolidated cases. *Federal Rule of Appellate Procedure 28(i)* provides that in cases involving multiple appellants or consolidated proceedings, parties may join in one brief or adopt portions of each other's briefs. This rule recognizes that while joint briefing is encouraged for efficiency, it may not always be feasible for parties with disparate interests to cover all issues in a single brief. Additionally, *Ninth Circuit Rule 28-4* (Circuit Rule 28-4) specifically addressed “[e]xtensions of Time and Enlargements of Size for Consolidated and Joint Briefing,” underscoring that the Court can grant relief from normal briefing limitations in consolidated cases. Although Circuit Rule 28-4 has been abrogated and superseded by updated length-limit provisions (see Circuit Rule 32-2), the practice it embodied remains: parties may seek leave to file separate briefs or to exceed standard length limits when consolidation would otherwise impair full presentation of the issues.

A. Vashon and the Three Cities Have Good Cause for Relief:

Good cause exists here for the requested relief, whether as separate briefs or an extended consolidated brief. Vashon and the Three Cities face precisely the scenario in which separate briefs (or an expanded joint brief) are warranted. They are nominally on the same “side” of the case because they are challenging the

decision by the FAA. However, they raise wholly different legal questions. *FRAP* 28(i) permits one party to adopt by reference an argument in another's brief, but adoption by reference is no solution here. Vashon's and the Three Cities' arguments do not overlap in any significant respect, and consequently there is nothing to "adopt" except lengthier discussions that each must independently develop. Forcing the petitioners into a single brief of normal length would either (a) lead to superficial treatment of each group's issues, or (b) require one group to sacrifice important arguments to allow the other's arguments to fit within the limit. Either outcome would prejudice the petitioners' right to a full and fair hearing of their claims.

By contrast, allowing separate briefs (each up to the standard 14,000 words) or a single combined brief with a word-count enlargement (23,500 words total) will enable the Court to receive well-developed briefing on all issues without undue repetition or wasted space. Notably, if separate briefs are permitted, Vashon and the Three Cities would coordinate to avoid duplicative coverage (and could each expressly incorporate the other's brief by reference on any common background points, per *FRAP* 28(i)). In short, the requested relief will promote effective advocacy and assist the Court's review, without any unfair advantage to petitioners or prejudice to Respondents.

Where a single attorney represents multiple petitioners with non-duplicative claims, consolidation coupled with a rigid word limit creates a risk that one client's claims will be abbreviated or omitted in favor of another's. The Federal Rules do not require such a result. To the contrary, consolidation is intended to promote efficiency without impairing substantive rights.

Here, undersigned counsel has an ethical obligation to present each client's claims with appropriate depth and rigor. Allowing either (1) separate opening briefs or (2) an oversized consolidated brief ensures that consolidation serves its intended administrative purpose rather than operating as a de facto restriction on the issues properly before the Court.

B. There is Persuasive Precedent in the Ninth Circuit

The Court's prior practice confirms that such relief is appropriate in consolidated cases presenting divergent issues. For example, in *City of Malibu v. FAA*, (Case No. 24-2503, consolidated with Case No. 24-2477) a Ninth Circuit case involving two consolidated petitions challenging the same change in FAA flight procedures, the petitioners, City of Malibu and City of Culver City, were allowed to file separate opening briefs despite consolidation. Each city had distinct concerns about the FAA's action, and separate briefs ensured that both sets of issues were fully presented. Indeed, in that case Malibu's counsel filed an opening brief on Malibu's specific airspace and noise arguments, while Culver City's

counsel addressed that city's different impacts. The briefs were later referenced in each other's reply arguments, illustrating that the Court effectively received *two coordinated, non-duplicative briefs* from the consolidated petitioners. More recently, on January 6, 2026, this Court entered an Order consolidating three appeals of the same FAA decision docketed at Nos. 25-6211, 25-6306 and 25-6502, respectively. The Order sets forth a briefing schedule providing a deadline for "opening *briefs*", which evidences the practice of this Court to allow for separate briefs to be submitted by petitioners in consolidated appeals. This same practice is not only warranted, but necessary here.

To the extent specific procedural authority is required, petitioners note that Circuit Rule 32-2(b) now governs motions to exceed the type-volume limits. The rule contemplates increased word limits for briefs responding to multiple parties or issues in a consolidated appeal. By analogy, the same principle should apply to opening briefs in a consolidated case with multiple distinct challenges. Vashon and the Three Cities submit that granting leave to file an enlarged brief in the alternative (23,500 words instead of 14,000) is consistent with this Court's routine practice when consolidation would otherwise curtail the parties' ability to brief all issues adequately. Indeed, former Circuit Rule 28-4 explicitly acknowledged the need for enlarging brief size in consolidated cases, and while that rule has been reorganized, the Court's inherent authority to manage briefing and page limits

remains unquestioned. FRAP 2 also vests the Court with discretion to suspend rules in a particular case for good cause. Here, ensuring sufficient briefing on two distinct sets of issues is plainly good cause.

In sum, granting the requested relief will serve the interests of justice and efficient case management. It will allow the Court to receive focused, thorough arguments from each petitioner group without the confusion or dilution that might result from forcing all content into one standard length brief.

Respondents, for their part, will not be prejudiced. They will have the same overall volume of arguments to answer, whether in one brief or two, and may seek appropriate adjustments to their own word limit or schedule if needed. Counsel for the Federal Respondents in both cases have indicated that “The United States does not oppose one enlarged brief for Petitioners. The United States takes no position on Petitioners’ proposal to file separate briefs, but notes that separate briefs might disserve judicial economy.” Similarly, counsel for Intervenor Port of Seattle stated that “The Port does not object to a request for extra words for a joint brief but opposes a request for multiple briefs because we think they would be unnecessarily confusing and duplicative. The rules disfavor multiple briefs, and we agree with FAA that, in this instance, they would likely disserve judicial economy.”

Granting this motion will simply maintain a level playing field and facilitate full judicial review of both the airspace/noise issues and the ground impacts issues in this consolidated proceeding.

IV. Conclusion

For the foregoing reasons, Petitioners respectfully requests that the Court grant leave for adjusted briefing as follows:

1. Separate Briefs: Permit Vashon to file its own opening brief, not to exceed 14,000 words, separate from the Three Cities' opening brief (which would likewise be limited to 14,000 words for their issues). Any Reply Briefs will follow the Circuit rule that the Reply will be one half the opening brief in length.

– or, in the alternative –

2. Enlarged Consolidated Brief: Permit petitioners to file a single consolidated opening brief up to 23,500 words in length, with the Reply Brief one half of the Opening Brief.

Dated: January 9, 2026

LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber
Steven M. Taber
*Attorneys for the Petitioners, Vashon
Island Fair Skies, City of Burien, City of
Des Moines, and City of SeaTac*

CERTIFICATE OF COMPLIANCE

I certify that the foregoing Motion complies with the type-volume limitations of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 2,075 words. I further certify that this Motion complies with the typeface requirements of and the type-style requirements of Federal Rule of Appellate Procedure 27(d)(1)(E) because it has been prepared in a proportionally spaced typeface using Microsoft Word in Times New Roman 14-point font.

Respectfully Submitted,

Dated: January 9, 2026 LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber

Steven M. Taber

*Attorneys for the Petitioners, Vashon
Island Fair Skies, City of Burien, City of
Des Moines, and City of SeaTac*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document on this date with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the Appellate Electronic Filing system.

Service on Case Participants Who Are Registered for Electronic Filing:

I certify that I served the foregoing document to all registered case participants on this date via filing and notice generated through the Appellate Electronic Filing system.

Description of Document(s) Motion:

**Motion for Leave to File Separate Opening Brief or To Exceed Type-
Volume Limits in Consolidated Brief**

Respectfully Submitted,

Dated: January 9, 2026 LEECH TISHMAN NELSON HARDIMAN INC.

By: Steven M. Taber

Steven M. Taber
*Attorneys for the Petitioners, Vashon
Island Fair Skies, City of Burien, City of
Des Moines, and City of SeaTac*

Exhibit A

Vashon Island Fair Skies
PO Box 1250
Vashon, WA 98070

<http://www.vifs.org>
info@vifs.org
(206)682-8638



Dedicated to restoring the pre-NextGen dispersed arrival paths and procedures at Seattle/Tacoma International Airport that had been in place since the introduction of commercial aviation to the Puget Sound region, decades ago.

Vashon Island Fair Skies SAMP Public Comments

12/13/24

Exhibits: https://1drv.ms/f/c/ee9dce312aad2855/EhcGiweNmWRLuQ7VYOyws_QBhm866H8414RSfV161IcsiA?e=niArkn

These comments of Vashon Island Fair Skies center around several key themes:

- 1) The CEQ Regulations Upon Which the Draft Environmental Assessment Are Based Have Been Held to Be *Ultra Vires*.
- 2) Cumulative Impact Analysis is Incomplete
- 3) General Study Area/Affected Environment is too small and does not consider all areas affected by the Project.
- 4) NEPA requires that a Health Risk Assessment be drafted for the Project
- 5) The fatally flawed DNL noise metric, whose choice is not required in any actual statute, and in fact is clearly in violation of the governing statute for aviation noise: 1979's Aviation Safety and Noise Abatement Act.
- 6) Inherent altitude errors in the arrival profiles used with AEDT.
- 7) There are deficiencies in the available documentation and data provided with the Draft EA, as well technical document production details that must be rectified before the document can really be adequately reviewed.

I. The CEQ Regulations Upon Which the Draft Environmental Assessment Are Based Have Been Held to Be *Ultra Vires*.

The Draft Environmental Assessment on p.1-1 states that the DEA “is being prepared in accordance with the requirements set forth by the Council on Environmental Quality (CEQ) in its regulations for implementing the National Environmental Policy Act (NEPA).” Moreover, these regulations form the basis for FAA’s Orders 1050.1F and 5050.4B. Indeed, the orders state that the order meant to implement the CEQ regulations. However, the D.C. Circuit in *Marin Audubon*

Soc'y v. Fed. Aviation Admin., 121 F.4th 902 (D.C. Cir. 2024) held that these regulations are *ultra vires* and of no effect. The DEA should be withdrawn and should be conducted without reliance on the CEQ Regulations.

II. Cumulative Impact Analysis is Incomplete

The Council on Environmental Quality (CEQ) in its memorandum *Considering Cumulative Effects Under the National Environmental Policy Act* defines cumulative effects as those resulting from incremental impacts of the action combined with other past, present, and reasonably foreseeable future actions. Temporal boundaries must be established considering:

- The longevity of the project's impacts.
- Historical and ongoing changes to the environment.

Per CEQ regulations (40 CFR §1508.7), the scope of cumulative effects analysis must extend to include all relevant temporal scales that influence resource sustainability. Likewise, the Environmental Protection Agency in its memorandum *Consideration of Cumulative Impacts in EPA Review of NEPA Documents* states “reviewers should determine whether the NEPA document considered *all* past, present, and future actions that contribute to significant cumulative effects on the resources of concern. The analysis should include the use of trends information and interagency analyses on a regional basis to determine the combined effects of past, present, and future actions.” EPA, p.11. To that end, setting an arbitrary cut-off for changes to the noise environment is not acceptable under NEPA.

A Five-Year lookback period is arbitrary

The DEA states that for the cumulative impacts analysis, “past projects are defined as those which occurred within the past five years (between 2017 and 2021). . . Projects that occurred more than five years ago (e.g., Third Runway) are not separately discussed in this chapter. . . .” DEA. P. 5-1. This five-year “lookback” has no basis in statute or regulation. There is no explanation in the DEA as to why this time period was chosen. Indeed, this arbitrary value, together with a SAMP and an EA nearly a decade in the making, appear tailored to run out the clock on the most important noise concentrating change in KSEA's history: the introduction of NextGen circa 2015. In testimony before the Port of Seattle Commission on April 25th 2017¹, the former FAA Northwest Mountain Regional Administrator David Suomi described the two new hyper-focused NextGen RNAV STARs, largely implemented by 2015, as the most significant operational change to the Puget Sound regional airspace since the introduction of civilian radar after WWII. Surely, such a monumental change would be part of the Cumulative Impact analysis. No, it is ignored. In fact, the lookback period extends just a single year before the Scoping Process started.

¹ See exhibit with slides and video from this meeting (NextGen section starts at 42:40).

During the Scoping Process, a large number of comments (see Appendix N) expressly demanded that the EA consider the cumulative impact resulting from the most environmentally significant and deleterious changes at KSEA in the 21st Century: Construction of the third runway and the introduction of NextGen. Neither are included in determining the cumulative impact of these changes together with the SAMP's Proposed NTPs. Simply saying that any older changes are embedded in the "existing conditions" is completely antithetical to the very premise of a Cumulative Impact Analysis. If all a Federal Agency has to do is break up an environmentally disastrous change into smaller pieces spaced just outside their self-declared, and arbitrary, lookback period, then any Cumulative Impact Analysis is rendered impotent: it just takes a little longer to wreck the environment. Justice demands that this gaming of the system must not be allowed!

The 2012 EA process for the introduction of the NextGen RNAV STARs, ironically called "Greener Skies"² in spite of (as implemented) increasing noise, pollution, carbon emissions, and fuel burn³, was very much a drive-by EA. Specifically, there was zero outreach to the community who lived under these new hyper-focused NextGen RNAV STARs. Further, that community is a rural Island accessible only by ferry, and thus by that physical reality cutoff from the mainland and in need of more, not less, outreach. NextGen STARs for downwind arrivals were only implemented on one side of KSEA, the Vashon Island side. A Port of Seattle email obtained through a Public Records Request⁴ concedes that NextGen STARs were not implemented on the East Side due to "noise considerations". So, the FAA & Port were perfectly willing to create a new extreme noise corridor over a rural Island whose key beneficial attribute is a rural and peaceful environment, but they were emphatically unwilling to create that same noise profile over the very affluent Eastside suburbs of Seattle. By ignoring these relevant past actions, the DEA sets up a false baseline from which to compare whether the cumulative effects of the past actions will have any impact on the Proposed Action.

Vashon Island has a one-to-one relationship with zip code 98070, and the Port's reports on geographic complaint distributions⁵ demonstrates the extreme and outsized impact of aviation noise on Vashon Island.

B. For past EAs, the analysis must consider what was actually done in reality vs. what was modeled

² Greener Skies Final EA and FONSI ROD in attached exhibit.

³ Due to conflicting arrivals on the East Side, the West Side downwind OPD (Optimized Profile Descent) effectively backfired resulting longer low altitude level-offs than before the OPD was implemented. As all the positive environmental benefits were predicated on reducing level-offs (see slides from note 1), the OPD had the opposite effect, making all the environmental impacts worse. The extended level-offs can be seen in a briefly released FAA "Nextgen Snapshot" site for KSEA <https://www.faa.gov/nextgen/snapshots/airport/?locationId=45> (still accessible via archive.org), and in much more detailed form with the raw track data released with FOIA request 2023-07909 (exhibit attached).

⁴ See "Greener Skies Incentives Response to Commissioner Bowman" exhibit.

⁵ See example "KSEA Monthly Report MAR24.pdf" exhibit.

In fact, it's even worse as the previous "Greener Skies" EA didn't even describe the full scope of the change as ultimately implemented⁶. In other words, the "Greener Skies" EA proposed one change, but the FAA implemented another much more significant change. So, the only chance to consider the significant environmental impact of the larger, but never studied, change to the operation of the Puget Sound regional airspace is by including those changes **as implemented** in the Cumulative Impact Analysis of the SAMP EA. On a very fundamental level, when a federal agency performs an EA of action X that results in a FONSI ROD, but then when implementing the change – potentially years later as with NextGen at KSEA – actually takes action Y, the **ONLY** recourse to evaluate the environmental impact of action Y is as part of the Cumulative Impact Analysis on the next EA/EIS when action Y can be considered as implemented. The DEA's failure to address environmental degradation that was unaddressed by the past actions undermines the efficacy of the cumulative impacts analysis.

C. The analysis does not include "reasonably foreseeable future actions"

Alaska Airlines is the lead airline at KSEA and has deep ties with the FAA and the Port of Seattle. On page 5 of Alaska Airlines' Scoping Comment, (dated 9/27/18, p. 2171, from Appendix N), Alaska Air writes: "[a]uthorizing the SAMP without linkage to and coordination with the **FAA upcoming redesign of the region's airspace** is akin to substantially expanding a railroad station without addressing the need for additional train tracks." (emphasis added). Clearly, Alaska Airlines knows that these airspace changes are not just "reasonably foreseeable" but in-fact *imminent*. All they are waiting for is a FONSI ROD on the SAMP EA, and then a five-year waiting period before releasing the next EA for the airspace changes. This is another example of a brazen attack at the core of a Cumulative Impact Analysis by spacing out EAs to try and escape legal requirements of NEPA. This disingenuous tactic cannot be allowed to succeed. As the CEQ pointed out "[a]nalyzing cumulative effects is more challenging primarily because of the difficulty of defining the geographic (spatial) and time (temporal) boundaries. For example, if the boundaries are defined too broadly, the analysis becomes unwieldy; if they are defined too narrowly, significant issues may be missed, and decision makers will be incompletely informed about the consequences of their actions." CEQ, p. v. In this case, the DEA is too narrow on both counts: both spatially and temporally. The cumulative impacts analysis must go much further back than five years and stretched to include many more people beyond the a mile radius from the Airport.

⁶ See Greener Skies EA Section "4.3 Operational Changes Resulting from the Proposed Action". Only 7% of Westside downwind arrivals were to fly the NextGen RNAV the entire length of Vashon Island. Instead, as mentioned numerous times in the 4/25/17 Port of Seattle Commission Meeting, David Soumi (FAA) and other FAA/Port staff report – accurate – that nearly all of Westside downwind fly the NextGen RNAV the entire length of Vashon Island. The raw flight track data in FOIA 2023-07909 show this as well.

III. General Study Area/Affected Environment is too small and does not consider all areas affected by the Project.

In drafting a NEPA environmental document, proper definition of the “affected environment” (which is often synonymous with “study area”) is essential. For example, the study area for noise is the three-dimensional geographic area with the potential to be impacted by noise from the proposed project. FAA Order 1050.1F, § B-1.3, p. B-2. The DEA defines the “General Study Area” as “represent[ing] the area where direct or indirect impacts may occur as a result of implementing the Proposed Action or alternatives. The GSA includes an area encompassing 3,692 acres (5.8 square miles).” See DEA, p.3-1. The GSA is depicted in Exhibit 3-2 on page 3-5. FAA Order 1050.1F, 6-2.1e “Affected Environment,” requires details regarding the environment and how it was calculated:

Affected Environment. This section succinctly describes the environmental conditions of the potentially affected geographic area or areas. The discussion of the affected environment will be no longer than is necessary to understand the impacts of the alternatives; data and analyses should be presented in detail commensurate with the importance of the impact.

FAA Order 1050.1F, § 6-2.1e. However, the DEA does not offer any reasoning as to how this very small area was chosen as the GSA. Both the Port and the FAA have known from the beginning that the direct and indirect impacts of the Proposed Action will be felt far beyond the boundaries indicated in Exhibit 3-1. This is an artificially small, narrow, and arbitrary study area that is used, no doubt, to avoid review of potentially significant environmental impacts. The DEA offers no explanation or justification for arbitrarily choosing this 5.8 square mile area. NEPA requires more than what the GSA and Affected Environment states in the DEA.

In the end, the DEA’s geographical boundaries encompassing the “general study area” or “affected environment” did not appropriately capture the true environmental impacts of the Project.

IV. NEPA requires that a Health Risk Assessment be drafted for the Project

With the growing body of scientific evidence that aviation noise and emissions are creating public health concerns all over the world, the time has come for airport projects such as this one, develop a Health Risk Assessment as required by NEPA. See *infra*, articles regarding the public health effects of aviation noise and emissions. NEPA requires agencies to analyze the direct and indirect environmental consequences that a proposed action might have on public health and safety. 40 C.F.R. §§ 1501.3(B)(2)(III), 1502.16(a) – (b), 1508.1(g). The DEA fails to take a hard look at the Project’s environmental impacts by failing to include an HRA or any comparable analysis and provides no support for the health and safety conclusions made in DEA § 4.3.11.3.

As a threshold issue, the DEA’s analysis is improperly constrained to consideration only of health impacts to children. See DEA § 4.3.11.3. NEPA does not limit an agency’s health impact analysis to just children, however. Rather, it mandates an agency consider “the degree of [a

proposed action's] effects on public health and safety." 40 C.F.R. § 1501.3(b)(2)(iii), emphasis added. The Environmental Protection Agency's ("EPA's") guidance advises agencies to assess health impacts for all "population groups of concern." An HRA for the proposed

V. Noise Data/threshold of Significance is antiquated, outdated, and no longer relevant (NES/WHO – ISO)

A. DNL Is a Fatally Flawed Noise Metric for Annoyance and Health of People on the Ground.

1979's Aviation Safety and Noise Abatement Act had a simple directive: "*establish a single system of measuring noise, for which there is a highly reliable relationship between projected noise exposure and surveyed reactions of people to noise.*" DNL's problems fall more into the realm of common sense than deeply technical issues:

- DNL does not take into account the ambient sound level at different exposure points on the ground. This is fundamentally absurd as it posits that a particular overflight event has the same annoyance impact in a large, busy, and noisy city vs. a tranquil rural area. In the former one cannot even notice the overflight while in the latter it completely overwhelms all the sounds of nature for two or more minutes of pure annoyance.
- The only option to try and get any rest in an otherwise peaceful location with hundreds of overflights per day/night, is to keep adding more and more artificial white noise to your interior environment until the overflights are no longer distracting/annoying. The supreme irony here is that one is *increasing* DNL, by intentionally adding increasingly louder white noise, in order to reduce annoyance. Scientists have concluded that aviation noise that deprives individuals of sleep (considered by some to be a Constitutional right) is a public health crisis.⁷ The previous sounds of nature, for many the prime reason for moving to a rural island decades or generations ago, is lost for the rest of your life.
- What's annoying is not the total acoustic energy normalized over a 24 hour period as DNL would have us believe, but rather (1) the number of jarring interruptions throughout the day/night, and (2) how long each of those interruptions last and (3) the irregular time distribution of the overflights. The final point being that it is much worse when the event distribution has a random nature, instead of being perfectly evenly spaced in time, like a fog horn. Points (1) and (2) can be measured by using a "Time Above Ambient" metric to model the actual human response to aviation noise as required by 1979's ASNAA.

One issue with all noise metrics that measure a sound level expressed in dB, is the default assumption to always use A-weighting. A-weighting was specifically designed to enhance those mid-range frequency components most important to human speech, on the reasonable

⁷ *Sleep Is a Human Right, and Its Deprivation Is Torture*, AMA Journal of Ethics, October 2024, Volume 26, Number 10: E784-794. Caitlyn Tabor and Katherine R. Peeler.

assumption that our auditory system and brain would be optimized for that frequency range. Specifically, it heavily attenuates low frequencies where aviation noise has its strongest components. Just because human hearing may not be as discriminating at low frequencies does not mean that low frequency noise is not extremely annoying, and A-weighting will minimize that annoyance. The more uniform C-weighting may very well perform better in predicting human annoyance, and as such would then be the preferred weighting as-per 1979's ASNAA "highly reliable" standard.

The recent Neighborhood Environmental Survey⁸ clearly shows that what utility DNL may have had as a noise metric decades ago when aviation noise was primarily a small number of very loud events near the airport in a city, is now completely inadequate with hundreds of daily randomly timed overflight events focused in narrow tracks over (previously) quiet residential areas. The results of the survey showed that the thresholds of significance and levels of compatibility are very outdated and no longer reflected the public's response to aircraft noise exposure. Comparison of the FICON Report prepared using the updated Schultz Curve and NES prepared using the National Curve showed the following percentage of population highly annoyed by exposure to transportation noise:

- At a noise exposure level of DNL 65 dB, the FICON Report indicated 12.3% of people were highly annoyed, compared to between 60.1% & 70.9% from the NES.
- At a noise exposure level of DNL 60 dB, the FICON Report indicated that 6.5% of people were highly annoyed, compared to between 43.8% & 53.7% from the NES.
- At a noise exposure level of DNL 55 dB, the FICON Report indicated that 3.3% of people were highly annoyed, compared to between 27.8% & 36.8% from the NES.
- At a noise exposure level of DNL 50 dB, the FICON Report indicated that 1.7% of people were highly annoyed, compared to between 15.4% & 23.4% from the NES.

Extrapolating from the FAA's current "thresholds of significance," one concludes that the new "threshold of significance" should be around DNL 45 dB, instead of DNL 65 dB, which the level recommended by the World Health Organization.⁹

⁸ See exhibit

⁹ In October 2018, the World Health Organization Regional Office for Europe published its Environmental Noise Guidelines for the European Region. Those Guidelines found that aviation noise was connected to higher incidence of ischemic heart disease, hypertension, "prevalence of 'highly annoyed'" population, and a delay in reading skills and oral comprehension in children. As a result, WHO made the strong recommendation that average noise exposure noise levels produced by

NES shows that FAA's current method of assessing noise impacts is obsolete. At the very least the DEA should explain why using 65 DNL is still relevant after the NES and not simply rely on "this is the way we have always done it." To do otherwise would be arbitrary and capricious.

B. Federally Approved New Method of Assessing Aviation Noise Is Available for Use.

What is needed is a method that analyzes population percentages in different communities associated with particular definitions of noise impacts. A method whereby by specifying two parameters, the percentage of the population of a nominally average community to be protected from high annoyance and detriment and the percentage of people in all communities to be similarly protected, can result in a gauge of the efficacy and efficiency of regulatory policies expressed in acoustic units. This method is ISO 1996-1:2016.

The International Organization for Standardization (ISO) produces international standards. An international standard "provides rules, guidelines or characteristics for activities or for their results, aimed at achieving the optimum degree of order in a given context." ISO 1996-1:2016 "Description, Measurement and Assessment of Environmental Noise – Part 1: Basic Quantities and Assessment Procedures," was published in March 2016. ISO 1996-1:2016 defines the basic quantities to be used for the description of noise in community environments and describes basic assessment procedures. It also specifies methods to assess environmental noise and gives guidance on predicting the potential annoyance response of a community to long-term exposure from various types of environmental noises. Application of ISO 1996-1:2016 to predict annoyance response is limited to areas where people live and to related long-term land uses. ISO 1996-1:2016 and its companion ISO 1996-2:2016, have been approved for use by the ISO countries, which includes the United States. As with all ISO standards, ISO 1996-1:2016 represents the best scientific practices.

ISO 1996-1:2016 states in its introduction that "[its] broad aim . . . is to contribute to the international harmonization of methods of description, measurement, and assessment of environmental noise from all sources." The introduction adds, "the aim of the ISO 1996 series is to provide authorities with material for the description and assessment of noise in community environments. Based on the principles described in this part of ISO 1996, national standards, regulations, and corresponding acceptable limits for noise can be developed. The methods and procedures described in Part 1 of the ISO 1996 are intended to be applicable to noise from various sources," not just those emanating from aircraft.

ISO 1996-1:2016 corrects the reliance on the "Schultz curve" and gives policymakers a much more accurate view of community tolerance levels of noise. The additional variable used in

aircraft be reduced below 45 dB DNL, as aircraft noise above this level is associated with adverse health effects. WHO Guidelines, p. xvii.

ISO 1996-1:2016 is the community tolerance level or (“LCT”). This variable, as explained in ISO Part 1, is the “day-night sound level at which 50% of the people in a particular community are predicted to be highly annoyed by noise exposure.” Note 1 to ISO Part 1 states that LCT is a parameter that accounts for differences between sources and/or communities when predicting the percentage highly annoyed by noise exposure. It is worth repeating that Annex D to ISO 1996 Part 1 states that in newly created situations, especially when the community is not familiar with this sound source, higher community annoyance can be expected. This difference may be equivalent to up to 5 dB. Research has shown there is a greater expectation for and value placed on “peace and quiet” in quiet rules settings. In quiet rural settings, this greater expectation for “peace and quiet” may be equivalent up to 10 dB. A new, unfamiliar sound source sited in a quiet rural area can engender much greater annoyance levels than are normally estimated by these formulae. This increase in annoyance may be equivalent to adding up to 15 dB to the measured or predicted levels. Since the U.S. government has approved ISO:1996-1:2016 for use in the U.S., the FAA is required to use it instead of obsolete scientific methods using the “Schultz Curve.”

Vashon Island is a rural area, and its inhabitants are accustomed to a relaxed, peaceful environment. And the area is known for residents who often prefer a secluded and quiet home environment. In addition, before the Third Runway was constructed and the RNAV procedures were implemented, residents of Vashon Island experienced only scant traces of aircraft noise. ISO Part 1 suggests that on Vashon Island, higher community annoyance can be expected. The FAA’s reliance on the DNL model does not account for the higher community annoyance being experienced on Vashon Island and other rural areas. The DEA should use ISO 1996-1:2016 to assess the noise impact of the SAMP since it is currently the best available science method that has been approved for use by the U.S. federal government.

VI. Use of Standard Arrival Profiles in AEDT Does Not Reflect Reality

Upon speaking with L&B staff at a SAMP open house, it became apparent that the AEDT Standard Arrival Profiles do not reflect the arrival altitude profiles as actually flown in reality for KSEA RNAV STARS. This is especially true of late/middle of the night arrivals which are often cleared to a visual approach and then descend far below the specified RNAV waypoint altitudes, which in the case of the HAWKZ RNAV over Vashon Island are already lower than the AEDT Standard Arrival profile. As sound intensity falls as the square of the distance, significant errors in altitude can generate profound noise modeling errors. The solution here is to create custom profiles for each arrival based on its particular radar/ADS-B flight track, as was done with the go-arounds. At the absolute minimum, this should be done for a one week sample to define the error bars that need to be put on the shortcut approach that was taken.

VII. Missing Information and Problematic Content in the Draft EA Document Itself.

A. AEDT raw input data and output results must be made available

All the AEDT input data files (especially the standard approach profiles) used for the modeling described in Appendix J, and the resulting AEDT output files, need to be made available for download or to copy to a flash drive. The set of input files must be sufficient such that with an installed version of AEDT Version 3f (assuming a valid BADA license) the output data supporting the results presented in Appendix J can be exactly reproduced by someone proficient with AEDT. Please include all topological input files used as well as any meteorological setting/files used – even if these are in theory downloadable from other government sites – so that an exact reproduction of results is possible. At the SAMP “open house” on November 16th at McMicken Heights Elementary School, Steve Rybolt (Senior Environmental Program Manager - Port of Seattle) and Rob Adams (President - Landrum & Brown, Inc.), together assured this data would be made available.

I was not convinced as the Greener Skies EA put in writing, in its Appendix H “Detailed NIRS Calculations,” that “NIRS results are available on CD by request.” I requested it by FOIA 2016-001183WS, which dragged on the better part of a year before my request was denied. I filed a FOIA appeal, which was also, after a long delay, denied. I then filed FOIA 2018-009352WS on documents concerning the first FOIA, which proved that all responsive records were not being released, but the FAA still refused to release the NIRS calculations. With no further options I filed Case No. 20-272 in the Western District Court of Washington¹⁰ and the FAA said the promise made in Appendix H was a vendor (HMMH) error and that HMMH, not the FAA, had physical domain over the data and the FAA was unwilling to ask the vendor for the data explicitly promised as available in Appendix H of the Greener Skies EA. At this point, the case law is tricky and my attorney was convinced that the FAA would spare no expense to litigate all the way to the Supreme Court to prevent this NIRS data from being exposed. From a budgetary point of view we made the decision to settle, as the FAA did agree to pay my attorney fees (as I had substantially prevailed), though the FAA admitted no wrong doing. Alas, a five year battle to get those NIRS results ended without ultimate success, and the data presumably remains locked in some HMMH secure location, safe from exposing the truth about the original RNAV modeling for the Greener Skies EA.

This half decade FOIA/lawsuit experience is why I am skeptical about promises of transparency and data availability.

B. Inappropriate use of scanned PDFs for newly created documents

In Appendix J, Exhibit B-1: Memo on "Missed Approach Operations" is a 44 page **scanned** PDF. I would further editorialize very poorly scanned at a low resolution. Given the number of very detailed diagrams the scanned nature of the PDF severely impairs its legibility. This memo was contemporaneously produced by Landrum & Brown, i.e. it is not the Dead Sea Scrolls. There is no reason to replace a crisp and high-resolution native vector PDF file with a

¹⁰ FOIA requests and court document in exhibits

fuzzy, unsearchable, and bloated scanned PDF. Please provide the original high-quality memo in native vector PDF format, which should actually have a smaller file size as well.

Exhibits: https://1drv.ms/f/c/ee9dce312aad2855/EhcGiwcNmWRLuQ7VYOyws_QBhm866H8414RSfV161IcsiA?e=niArkn

Exhibit B

No. _____

In the
UNITED STATES COURT OF APPEALS
For the Ninth Circuit

VASHON ISLAND FAIR SKIES, a Washington nonprofit corporation,
Petitioner,

v.

FEDERAL AVIATION ADMINISTRATION, BRYAN BEDFORD, in his official
capacity as Administrator, Federal Aviation Administration, U.S. DEPARTMENT
OF TRANSPORTATION and SEAN DUFFY, in his official capacity as Secretary
Respondents

PETITION FOR REVIEW OF AGENCY ORDER
[Federal Rules of Appellate Procedure, Rule 15]
[49 U.S.C. § 46110(a)]

STEVEN M. TABER
Leech Tishman Nelson Hardiman, Inc.
1100 Glendon Ave., 14th Floor
Pasadena, California 91101
Telephone: (626) 796-4000
Facsimile: (626) 795-6321
staber@leechtishman.com

Attorneys for Petitioner Vashon Island Fair Skies

Pursuant to 49 U.S.C. § 46110, Rule 15(a) of the Federal Rules of Appellate Procedure, and Circuit Rule 15-1, Petitioner, Vashon Island Fair Skies (“VIFS”) hereby petition the United States Court of Appeals for the Ninth Circuit for review of the Federal Aviation Administration’s decision signed on September 24, 2025, to issue an “Finding of Significant Impact/Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport” (“FONSI/ROD”). A copy of the FONSI/ROD is attached as Exhibit A to this Petition.

As stated in 49 U.S.C. § 46110(a), a person “may apply for review of the order by filing a petition for review in the United States Court of Appeals for the District of Columbia Circuit or in the court of appeals of the United States for the circuit in which the person resides or has its principal place of business.” Because VIFS has its principal place of business within the Ninth Circuit, this Court has jurisdiction over this Petition for Review.

This Petition is timely filed under 49 U.S.C. § 46110(a), in that Federal Rule of Appellate Procedure 26(a)(1) provides that “[i]f the last day [of a filing period] is a Saturday, Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.” Since the 60th day after September 24, 2025, fell on a Sunday, the filing period under § 46110(a) continues to run until Monday, November 24, 2025.

Having confirmed that the Court has jurisdiction and this Petition is timely under § 46110(a), VIFS now addresses the underlying subject of this action—the significant environmental effects the FAA’s approval of the federal actions necessary to implement the Port of Seattle’s Sustainable Airport Master Plan will have on the residents of Vashon Island.

1. VIFS is a Washington not-for-profit corporation and federally recognized 501(c)(3) public charity based on Vashon Island, Washington. VIFS was formed in 2018 “in the wake of PBN implementation at KSEA as part of the Greener Skies project,” to respond to the concentration and lowering of arrival flight paths over Vashon Island caused by the FAA’s NextGen/Performance-Based Navigation (“PBN”) procedures at Seattle-Tacoma International Airport (“SEA”).

2. VIFS’s stated mission is to “restore the peace and natural environment to Vashon and Maury Islands that the FAA’s NextGen program has stolen” by restoring the pre-NextGen dispersed arrival paths and more optimized profile descents that historically spread noise more widely and kept aircraft higher over the islands. Since 2018, VIFS and its officers have engaged in technical analysis of flight tracks, filed comments with the Port of Seattle, FAA, and other bodies, and participated in national NextGen forums, including the FAA’s NextGen Advisory Committee.

3. Vashon Island lies under SEA’s downwind arrival legs, with the “Southflow” one being significantly more impactful. VIFS has documented that, after implementation of NextGen RNAV STARs, hundreds of daily SEA arrivals were routed in a narrow “razor-thin line” over the island at substantially lower altitudes than before, transforming what had been a quiet rural soundscape into a high-intensity aviation noise corridor. VIFS’s work has focused on the mismatch between this new, concentrated noise burden and FAA/Port of Seattle environmental documents that continue to treat Vashon as a “less noise sensitive area” and omit it from detailed noise analysis and monitoring.

4. In December 2024, as part of the National Environmental Policy Act (NEPA) process for the Sustainable Airport Master Plan (“SAMP”) Near-Term Projects Environmental Assessment (“EA”), VIFS submitted detailed technical and legal comments on the Draft Environmental Assessment (“Draft EA”) dated December 13, 2024 (“Vashon Island SAMP Comments”). Those comments identified seven primary themes: (1) the Draft EA’s reliance on the Council on Environmental Quality (“CEQ”) NEPA regulations, which VIFS argued had been held ultra vires by the D.C. Circuit in *Marin Audubon Society v. FAA*, 121 F.4th 902 (D.C. Cir. 2024); (2) an incomplete cumulative impacts analysis that fails to account for the Third Runway and the Greener Skies/NextGen RNAV changes; (3) an arbitrarily small General Study Area (“GSA”) and “affected environment” that

excludes communities like Vashon Island that bear substantial noise and emissions impacts; (4) the absence of a project-specific Health Risk Assessment; (5) continued reliance on the “fatally flawed” DNL noise metric and 65 dB threshold; (6) unresolved altitude and profile errors in the Aviation Environmental Design Tool (“AEDT”) inputs for arrivals; and (7) serious deficiencies in the availability and quality of technical documentation, including key noise and missed-approach exhibits.

5. On cumulative impacts, VIFS emphasized that many scoping commenters had expressly demanded that the EA evaluate the cumulative effects of the Third Runway and the 2012 Greener Skies NextGen RNAV STARs together with the SAMP Near-Term Projects, and argued that treating those prior changes as merely part of “existing conditions” “is completely antithetical to the very premise of a Cumulative Impact Analysis.”

6. It bears emphasis that the operational changes purportedly “inspired” by the FAA’s 2012 Greener Skies Over Puget Sound FONSI/ROD were not implemented in any meaningful way until approximately 2015 and, even today, remain only partially implemented. Most notably, the central justification for the Greener Skies initiative—the continuous-descent, curved Required Navigation Performance (RNP) approach through Elliott Bay, designed to concentrate arrivals over water and reduce noise and emissions over densely populated areas—was never deployed

as an operational procedure. Instead, it has been used only a negligible number of times per year, far short of the level of implementation assumed and analyzed in the 2012 NEPA document.

7. The Vashon Island SAMP Comments explained that the Draft EA's baseline was fundamentally distorted because it excluded major past actions, most notably the so-called *Greener Skies* procedures that were modeled in the FAA's 2012 FONSI/ROD but were never implemented in the form or frequency the agency represented. By treating these unimplemented or materially altered procedures as if they were fully in effect, the Draft EA constructed a false baseline and unlawfully minimized the cumulative noise and emissions burdens already borne by communities such as Vashon Island.

8. On the scope of the affected environment, VIFS objected that the Draft EA's "General Study Area" (GSA). The GSA's 3,692 acres (5.8 square miles) loosely bounded by S. 140th Street, 33rd Avenue S., S. 200th Street, and Des Moines Way was an artificially small, unexplained study area that ignored reasonably foreseeable noise and emissions impacts on more distant communities, including Vashon Island. The Final Environmental Assessment ("Final EA") retains this same 5.8-square-mile GSA definition and boundaries, with no additional explanation responding to VIFS's contention that the affected environment must

encompass the full three-dimensional area of potential noise impacts from SEA arrivals and departures.

9. VIFS further argued that NEPA required preparation of a Health Risk Assessment for the SAMP Near-Term Projects in light of the expanding scientific literature linking aviation noise and emissions to cardiovascular disease, sleep disturbance, and other health harms, particularly in quiet rural soundscapes such as Vashon Island. The Final EA does not add a stand-alone Health Risk Assessment, does not systematically quantify health risks from aviation noise and emissions, and nowhere explains why such an assessment is unnecessary in light of VIFS's comments and the cited literature.

10. On noise metrics and thresholds, Vashon Island's SAMP Comments attacked continued use of the DNL metric and the 65 dB "significance" threshold as inconsistent with the Aviation Safety and Noise Abatement Act's directive to use a metric with a "highly reliable relationship" to surveyed community responses, and as incompatible with newer evidence (including FAA's own Neighborhood Environmental Survey) showing substantial annoyance and health impacts at far lower levels. VIFS urged FAA and the Port to abandon exclusive reliance on DNL 65 in favor of alternative metrics such as Time-Above Ambient (TAA) to account for low ambient noise on Vashon Island. The Final EA and accompanying FONSI/ROD instead continue to define significant noise effects by

reference to the 65+ DNL contour, and the FONSI specifically summarizes noise impacts in terms of the 65+ DNL contour area, population, and housing units, concluding that the Future (2032) Action Alternatives would not cause significant noise impacts so defined. The 65+ DNL contour extends only a few miles from the airport and does not reach Vashon Island, and neither the Final EA nor the FONSI/ROD responds to VIFS's argument that this metric and threshold are themselves unlawful and inadequate.

11. VIFS also raised technical concerns with the Draft EA's "Aviation Environmental Design Tool" (AEDT) modeling, including inherent altitude errors in arrival profiles, and criticized the poor quality or unavailability of key technical supporting documents, such as the 44-page "Missed Approach Operations" memo (Exhibit B-1 to Appendix J). In the Final EA, FAA acknowledges "comment (037 Vashon Island Fair Skies)" and responds only by replacing the low-resolution, unsearchable version of Exhibit B-1 with a higher-resolution copy in Appendix J; there is no indication that FAA revisited the underlying arrival-profile assumptions or altitude modeling in AEDT in response to VIFS's technical critiques. Apart from this formatting correction, neither the Final EA's main text nor Appendix O (Agency & Public Engagement) contains a substantive change that addresses VIFS's specific modeling concerns.

12. VIFS also challenged the Draft EA's reliance on CEQ's NEPA regulations in light of the D.C. Circuit's *Marin Audubon* decision, where a divided panel declared those regulations ultra vires—beyond CEQ's statutory authority—even as it ultimately resolved the case on other grounds. The Draft EA expressly cites CEQ's regulations as the governing NEPA framework, and the Final EA does not alter that reliance, acknowledge the *Marin Audubon* holding or dicta, or otherwise grapple with VIFS's argument that the SAMP NEPA review must be grounded directly in the NEPA statute and binding FAA regulations rather than in CEQ rules of questionable validity.

13. The FONSI/ROD reiterates that the SAMP Near-Term Projects will not cause significant environmental impacts and relying on the EA's noise, cumulative impact, and health-effects assessments (or lack thereof). The FONSI/ROD does not expand the geographic scope of the noise analysis beyond the 65+ DNL contour, and does not address the ultra vires CEQ argument, the request for a Health Risk Assessment, the criticisms of the DNL metric, or the demand for a cumulative impacts analysis that includes the Third Runway and Greener Skies/NextGen RNAV procedures.

14. In sum, VIFS is a long-standing, technically sophisticated community organization formed in direct response to FAA's PBN/NextGen changes at SEA and represents a uniquely impacted rural island community. Its SAMP comment

letter raised fundamental legal and technical defects in the Draft EA's regulatory framework, cumulative-impacts baseline, geographic study area, absence of a Health Risk Assessment, reliance on the DNL 65 metric, and AEDT modeling inputs. With the narrow exception of supplying a readable copy of a single Appendix J exhibit, the Final EA and FONSI/ROD fail to meaningfully address or resolve those concerns, instead preserving the same limited study area, metric and threshold choices, and analytical omissions that VIFS had identified as unlawful and inadequate.

15. For these above-stated reasons and arguments to be raised in the briefs, VIFS contends that its Petition for Review of the SAMP FONSI/ROD should be granted and the FONSI/ROD be vacated and remanded.

Dated: November 21, 2025 LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber
Steven M. Taber

Attorneys for Vashon Island Fair Skies

RULE 26.1 DISCLOSURE STATEMENT

Petitioner Vashon Island Fair Skies is Washington Nonprofit corporation. It does not have a parent entity, and no publicly held corporation owns 10% or more of the shares or interests in Vashon Island Fair Skies.

Dated: November 21, 2025 LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber
Steven M. Taber

Attorneys for Vashon Island Fair Skies

Exhibit C

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

Form 7. Mediation Questionnaire

Instructions for this form: <https://www.ca9.uscourts.gov/forms/form07instructions.pdf>

9th Cir. Case Number(s)

Case Name

Counsel submitting this form

Represented party/parties

Briefly describe the dispute that gave rise to this lawsuit.

Feedback or questions about this form? Email us at forms@ca9.uscourts.gov

Briefly describe the result below and the main issues on appeal.

Describe any proceedings remaining below or any related proceedings in other tribunals.

Signature

Date

(use "s/[typed name]" to sign electronically-filed documents)

Exhibit D



Mr. Steve Rybolt
Port of Seattle, Aviation Environment and Sustainability
P.O. Box 68727
Seattle, WA 98168
Sent via email: samp@portseattle.org

Dear Mr. Rybolt:

Introduction

Thank you for the opportunity to review and comment on the Seattle Tacoma Sustainable Airport Master Plan Environmental Assessment. On behalf of the Cities of Burien, Normandy Park, SeaTac, and Des Moines, Washington, we are writing to share our collective comments and observations regarding the Seattle Tacoma International Airport (SEA) Sustainable Airport Master Plan Environmental Assessment (EA).

We recognize the Port of Seattle's significant role in driving the economic growth of our region and appreciate the airport's importance in facilitating regional, national, and international connectivity. However, as communities directly affected by airport operations and development, we believe it is essential that SEA growth is balanced to sustain the quality of life in the region, particularly for those communities adjacent to SEA. Historically, south King County, including the communities within the general study area, has a large population of minority and low-income communities. The increase in impacts on these already disadvantaged communities is unfair and must be addressed by the Port.

In an effort to share our concerns and comments regarding the environmental assessment and impacts to our citizens, we have engaged in an effort to review the EA, in spite of the limited time offered by the Port, we wish to provide the following comments related to the Environmental Assessment and the impacts our communities face due to the existing and growing impacts attributed to the airport.

First and most importantly, regardless of legal and regulatory requirements for abatement and mitigation of these impacts, it is our hope that the Port of Seattle will proactively and

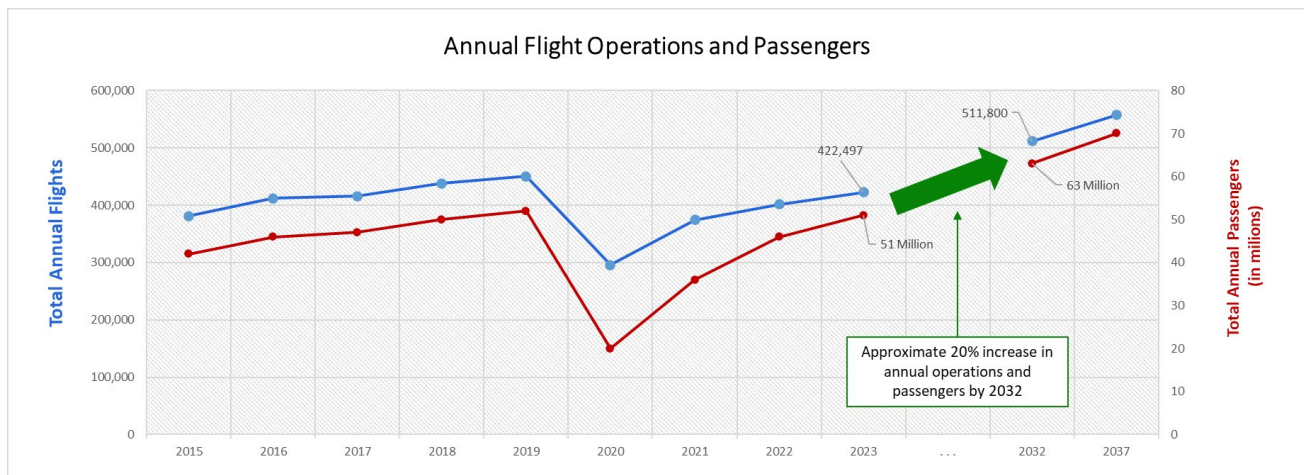
collaboratively engage with the leadership in our four cities to understand these concerns, within and alongside of the NEPA process. Collaboration will build trust and enable partnership with impacted communities, enabling the region to work together on shared economic goals. Working together we can respond to growing demand at SEA, while acknowledging and addressing the inevitable impacts of that growth, most of which will be experienced by our residents who live closest to the airport.

Insufficient timeframe for review of EA

Many of our residents expressed concern over the time allotted for the public comment period. We understand the Port requested an extension which was granted. However, the amount of information contained in the Environmental Assessment combined with the highly technical nature of the content would require months to review thoroughly. The review period, even with the extension, does not provide ample time for professional staff, including environmental specialists to conduct a proper review and to provide comment. It is very disappointing that the FAA offered such a short timeframe, especially considering the magnitude of the SAMP and Environmental Assessment. In many ways it seems allowing the public to review the assumptions, analyses, and conclusions, was more about “checking a box” rather than truly seeking input. It is our hope that this is not the Port’s intention, and more time will be put into long-term planning for truly understanding and addressing the impacts that will result in not only the SAMP projects, but also the growth expected over the next ten (10) years. This should not be just about “checking a box” but rather respecting the communities and environment that are directly and indirectly impacted by SEA.

Aircraft Noise

The expansion of operations at SEA will result in increased impacts, particularly for nearby communities. Residents of our communities are subjected to constant aircraft overflights day and night, irrespective of runway usage or flow. Operational levels have reached pre-COVID levels and are expected to continue to growth through the EA study period. By 2032, annual operations are forecast to reach 511,800. This is an increase of nearly 20%, resulting in more overflights, more noise events, and more disruptions to conversations, learning, working, and sleeping.



Data Source: Port of Seattle Environment and Sustainability & 2023 Annual Report and SEA SAMP DRAFT EA, Appendix A
Total Annual Passenger data is rounded to the nearest million.

According to the environmental assessment, noise exposure will not exceed NEPA thresholds; however, the DNL 65 dBA contour will expand, resulting in “significant” (as defined in CFR Part 150) aircraft noise exposure for more residents and noise-sensitive facilities, including libraries, schools, childcare centers, nursing homes, and places of worship.

Mitigation Status / Land Use	2022 Existing Condition DNL 65+ dB	2032 No Action DNL 65+ dB	2032 Proposed Action DNL 65+ dB	Existing (2022) vs. No Action (2032)	Existing (2022) vs. Proposed Action (2032)
Sound Insulation Completed					
Single-Family	3,193	4,146	4,258	953	1,065
Multi-Family	349	388	436	39	87
Mobile Home	0	0	0	0	0
<i>Sub Total</i>	<i>3,542</i>	<i>4,534</i>	<i>4,694</i>	<i>992</i>	<i>1,152</i>
					0
Not Sound Insulated					0
Single-Family	662	1,046	1,089	384	427
Multi-Family	1,887	3,782	3,895	1,895	2,008
Mobile Home	125	156	177	31	52
<i>Sub Total</i>	<i>2,674</i>	<i>4,984</i>	<i>5,161</i>	<i>2,310</i>	<i>2,487</i>
Total Housing Units	6,216	9,518	9,855	3,302	3,639
Total Estimated Population	14,061	21,975	22,799	7,914	8,738

Data Source: Annual Report and SEA SAMP DRAFT EA, Appendix F

A comparison of the existing noise exposure conditions (2022) indicates the 14,061 total population exposed to “significant” noise exposure conditions will increase to nearly 22,000 in 2032, even in the No Action scenario. This represents an increase of 37%. And the Proposed Action scenario increases this even further. It is clear that the growth in operations at SEA, with or without the Proposed Actions included in the SAMP will have a substantial impact on residents.

Global research indicates that elevated levels of noise exposure can result in health impacts, sleep disturbance, and impact on learning. While we acknowledge the socio-economic benefits the airport brings to the region, it is crucial that growth is sustainable and does not disproportionately burden close-in communities with environmental impacts and reduced quality of life. With no mitigations identified in the environmental assessment, it is imperative that the Port’s update of the Part 150 study includes both noise abatement measures to reduce noise exposure and mitigation efforts, such as sound insulation for eligible homes and schools.

The Part 150 update must also address the numerous issues associated with the existing/historic sound insulation program. Issues with the contractors’ quality of work, damage to residents’ homes, and other issues with the program have led to tremendous stress for residents doing nothing to improve quality of life or to mitigate aircraft noise impacts. These issues must be addressed during the Part 150 update to ensure the same problems are not repeated. Impacts on residents already heavily impacted by SEA were compounded by the experience and added costs resulting from the sound insulation program.

A comparison of the existing conditions (2022) versus future conditions with the Proposed Action will result in an increase in daily arrivals of 14% and a 25% increase in nighttime arrivals.

Nighttime operations are particularly impactful for close-in communities as this results in sleep-disturbance and awakenings which add to the health effects of aircraft noise exposure. While the DNL 65 dBA threshold may not be exceeded for all close-in communities and residents, the effects will extend far beyond those contours and should be considered when planning for impact mitigation.

	ARRIVALS DAY	ARRIVALS NIGHT	DEPARTURES DAY	DEPARTURES NIGHT	TOTAL OPS
2022 Existing Condition	469	82	456	97	1,100
2032 Proposed Action	545	108	500	100	1,303
Difference	14%	25%	9%	3%	16%

Data Source: SEA SAMP DRAFT EA, Appendix F

The DNL noise metric does not adequately reflect residents' experiences with aircraft noise. This is particularly true given the current conditions within the NAS, characterized by a significantly higher number of aircraft operations/overflights and quieter aircraft (per event). Supplemental metrics, including the Number-of-Events-Above (NA) and NA night, should be utilized in the FAR Part 150 study to provide decision-makers and the public with a comprehensive understanding of both existing conditions and future changes, including those projected for the SAMP (2032). These metrics should also be considered when evaluating potential noise abatement strategies that can be applied beyond the DNL 65 dBA contours, as practiced at other airports in the United States.

The FAA's Neighborhood Environmental Survey confirmed that community noise annoyance is significantly higher than historically recorded. According to the study, 60-70% of residents are "highly annoyed" at noise exposure levels of DNL 65 dBA, and 27-37% are "highly annoyed" at levels down to DNL 55 dBA. While federal regulations mandate the use of DNL 65 dBA for certain policy decisions, impacts on residents outside this exposure level should be considered during noise compatibility planning. For SEA to truly support "sustainable" growth, it must consider the impacts on neighboring jurisdictions and the quality of life in those communities. Sustainable growth requires adequate and effective mitigation to offset or reduce impacts, which should be identified and prioritized in collaboration with affected communities.

Also noteworthy, SEA has experienced consistent growth in air carrier operations since 2003. The increase in operations has resulted in the continued rise in environmental and community impacts, including those considered in the SAMP environmental assessment, however, the increase in impacts was largely ignored by SEA, since it was not attached to a federal action requiring environmental review. The Port has done little to acknowledge or mitigate the growth in impact and because there was no federal action trigger, the cumulative impacts attributed to this growth is not considered in the SAMP EA.

Impacts on Education and Learning

Under the existing conditions (2022) there are nine (9) schools within the DNL 65 dBA. This will increase to 12 schools in both the 2032 No Action and 2032 Proposed Action scenarios. Again, federal regulations characterize this level of noise exposure as not compatible with noise-sensitive development which includes schools. Research indicates that aircraft noise exposure can impair classroom learning. And while federal regulations cite DNL 65 dBA as the threshold of what is “compatible”, the growth in daily aircraft noise events are likely to be disruptive and to impede learning, affecting many more than the 12 schools within the DNL 65 dBA contours. The health and well-being for our communities, as well as our children’s education should all be carefully considered as the Port plans for growth in SEA operations and strives for sustainability when working with neighboring communities.

Health Effects

Global research indicates elevated levels of noise exposure can lead to health impacts, sleep disturbance, and impacts to learning. While we acknowledge the socio-economic benefits the airport brings to the region, it is important that growth is sustainable and does not benefit the region with only those close-in communities bearing the burden in terms of environmental impacts and reduced quality of life.

Air Emissions / Air Quality

Air quality is another major concern for communities surrounding the airport. The environmental assessment indicates increases in all critical air pollutants. Although these increases do not exceed significance thresholds, they will impact our residents, particularly vulnerable populations such as those with asthma, other respiratory conditions, and the elderly.

Surface Transportation and Congestion

Total passengers are forecast to reach 63 million annually by 2032. The 20% increase in passengers will mean a significant increase in vehicular traffic on local roads for arriving and departing passengers as well as the increase in support services such as concessionaires, vendors, employees, etc. This will result in additional impacts for our communities including more roadway congestion, increased air pollution and noise. The EA indicates the Port will mitigate these impacts through the funding of local improvements to roadways and intersections. We expect mitigation plans to be developed in collaboration with impacted jurisdictions following completion of the NEPA and SEPA processes.

Airspace and Flight Procedure Changes

The increase in total operations will result in more aircraft noise including overnight as well as increased emissions. Ultimately, airspace and flight procedures/patterns will likely change to accommodate the increased operations in the existing airspace. Airspace and flight procedure changes should be thoroughly explored. These can help mediate the increase in impacts while improving efficiency and safety. Environmental Assessment identifies specific impacts on airport-adjacent communities, and specific mitigation plans should be developed in collaboration with

these communities. Note, we included recommended flight procedure changes in our 2018 SAMP comments. These should be considered during the Part 150 update. The letter which included potential flight procedure changes is attached.

SEPA Review and Comment Period

And as noted, the time allotted for the public review and comment on the draft EA was grossly inadequate. Reviewing the thousands of pages of technical documentation and providing meaningful comment requires ample time and is a critical part of NEPA. Public input and input from affected jurisdictions should be a high priority for both the Port and FAA. We ask that a proper review/comment period be offered as part of the SEPA process.

While we recognize and value the economic and connectivity benefits provided by the airport, we remain committed to advocating for our communities to ensure that any negative impacts are fully considered and mitigated to the maximum extent possible. Thank you for the opportunity to continue a productive dialogue. We look forward to your response and further discussion.

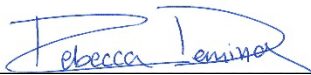
Sincerely,



Liz Stead
Community Development Director
SEPA Responsible Official
City of Burien



Nicholas Matz
Community Development Director
SEPA Responsible Official
City of Normandy Park



Rebecca Deming
Community Development Director
SEPA Responsible Official
City of Des Moines



Jenn Kester
Planning Manager
SEPA Responsible Official
City of SeaTac



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:



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.

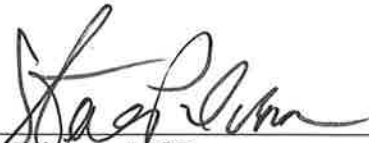
Public annoyance and sensitivity to aircraft noise is changing. This has been acknowledged by the FAA and others and has prompted a great deal of research by the FAA, Airport Cooperative Research Program, and others. Despite the reduction in numbers of people exposed to DNL 65 dBA, noise complaints are 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.

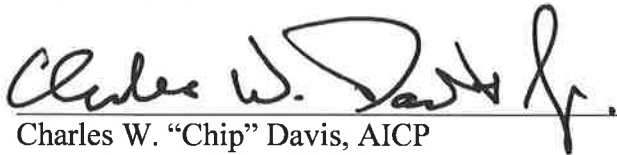
The EA/EIS needs to include use of supplemental metrics to include exposure beyond DNL 65 (i.e. down to the DNL 55 dBA levels of exposure), such as Number of Events Above and Time Above.

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.

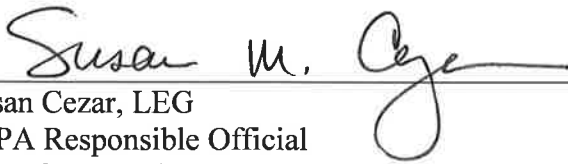
Sincerely,



Steve Pitcher, AICP
SEPA Responsible Official
City of SeaTac



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



Susan Cezar, LEG
SEPA Responsible Official
City of Des Moines



David Nemens
SEPA Responsible Official
City of Normandy Park



December 13, 2024

Via Email: samp@portseattle.org

Kandice Krull
Environmental Protection Specialist
FAA – Denver Airports District Office

Steve Rybolt
Senior Environmental Program Manager
Port of Seattle

Re: City of SeaTac Comments: Sustainable Airport Master Plan: FAA's Draft NEPA Environmental Assessment (EA)

Ms. Krull:

On behalf of the City of SeaTac, I am writing to formally convey our comments regarding the Port of Seattle's (Port) Sustainable Airport Master Plan (SAMP) and the FAA's Draft NEPA Environmental Assessment (EA) with respect to the future infrastructural development and expansion at Seattle-Tacoma International Airport (SEA). SeaTac acknowledges and commends the Port's commitment to long-term sustainability. However, we believe that several significant issues, particularly those directly affecting the SeaTac community, are inadequately addressed within the current environmental review framework. This is unfortunate, since several of these issues were identified during the 2018 scoping of the Environmental Assessment.

The FAA's Draft NEPA Environmental Assessment (EA) materials posted on the SAMP Environmental Review website on October 21, 2024, raise significant concerns about potential impacts on the SeaTac community. As you know, the City of SeaTac has joined the neighboring jurisdictions of Burien, Des Moines, and Normandy Park to retain professional assistance to help us respond to areas of concern in all four municipalities. The comments in this letter are intended to supplement, and do not abrogate, the joint comments provided by the four cities in the comment letter dated December 12, 2024.

Scope of Environmental Assessment: Consideration of Cumulative Impacts and Background Growth

The City of SeaTac, in its September 2018 letter to your office, noted that, beyond the near-term projects, "it is clear that the Port has developed concepts for how future expansion (Long-Term Vision) will occur after completion of the defined 'near-term projects.'" The City respectfully reiterates that Washington SEPA Guidelines (WAC 197-11-005 (2)) states:

"the lead agency shall prepare its threshold determination and environmental impact statement (EIS), if required, at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified."

The City has raised its concern with the 'piecemeal' environmental review and assessment process in previous Port SEPA actions, including the International Arrivals Facility, North Satellite Expansion, Flight Corridor Safety Program, and the Concourse D Hardstand Project. The City reiterates this concern in light of the SAMP's compartmentalization between near-term and long-term work at the

airport. A piecemeal approach to environmental review does not adequately consider the cumulative impacts of all these projects together, which is a requirement under WAC 197-11-060 (3) and WAC 197-11-060 (5.d.ii) that state that 'phased review' is not appropriate when 'it would merely divide a larger system into segmented fragments or avoid discussion of cumulative impacts.'

Moreover, SeaTac has expressed ongoing concern regarding the methodologies employed in assessing SAMP background growth in the environmental review contained within the EA. Specifically, the period from 2012 to 2023, now considered in terms of accrued demand, coexists with significant proposed funding—\$5 billion—for airport infrastructure enhancements that are occurring outside the SAMP environmental review process.¹ With the inherent complexities of growth projections and environmental ramifications, there is a distinct worry that the previous environmental reviews and current assessment framework may not accurately capture the growth trajectory of SEA and its potential environmental impacts.

In relation to the assessed background growth during the 2012 – 2023 timeframe, SeaTac has previously sought clarification on whether the SAMP properly contextualizes the development that has transpired and will continue to occur at the airport. Our concern is that the very significant growth that has occurred at SEA during 2012-2023 is relegated to a foregone conclusion without sufficient environmental review or analysis. The City is skeptical of the Port's stated position that *"implementation of the NTPs would neither induce regional macro-economic growth nor induce demand for air services to higher levels than expected in the unconstrained forecast."* This assertion appears overly simplistic and does not reflect the complex interdependencies of regional economic development and air travel demand. (Landrum & Brown, 1-11).

NEPA/SEPA Review Separation

On February 12, 2019, The Port of Seattle issued the Near-term Projects Environmental Review Scoping Report. Within the report, the Port committed to coordinated NEPA/SEPA environmental reviews to make review "easier by the public, agencies, and potentially affected Tribes" (Landrum & Brown, 2). However, in practice, the NEPA process is occurring in advance of, and separate from, the state SEPA review.² The July 2018 SAMP NTP Environmental Review Process Scoping Information Packet states that,

"no approvals or implementation of the proposed action will take place before the completion of the environmental review process that will follow the requirements of the National Environmental Policy Act and the State Environmental Policy Act" (Landrum & Brown, 1).

An integrated approach to environmental impact assessment across both federal and state parameters ensures that all environmental impacts are identified prior to any action. On Page 16 of the report, the Port offers a "Preliminary Environmental Review Schedule" which shows that the Draft NEPA EA and SEPA EIS would be released in the Early Fall of 2019 and a Final NEPA EA and SEPA EIS by Early Winter 2019.

¹ The City learned of further leases and acquisitions the Port has made for properties near the airport to bolster their employee parking capacity following the publication of the NEPA Draft EA on October 21, 2024. These leases/acquisitions that were not included as part of the SAMP's Near-term projects or any other environmental assessment that the city can find.

² To the City of SeaTac's knowledge, the Port did not communicate its reason to separate the NEPA and SEPA review processes from a concurrent review to consecutive environmental reviews.

Now, with the NEPA process progressing on a separate timeline, there exists a greater risk that critical information regarding environmental impacts may not be adequately incorporated into the ongoing environmental assessment.

The Scoping Report cited above goes on to note that “*based on that level of concern and the potential for impacts that may occur with the implementation of the Proposed Action, the Port of Seattle has determined that a SEPA Environmental Impact Statement (EIS), known as a ‘SEPA EIS,’ will be prepared*” (Landrum & Brown, 1). The commitment to a full Environmental Impact Statement (EIS) within the 2019 Scoping Report highlights discrepancies between the projected and actual growth in passenger traffic at the airport. As stated in the Draft Environmental Assessment (EA):

“Since the SAMP forecasts were prepared, actual passenger traffic at SEA had exceeded the SAMP forecasts, reflecting strong economic growth, decreases in domestic airfares, airline competition, the continued development of Delta Air Lines hub, and strong growth in both origin-destination and connecting passengers. The analysis conducted to prepare the 2019 updated forecast indicated that the resulting level of aircraft operations could exceed the Airport’s ability to accommodate the demand, even with implementation of the Proposed Action.”

How will the Port reconcile the separate NEPA and SEPA review processes to ensure a comprehensive analysis of environmental impacts? The Port’s approach to the environmental review process, which includes dividing it into Near-term and Long-term strategies, increases the difficulty of adequately analyzing and mitigating for these effects.

Consolidation of Employee Parking Projects: L-06 & L-07

Originally scoped as providing a new 1,500-stall employee parking lot and a new parking structure of up to 2,000 stalls, the Port instead proposes an 8-story 3,500-stall parking structure on Port property north of SR 518 and south of S. 144th Street with an approximately 3.3-acre footprint. The original L-06 and L-07 projects were intended to “accommodate increased demand and replace stalls displaced by potential cargo development on the existing North Employee Parking Lot (NEPL).

In 2024, the City became aware of ongoing acquisitions by the Port outside of the original 2018 SAMP’s scope. This appears to us to be a function of ongoing demand and growth at the airport and, therefore, functionally, should have been included in the environmental analysis documents.

The City is concerned that the cumulative impacts of these changes were not adequately communicated to the public or included as a substantive revision to the proposed SAMP Near-term Projects as part of surface transportation mitigation discussions between Port and City staff.

Surface Transportation Mitigation

A Letter of Understanding dated September 15, 2015, notes that the City and Port have worked together on a shared travel demand model to inform the City’s Transportation Improvement Plan and the SAMP. This approach was confirmed in the 2018 Interlocal Agreement and reaffirmed as part of the 2024 joint update to the shared travel demand model.

The decision not to proceed with the previously proposed Airport South Access Expressway (South Access) is concerning to the City. According to the PSRC Regional Transportation Plan, the South Access project would involve a new two-lane, limited-access arterial road connecting the airport drive system south to the planned extension of SR 509 to I-5. It would also involve relocating the existing south airport entrance from S. 182nd Street to a new connection with the local roadway network at S. 188th Street and 28th Ave. S.

The Port's position is that while Airport South Access Expressway, or South Access, will remain in the regional plan, it is not currently part of the SAMP, which has major implications for the city's transportation network. The South Access project was included in the PSRC Regional Transportation Plan's Regional Capacity Project List, adopted in May 2022, with a projected completion date of 2032, which falls within the SAMP program horizon. Over the past two years, City staff engaged in ongoing discussions during the development of the updated 2024 travel demand model. Through these discussions, City staff discovered that the South Access project would not be completed as initially planned.

Regarding the Port's proposed surface transportation mitigation, the Port's mitigation development occurred before the updated 2024 joint-travel demand model (SeaCast) effort was completed. A further evaluation utilizing more recent traffic count data and the updated model parameters is necessary to adequately assess impacts outside of the SAMP study area confined to the airport campus proper.

Regarding potential unanalyzed impacts directly related to surface transportation, it is noted within the Draft EA that the passenger parking facilities and arrival and departure curb construction are reliant on the terminal concourse work due to space limitations. As a result, those elements do not have a separate alternatives analysis covering the potential for further changes to the scope of work around parking for passengers and employees should the proposed L-07 project not come to fruition.

On September 30, 2024, the Port provided the City a draft Traffic Impact Mitigation Agreement for the surface transportation mitigation proposed in the Draft EA. Port staff shared that the FAA wants this agreement signed prior to the issuance of Record of Decision. Further, Port staff have shared that the SEPA EIS will not be issued prior to the NEPA Record of Decision. As a SEPA-responsible official for the City of SeaTac, I cannot recommend Council authorization of the proposed surface transportation mitigation agreement prior to the SEPA environmental review, given the separation of the NEPA and SEPA environmental review process and concerns with possible impacts resulting from omitting the parking alternatives from the analysis.

Aviation Noise & Emissions

Residents of SeaTac are regularly exposed to noise and emissions from departing and arriving aircraft and supporting airfield operations, particularly during early morning and late-night hours. The City appreciates the Port's continued participation in noise mitigation efforts.

Prolonged exposure to aircraft noise and particulate emissions has been linked to various health issues, including hypertension, stress, hearing loss, and a reduction in overall quality of life. It is impactful both in the home and while residents travel to work or recreate at one of our parks. Recent research from a two-year Mobile Observations of Ultrafine Particles (MOV-UP) study funded by the Washington State Legislature and led by the University of Washington (UW) Department of Environmental & Occupational Health Sciences and the Department of Civil and Environmental Engineering, found that communities underneath and downwind of jets landing at SEA are exposed to a type of ultrafine particle pollution that is distinctly associated with aircraft.

The landmark 2019 UW study is the first to identify the unique signature of aircraft emissions in Washington. The study findings raise important questions of health equity and the potential health burden from jet-related air pollution that falls heaviest on South King County communities adjacent to the airport, which socio-economic data shows tend to be less affluent, less healthy, and more

racially and ethnically diverse than King County as a whole.³ In the 2018 SAMP Executive Summary, the Port stated, “As activity increases in the future, additional aircraft overflights and potential aircraft noise impacts could increase” (Leigh Fisher, 42).

The significant concerns surrounding the potential increases in carbon monoxide and nitrogen dioxide emissions, as detailed in Tables 4.6 and 4.8 of the SAMP, along with the findings of the notable UW study and the ongoing Part 150 Study related to airport noise, raise questions about the consultants' conclusion that "no significant impacts to air quality were identified, and no mitigation would be necessary." This assertion appears inconsistent with a potential expansion of the 2032 Action Alternatives 65+ DNL noise contour and the expected increase in airfield operations (Landrum & Brown, p. 4-13~4-14).

The City continues to partner with the Port of Seattle as a SEA Stakeholder Advisory Roundtable: Aviation Noise Working Group member and as part of the ongoing Part 150 Noise Study process. The City requests that the SAMP environmental review process be delayed until the completion of or incorporation of the Part 150 Noise Study findings.

Marin Audubon v. Federal Aviation Administration

On November 12, 2024, the Washington D.C. Circuit Court issued an opinion in *Marin Audubon Society v. Federal Aviation Administration*. In light of the recent ruling by the DC Circuit Court, which invalidated the authority of the CEQ to issue binding regulations under NEPA, and because FAA has improperly relied on CEQ's baseline for their environmental analysis related to SAMP, SeaTac is persuaded that FAA should reevaluate the finding of no significant impact outside of CEQ's NEPA regulation. Alternatively, FAA is asked to take no further action until there is clarity on what is the proper environmental assessment in relation to SAMP.

Assessment of Cumulative Impacts

When considering the cumulative impacts described in SEPA guidelines, it is clear that not only the immediate impacts of the proposed near-term projects but also how they interact with long-term expansions must be evaluated. It is particularly troubling that while there is broad concern about the cumulative effects of multiple projects, the SAMP environmental assessment process seems to treat these expansions as separate entities, neglecting the larger environmental narrative.

This fragmented view makes it difficult to ascertain the full extent of potential impacts on air quality, noise pollution, traffic congestion, and community health, particularly for those living near the airport.

The background growth assessment from 2012 to 2023 deserves deeper investigation. This issue raises questions about the accuracy of basing future infrastructure plans on projected demands without considering actual growth dynamics in the region. For example, what are the implications of increased passenger traffic beyond SAMP forecasts? If growth continues to exceed projections, the airport may face challenges that were not anticipated, which could strain local infrastructure and services.

The City appreciates the 8-day extension for review of the FAA's Draft EA. However, the City of SeaTac contends that significant concerns with the Sustainable Airport Master Plan (SAMP) render the extended 53-day window still inadequate for the City to appropriately weigh the potential outcomes of what the Port proposes. The 53-day review period occurs during the holiday season, and

³ King County Community Health Needs Assessment Report, 2018-19.

while cities across the Puget Sound are working to adopt their respective major comprehensive plan updates as required by state law.

In light of the significant questions around the validity of CEQ regulations raised in *Marin* and the unaddressed outstanding issues that the City has raised since 2018 in individual and joint letters with the jurisdictions of Burien, Normandy Park, and Des Moines, it is impossible to adequately respond on behalf of the community in a timely fashion while addressing the areas of concern for our City.

Thank you for your consideration and for providing opportunities for public and agency comments.

Sincerely,



Jenn Kester
SEPA Responsible Official
City of SeaTac



Evan Maxim
Director of Community & Economic Development
City of SeaTac

CC: Kyle Moore, Interim City Manager
City Council



City of Burien
400 SW 152nd Street
Suite 300
Burien, WA 98166-1911

P 206.241.4647
F 206.248.5539

burienwa.gov

December 11, 2024

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



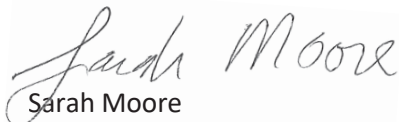
Alex Andrade
Burien City Councilmember



Hugo Garcia
Burien City Councilmember



Jimmy Matta
Burien City Councilmember



Sarah Moore
Burien City Councilmember



December 13, 2024

Mr. Steve Rybolt
Port of Seattle, Aviation Environment and Sustainability
P.O. Box 68727
Seattle, WA 98168
Sent via email: samp@portseattle.org

Dear Mr. Rybolt:

Thank you for the opportunity to review and comment on the Seattle Tacoma Sustainable Airport Master Plan Environmental Assessment. As you know, the City of Des Moines is located directly south of SEA and below the concentrated flight paths for arrivals during north-flow conditions and departures during south-flow conditions. Our residents are exposed to overflight activity during all conditions, both day and night. The growth in operations at SEA will result in increased impacts, especially for close-in communities, including Des Moines.

The City recognizes the Port's role in driving the economic growth of our region and we appreciate the airport's importance in facilitating regional, national, and international connectivity. However, as one of the communities directly affected by airport operations and development, we believe it is essential that SEA growth is balanced to sustain the quality of life in the region, particularly for those communities adjacent to SEA.

Most importantly, regardless of legal and regulatory requirements for abatement and mitigation of these impacts, it is our hope that the Port of Seattle will proactively and collaboratively work with the City to understand how our residents are impacted, how those impacts will increase, and how we can work together to plan for SEA's growth while also developing plans to address existing and increasing impacts associated with Sea-Tac operations. Collaboration with airport neighbors will build trust and enable partnership with those most impacted enabling the region to work together on shared economic goals.

Working together we can respond to growing demand at SEA, while acknowledging and addressing the inevitable impacts of that growth, most of which will be experienced by our residents who live closest to the airport.

The City of Des Moines held a community meeting on December 3, 2024, to help the community understand the environmental Review and comment period process, but also to understand the community concerns regarding the SAMP and its impacts on the community and its residents.

Approximately, ninety people attended the meeting split between in person and online attendance,

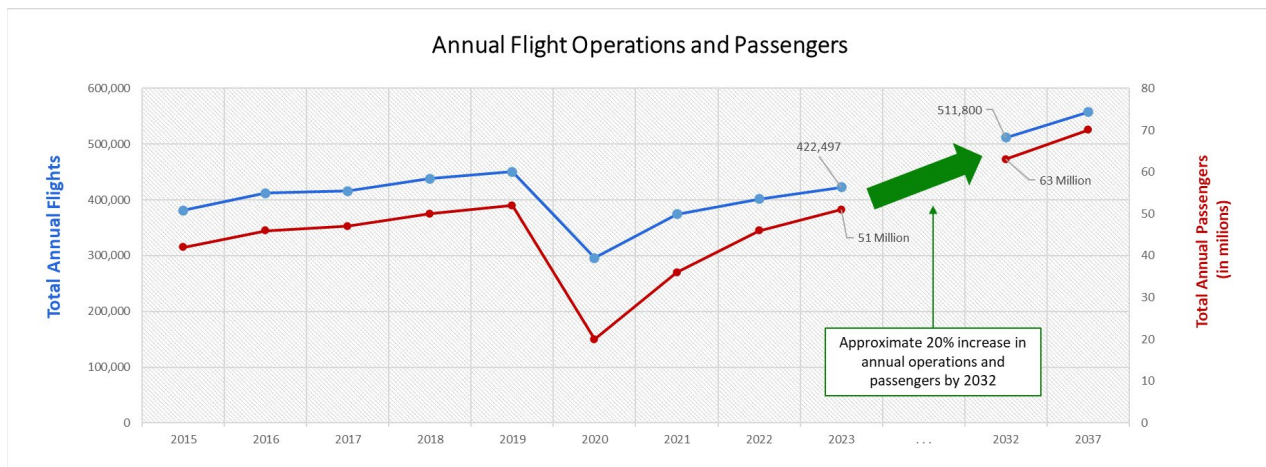
we heard concerns and questions for over 45 minutes, and could have gone on for hours longer, had we not needed to limit it to an hour meeting. Additionally, community members held their own meetings gathering support to help their fellow citizens express their concerns and respond to the SAMP. This letter aims to capture and communicate the concerns of the community who live and work in the City of Des Moines, based on the information provided to the city at the meeting, over email, and through conversations with staff and Council.

Public Comment Period

A number of residents expressed concern over the time allotted for the public comment period. We understand the Port requested an extension which was granted. However, the amount of information contained in the Environmental Assessment combined with the highly technical nature of the content would require months to review thoroughly. The period, even with the extension, does not provide ample time for staff, let alone the public, to review areas of interest to ensure their concerns are satisfactorily addressed. It is very disappointing that the FAA offered such a short timeframe, especially considering the magnitude of the SAMP and Environmental Assessment. In many ways it seems allowing the public to review the assumptions, analyses, and conclusions, was more about “checking a box” rather than truly seeking input. It is our hope that this is not the Port’s or FAA’s intention, and more time will be put into long-term planning for truly understanding and addressing the impacts that will result in not only the SAMP projects, but also the growth expected over the next ten (10) years. This should not be just about “checking a box” but rather respecting the communities and environment that are directly and indirectly impacted by SEA.

Aircraft Noise

The expansion of operations at SEA will result in increased impacts, particularly for nearby communities. Residents of our communities are subjected to constant aircraft overflights day and night, irrespective of runway usage or flow. Operational levels have reached pre-COVID levels and are expected to continue to grow through the EA study period. By 2032, annual operations are forecast to reach 511,800. This is an increase of nearly 20%, resulting in more overflights, more noise events, and more disruptions to conversations, learning, working, and sleeping.



Data Source: Port of Seattle Environment and Sustainability & 2023 Annual Report and SEA SAMP DRAFT EA, Appendix A

Total Annual Passenger data is rounded to the nearest million.

According to the Environmental Assessment, noise exposure will not exceed NEPA thresholds; however, the DNL 65 dBA contour will expand, resulting in “significant” (as defined in CFR Part 150) aircraft noise exposure for more residents and noise-sensitive facilities, including schools and nursing homes.

Mitigation Status / Land Use	2022 Existing Condition DNL 65+ dB	2032 No Action DNL 65+ dB	2032 Proposed Action DNL 65+ dB	Existing (2022) vs. No Action (2032)	Existing (2022) vs. Proposed Action (2032)
Sound Insulation Completed					
Single-Family	3,193	4,146	4,258	953	1,065
Multi-Family	349	388	436	39	87
Mobile Home	0	0	0	0	0
<i>Sub Total</i>	<i>3,542</i>	<i>4,534</i>	<i>4,694</i>	<i>992</i>	<i>1,152</i>
					0
Not Sound Insulated					0
Single-Family	662	1,046	1,089	384	427
Multi-Family	1,887	3,782	3,895	1,895	2,008
Mobile Home	125	156	177	31	52
<i>Sub Total</i>	<i>2,674</i>	<i>4,984</i>	<i>5,161</i>	<i>2,310</i>	<i>2,487</i>

Data Source: Annual Report and SEA SAMP 1

A comparison of the existing noise exposure conditions (2022) indicates the 14,061 total population exposed to “significant” noise exposure conditions will increase to nearly 22,000 in 2032, even in the No Action scenario. This represents an increase of 37%. And the Proposed Action scenario increases this even further. It is clear that the growth in operations at SEA, with or without the Proposed Actions included in the SAMP will have a substantial impact on residents. Worth noting, based on the analysis in the EA, most, if not all of the increased noise exposure (increase in the existing DNL 65 dBA contour) will occur within the City of Des Moines. Again, leaving our residents carrying most of the impacts associated with the growth in operations.

Global research indicates that elevated levels of noise exposure can result in health impacts, sleep disturbance, and impact learning. While we acknowledge the socio-economic benefits the airport brings to the region, it is crucial that growth is sustainable and does not disproportionately burden close-in communities with environmental impacts and reduced quality of life. With no mitigations identified in the Environmental Assessment, it is imperative that the Port’s update of the Part 150 study includes both noise abatement measures to reduce noise exposure and mitigation efforts, such as sound insulation for eligible homes and schools. Additional studies, including but limited to, ongoing monitoring and testing in the City of Des Moines.

A comparison of the existing conditions (2022) versus future conditions with the Proposed Action will result in an increase in daily arrivals of 14% and a 25% increase in nighttime arrivals. Nighttime operations are particularly impactful for close-in communities as this results in sleep-disturbance and awakenings which add to the health effects of aircraft noise exposure. And while the DNL 65 dBA threshold may not be exceeded for all close-in communities and residents, the effects will extend far beyond those contours and should be considered when planning for impact mitigation.

	ARRIVALS DAY	ARRIVALS NIGHT	DEPARTURES DAY	DEPARTURES NIGHT	TOTAL OPS
2022 Existing Condition	469	82	456	97	1,100
2032 Proposed Action	545	108	500	100	1,303
Difference	14%	25%	9%	3%	16%

The DNL noise metric does not adequately reflect residents' experiences with aircraft noise. This is particularly true given the current conditions within the NAS, characterized by a significantly higher number of aircraft operations/overflights and quieter aircraft (per event). Supplemental metrics, including the Number-of-Events-Above (NA) and NA night, should be utilized in the FAR Part 150 study to provide decision-makers and the public with a comprehensive understanding of both existing conditions and future changes, including those projected for the SAMP (2032). These metrics should also be considered when evaluating potential noise abatement strategies that can be applied beyond the DNL 65 dBA contours, as practiced at other airports in the United States.

The FAA's Neighborhood Environmental Survey confirmed that community noise annoyance is significantly higher than historically recorded. According to the study, 60-70% of residents are "highly annoyed" at noise exposure levels of DNL 65 dBA, and 27-37% are "highly annoyed" at levels down to DNL 55 dBA. While federal regulations mandate the use of DNL 65 dBA for certain policy decisions, impacts on residents outside this exposure level should be considered during noise compatibility planning. For SEA to truly support "sustainable" growth, it must consider the impacts on neighboring jurisdictions and the quality of life in those communities.

Health Effects

Global research indicates elevated levels of noise exposure can lead to health impacts, sleep disturbance, and impacts to learning. While we acknowledge the socio-economic benefits the airport brings to the region, it is important that growth is sustainable and does not benefit the region with only those close-in communities bearing the burden in terms of environmental impacts and reduced quality of life. The increase in aircraft operations will result in an increase in aircraft noise and emissions, both of which are known to have health effects in nearby communities. The concentration of operations over Des Moines results in greater exposure to aircraft noise and emissions for residents of Des Moines resulting in an unfair burden for our community.

Impacts on Education and Learning

Under the existing conditions (2022) there are nine (9) schools within the DNL 65 dBA. This will increase to 12 schools in both the 2032 No Action and 2032 Proposed Action scenarios. Almost half of those schools are in Des Moines. Again, federal regulations characterize this level of noise exposure as not compatible with noise-sensitive development which includes schools. Research indicates that aircraft noise exposure can impair classroom learning. And while federal regulations cite DNL 65 dBA as the threshold of what is "compatible", the growth in daily aircraft noise events

are likely to be disruptive and to impede learning, affecting many more than the 12 schools within the DNL 65 dBA contours. Health and well-being for our communities, as well as our children's education should all be carefully considered as the Port plans for growth in SEA operations and strives to sustainability when collaborating with neighboring communities.

Air Quality

Air quality is another major concern for communities surrounding the airport. The Environmental Assessment indicates increases in all critical air pollutants. Although these increases do not exceed significance thresholds according to federal guidelines, they will impact our residents, particularly vulnerable populations such as those with asthma, other respiratory conditions, and the elderly. With Des Moines located directly south of SEA, our residents are overflown by nearly all aircraft arriving or departing the airport, depending on which flow is in use. The result is ongoing and growing emissions and air pollutants from the vehicular traffic, as well as the increased ground-service equipment (GSE) and aircraft. Air pollutants including air toxins, carbon monoxide, nitrogen dioxide, ozone, and ultrafine particulate matter are negatively impacted our community by the airport according to health study results by University of Washington (MOV-UP 2019).

Surface Transportation and Congestion

Total passengers are forecast to reach 63 million annually by 2023. The 20% increase in passengers will mean a significant increase in vehicular traffic on local roads for arriving and departing passengers as well as the increase in support services such as concessionaires, vendors, employees, etc. This will result in additional impacts for our communities including more roadway congestion, increased air pollution and noise. The EA indicates the Port will mitigate these impacts through the funding of local improvements to roadways and intersections. Mitigation plans should be developed in collaboration with impacted jurisdictions.

Third Runway

While the 3rd Runway (16R-34L) is outside the scope of the Environmental Assessment, it is worth noting that the runway increased overflights of Des Moines and residents have expressed concerns with this increase. While we understand the FAA can (and does) use it as needed, we hope you will consider limiting the growth in operations and use of that runway, especially during nighttime hours. A preferential runway-use program or preferential nighttime runway-use program could limit the growth in impact for residents of Des Moines with little or no impact to airfield capacity, particularly if applied as nighttime only.

Airspace and Flight Procedure Changes

The increase in total operations will result in more aircraft noise including overnight as well as increased emissions. Ultimately, airspace and flight procedures/patterns will likely change to accommodate the increased operations in the existing airspace. Airspace and flight procedure/noise abatement changes should be thoroughly explored. These can help mediate the increase in impacts while improving efficiency and safety. The Environmental Assessment identifies specific impacts on airport-adjacent communities, and specific mitigation plans should

be developed in collaboration with these communities. Sustainable growth requires adequate and effective mitigation to offset or reduce impacts, which should be identified and prioritized in collaboration with affected communities, including the City of Des Moines.

Alternative Airports

Continued growth at SEA will result in increased impacts for more and more residents. There have been discussions and studies of expanding capacity and commercial service at other airports as well as siting a new airport as a reliever to SEA. The only truly sustainable approach to meeting demand through 2032 and beyond will be to leverage other existing facilities and/or to build another airport to provide additional capacity for commercial aviation rather than continuing to increase operations at SEA. While capacity on the landside, terminal, and airside can be expanded to improve service, this growth has a reciprocal effect on the quality of life to residents of communities including Des Moines. True sustainability cannot be accomplished solely by meeting the needs of SEA and its customers. True sustainability requires consideration and ultimately limiting the negative impacts for the cities, communities, and residents surrounding SEA.

Moving Forward

The Port should collaborate with local jurisdictions as the airport expands to ensure mutual prosperity for both the airport and its neighbors. In addition, as the FAR Part 150 moves forward to review noise contour changes, SEA should incorporate that review and findings into community communication and educations to remove silos of review and possible impact.

As previously noted, the time allotted for the public review and comment on the draft EA was grossly inadequate. Reviewing the thousands of pages of technical documentation and providing meaningful comment requires ample time and is a critical part of NEPA. Public input and input from affected jurisdictions should be a high priority for both the Port and FAA. We ask that a proper review/comment period be offered as part of the SEPA process.

In light of the recent ruling by the DC Circuit Court, which invalidated the authority of the CEQ to issue binding regulations under NEPA, and because FAA relies on CEQ's baseline for their environmental analysis related to SAMP, the City of Des Moines requests that FAA reevaluate the finding of no significant impact outside of CEQ's NEPA regulation. Alternatively, FAA is asked to take no further action until there is clarity on what is the proper environmental assessment in relation to SAMP.

While we recognize and value the economic and connectivity benefits provided by the airport, we remain committed to advocating for our communities to ensure that any negative impacts are fully considered and mitigated to the greatest extent possible.

Thank you for the opportunity to continue a productive dialogue. We look forward to your response and further discussion.

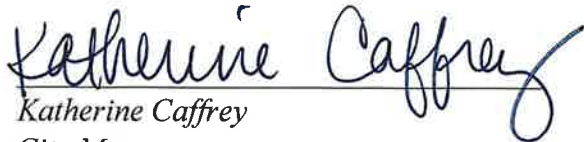
On behalf of Des Moines Residents,

A handwritten signature in black ink, appearing to read "Traci Buxton", written over a horizontal line.

Traci Buxton

Mayor

City of Des Moines

A handwritten signature in black ink, appearing to read "Katherine Caffrey", written over a horizontal line.

Katherine Caffrey

City Manager

City of Des Moines

Exhibit E

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

Form 7. Mediation Questionnaire

Instructions for this form: <https://www.ca9.uscourts.gov/forms/form07instructions.pdf>

9th Cir. Case Number(s) 25-7439

Case Name City of SeaTac et al. v. FAA

Counsel submitting this form Steven M. Taber

Represented party/parties City of SeaTac, City of Des Moines, City of Burien

Briefly describe the dispute that gave rise to this lawsuit.

This Petition for Review challenges the Federal Aviation Administration’s September 24, 2025 Finding of No Significant Impact/Record of Decision (“FONSI/ROD”) for the Seattle-Tacoma International Airport Sustainable Airport Master Plan Near-Term Projects (“SAMP NTPs”). The Cities contend that the FAA’s decision violates NEPA and FAA Order 1050.1F because the Final Environmental Assessment (“Final EA”) relied on an artificially truncated environmental baseline, failed to assess reasonably foreseeable impacts on surrounding communities, and excluded major past and present actions—thereby materially understating noise, air quality, surface transportation, and land-use effects.

The Cities further assert that FAA’s removal of cumulative-effects analysis, its failure to account for procedural changes associated with NAVAID relocations, and its reliance on constrained-operations demand modeling rendered the environmental review legally insufficient.

Briefly describe the result below and the main issues on appeal.

The FAA issued a FONSI/ROD, finding the SAMP NTPs would have no significant impact. The principal issues on appeal include:

- (1) Baseline and Past Actions: Whether FAA violated NEPA by excluding major past actions, thereby creating a false environmental baseline and materially minimizing reasonably foreseeable impacts on airport-adjacent communities.
- (2) Elimination of Cumulative-Effects Analysis: Whether FAA's removal of cumulative-effects review, based on its interpretation of the Fiscal Responsibility Act and Seven County Infrastructure Coalition v. Eagle County, is inconsistent with NEPA's statutory text and FAA Orders.
- (3) Noise and Air Quality Analysis: Whether FAA's projected operations, noise contours, and air-quality modeling unlawfully rely on constrained-growth assumptions and fail to disclose significant environmental effects on the Cities' residents.
- (4) Surface Transportation Impacts: Whether FAA failed to meaningfully address foreseeable traffic congestion and level-of-service degradation at already-strained intersections within the Cities.
- (5) Failure to Analyze Procedural Impacts: Whether the EA/ROD improperly omitted analysis of likely changes to flight paths and procedures triggered by the required relocation of NAVAIDS.

Describe any proceedings remaining below or any related proceedings in other tribunals.

There are no further proceedings pending before FAA; the FONSI/ROD is a final order under 49 U.S.C. § 46110(a).

A related case, Vashon Island Fair Skies v. FAA, Case No. 25-7373, challenges the same FAA FONSI/ROD regarding the SAMP NTPs.

The Cities are not aware of any other active tribunal proceedings directly governing the SAMP FONSI/ROD.

Signature s/Steven M. Taber

Date 12/01/2025

(use "s/[typed name]" to sign electronically-filed documents)

IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

VASHON ISLAND FAIR SKIES,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents,

PORT OF SEATTLE,

Intervenor.

Case No. 25-7373

CITY OF BURIEN, CITY OF DES
MOINES, and CITY OF SEATAC,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION, et al.,

Respondents,

PORT OF SEATTLE,

Intervenor.

Case No. 25-7439

**RESPONSE OPPOSING IN PART PETITIONERS' MOTION FOR
LEAVE TO FILE SEPARATE OPENING BRIEFS**

Respondent-Intervenor Port of Seattle (the “Port”) objects in part to Petitioners’ Joint Motion for Leave to File Separate Opening Briefs or to Exceed Type-Volume Limits in Consolidated Brief, filed on January 9, 2026. Dkt. 17.1 (“Motion”).

As a preliminary matter, to the extent Petitioners claim they need multiple briefs to avoid favoring one petitioner’s claims over the other’s, the Port does not object to applying Circuit Rule 32-2(b)’s allowance for an additional 1,400 words to a consolidated brief here. But Petitioners’ citation to two sets of consolidated cases as persuasive precedent for their request is inapt, *id.* at 8-9, as it appears petitioners in those cases retained different counsel. Here, petitioners share an attorney. If anything, efficiently allocating space and words should be simpler since one firm will do all the drafting.

Aside from logistics, petitioners do not need 23,500 (or more) words to sufficiently make their arguments in a consolidated brief. Petitioners challenge a single agency decision involving a single set of controlling facts—the Federal Aviation Administration’s September 2025 final decision to issue a Finding of No Significant Impact and Record of Decision for the Port’s Sustainable Airport Master Plan Near-Term

Projects at the Seattle-Tacoma International Airport. If Petitioners file multiple briefs, each brief will necessarily cover the same factual background, procedural history, and legal standards. The Port also disputes any suggestion that issues involving “groundside and community impacts” are entirely separate from issues involving “airspace, noise and NEPA cumulative impacts.” In fact, while each Petitioner may have identified one or more independent issues, the majority substantially overlap, including claims related to the size of the study area, *see* Motion at 20 (Petitioner VIFS), *id.* at 64 (Petitioner Cities); consideration of noise impacts and corresponding health effects, *see* Motion at 21, 40 (Petitioner VIFS), *id.* at 44-47, 49, 56-57, 61-62, 70-73, 77-78 (Petitioner Cities); and consideration of cumulative impacts, *see* Motion at 17-19 (Petitioner VIFS), *id.* at 50-51, 54, 58-59, 62, 65-66, 73, 77-78 (Petitioner Cities).

The Port does not object to a consolidated brief with a reasonable page limitation sufficient to permit petitioners to make their arguments, in line with Circuit Rule 32-2(b)’s allowance for an extra 1,400 words or another number this Court deems reasonable, but 23,500 words is excessive.

If the Court grants Petitioners additional words for their briefing, the Port requests corresponding increases for its briefing to ensure adequate opportunity to respond to Petitioners' arguments.

For the reasons stated above, the Port respectfully opposes in part Petitioners' motion.

Respectfully submitted,

/s/ Charlene Koski

Charlene Koski
Molly Lawrence
Van Ness Feldman, LLP
1191 Second Avenue
Suite 1800
Seattle, WA 98101
Tel: 206-623-9372
Email: ckoski@vnf.com
mol@vnf.com

Taylor A. Mayhall
Van Ness Feldman, LLP
2000 Pennsylvania Avenue, NW
Suite 6000
Washington, D.C. 20006
Tel: 202-298-1800
Email: tmayhall@vnf.com

Counsel for Intervenor Port of Seattle

Dated: January 20, 2026

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 27(d), I certify that the attached Motion is proportionately spaced, has a typeface of Century Schoolbook, 14-point, and contains 416 words, excluding those listed under Rule 32(f), and in compliance with the type-volume requirements of Rule 32(a), 27(d)(1)(E), and Rule 27(d)(2).

/s/ Charlene Koski
Charlene Koski
VAN NESS FELDMAN, LLP
1191 Second Avenue
Suite 1800
Seattle, WA 98101
Tel: 206-623-9372
Email: ckoski@vnf.com

Dated: January 20, 2026

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2026, I electronically filed the foregoing with the Clerk of the Court for the U.S. Court of Appeals for the Ninth Circuit by using the ACMS system. I certify that all participants in the case are registered ACMS users and that service will be accomplished by the ACMS system.

Dated at Seattle, Washington on this 20th of January, 2026.

/s/ Charlene Koski
Charlene Koski
VAN NESS FELDMAN, LLP
1191 Second Avenue
Suite 1800
Seattle, WA 98101
Tel: 206-623-9372
Email: ckoski@vnf.com

In the
UNITED STATES COURT OF APPEALS
For the Ninth Circuit

No. 25-7373
VASHION ISLAND FAIR SKIES,
Petitioner
v.
FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents

No. 25-7439
CITY OF BURIEN, *et al.*,
Petitioners,
v.
FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents

PETITIONERS VASHION ISLAND FAIR SKIES, CITY OF BURIEN,
CITY OF DESMOINES, AND CITY OF SEATAC JOINT REPLY TO
INTERVENOR PORT OF SEATTLE'S RESPONSE TO MOTION

Steven M. Taber
LEECH TISHMAN NELSON HARDIMAN, INC.
1100 Glendon Avenue, 14th Floor
Los Angeles, California 90024
Telephone: (424)738-4400; Facsimile: (424)738-5080
staber@leechtishman.com

*Attorneys for Petitioners, Vashon Island Fair Skies, City of Burien, City of Des
Moines and City of SeaTac.*

Petitioner Vashon Island Fair Skies (“Vashon,” Case No. 25-7373), and Petitioners the City of Burien, the City of Des Moines, and the City of SeaTac (the “Three Cities,” Case No. 25-7439) through undersigned counsel, hereby submit the following reply to Intervenor Port of Seattle’s (the “Port”) Response Opposing in Part Petitioners’ Motion for Leave to File Separate Opening Briefs (the “Response”).

On January 9, 2026, Petitioners filed their Joint Motion for Leave to File Separate Opening Briefs or to Exceed Type-Volume Limits in Consolidated Brief (the “Motion”). The Port filed its Response to the Motion on January 20, 2026.

I. The Identity of Counsel Does Not Resolve the Question Before the Court

In the Response, the Port argues that Vashon and the Three Cities sharing the same counsel somehow distinguishes this matter from other consolidated cases in which the Court has recognized the need for petitioners to file separate briefs. The relevant question is not who signs the briefs, but whether consolidation, combined with standard word limits, would impair the fair and complete presentation of materially distinct claims.

Nothing in the Federal Rules of Appellate Procedure or this Court’s local rules conditions briefing relief on separate representation. To the contrary, consolidation is a procedural convenience. It is not intended to function as a substantive constraint on the scope or depth of judicial review. See *Johnson v. Manhattan Ry. Co.*, 289 U.S. 479, 496–97 (1933). Where multiple petitioners advance different legal theories, rest on different standing predicates, and seek different relief, the Court routinely exercises its discretion to permit separate or enlarged briefing to ensure that consolidation does not distort advocacy.

II. Challenging the Same Agency Order Does Not Mean the Issues Are the Same

The Port’s assertion that Petitioners challenge a “single agency decision involving a single set of controlling facts” oversimplifies the nature of these consolidated petitions.

Vashon and the Three Cities advance materially different legal claims, factual predicates, and requested relief, such that a single standard-length consolidated brief, or a brief subject to only the additional 1,400 words provided for under Circuit Rule 32-2(b), would necessarily constrain counsel’s ability to fully and fairly present each client’s independent claims. Contrary to the Port’s contention in the Response, and as set forth fully in the Motion, the issues to be

argued lack significant overlap, and a single brief would need to encompass two separate suites of issues. Vashon's petition centers around airspace management, aircraft noise, cumulative impacts, and NEPA deficiencies tied to flight procedures and operational intensity. The Three Cities' petition focuses on ground-level and community impacts, land-use compatibility, transportation congestion, environmental justice, and municipal interests that arise from on-airport development and growth assumptions.

Although some factual background is necessarily shared, the legal frameworks, evidentiary emphases, and remedial concerns are not. Importantly, the standing to bring these petitions for review are fundamentally different: Vashon is a not-for profit corporation asserting organizational and representational harms, and the Three Cities are municipal corporations asserting proprietary, regulatory, and sovereign interests. These differences alone will require significant briefing. Accordingly, compressing all arguments into one 14,000-word (or 15,400 word) brief would force the Petitioners to omit or unduly truncate crucial arguments, undermining effective advocacy on each set of issues.¹

¹ The Three Cities point out that each of them had a legal right to file a separate Petition for Review. Had they done so and the matters were consolidated, the Port's arguments would have more merit since they share many (if not all) of the same issues and rely on the same theories of standing. That is not the case here.

III. Rule 32-2(b) Does Not Displace the Court's Broader Discretion

Petitioners appreciate that the Port does not oppose application of Circuit Rule 32-2(b)'s additional 1,400 words to a consolidated brief. But Rule 32-2(b) establishes a minimum accommodation. It does not limit the Court's inherent authority to manage briefing in consolidated cases.

FRAP 28(i) expressly contemplates that consolidated parties may not be able to proceed through a single brief. And FRAP 2 independently authorizes this Court, for good cause, to suspend or modify procedural rules to ensure fairness and effective review. Here, good cause is evident. Forcing Petitioners into a standard-length brief, even with a modest enlargement, would either dilute both sets of claims or require one petitioner's issues to be subordinated to another's. That outcome would be inconsistent with the purpose of consolidation and with counsel's obligation to each client.

IV. Separate or Enlarged Briefing Will Not Prejudice the Port or Respondents

Granting the requested relief will not prejudice any party. Respondents and the Port will respond to the same universe of arguments whether presented in one brief or two. Petitioners have no objection to Respondents and the Port receiving corresponding increases for their respective briefing if the Court deems them appropriate.

By contrast, the only parties that stand to suffer prejudice are Petitioners if they are not provided the opportunity to present their arguments fully and adequately to the Court. Denying relief risks concrete prejudice to Petitioners by constraining the presentation of distinct claims that are properly before the Court.

This issue goes beyond simple practical or logistical concerns, as counsel has an obligation to ensure that each client's distinct interests and theories are fully developed and not subordinated within a single, compressed presentation. Petitioners respectfully submit that in order to do so, either separate briefs or an expanded consolidated brief of 23,500 words is necessary.

V. Ninth Circuit Practice Confirms the Appropriateness of Relief

This Court has, in other consolidated FAA cases, permitted separate opening briefs where petitioners raised distinct issues arising from the same agency action. Such practice reflects a pragmatic recognition that judicial efficiency is best served by clear, focused briefing—not by forcing unrelated theories into an artificially compressed format.

VI. Conclusion

For these reasons, Petitioners respectfully ask that the Court grant the Motion and permit either (1) the filing of separate opening briefs, each subject to the standard word limit in accordance with Circuit Rule 32-1(a), or (2) a

consolidated opening brief with an expanded type-volume limit to 23,500 words which would be sufficient to allow full and fair presentation of all claims.

Dated: January 27, 2026

LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber
Steven M. Taber
*Attorneys for the Petitioners, Vashon
Island Fair Skies, City of Burien, City of
Des Moines, and City of SeaTac*

CERTIFICATE OF COMPLIANCE

I certify that the foregoing Reply complies with the type-volume limitations of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 964 words. I further certify that this Reply complies with the typeface requirements of and the type-style requirements of Federal Rule of Appellate Procedure 27(d)(1)(E) because it has been prepared in a proportionally spaced typeface using Microsoft Word in Times New Roman 14-point font.

Respectfully Submitted,

Dated: January 27, 2026

LEECH TISHMAN NELSON HARDIMAN, INC.

By: Steven M. Taber

Steven M. Taber

*Attorneys for the Petitioners, Vashon
Island Fair Skies, City of Burien, City of
Des Moines, and City of SeaTac*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document on this date with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the Appellate Electronic Filing system.

Service on Case Participants Who Are Registered for Electronic Filing:

I certify that I served the foregoing document to all registered case participants on this date via filing and notice generated through the Appellate Electronic Filing system.

Description of Document(s) Motion:

**PETITIONERS VASHION ISLAND FAIR SKIES, CITY OF BURIEN,
CITY OF DESMOINES, AND CITY OF SEATAC JOINT REPLY TO
INTERVENOR PORT OF SEATTLE’S RESPONSE TO MOTION**

Respectfully Submitted,

Dated: January 27, 2026

LEECH TISHMAN NELSON HARDIMAN INC.

By: Steven M. Taber
Steven M. Taber

*Attorneys for the Petitioners, Vashon
Island Fair Skies, City of Burien, City of
Des Moines, and City of SeaTac*

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FILED

FEB 5 2026

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

VASHON ISLAND FAIR SKIES, a
Washington nonprofit corporation,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION,

Respondent,

PORT OF SEATTLE,

Intervenor.

No. 25-7373

Federal Aviation Administration

ORDER

CITY OF BURIEN, Washington municipal
corporations; et al.,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION; et al.,

Respondents,

PORT OF SEATTLE,

Intervenor.

No. 25-7439

Federal Aviation Administration

The motion (Docket Entry No. 17) for leave to file separate opening briefs is denied.

The motion (included in Docket Entry No. 17) for leave to file an oversized consolidated opening brief is denied without prejudice to filing a renewed motion accompanied by a copy of the proposed oversized brief. *See* 9th Cir. R. 32-2(a).

The consolidated opening brief remains due March 30, 2026. The consolidated answering brief is due April 29, 2026. Intervenor's consolidated brief is due May 13, 2026. The optional consolidated reply brief is due 21 days after intervenor's brief is served.

FOR THE COURT:

MOLLY C. DWYER
CLERK OF COURT

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

No. 25-7373

VASHON ISLAND FAIR SKIES,
Petitioner,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

No. 25-7439

CITY OF BURIEN, *et al.*,
Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

Petitions for Review of an Order by the Federal Aviation Administration

MOTION TO EXTEND ADMINISTRATIVE RECORD DEADLINE

Of Counsel:

PATRICIA DEEM

Attorney

Office of the Chief Counsel

Federal Aviation Administration

ADAM R.F. GUSTAFSON

Principal Deputy Assistant Attorney General

REBECCA JAFFE

CHRISTOPHER HAIR

Attorneys

Environment and Natural Resources Division

U.S. Department of Justice
Post Office Box 7415
Washington, D.C. 20044
(202) 598-0983
christopher.hair@usdoj.gov

Respondent the Federal Aviation Administration (“FAA”) respectfully moves for an extension of time, i.e., from February 17, 2026, to **March 19, 2026**, to file the administrative record in the above-captioned consolidated cases. This is Respondents’ second motion to extend the administrative record deadline. Undersigned counsel for Respondent conferred with counsel for Petitioners and Intervenors and neither oppose the requested relief.

There is good cause for the extension. The FAA requires additional time to prepare and file the administrative record because of the long history of the agency action at issue in this litigation, which requires the FAA to compile and review numerous documents underlying the agency action. Also, while the FAA has been diligent and has made significant progress in its efforts to prepare the administrative record, the recent lapse in federal appropriations¹ has impacted the FAA’s ability to meet its current deadline. The FAA therefore requires a reasonable amount of additional time (i.e., 30 days) to complete the process of compiling and reviewing the administrative record pursuant to Rule 17 of the Federal Rules of Appellate Procedure. *See also* Ninth Circuit Rule 17-1.

¹ The FAA’s appropriations lapsed from January 31, 2026, until February 3, 2026.

For the foregoing reasons, the Court should extend the administrative record deadline to March 19, 2026.

Respectfully submitted,

ADAM R.F. GUSTAFSON
Principal Deputy Assistant Attorney General

Of Counsel:

PATRICIA DEEM
Attorney
Office of the Chief Counsel
Federal Aviation Administration

/s/ Christopher Hair
REBECCA JAFFE
CHRISTOPHER HAIR
Attorneys
Environment and Natural Resources Division
U.S. Department of Justice
Post Office Box 7415
Washington, D.C. 20044
(202) 598-0983
christopher.hair@usdoj.gov

Dated: February 11, 2026

90-13-1-18042

CERTIFICATE OF COMPLIANCE

I hereby certify:

1. This document complies with the type-volume limitation of Federal Rule of Appellate Procedure 27(d)(2) because, excluding the parts of the document exempted by Rule 32(f), this document contains 200 words.

2. This document complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Rule 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font.

/s/ Christopher Hair
CHRISTOPHER HAIR
Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2026, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the Appellate Electronic Filing system. I also used the Appellate Electronic Filing system to serve all registered case participants.

/s/ Christopher Hair
CHRISTOPHER HAIR
Counsel for Respondent

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FILED

FEB 17 2026

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

VASHON ISLAND FAIR SKIES, a
Washington nonprofit corporation,

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION,

Respondent,

PORT OF SEATTLE,

Intervenor.

No. 25-7373

Federal Aviation Administration

ORDER

CITY OF BURIEN, Washington municipal
corporations; et al.,

Petitioners,

v.

FEDERAL AVIATION
ADMINISTRATION; et al.,

Respondents,

PORT OF SEATTLE,

Intervenor.

No. 25-7439

Federal Aviation Administration

The motion (Docket Entry No. 24) for an extension of time to file the certified administrative record is granted. The certified administrative record is due March 19, 2026.

The consolidated opening brief is now due April 28, 2026. The consolidated answering brief is due May 28, 2026. Intervenor's consolidated brief is due June 11, 2026. The optional consolidated reply brief is due 21 days after intervenor's brief is served.

FOR THE COURT:

MOLLY C. DWYER
CLERK OF COURT

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

No. 25-7373

VASHON ISLAND FAIR SKIES,
Petitioner,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

No. 25-7439

CITY OF BURIEN, *et al.*,
Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION, *et al.*,
Respondents.

Petitions for Review of an Order by the Federal Aviation Administration

CERTIFIED INDEX TO THE ADMINISTRATIVE RECORD

Of Counsel:

PATRICIA DEEM

Attorney

Office of the Chief Counsel

Federal Aviation Administration

ADAM R.F. GUSTAFSON

Principal Deputy Assistant Attorney General

REBECCA JAFFE

CHRISTOPHER HAIR

Attorneys

Environment and Natural Resources Division

U.S. Department of Justice

Post Office Box 7415

Washington, D.C. 20044
(202) 598-0983
christopher.hair@usdoj.gov

Respondents hereby provide notice to the Court and parties that the administrative record for the above-captioned case is available. Attached to this filing are the following documents:

1. A certification from the Federal Aviation Administration that the materials described in the attached list constitute the complete administrative record for these petitions, which challenge the agency's September 24, 2025, Finding of No Significant Impact/Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport.
2. The certified index to that record.

The United States is making the documents in the administrative record available to the Petitioners via a Box.com link provided to counsel for Petitioners and Intervenors on March 19, 2026.

Respectfully submitted,

ADAM R.F. GUSTAFSON
Principal Deputy Assistant Attorney General

Of Counsel:

PATRICIA DEEM
Attorney
Office of the Chief Counsel
Federal Aviation Administration

/s/ Christopher Hair
REBECCA JAFFE
CHRISTOPHER HAIR
Attorneys
Environment and Natural Resources Division
U.S. Department of Justice
Post Office Box 7415
Washington, D.C. 20044
(202) 598-0983
christopher.hair@usdoj.gov

Dated: March 19, 2026

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2026, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the Appellate Electronic Filing system. I also used the Appellate Electronic Filing system to serve all registered case participants.

/s/ Christopher Hair
CHRISTOPHER HAIR
Counsel for Respondent

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

VASHON ISLAND FAIR SKIES,
a Washington nonprofit corporation

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION

Respondent,

PORT OF SEATTLE

Intervenor

Case No. 25-7373

CITY OF BURIEN, Washington
municipal corporations: et al.

Petitioner,

v.

FEDERAL AVIATION
ADMINISTRATION

Respondent,

PORT OF SEATTLE

Intervenor

Case No. 25-7439

**CERTIFIED INDEX OF THE MATERIALS COMPRISING THE
ADMINISTRATIVE RECORD FOR THE FEDERAL AVIATION
ADMINISTRATION FINDING OF NO SIGNIFICANT IMPACT/RECORD
OF DECISION FOR THE SUSTAINABLE MASTER PLAN NEAR-TERM
PROJECTS AT THE SEATTLE-TACOMA INTERNATIONAL AIRPORT
ISSUED SEPTEMBER 24, 2025**

I, Kandice N. Krull, am currently employed as an Environmental Protection Specialist at the Federal Aviation Administration's Denver Airports District Office, a field office within the Office of Airports. In this role, I am responsible for providing oversight and support for certain federal actions taken by the Federal Aviation Administration, including the environmental review and public involvement process for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport, including involvement in the preparation of the associated Environmental Assessment.

I hereby certify to the best of my knowledge that the materials described in the attached categorized list constitute the complete administrative record for the Federal Aviation Administration's September 24, 2025, Finding of No Significant Impact/Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport.



Kandice N. Krull
Environmental Protection Specialist
Federal Aviation Administration

March 18, 2026

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

Starting Bates #	Ending Bates #	Title/Description
Section 1: Final Environmental Assessment		
SEA SAMP NTP FONSI-ROD		
AR000001	AR000024	Finding of No Significant Impact (FONSI) and Record of Decision (ROD)
SEA SAMP NTP Final EA		
AR000025	AR000048	SEA SAMP NTP Final EA -Table of Contents Errata Acronyms
AR000049	AR000062	SEA SAMP NTP Final EA -Chapter 1 - Purpose and Need
AR000063	AR000076	SEA SAMP NTP Final EA -Chapter 2 - Alternatives
AR000077	AR000172	SEA SAMP NTP Final EA -Chapter 3 - Affected Environment
AR000173	AR000260	SEA SAMP NTP Final EA -Chapter 4 - Environmental Consequences
AR000261	AR000262	SEA SAMP NTP Final EA -Chapter 5 - Cumulative Impacts
AR000263	AR000266	SEA SAMP NTP Final EA -Chapter 6 - List of Preparers
AR000267	AR000270	SEA SAMP NTP Final EA -Chapter 7 - References
AR000271	AR000422	SEA SAMP NTP Final EA-Appendix A-Forecast and Operational Assumptions
AR000423	AR000620	SEA SAMP NTP Final EA-Appendix B-Purpose & Need & Alternatives
AR000621	AR001050	SEA SAMP NTP Final EA-Appendix C-Air Quality/Greenhouse Gas Emissions
AR001051	AR002034	SEA SAMP NTP Final EA-Appendix D-Biological Resources
AR002035	AR002046	SEA SAMP NTP Final EA-Appendix E-Coastal Resources
AR002047	AR002307	SEA SAMP NTP Final EA-Appendix F-Hazardous Materials & Solid Waste
AR002308	AR002453	SEA SAMP NTP Final EA-Appendix G-Historic Resources
AR002454	AR002628	SEA SAMP NTP Final EA-Appendix H-Land Use
AR002629	AR002655	SEA SAMP NTP Final EA-Appendix I-Natural Resources & Energy Supply
AR002656	AR002964	SEA SAMP NTP Final EA-Appendix J-Noise & Noise Compatible Land Use
AR002965	AR003008	SEA SAMP NTP Final EA-Appendix K-Socioeconomics & Children's Health
AR003009	AR003170	SEA SAMP NTP Final EA-Appendix L-Surface Transportation
AR003171	AR004661	SEA SAMP NTP Final EA-Appendix L-Surface Transportation-Information Available by Request
AR004662	AR004981	SEA SAMP NTP Final EA-Appendix M-Water Resources

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

AR004982	AR005931	SEA SAMP NTP Final EA-Appendix M-Water Resources-Information Available by Request
AR005932	AR008160	SEA SAMP NTP Final EA-Appendix N-Scoping
AR008161	AR009306	SEA SAMP NTP Final EA-Appendix O-Agency & Public Engagement
AR009307	AR010151	SEA SAMP NTP Final EA-Appendix O-Agency & Public Engagement-Submitted Studies & Materials
Section 2: Draft Environmental Assessment		
SEA SAMP NTP Draft EA		
AR010152	AR010164	SEA SAMP NTP Draft EA -Table of Contents & Acronyms
AR010165	AR010178	SEA SAMP NTP Draft EA -Chapter 1 - Purpose and Need
AR010179	AR010192	SEA SAMP NTP Draft EA -Chapter 2 - Alternatives
AR010193	AR010304	SEA SAMP NTP Draft EA -Chapter 3 - Affected Environment
AR010305	AR010396	SEA SAMP NTP Draft EA -Chapter 4 - Environmental Consequences
AR010397	AR010414	SEA SAMP NTP Draft EA -Chapter 5 - Cumulative Impacts
AR010415	AR010418	SEA SAMP NTP Draft EA -Chapter 6 - List of Preparers
AR010419	AR010422	SEA SAMP NTP Draft EA -Chapter 7 - References
AR010423	AR010574	SEA SAMP NTP Draft EA-Appendix A-Forecast and Operational Assumptions
AR010575	AR010772	SEA SAMP NTP Draft EA-Appendix B-Purpose & Need & Alternatives
AR010773	AR011214	SEA SAMP NTP Draft EA-Appendix C-Air Quality/Greenhouse Gas Emissions
AR011215	AR011446	SEA SAMP NTP Draft EA-Appendix D-Biological Resources
AR011447	AR011458	SEA SAMP NTP Draft EA-Appendix E-Coastal Resources
AR011459	AR011719	SEA SAMP NTP Draft EA-Appendix F-Hazardous Materials & Solid Waste
AR011720	AR011851	SEA SAMP NTP Draft EA-Appendix G-Historic Resources
AR011852	AR012026	SEA SAMP NTP Draft EA-Appendix H-Land Use
AR012027	AR012053	SEA SAMP NTP Draft EA-Appendix I-Natural Resources & Energy Supply
AR012054	AR012360	SEA SAMP NTP Draft EA-Appendix J-Noise & Noise Compatible Land Use
AR012361	AR012429	SEA SAMP NTP Draft EA-Appendix K-Socioeconomics & Children's Health
AR012430	AR012591	SEA SAMP NTP Draft EA-Appendix L-Surface Transportation

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

AR012592	AR014082	SEA SAMP NTP Draft EA-Appendix L-Surface Transportation-Information Available by Request
AR014083	AR014260	SEA SAMP NTP Draft EA-Appendix M-Water Resources
AR014261	AR015210	SEA SAMP NTP Draft EA-Appendix M-Water Resources-Information Available by Request
AR015211	AR017439	SEA SAMP NTP Draft EA-Appendix N-Scoping
AR017440	AR017442	SEA SAMP NTP Final EA-Appendix O-Agency & Public Engagement
SEA SAMP NTP Draft EA Notices and Public Resources		
Notice of Upcoming Release		
AR017443	AR017450	SAMP 30-Day Notice Fact Sheet
AR017451	AR017451	Notification on Port of Seattle Facebook Page on Upcoming Release of Draft EA
AR017452	AR017453	Notification on Port of Seattle LinkedIn Page on Upcoming Release of Draft EA
AR017454	AR017454	Notification on Port of Seattle X Account on Upcoming Release of Draft EA
AR017455	AR017457	Press Release
AR017458	AR017459	Frequently Asked Questions
AR017460	AR017461	Notification of Upcoming Release
AR017462	AR017463	Notification of Upcoming Release - Amharic
AR017464	AR017465	Notification of Upcoming Release - Chinese
AR017466	AR017467	Notification of Upcoming Release - Korean
AR017468	AR017469	Notification of Upcoming Release - Soomaali
AR017470	AR017471	Notification of Upcoming Release - Spanish
AR017472	AR017473	Notification of Upcoming Release - Vietnamese
AR017474	AR017477	Frequently Asked Questions - Amharic
AR017478	AR017481	Frequently Asked Questions - Chinese
AR017482	AR017485	Frequently Asked Questions - Korean
AR017486	AR017489	Frequently Asked Questions - Soomaali
AR017490	AR017493	Frequently Asked Questions - Spanish
AR017494	AR017497	Frequently Asked Questions - Vietnamese
Notice of Availability		

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

AR017498	AR017499	Postcard Mailer with Translations
AR017500	AR017501	Notice of Availability - Snail Mail Letter
AR017502	AR017502	Draft EA notifications schedule
AR017503	AR017503	Legal Notification - Daily Journal of Commerce
AR017504	AR017505	Legal Notification - Seattle Times
AR017506	AR017506	Notification of Availability of DEA on Port of Seattle Facebook Page
AR017507	AR017507	Notification of Availability of DEA on Port of Seattle LinkedIn Page
AR017508	AR017508	Notification of Availability of DEA on Port of Seattle X Account
AR017509	AR017513	Port of Seattle Connections Email with Notification of Availability of DEA
AR017514	AR017515	Port of Seattle Email Notification of Availability of DEA
AR017516	AR017517	Port of Seattle NEPA Email Notification of Availability of DEA
AR017518	AR017521	Press Release
AR017522	AR017522	Digital AD 1 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017523	AR017523	Digital AD 2 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017524	AR017524	Digital AD 3 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017525	AR017525	Digital AD 4 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017526	AR017526	Digital AD 5 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017527	AR017527	Digital AD 6 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017528	AR017528	Digital AD 7 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017529	AR017529	Digital AD 8 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017530	AR017530	Digital AD 9 Ran Between 10/23/24-11/15/24 in Multiple Publications
AR017531	AR017531	El Siete Dias Ad - Spanish Ran Between 10/23/24-11/15/24
AR017532	AR017532	International Examiner Ad Ran Between 10/23/24-11/15/24
AR017533	AR017533	Runtanews.com - English (short) Ran Between 10/23/24-11/15/24
AR017534	AR017534	Runtanews.com - English (long) Ran Between 10/23/24-11/15/24
AR017535	AR017535	Runtanews.com - Soomalli (short) Ran Between 10/23/24-11/15/24
AR017536	AR017536	Runtanews.com - Soomalli (long) Ran Between 10/23/24-11/15/24
AR017537	AR017538	Open House Guide

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

AR017539	AR017568	Public Meeting Boards
AR017569	AR017570	Email notifying public meeting attendees of flyer with misprint
AR017571	AR017572	Second email notifying public meeting attendees of flyer with misprint
AR017573	AR017575	Notification Materials Requested Added to Website & Locations of Hard Copy
AR017576	AR017576	Notification Web Portal Stopped Accepting Comments Early
AR017577	AR017577	Discussion on what the message should say on public website
AR017578	AR017585	List of All Updates to Project Website
SEA SAMP NTP Draft EA – Comment Period Extension Requests and Notices		
AR017586	AR017587	SEA Request to Extend Comment Period
AR017588	AR017590	FAA Agreement to Extend Comment Period to 45 Days
AR017591	AR017591	Request for Comment Period Extension to 60 Days
AR017592	AR017592	Request for Comment Period Extension by 35 Days
AR017593	AR017594	FAA Response to Port of Seattle Commissioner Request For Extension
AR017595	AR017595	Request for Comment Period Extension by 35 Days
AR017596	AR017597	Updated Master Plan vs EA Handout
AR017598	AR017598	Updated Public Comment Process Handout
AR017599	AR017602	Updated Frequently Asked Questions
AR017603	AR017604	Legal Notification of Comment Period Extension - Daily Journal of Commerce
AR017605	AR017605	Legal Notification of Comment Period Extension - Seattle Times
AR017606	AR017607	FAA Response to Earthjustice's Request for Comment Period Extension
AR017608	AR017609	Notification of Public Comment Extension - Email
AR017610	AR017610	Notification of Public Comment Extension - Facebook
AR017611	AR017611	Notification of Public Comment Extension - LinkedIn
AR017612	AR017612	Notification of Public Comment Extension - EX
AR017613	AR017616	Notification to Submit Extension Requests Directly to the FAA
AR017617	AR017620	Forward of Congressman Smith's Informal Extension Request
SEA SAMP NTP Draft EA - Late Comments		
AR017621	AR017621	Late comment submittal from Melissa Beatty
AR017622	AR017622	Late comment submittal from Tim Gould

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

AR017623	AR017625	Late comment submittal from Kathy Dooley
AR017626	AR017629	Late comment submittal from Sandra Locklear
AR017630	AR017631	Late comment submittal from Mary Olsen
AR017632	AR017632	Late comment submittal from Hannah Alhajahja
AR017633	AR017634	Late comment submittal from Barbara Petersen
AR017635	AR017636	Late comment submittal from Stephanie Kenick
AR017637	AR017638	Late comment submittal from Joe Vinson
AR017639	AR017640	Late comment submittal from Eileen Lambert
AR017641	AR017646	Late comment submittal from Yoshiko Grace Matsui
AR017647	AR017647	Late comment submittal from Elizabeth Burn
Section 3: Resource Categories – Technical Analyses, Reports, and Agency Coordination		
Air Quality & GHG		
AR017648	AR017648	Submittal of preliminary final AQ and Climate Protocol
AR017649	AR017650	Submittal of FAA comments on AQ and Climate Protocol
AR017651	AR017651	Email Submittal of AQ Protocol to the Puget Sound Clean Air Agency (PSCAA)
AR017652	AR017653	PSCAA Agreement to Provide Comments by Deadline
AR017654	AR017655	PSCAA Comments on AQ Protocol
AR017656	AR017658	Inclusion of FAA in PSCAA approval of SEAP AQ Protocol
AR017659	AR017660	Landrum & Brown Email to EPA on King County WA Air Quality Status
AR017661	AR017662	Discussion on how projects with no FAA authority impact AQ analysis
AR017663	AR017663	Port Email Preliminary AQ Results to PSCAA
AR017664	AR017665	PSCAA Determination Project will not Cause Exceedance of NAAQS
AR017666	AR017667	Notification that the AQ analysis for vehicle emissions needs to be updated
AR017668	AR017669	FAA concerns with methodology for discussion
AR017670	AR017672	PSCAA Availability for Meeting to Discuss AQ Analysis
AR017673	AR017680	Updated presentation for call with PSCAA
AR017681	AR017701	Submittal of revised air quality protocol
AR017702	AR017704	Discussion on General Conformity and How it Relates to the Project
AR017705	AR017726	Confirmation of receipt of FAA comments on AQ Protocol

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
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AR017727	AR017728	Submittal of revised air quality protocol
AR017729	AR017731	FAA comments on air quality protocol
AR017732	AR017732	Submittal of Updated AQ Protocol to PSCAA for Review
AR017733	AR017734	PSCAA Agreement to Provide Comments by Deadline
AR017735	AR017735	SEA Questions on GHG Guidance for Discussion
AR017736	AR017737	PSCAA Comments on AQ Protocol
AR017738	AR017738	Contradictory guidance on how to model aircraft GHG emissions
AR017739	AR017741	Explanation of why using taxi times for 2027 and 2032
AR017742	AR017745	Confirmation that they can continue to use TAAM taxi times
AR017746	AR017746	FAA Comments on revised air quality protocol
AR017747	AR017747	Revised AQ protocol in response to PSCAA comments
AR017748	AR017749	Request to Schedule Meeting to Discuss Mixing Height
AR017750	AR017751	Submittal of Updated AQ Protocol to PSCAA for Review
AR017752	AR017753	Acknowledgement of Receipt of Submitted Updated AQ Protocol
AR017754	AR017754	Port Email Submitting Climate Protocol to PSCAA for Review
AR017755	AR017755	PSCAA Agreement to Provide Comments by Deadline
AR017756	AR017756	PSCAA Comments on Climate Protocol
AR017757	AR017758	Acknowledgement of Receipt of PSCAA Comments
AR017759	AR017761	Discussion on update to text in AQ Protocol related to APU
AR017762	AR017783	Submittal of updated climate protocol in response to PSCAA comments
AR017784	AR017786	Submittal of FAA comments to climate protocol changes
AR017787	AR017788	Submittal of updated climate protocol with request for guidance
AR017789	AR017794	Discussion on Emission Increases in Attainment Areas
AR017795	AR017796	FAA responses to request for guidance on climate protocol
AR017797	AR017798	Port Email Submitting Updated Climate Protocol to PSCAA
AR017799	AR017801	PSCAA Comments on Climate Protocol
AR017802	AR017805	SEA acknowledgement did not include FAA comments in submittal to PSCAA
AR017806	AR017809	FAA Responses to PSCAA Comments on Climate Protocol

Federal Aviation Administration -- Administrative Record for Finding of No Significant Impact/
Record of Decision for the Sustainable Airport Master Plan Near-Term Projects at the Seattle-Tacoma International Airport

AR017810	AR017813	Submittal of Preliminary AQ Results
AR017814	AR017816	Thanks for Review and Agreement to Provide Full Results
AR017817	AR017822	Discussion on issues with AEDT 3F and boiler emissions
AR017823	AR017823	Preliminary air quality results using AEDT 3F
AR017824	AR017824	Comparison of AEDT 3E results vs AEDT 3F
Biological		
AR017825	AR017827	Introductions and Discussion on Consultation Process
AR017828	AR017829	Submittal of draft stormwater report (water resources)
AR017830	AR017832	Update on Biological Assessment Development Process
AR017833	AR017834	Submittal of Preliminary BA for NMFS Review
AR017835	AR017836	Acknowledgement of Receipt of Submitted BA
AR017837	AR017838	Email Check-In to Get Updated on Review
AR017839	AR017840	NMFS Initial Comments on Preliminary BA for FAA Consideration
AR017841	AR017842	NMFS Email Requesting Additional Information to Determine Consultation
AR017843	AR017847	Agreement with NMFS that biologist needed to finish report
AR017848	AR017850	NMFS Section Chief joining 4/26/24 call
AR017851	AR017853	Update on Confluence development of BA
AR017854	AR017856	Acknowledgement of submitted comments & update on process
AR017857	AR017857	Update on progress of BA update
AR017858	AR018060	Submittal of updated Final Draft BA
AR018061	AR018062	FAA decision to have BA based on existing science
AR018063	AR018066	Updated information for the Biological Evaluation
AR018067	AR018067	Submittal of working BE for review
AR018068	AR018070	FAA request & SEA submittal of additional studies
AR018071	AR018189	Fall 2017 and Spring 2018 Rainbow Trout In Situ Results
AR018190	AR018343	Fall 2018 and Spring 2019 Rainbow Trout In Situ Results
AR018344	AR018495	Fall 2019 and Spring 2020 Rainbow Trout In Situ Results

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AR018496	AR018706	Fall 2020 and Spring 2021 Rainbow Trout In Situ Results
AR018707	AR018745	Fall 2021 and Spring 2022 Rainbow Trout In Situ Results
AR018746	AR018933	Fall 2022 and Spring 2023 Rainbow Trout In Situ Results
AR018934	AR018936	Submittal of 6PPD-Q test results
AR018937	AR018940	Request to Resubmit Informal Consultation Request to Six Different Emails
AR018941	AR018941	Notification of NMFS Priorities and Delay in Review
AR018942	AR018943	FAA's Resubmittal of Informal Consultation w/ BE to NMFS & USFWS - Part 1
AR018944	AR018946	FAA's Resubmittal of Informal Consultation w/ BE to NMFS & USFWS - Part 2
AR018947	AR018947	FAA's Resubmittal of Informal Consultation w/ BE to NMFS and USFWS - Part 3
AR018948	AR018948	Resubmittal of Informal Consultation w/ BE to NMFS and USFWS - Part 4
AR018949	AR018949	FAA's Resubmittal of Informal Consultation w/ BE to NMFS & USFWS - Part 5
AR018950	AR018950	FAA's Resubmittal of Informal Consultation w/ BE to NMFS & USFWS - Part 6
AR018951	AR018957	Discussion on ways to Submit Rainbow Trout Study too Large for Email
AR018958	AR018963	USFWS Receipt of Submittal and Notification Submittal has Been Logged
AR018964	AR018965	NOAA Receipt of Submittal and Notification Submittal has Been Logged
AR018966	AR018966	NMFS Provided Contact Person for Submittal of Large File
AR018967	AR018967	Realization Issue Already Resolved
AR018968	AR018969	Submittal of Rainbow Trout 2023 Report
AR018970	AR018970	Receipt of Rainbow Trout 2023 Report
AR018971	AR018971	NOAA Non-concurrence Email
AR018972	AR018973	Provided POC to get NOAA Attorney Contact Information
AR018974	AR018974	Provided NOAA Attorney Contact Information
AR018975	AR018976	Confirmation Bonnie Shorin is POC for Project until Position is Filled
AR018977	AR018980	Coordination of Calendars to Schedule Meeting Between FAA and NMFS
AR018981	AR018981	Acknowledgment Received Invite but Notifying Haven't Reviewed
AR018982	AR018982	Notification of Phased Retirement and New Branch Chief
AR018983	AR018983	Notification of Phased Retirement and New Branch Chief
AR018984	AR018985	Notification Bonnie can Attend for Day Lowry

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AR018986	AR018986	Summary of call with NOAA and request for additional information
AR018987	AR019051	Provided information requested 3/13/25
AR019052	AR019053	FAA Submittal of Information Requested by NMFS During 3/13/25 Meeting
AR019054	AR019056	Update on Review of Information Submitted 4/10/25
AR019057	AR019061	NOAA Non-concurrence Email
AR019062	AR019067	Coordination of Calendars to Schedule Meeting Between FAA and NMFS
AR019068	AR019068	Submittal of Presentation & Information Requested from 5/14/25
AR019069	AR019075	Notification Project was Closed Out on NMFS End
AR019076	AR019082	Notification of Need to Resubmit Consultation Request
AR019083	AR019086	Coordination of Calendars to Schedule Meeting Between FAA and NMFS
AR019087	AR019090	Notification FAA Attorney will be Joining Call
AR019091	AR019092	FAA Email with Agenda for FAA/NMFS Meeting
AR019093	AR019095	Response to NMFS Request for Meeting Attendees
AR019096	AR019096	Request for Information to Support Formal Consultation Requirement
AR019097	AR019098	Submittal of Information Requested on 6/18/25
AR019099	AR019104	Consultation Request Letter as Requested by NOAA
AR019105	AR019109	Notification of Receipt of Submittal
AR019110	AR019111	Notification of Receipt of Consultation Letter
AR019112	AR019118	Notification of Receipt of Submittal and Project Number
AR019119	AR019119	NOAA Biological Opinion Letter and Document
AR019120	AR019120	Notification of USFWS Non-concurrence Email
AR019121	AR01923	FAA Response to Non-concurrence Notification
AR019124	AR019127	Email Chain Between FAA and USFWS Discussing Schedule and Review Time
AR019128	AR019130	Email Chain Between FAA and USFWS Discussing Schedule and Review Time
AR019131	AR019131	Notification that Steve spoke with Logan Kent to get an update
AR019132	AR019133	Clarification that Port funds Logan Kent's position
AR019134	AR019142	USFWS Response to Request for Expedited Review

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AR019143	AR019144	Concerns BO Not Compliant with EO 14303
AR019145	AR019149	Concerns BO Not Compliant with EO 14303
AR019150	AR019156	Email Discussion on Status of Project Review
AR019157	AR019159	FAA Preference not to see BO Before Issued
AR019160	AR019160	Reminder for Responses to EFH Conservation Recommendations
AR019161	AR019161	Unofficial Submittal of USFWS BO
AR019162	AR019163	Forward of USFWS status update
AR019164	AR019164	Thanks for effort provided in review
AR019165	AR019166	Submittal of EFH Conservation Recommendations
AR019167	AR019169	Acknowledgement of Receipt of EFH CR
Coastal Zone		
AR019170	AR019173	Submittal of Questions on When Consistency Finding Required
AR019174	AR019181	Email Discussion on when a Consistency Finding is Required
AR019182	AR019182	Forward of WSDE Letter
AR019183	AR019184	Coordination of Calendars to Schedule Meeting
AR019185	AR019186	Email Discussion on when a Consistency Finding is Required
AR019187	AR019189	Submittal of Consistency Determination Template
AR019190	AR019194	Submittal of Information Needed to Determine if Consistency Finding Required
AR019195	AR019200	Update on Coordination with NOAA
AR019201	AR019206	Update on Coordination with NOAA
AR019207	AR019210	Email Clarifying Consistency Finding Only Required for FAA Actions
AR019211	AR019215	Discussion on Wetland Permits and Consistency Determinations
Forecast		
AR019216	AR019219	Questions on FAA's forecast guidance
AR019220	AR019224	Questions on FAA's forecast guidance
AR019225	AR019225	FAA comments and edits to updated forecast email
AR019226	AR019228	Questions on responses to forecast comments
AR019229	AR019232	Response to 8/13/19 questions
AR019233	AR019236	Request for clean copy of forecast to proceed with approval

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AR019237	AR019278	Final Aviation Activity Forecast Update report
AR019279	AR019288	Final Constrained Growth Scenario report
AR019289	AR019291	Forecast Approval
AR019292	AR019292	Submittal of modeling assumptions for no action
AR019293	AR019294	Submittal of FAA comments on modeling assumptions
AR019295	AR019298	Request for update on review of updated modeling approach
AR019299	AR019303	Confirmation of FAA concurrence & moving forward with analysis
AR019304	AR019304	Submittal of TAAM taxi times summaries for future NA and PA
AR019305	AR019307	Submittal of runway use tables for TAAM Modeling
AR019308	AR019308	Submittal of updated modeling approach & updated TAAM taxi times
AR019309	AR019309	Submittal of final No Action modeling assumptions for FAA records
AR019310	AR019310	SEA Email on COVID-19 Effects on SEA's operations & Project Status
AR019311	AR019312	Acknowledgement of SEA email on COVID-19
AR019313	AR019313	FAA provided recommended induced demand text to SEA
AR019314	AR019314	SEA's proposed revisions to induced demand text
AR019315	AR019316	Submittal of preliminary updated unconstrained forecast
AR019317	AR019341	Confirmation of receipt of FAA comments on forecast
AR019342	AR019345	Submittal of Proposed Methodology for COGS
AR019346	AR019350	Submittal of supporting documentation for updated COGS
AR019351	AR019352	Submittal of FAA comments on COGS supporting documentation
AR019353	AR019354	FAA conditional approval of COGS - need final report
AR019355	AR019355	Submittal of updated forecast and COGS for approval
AR019356	AR019356	Submittal of FAA comments on updated COGS
AR019357	AR019358	Confirmation no additional comments on updated forecast
AR019359	AR019370	Submittal of updated COGS based on comments
AR019371	AR019371	FAA letter of approval for SEA activity forecast update
AR019372	AR019373	Discussion on why SEA is updating forecast in midst of EA
AR019374	AR019378	Discussion on changes made between 2021 and 2022 forecasts

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AR019379	AR019379	Explanation of cargo operations not changing in COGS
AR019380	AR019383	Notification FAA okay with data sources
AR019384	AR019386	Submittal of updated Draft Forecast Memo
AR019387	AR019387	Approval to move forward with preparing future fleet mix tables
AR019388	AR019390	Submittal of FAA comments on updated forecast
AR019391	AR019392	Submittal of FAA comments on fleet mix for air/noise
AR019393	AR019395	Submittal of updated forecast memo based on comments
AR019396	AR019404	Discussion on forecast and scheduling of meeting to discuss further
AR019405	AR019405	Submittal of forecast approval letter
AR019406	AR019406	Submittal of September version of COGS
AR019407	AR019407	Signed updated forecast approval letter
National Historic Preservation Act		
AR019408	AR019409	Scheduling Meeting to Discuss Project
AR019410	AR019410	Provided Graphic of Proposed Project for Meeting
AR019411	AR019412	WISAARD Sign Up
AR019413	AR019413	WISAARD Access Granted
AR019414	AR019414	Email Submittal of Section 106 Initiation Letter
AR019415	AR019416	Email Submittal of Proposed Methodology to DAHP
AR019417	AR019418	Scheduling of Time to Return Phone Call
AR019419	AR019420	Email Submittal of Updated Methodology to DAHP
AR019421	AR019424	Coordination of Calendars to Schedule Meeting
AR019425	AR019428	Email Concurrence with Methodology to FAA
AR019429	AR019429	Email submitting Section 106 finding
AR019430	AR019431	Request for submittal of trinomials and HPI forms in WISAARD
AR019432	AR019433	Trinomials provided and added into the report
AR019434	AR019435	Confirmation of submittal of trinomials and HPI forms in WISAARD
AR019436	AR019437	Notification that consultation letter needs to be updated
AR019438	AR019438	Submittal of DAHP comments on Section 106 finding

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AR019439	AR019441	Notification of form release and clarification on SOI qualifications
AR019442	AR019443	Notification of form and property release
AR019444	AR019445	Qualification Issue Discussion
AR019446	AR019447	Submittal of updated Section 106 finding
AR019448	AR019450	Request for update on review & DAHPs response
AR019451	AR019453	DAHP Section 106 Concurrence Letter
AR019454	AR019456	Notification did not find any previous surveys
AR019457	AR019460	Confirmation of no history of consultation for sound insulation projects
AR019461	AR019461	Submittal of updated Visual APE
AR019462	AR019462	Explanation of file types that can be uploaded in WISAARD
AR019463	AR019464	APE Concurrence
AR019465	AR019466	Submittal of updated Section 106 Finding
AR019467	AR019468	Submittal of Appendix E
AR019469	AR019470	DAHP Section 106 Concurrence Letter
AR019471	AR019473	Updated Section 106 Finding Transmittal Email
Noise		
AR019474	AR019547	Submittal of Draft Noise Technical Report
AR019548	AR019549	Submittal of missed approaches memo
AR019550	AR019552	Submittal of FAA comments on missed approaches memo
AR019553	AR019554	Submittal of normalized taxi times for review
AR019555	AR019574	Submittal of missed approaches memo
AR019575	AR019576	Submittal of requested information on missed approach memo
AR019577	AR019577	Submittal of updated missed approach memo
AR019578	AR019584	Notification of preference to submit substitution request separately
AR019585	AR019585	Submittal of future fleet mix tables
AR019586	AR019586	Submittal of substitution request
AR019587	AR019589	Discussion on discrepancy with forecast
AR019590	AR019591	Submittal of updated substitution request

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AR019592	AR019592	Submittal of noise protocol
AR019593	AR019594	Notification no more comments on noise protocol and can proceed
AR019595	AR019595	Submittal of draft construction noise protocol
AR019596	AR019597	Submittal of FAA comments on construction noise protocol
AR019598	AR019599	Submittal of updated construction noise protocol
AR019600	AR019601	Submittal of initial construction noise results
AR019602	AR019602	Submittal of requested information with preliminary results
AR019603	AR019604	Submittal of construction schedule for noise analysis
AR019605	AR019605	Where ambient noise levels are located in report
AR019606	AR019606	Submittal of FAA edits to construction noise protocol
AR019607	AR020001	Link to Burbank construction noise analysis
AR020002	AR020002	Request to use TCM 3.2 for construction noise analysis & FAA approval
AR020003	AR020003	Discussion on how overlapping construction schedules were modeled
AR020004	AR020004	Submittal of proposed construction noise language for env. Consequences
AR020005	AR020005	Notification that construction schedule figure missing a project
Section 4f and Section 6f		
AR020006	AR020007	Screenshot of Land and Water Conservation Fund website
AR020008	AR020010	Discussion on Section 4(f) site
Surface Transportation		
AR020011	AR020511	WSDOT submittal of signal timing, count data, & approval to use SR 518 data
		Zip Drive provided with 10/14/19 email
AR020512	AR020513	Request for Tukwila intersection data for analysis
AR020514	AR020519	City of Des Moines submittal of updated inventory and count information
AR020520	AR020522	Surface Transportation Overview Meeting Agenda
AR020523	AR020523	Submittal of Airport Activity Area Map for discussion
AR020524	AR020526	Submittal of SeaTac transportation codes as requested
AR020527	AR020527	Submittal of Burien traffic code as requested
AR020528	AR020529	Notification meeting rescheduled and submittal of materials for review

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AR020530	AR020530	Clarification on who from WSDOT should participate in meeting
RA020531	AR020599	Agenda & Presentation for WSDOT meeting
AR020600	AR020600	Confirmation of Port responsibility for review account
AR020601	AR020602	Notification WSDOT has requested more time for their review
AR020603	AR020605	Agreement that WSDOT will be ready for 9/21/21 meeting
AR020606	AR020611	Submittal of follow-up comments
AR020612	AR020613	Request for update on review of technical appendices
AR020614	AR020620	Additional WSDOT questions/comments on analysis & SEA receipt
AR020621	AR020622	Coordination of calendars to schedule meeting
AR020623	AR020625	WSDOT's response to FAA questions (ICE, WSDOT authority, methodology)
AR020626	AR020626	Submittal of information requested 1/3 emails
AR020627	AR020627	Submittal of information requested 2/3 emails
AR020628	AR020628	Submittal of information requested 3/3 emails
AR020629	AR020629	Submittal of excel spreadsheet requested
AR020630	AR020633	Preliminary responses to WSDOT questions/comments
AR020634	AR020634	Forward of WSDOT's draft comments
AR020635	AR020636	Agenda for WSDOT meeting
AR020637	AR020638	Draft presentation for meeting next day
AR020639	AR020792	Submittal of additional ICEs
AR0207093	AR020800	Forward of WSDOT's comments on meeting notes
AR020801	AR020803	Meeting notes and recap of next steps
AR020804	AR020806	Agenda for the 2-1-25 technical meeting
AR020807	AR020813	Submittal of presentation from 2/1/25 meeting
AR020814	AR020818	Submittal of meeting notes and updated presentation for 2/15/22 meeting
AR020819	AR020819	Meeting notes and recap of next steps
AR020820	AR020823	Submittal of meeting notes & ICE & Segment Methods and Assumptions

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AR020824	AR020826	Request for meeting to discuss questions on traffic study
AR020827	AR020827	Meeting notes and recap of next steps
AR020828	AR020832	Submittal of meeting notes and existing conditions Synchro results
AR020833	AR020836	Discussion with FHWA on what is considered a surface transportation impact
AR020837	AR020837	Meeting notes and recap of next steps
AR020838	AR020838	Submittal of SR 516 Interchange Volumes for review
AR020839	AR020839	Meeting notes and recap of next steps
AR020840	AR020840	Submittal of draft volume comparison tables & LOS 2027 summary
AR020841	AR020841	Meeting notes and recap of next steps
AR020842	AR020842	Notification meeting is cancelled
AR020843	AR020844	Meeting notes and recap of next steps
AR020845	AR020846	Submittal of discrepancies between draft reports
AR020847	AR020847	Response to questions on VISSIM
AR020848	AR020849	Meeting notes and recap of next steps
AR020850	AR020854	Forward of email sent to WSDOT
AR020855	AR020856	Meeting notes and recap of next steps
AR020857	AR020869	Submittal of agenda, meeting summary and updated VISSIM methodology
AR020870	AR020876	Agenda, corrected meeting notes and recap of next steps
AR020877	AR020877	Submittal of updated VISSIM methodology
AR020878	AR020878	Notification of canceled meeting & next steps
AR020879	AR020879	Explanation of defining LOS for Intersection #18 for review
AR020880	AR020880	Submittal of Synchro files for future proposed action with mitigation
AR020881	AR020881	Submittal of WSDOT comments on VISSIM methodology
AR020882	AR020883	Meeting notes and recap of next steps
AR020884	AR020887	Submittal of WSDOT comments on mitigation summary
AR020888	AR020889	Meeting notes and recap of next steps
AR020890	AR020899	Submittal of WSDOT comments on VISSIM methodology
AR020900	AR020901	Meeting agenda, notes, and next steps

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AR020902	AR020902	Update provided in lieu of meeting
AR020903	AR020917	Submittal of updated methodologies and WSDOT comments
AR020918	AR020919	Meeting notes and recap of next steps
AR020920	AR020921	Meeting notes and recap of next steps
AR020922	AR020922	Updated VISSIM and HCS files (final)
AR020923	AR020923	Notification of delay in review of final documents
AR020924	AR020925	Follow-up after meeting on updating base year in EA
AR020926	AR020926	Meeting notes and recap of next steps
AR020927	AR020927	Source of information on spot checking intersection counts
AR020928	AR020928	Identification of intersections to complete spot checks for review
AR020929	AR020930	Meeting notes and recap of next steps
AR020931	AR020932	Notification of permit required for traffic counts
AR020933	AR020934	Traffic count comparison
AR020935	AR020936	Meeting notes and recap of next steps
AR020937	AR020937	WSDOT meeting summary
AR020938	AR020939	WSDOT meeting agenda and summary
AR020940	AR020940	Traffic count comparison
AR020941	AR020945	Submittal of spreadsheet and request for WSDOT loop sensor data
AR020946	AR020947	WSDOT meeting agenda and summary
AR020948	AR020951	WSDOT meeting agenda & summary and WSDOT submittal of traffic comparison
AR020952	AR020955	WSDOT meeting agenda and summary
AR020956	AR020959	Meeting confirmation and materials for meeting
AR020960	AR020963	Meeting notes and recap of next steps
AR020964	AR020967	Follow-up on request for concurrence on methodology
AR020968	AR020970	Concurrence on proposed methodology
AR020971	AR020972	WSDOT meeting agenda and summary
AR020973	AR020974	WSDOT meeting agenda and summary

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AR020975	AR020975	Submittal of freeway data request
AR020976	AR020977	Confirmation 1/6/23 email received and estimated time to respond
AR020978	AR020979	WSDOT meeting agenda and summary
AR020980	AR020983	WSDOT meeting agenda and summary and submittal of mitigation plan
AR020984	AR020985	WSDOT meeting agenda and summary
AR020986	AR020990	Submittal of draft concurrence request and WSDOT comments
AR020991	AR020991	Submittal of existing conditions Synchro results
AR020992	AR020995	FAA agreement with WSDOT comments & SEA agreement for review
AR020996	AR020997	WSDOT meeting agenda and summary
AR020998	AR021004	Submittal Freeway Volumes (2/24/23), WSDOT Comments (3/7/23), & Responses to WSDOT Comments
AR021005	AR021007	WSDOT concurrence with DTA model
AR021008	AR021027	Submittal of VISSIM and HCS methodology & WSDOT Comments
AR021028	AR021035	Notification unable to review 3/8/23 email yet
AR021036	AR021039	Notification of no further comments on DTA model
AR021040	AR021041	WSDOT meeting agenda and summary
AR021042	AR021042	Submittal of email that will be sent to local jurisdictions
AR021043	AR021043	Submittal of surface transportation overview to City of Burien
AR021044	AR021044	Submittal of surface transportation overview to City of Tukwila
AR021045	AR021045	Submittal of surface transportation overview to City of Federal Way
AR021046	AR021046	Submittal of surface transportation overview to Normandy Park
AR021047	AR021048	WSDOT meeting agenda and notes
AR021049	AR021055	City of Des Moines to include an additional intersection in study
AR021056	AR021087	Submittal of VISSIM & HCS methodologies-WSDOT comments on VISSIM-submittal of updated VISSIM methodology
AR021088	AR021089	WSDOT meeting agenda and notes
AR021090	AR021096	City of Kent does not have comments on surface transportation overview
AR021097	AR021097	Submittal of draft calibration results for SR 518 VISSIM

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AR021098	AR021098	Received email and agreement to meeting
AR021099	AR021100	Notification of no comments on study area or methodology
AR021101	AR021101	Submittal of HCS calibration
AR021102	AR021102	WSDOT concurrence with VISSIM calibration
AR021103	AR021104	WSDOT meeting agenda and notes
AR021105	AR021113	City of SeaTac's request to add intersections & justification for request
AR021114	AR021114	Update on coordination with City of SeaTac
AR021115	AR021115	WSDOT meeting agenda and notes
AR021116	AR021116	Update on surface transportation analysis and coordination
AR021117	AR021402	Submittal of existing conditions SlimTraffic, Synchro & HCS - WSDOT comments on reports - Submittal of updated reports
AR021403	AR021403	Submittal of draft methodology for future traffic analysis
AR021404	AR021413	WSDOT comments on methodology for future traffic analysis & potential meeting
AR021414	AR021414	Notification regularly scheduled meeting is canceled
AR021415	AR021418	Received comments and request for meeting availability
AR021419	AR021419	Submittal of latest version of DTA model documentation
AR021420	AR021420	Submittal of intersections to Burien to confirm information accurate
AR021421	AR021421	Submittal of intersections to Des Moines to confirm information accurate
AR021422	AR021422	Submittal of intersections to SeaTac to confirm information accurate
AR021423	AR021423	Submittal of intersections to Tukila to confirm information accurate
AR021424	AR021424	Submittal of intersections to WSDOT to confirm information accurate
AR021425	AR021427	Submittal of WSDOT comments on mitigation methodology
AR021428	AR021428	Submittal of updated existing conditions reports
AR021429	AR021437	Submittal of updated future methodology and WSDOT concurrence
AR021438	AR021439	WSDOT meeting agenda and summary
AR021440	AR021477	WSDOT comments on existing traffic analysis report
AR021478	AR021478	Submittal of revised existing traffic analysis report

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AR021479	AR021480	WSDOT meeting agenda and summary
AR021481	AR021481	Submittal of draft future no action results for review
AR021482	AR021483	Submittal of Sidra file for future no action
AR021484	AR021484	WSDOT meeting summary
AR021485	AR021485	Submittal of information from meeting for quick review
AR021486	AR021488	Submittal of WSDOT comments and updated No Action deliverables
AR021489	AR021490	WSDOT meeting agenda and notes
AR021491	AR021492	WSDOT meeting agenda and notes
AR021493	AR021495	No further WSDOT comments on future no action
AR021496	AR021496	Submittal of No Action segment and HCS results
AR021497	AR021498	Submittal of simulation summary results provided in meeting
AR021499	AR021500	Received HCS comment & submitted proposed action draft results
AR021501	AR021501	Submittal of summary materials provided during meeting
AR021502	AR021504	WSDOT notification of no comments on future Synchro, VISSIM or Sidra
AR021505	AR021505	Submittal of materials for no action segment and VISSIM analyses
AR021506	AR021507	WSDOT meeting agenda, notes, and submittal of intersection map
AR021508	AR021514	Responses to FAA questions/comments
AR021515	AR021516	WSDOT meeting agenda and summary
AR021517	AR021520	Submittal of latest NA/PA results and WSDOT's mitigation list
AR021521	AR021521	Submittal of updated mitigation methodology
AR021522	AR021522	Final meeting notes
AR021523	AR021531	Submittal of updated ICE methodology - WSDOT Comments - submittal of final ICE and mitigation contingency methodologies
AR021532	AR021534	Submittal of mitigation with clarification looking for fatal flaws & feasibility
AR021535	AR021536	Submittal of notes on volume changes in SR 518 corridor
AR021537	AR021540	WSDOT comments on mitigation summary and initial responses from SEA
AR021541	AR021542	Meeting agenda and notes
AR021543	AR021601	Submittal of preliminary ICE results for review

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AR021602	AR021602	Submittal of updated table
AR021603	AR021603	Meeting cancellation and previous meeting notes
AR021604	AR021605	Submittal of updated ICE reports
-	-	Reports linked in 12-22-23 email
AR021606	AR021607	Submittal of additional link and WSDOT request for extension
AR021608	AR021612	Confirmation of meeting date and time with City of Des Moines
AR021613	AR021618	Submittal of SeaTac responses provided during meeting
AR021619	AR021623	Submittal of Des Moines responses provided during meeting
AR021624	AR021625	Submittal of corrected meeting notes & agenda and notes for recent meeting
AR021626	AR021630	Submittal of Tukwila responses provided during meeting
AR021631	AR021634	Submittal of Burien responses provided during meeting
AR021635	AR021635	Des Moines provided clarification on one of their responses
AR021636	AR021636	WSDOT comments on five preliminary ICE reports
AR021637	AR021637	Additional WSDOT comments on ICE reports
AR021638	AR021638	Meeting notes and recap of next steps
AR021639	AR021640	SeaTac confirmed still moving forward with intersection project
AR021641	AR021642	Forward of City of SeaTac project confirmation email
AR021643	AR021643	Meeting notes and recap of next steps
AR021644	AR021644	Coordination of Calendars to Schedule Meeting
AR021645	AR021646	Coordination of Calendars to Schedule Meeting
AR021647	AR021649	Coordination of Calendars to Schedule Meeting
AR021650	AR021650	Meeting notes and recap of next steps
AR021651	AR021670	Proposed mitigation for WSDOT impacted intersections presentation
AR021671	AR021673	Coordination of Calendars to Schedule Meeting
AR021674	AR021677	Coordination of Calendars to Schedule Meeting
AR021678	AR021678	Submittal of draft Burien and Tukwila meeting notes for review
AR021679	AR021679	Notification no comments on meeting notes
AR021680	AR021694	Submittal of meeting notes and Des Moines provided ILA

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AR021695	AR021696	Meeting agenda and notes
AR021697	AR021710	Submittal of presentation & meeting notes & Tukwila confirmation no comments
AR021711	AR021731	Submittal of presentation & meeting notes & Burien confirmation no comments
AR021732	AR021738	WSDOT preferences for mitigation and submittal of mitigation spreadsheet
AR021739	AR021782	Submittal of presentation & meeting notes & City of SeaTac comments
AR021783	AR021783	Meeting agenda and notes
AR021784	AR021784	Submittal of notes from meeting with City of SeaTac
AR021785	AR021787	Submittal of future conditions report and attachments
AR021788	AR021854	Submittal of WSDOT comments on future conditions report
AR021855	AR021855	Meeting summary notes
AR021856	AR021856	Submittal of updated future conditions report
AR021857	AR021858	Confirmation of no further comments on future conditions report
AR021859	AR021896	Request for City of SeaTac to confirm no more comments
AR021897	AR021902	Additional request for City of SeaTac to confirm comments addressed
AR021903	AR021906	Submittal of information request by the City of SeaTac
Water Resources		
AR021907	AR02910	Discussion on USACE expectations and permitting role in project
AR021911	AR02911	Notification of new USACE contact
AR021912	AR021913	Request for a meeting while in SEA
AR021914	AR021914	Request for virtual meeting to discuss project
AR021915	AR021915	Another request for virtual meeting to discuss project
AR021916	AR021917	FAA comments on presentation and SEA response
AR021918	AR021918	Submittal of agenda and presentation for meeting
AR021919	AR021920	Thanks for notification unable to attend meeting
AR021921	AR021921	Submittal of Water Resources Mitigation Summary & Permitting
AR021922	AR021922	Request for availability for meeting
AR021923	AR021924	Coordination of calendars to schedule meeting

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AR021925	AR021926	FAA comments on mitigation summary report
AR021927	AR021928	Coordination of calendars to schedule meeting
AR021929	AR021929	Submittal of Cooperating Agency Request letter
AR021930	AR021931	Received letter and currently reviewing request
AR021932	AR021933	Agreement to be cooperating agency response
AR021934	AR021935	Notification to ignore sentence in letter that should have been removed
AR021936	AR021936	Meeting invite with mitigation summary memo
AR021937	AR021937	Submittal of USACE alternative analysis framework
AR021938	AR021938	Receipt of Chapters 1 and 2 of DEA
AR021939	AR021940	Inquiry on USACE contact for project
AR021941	AR021942	Granting of request for extension to review DEA chapters
AR021943	AR021944	Forward of USACE email that provides different information on POC
AR021945	AR021945	Forward of USACE comments on draft chapters
AR021946	AR021947	Receipt of comments and FAA contact information
AR021948	AR021997	Submittal of aquatic report & confirmation USACE to remain a cooperating agency
AR021998	AR023040	Submittal of Chapters 3 & 4 & Appendix M of Preliminary Draft EA
AR023041	AR023042	Submittal of Chapter 3 with figures
AR023043	AR023044	Submittal of USACE comments on draft chapters
AR023045	AR023045	Submittal of requested reports
AR023046	AR023046	Submittal of requested report
Section 4: Sustainable Airport Master Plan		
Sustainable Airport Master Plan Technical Memorandums		
AR023047	AR023102	Tech Memo No. 1 - Background, Process, Goals, and Objectives
AR023103	AR023233	Tech Memo No. 2 - Inventory of Existing Conditions
AR023234	AR023268	Tech Memo No. 3 - Air Cargo Market Assessment
AR023269	AR023359	Tech Memo No.4 - Forecasts of Aviation Activity
AR023360	AR023545	Tech Memo No. 5 - Facility Requirements
AR023546	AR023948	Tech Memo No. 6 - Alternatives

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AR023949	AR023992	Tech Memo No. 7 - Facilities Implementation and Financial Feasibility
AR023993	AR024028	Tech Memo No. 8 - Environmental Overview
AR024029	AR024477	Tech Memo No. 9 - Sustainability Planning and Management Strategy
AR024478	AR024479	SAMP Public Outreach Summary
Section 5: General Correspondence		
350 Seattle		
AR024480	AR024481	350 Seattle request for an EIS
AR024482	AR024483	Response to 350 Seattle request for an EIS
AR024484	AR024486	Response to 350 Seattle question on EA schedule
Alaska Airlines		
AR024487	AR024488	Concerns with the SAMP as proposed
AR024489	AR024494	Phasing options for SEA SAMP presentation
AR024495	AR024496	Concerns with the SAMP as proposed
AR024497	AR024502	Concerns with the SAMP as proposed & Alaska's suggested alternative
AR024503		Response to 2/4/19 letter from Alaska
AR024504	AR024505	Response to Alaska's suggested alternative
AR024506	AR024510	Legal basis to keep discussing alternatives during NEPA
AR024511	AR024512	Response from meeting with Alaska to discuss SAMP
AR024513	AR024597	Alaska submittal of Enhanced Approach to SEA SAMP Report
AR024598	AR024793	Alaska's response to Port Dec 2019 letter
AR024794	AR024810	Port draft response to FAA re: Alaska
AR024811	AR024827	Port response to FAA re: Alaska
City of Burien		
AR024828	AR024828	Response to request for EIS
AR024829	AR024830	Request for thorough cumulative impact analysis
AR024831	AR024832	Request to pause EA until 250-degree turn resolved
AR024833	AR024833	Request for SEA to ask for extended public comment period
City of SeaTac		
AR024834	AR024839	Confirmation of FAA POC for project

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EPA		
AR024840	AR024842	Response to EPA to provide FAA POC and update on project
King County		
AR024843	AR024843	King County request for an EIS
AR024844	AR024844	Response to King County request for EIS
Noemie Maxwell		
AR024845	AR024846	Response to request for information on NEPA process
AR024847	AR024851	Questions on possible forest destruction with proposed NTPs
Section 6: References, Secondary Sources, and Guidance Documents		
AR024852	AR025043	FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions
AR025044	AR025772	FAA Order JO7110.65W
AR025773	AR025904	FAA Order 1050.1F, Environmental Impacts: Policies and Procedures
AR025905	AR026162	FTA Transit Noise & Vibration Impact Assessment Manual
AR026163	AR026205	Sea-Tac International Airport Economic Impacts
AR026206	AR026225	FAA Order JO7110.126A
AR026226	AR026385	Puget Sound Regional Council Vision 2050
AR026386	AR026819	FAA Advisory Circular (AC) 150/5300-13B, Airport Design
AR026820	AR027113	FAA Order 1050.1F, Desk Reference
Air Quality & GHG		
-	-	Intergovernmental Panel on Climate Change (IPCC), Fifth Assessment Report
AR027114	AR027249	Mixing Heights, Wind Speeds, and Potential for Urban Air Pollution throughout the Contiguous United States
AR027250	AR027255	Federal Register notice of ozone attainment for King County
AR027256	AR027261	Federal Register notice of CO attainment for King County
AR027262	AR027486	Aviation Emissions and Air Quality Handbook, Version 3 Update 1
AR027487	AR027838	International Civil Aviation Organization Annex 14 Aerodromes
AR027839	AR027976	King County Board of Health briefing on airport community health profiles
Biological		

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AR027977	AR028024	2021 Washington vascular plant species of conservation concern report
AR028025	AR028032	Guide to Native Milkweeds of Washington
AR028033	AR028033	Summary of King County wildlife habitat conservation areas
Forecast		
AR028034	AR028034	Nonstop destinations served from SEA in 2020
AR028035	AR028094	Airside modeling, approach, key assumptions, & results presentation
AR028095	AR028109	Future activity forecasts and facility requirement calculations for 2027
Hazardous and Solid Waste		
AR028110	AR028130	Informational document about Per- and polyfluoroalkyl substances (PFAS)
AR028131	AR028502	SEA's Construction Safety Manual
AR028503	AR028719	SEA's construction general requirements for tenants within terminal facilities
AR028720	AR029059	SEA's construction general requirements
AR029060	AR029066	EPA interim recommendations to address groundwater PFAS contamination
AR029067	AR029068	Information on hazardous sites from WA Department of Ecology
AR029069	AR029168	National pollutant discharge elimination system & state waste discharge permit
AR029169	AR029282	WA Department of Ecology notification of no further action required
AR029283	AR029698	Cedar Hills Regional Landfill Final Environmental Impact Statement
AR029699	AR029703	Washington State monitoring requirements for PFAS
AR029704	AR029705	WA Department of Ecology toxic cleanup program list of sites
AR029706	AR029707	Requested update on hazardous sites on-airport
AR029708	AR029902	WSDOE's guidance for investigating & remediating PFAS contamination in WA
AR029903	AR029911	USEPA Document regarding a proposed PFAS national drinking water regulation
AR029912	AR029938	Cedar Hills regional landfill 2023 annual report

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AR029939	AR029939	Solid waste projections for 2032 and 2037
Natural Resources and Energy Supply		
AR029940	AR029940	Electricity, natural gas, & fuel consumption for years 2010, 2015, 2019, & 2022
AR029941	AR029955	Washington State's energy profile
AR029956	AR029956	Screenshot from the Canadian Gas Association's website about gas facts
AR029957	AR029960	Spreadsheet containing information on SEA fuels, electricity, gas, and water
Socioeconomics		
AR029961	AR029961	Median earnings data from Census 2021 (.csv version)
AR029962	AR029968	Median earnings data from Census 2021 (.xls version)
AR029969	AR029976	Median earnings data from Census 2021 for General Study Area (GSA)
AR029977	AR029977	Median earnings data from Census 2021 metadata
AR029978	AR029984	Median earnings data from Census 2021 to join with a GIS shapefile
AR029985	AR029986	Median earnings data from Census 2021 table notes
AR029987	AR029993	Economic data for Washington State and King County from US Census 2021
AR029994	AR029999	Economic data for Washington State and King County from US Census 2017 - 2021
AR030000	AR030007	Employment numbers from Census 2017 data
AR030008	AR030008	Employment numbers from Census 2017 data metadata
AR030009	AR030010	Employment numbers from Census 2017 table notes
AR030011	AR030018	Employment numbers from Census 2018 data
AR030019	AR030019	Employment numbers from Census 2018 data metadata
AR030020	AR030021	Employment numbers from Census 2018 table notes
AR030022	AR030028	Employment numbers from Census 2019 data
AR030029	AR030029	Employment numbers from Census 2019 data metadata
AR030030	AR030031	Employment numbers from Census 2019 table notes
AR030032	AR030042	Employment numbers from Census 2020 data
AR030043	AR030043	Employment numbers from Census 2020 data metadata
AR030044	AR030045	Employment numbers from Census 2020 table notes
AR030046	AR030055	Median earnings data from Census 2020 for General Study Area (GSA)
AR030056	AR030072	Median household earnings data from Census 2021 data

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AR030073	AR030073	Median household earnings from Census 2021 data metadata
AR030074	AR030091	Per capita income data from Census 2021 data
AR030092	AR030092	Per capita income data from Census 2021 metadata
AR030093	AR030094	Per capita income data from Census 2021 table notes
AR030095	AR030109	Per capita income data from Census 2021 data for GIS shapefile
AR030110	AR030117	Employment numbers from Census 2017 data to join with a GIS shapefile
AR030118	AR030126	Employment numbers from Census 2018 data to join with a GIS shapefile
AR030127	AR030135	Employment numbers from Census 2019 data to join with a GIS shapefile
AR030136	AR030144	Employment numbers from Census 2020 data to join with a GIS shapefile
AR030145	AR030154	Unemployment 2017 US Census for General Study Area (GSA)
AR030155	AR030164	Unemployment 2018 US Census for General Study Area (GSA)
AR030165	AR030174	Unemployment 2019 US Census for General Study Area (GSA)
AR030175	AR030184	Unemployment 2020 US Census for General Study Area (GSA)
AR030185	AR030194	Unemployment 2021 US Census for General Study Area (GSA)
AR030195	AR030223	Per capita income 2021 US Census for General Study Area (GSA)
AR030224	AR030227	State and county age data from US Census
AR030228	AR030237	Age data from US Census for General Study Area
AR030238	AR030242	US Census data from 2020
AR030243	AR030243	Metadata for US Census data from 2020
AR030244	AR030265	Median household earnings from Census 2021 data for GIS shapefile (.csv version)
AR030266	AR030289	Median household earnings from Census 2021 data for GIS shapefile (.xls version)
AR030290	AR030312	Median household earnings from Census 2021 for General Study Area (GSA)
AR030313	AR030970	Block data from US Census 2020
AR030971	AR031519	Block data from US Census 2020
AR031520	AR031540	Employment numbers from Census 2022 data
AR031541	AR031558	Employment numbers from Census 2022 data to join with a GIS shapefile
AR031559	AR031560	Table notes for 2022 Employment Census Data
AR031561	AR031561	Employment numbers from Census 2022 data

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Surface Transportation		
AR031562	AR032549	SR 509: Corridor Completion/I-5/South Access Road EIS Volume 1
AR032550	AR032665	Transportation Master Plan for the city of SeaTac
AR032666	AR032666	Submittal of Highways of Statewide and Regional Significance
Water Resources		
AR032667	AR032892	Des Moines Creek Basin Plan
AR032893	AR033194	South King County ground water management plan
AR033195	AR033631	Phase 1 groundwater study report
AR033632	AR033691	Groundwater study
AR033692	AR033906	Seattle-Tacoma International Airport stormwater management manual
AR033907	AR033907	State of Washington Department of Ecology receipt of NPDES permit renewal
AR033908	AR034093	Programmatic Construction Stormwater Pollution Plan
AR034094	AR034238	Deep Infiltration Testing for Drainage Basin SDE4
Section 7: Other/Misc		
AR034239	AR034251	Port of Seattle Updates on Cyberattack
Meeting Agenda and Notes		
AR034252	AR034252	Submittal of draft agenda for biweekly call
AR034253	AR034253	Submittal of draft agenda for biweekly call
AR034254	AR034254	Submittal of draft agenda for biweekly call
AR034255	AR034255	Submittal of draft agenda for biweekly call
AR034256	AR034256	Request for meeting to discuss project management
AR034257	AR034257	Submittal of biweekly meeting agenda
AR034258	AR034258	Submittal of biweekly meeting agenda
AR034259	AR034259	Submittal of biweekly meeting agenda
AR034260	AR034260	Submittal of biweekly meeting agenda
AR034261	AR034261	Submittal of biweekly meeting agenda
AR034262	AR034262	Submittal of biweekly meeting agenda
AR034263	AR034263	Submittal of biweekly meeting agenda
AR034264	AR034264	Submittal of agenda for call

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AR034265	AR034265	Submittal of biweekly meeting agenda
AR034266	AR034266	Submittal of biweekly meeting agenda
AR034267	AR034267	Submittal of biweekly meeting agenda
AR034268	AR034268	Submittal of biweekly meeting agenda
AR034269	AR034269	Submittal of biweekly meeting agenda
AR034270	AR034270	Items for discussion on next call
AR034271	AR034271	Submittal of biweekly meeting agenda
AR034272	AR034272	Submittal of biweekly meeting agenda
AR034273	AR034274	Request to focus on AQ for next biweekly call
AR034275	AR034275	Submittal of biweekly meeting agenda
AR034276	AR034276	Submittal of biweekly meeting agenda
AR034277	AR034278	Submittal of biweekly meeting agenda
AR034279	AR034279	Discussion on topics for meeting
AR034280	AR034281	Submittal of biweekly meeting agenda
AR034282	AR034282	Project updates and cancellation of biweekly meeting
AR034283	AR034284	Submittal of biweekly meeting agenda
AR034285	AR034285	Submittal of biweekly meeting agenda
AR034286	AR034286	Submittal of biweekly meeting agenda
AR034287	AR034287	Submittal of biweekly meeting agenda
AR034288	AR034288	Submittal of biweekly meeting agenda
AR034289	AR034289	Submittal of biweekly meeting agenda
AR034290	AR034290	Submittal of biweekly meeting agenda
AR034291	AR034291	Submittal of biweekly meeting agenda
AR034292	AR034292	Submittal of biweekly meeting agenda
AR034293	AR034293	Submittal of biweekly meeting agenda
AR034294	AR034294	Submittal of biweekly meeting agenda
AR034295	AR034295	Submittal of in-person workshop agenda
AR034296	AR034296	Submittal of agenda for leadership meeting

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AR034297	AR034297	Submittal of biweekly meeting agenda
AR034298	AR034298	Submittal of in-person workshop agenda
AR034299	AR034299	Submittal of meeting notes from in-person workshop
AR034300	AR034300	Submittal of in-person workshop agenda
AR034301	AR034301	Submittal of biweekly meeting agenda
AR034302	AR034303	Submittal of agenda for leadership meeting
AR034304	AR034304	Discussion on what to include for leadership meeting agenda
AR034305	AR034306	Submittal of agenda for leadership meeting
AR034307	AR034307	Submittal of in-person workshop agenda
AR034308	AR034309	Submittal of agenda for leadership meeting
AR034310	AR034311	Discussion on what to include for leadership meeting agenda
AR034312	AR034313	Submittal of in-person workshop agenda
AR034314	AR034314	Submittal of agenda for leadership meeting