Port of Seattle

December 18, 1996

Mr. Jack Kennedy
U.S. Army Corps of Engineers
Seattle District Office
P.O. Box 3755
Seattle, Washington 98124-2255

Dear Mr. Kennedy:

The Port of Seattle is pleased to submit this Section 404 Application to place fill material into waters of the United States at Seattle Tacoma International Airport associated with the Master Plan Update improvements, as well as associated backup information.

## 1. Background

The Port Commission's approval of the Master Plan Update in August 1996 was the culmination of nearly ten years of regional process regarding the need for additional airport capacity in the Puget Sound Region. It is the result of significant technical and environmental analyses; a comprehensive public information and involvement program; and extensive review of the airport capacity issue by airlines, other Airport users, citizens, and local and regional policy makers.

A 39-member panel with representatives from cities and counties throughout the Region, aviation industry experts, citizens, and the State - known as the Puget Sound Air Transportation Committee (PSATC) - was assembled and conducted the three-year long Flight Plan Study. The purpose of the Flight Plan was to develop a regional solution that would meet the Region's commercial air travel needs to the year 2020 and beyond. The PSATC conducted a thorough review of a wide range of options, including a replacement airport, supplemental airports, new navigational technologies, demand management, and high speed rail. The PSATC, Port and PSRC prepared and issued for public review and comment a report examining the potential environmental impacts of the studied alternatives. Following its deliberations, the PSATC recommended a multiple airport system that includes a new air carrier runway at Sea-Tac Airport.

On April 29, 1993, the PSRC General Assembly adopted by a vote of 89% in favor, Resolution A-93-03 which stated that "The third runway shall be authorized by April 1, 1996," subject to three conditions: 1) a regional feasibility study of potential supplemental airport sites; 2) consideration of demand & system management measures; and 3) independent evaluation of whether noise reduction goals at Sea-Tac Airport have been met. PSRC made this decision as a result of the three year "Flight Plan" study which evaluated a range of potential options for addressing the region's long-term air travel needs and based on a subsequent six month review process.

The first condition for PSRC runway approval was fulfilled on October 27, 1994 with the PSRC Executive Board adoption of Resolution EB-94-01 which concluded that "there are no feasible sites for a major supplemental airport within the four-county region." This finding was based on PSRC evaluation and public review of twenty-six existing and potential new airport sites. A number of technical documents that were prepared as part of this effort will be supplied to the Army Corps of Engineers in

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support of this determination. Included in these studies were consideration of the wetland and natural resource impacts associated with a supplemental or replacement airport. The studies indicated that a supplemental or replacement airport would result in greater wetland impacts than would occur through development of a third runway at Sea-Tac Airport.

The second condition was fulfilled in 1995 when after a year of review, the independent PSRC Expert Panel (Panel) determined that a range of demand and system management measures would neither obviate nor defer the need for the third runway. The Panel's specific findings are discussed in written documents it released on July 27, 1995 and December 8, 1995. The third condition was fulfilled in 1996 when the PSRC General Assembly adopted Resolution A-96-02 which amends the Metropolitan Transportation Plan (MTP) to include a third runway with additional noise reduction measures. The PSRC General Assembly adopted this resolution by a vote of 84% in favor.

2. Environmental Impact Statement

In February 1996, the Federal Aviation Administration (FAA) and the Port of Seattle issued a joint National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) Final EIS for the proposed improvements. The U.S. Army Corps of Engineers was a cooperating agency on the EIS. The Final EIS presented the impacts of the proposed Master Plan Update improvements by examining impacts to 24 environmental and social conditions.

The following four purpose and need statements were defined in the Final Environmental Impact Statement:

(1) Improve the poor weather airfield operating capability in a manner that accommodates aircraft activity with an acceptable level of aircraft delay;

(2) Provide sufficient runway length to accommodate warm weather operations without restricting passenger load factors or payloads for aircraft types operating to the Pacific Rim;

(3) Provide Runway Safety Areas (RSAs) that meet current FAA standards; and

(4) Provide efficient and flexible landside facilities to accommodate future aviation demand.

The wetland impacts associated with each of these purpose and need statements are:

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| Third Parallel Runway | 7.38 acres (including on-site borrow sources) |
| 34R Extension by 600 feet | 0 acres |
| Runway Safety Areas (16L/R) | 2.34 acres |
| Terminal/Landside improvements | 2.51 acres (associated with the South Aviation Support Area and North Employee Parking Lot) |
| Subtotal | 12.23 acres |

The primary impacts to wetlands are a result of the Port's desire to remedy the poor weather operating constraints to the existing airfield. The close spacing (800 feet) between Sea-Tac's existing two parallel runways does not allow for two arrival streams whenever cloud ceilings drop below 5,000 feet or whenever visibility is reduced below 5 miles. These conditions occur, which occur about 44% of the year, reduce the total number of arrivals that can be accommodated from 60 per hour to as low as 24,

resulting in inefficient operations and aircraft delay. This condition exists today, but is expected to become increasingly severe as air traffic increases. Because pilots can not maintain visual separation in these conditions, FAA air traffic control rules require at least 2,500 feet between parallel runways for two staggered (dependent) arrival streams in such "poor weather". Over 85 percent of total Sea-Tac delays are incurred by arriving aircraft.

While Sea-Tac currently has sufficient operating capability during good weather conditions, the existing runway system produces extensive arrival delays during poor weather. For instance, when weather worsens from Visual Flight Rule 1 (VFR1) to VFR2, average arrival delay increases by more than ten-fold (from 1 minute to 11.4 minutes). Delays further worsen when Instrument Flight Rule (IFR1/2/3) conditions occur. In these cases, average arrival delay increases more than twenty-fold over VFR1 (21.7 minutes Vs 1.0 minutes). Because these delay statistics represent averages, some flights experience less delay, while others experience substantially higher delay. The FAA's National Plan of Integrated Airport Systems concludes that when annual average delay exceed 9 minutes an airport is experiencing severe delay.

Using average aircraft operating costs developed by the FAA, Sea-Tac aircraft delays cost the airlines about $42 million annually under 1992 demand. When annual aircraft operations reach 425,000, delay costs are anticipated to exceed $176 million annually. Without the third parallel runway at this level of activity, average VFR2 arrival delay would exceed 40 minutes and IFR delay would exceed 70 minutes.

The third parallel runway, located 2,500 feet west of the existing 16R/34L, would permit staggered dual stream arrivals in poor weather conditions. It would decrease average arrival delays by about 80 percent in comparison to the Do-Nothing and result in a savings of $132 million per year.

Your prompt attention to the processing of this permit application is appreciated.

Sincerely,

Barbara Hinkle
Senior Environmental Specialist

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