



August 19, 2026

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

Via email: samp@portseattle.org
Via webpage: www.sea-samp.com

Re: Comments on the Sustainable Airport Master Plan (SAMP) Near-Term Projects (NTP) Draft Environmental Impact Statement, May 2026

Dear Mr. Rybolt:

Sea-Tac Noise.Info (STNI) submits the following comments on the Sustainable Airport Master Plan (SAMP) Near-Term Projects (NTP) Draft Environmental Impact Statement (DEIS), issued May 2026. These comments are organized in three parts. Part I addresses procedural and analytical adequacy under SEPA — whether the DEIS, as structured, permits the kind of review SEPA requires. Part II addresses specific technical standards the DEIS relies on that STNI believes are outdated or misapplied. Part III addresses impacts to host cities and their residents that the DEIS's regional-scale analysis does not capture. Each comment identifies a specific, additional analysis STNI requests the Port undertake before finalizing this EIS.

I. Procedural and Analytical Adequacy

The SAMP minimizes review of its full impacts by breaking one large expansion into components small enough, and separated enough in time, place, and permitting authority, that no single review captures the whole. The following comments address that pattern directly.

Comment 1 — Design detail is insufficient to support the DEIS's own conclusions.

The DEIS describes all 31 NTPs at a conceptual level of design, well short of the detail needed to verify the impacts claimed for them.¹ Impacts from construction — dust, noise, traffic staging, hazardous material handling, and duration — cannot be

meaningfully measured against a design that has not been drawn. Taken further, it is not possible to calculate any number of ongoing operational impacts without that same design. Figures elsewhere in this DEIS that depend on it necessarily assume a design that does not yet exist, and cannot be independently verified until one does.

STNI requests that the Port complete design to at least 30 percent for each NTP and re-issue the impact analysis for public review before any project is permitted.

Comment 2 — Demolition of twelve existing buildings is disclosed without complete hazardous materials surveys.

The Proposed Action requires demolition of twelve existing buildings: 160D, 161A, 161E, 161G, 166B, 167A/167B, 170A, 170B, 170C, 170D, 170W, and 188WB.² For several of these — including Building 160D — the DEIS states that no hazardous materials survey has been conducted and that the presence of asbestos-containing materials, lead, and mercury is simply “assumed” based on the building’s age. This is a defect SEPA already has a cure for. Where information on significant adverse impacts essential to a reasoned choice is not known, and the cost of obtaining it is not exorbitant, the lead agency must obtain and include that information in its environmental documents — not substitute an assumption for it.³

STNI requests that the Port complete and publicly disclose hazardous materials surveys for every building slated for demolition, including any structures outside the Airport Activity Area (AAA), before permits are issued, consistent with the Port’s obligation under WAC 197-11-080 to obtain readily available information rather than assume it.

Comment 3 — The Port’s own records system has not produced documents that support DEIS conclusions.

Two outstanding Public Records Requests bear directly on this DEIS. PRR 26-610, filed May 10, 2026, was only partially fulfilled. It sought the AEDT and TAAM modeling files, forecast and Constrained Operating Growth Scenario methodology, and calibration assumptions underlying the FONSI/ROD’s noise, emissions, and capacity findings — the same analytical foundation this SEPA DEIS incorporates by reference for surface transportation and other topics.⁴ PRR 26-949, filed July 31, 2026, seeks documents named in the Port’s own SEPA IWTP Project Checklist, including the IWTP Basis of Design Report, the Industrial Wastewater System (IWS) Alternatives Analysis Technical Memorandum, and the Cultural Resources Assessment. Several are marked “in draft” as of the checklist’s own August 2025 date.⁵ The Port’s own scheduled response date for PRR 26-949 is August 26, 2026 — six days after this comment period closes.

This is not merely a timing problem but a procedural defect in the DEIS itself. SEPA permits an EIS to incorporate technical material by reference, but only where that material is reasonably available for public inspection. The AEDT/TAAM modeling files and IWTP design documents this DEIS relies on for its noise, emissions, capacity, and wastewater conclusions have been formally requested and not produced.

STNI requests that the Port hold this comment record open, or extend the comment period, until all documents responsive to outstanding PRRs that directly support DEIS conclusions have been produced.

STNI further requests that the Final EIS identify each technical conclusion that rests on a document not made available during this comment period.

WAC 197-11-635; WAC 197-11-080.

Comment 4 — Prior airport expansion is folded into the baseline rather than counted as cumulative impact.

The Third Runway and every major project built since 2008 are treated as part of “existing conditions” rather than analyzed as contributors to cumulative impact.⁶ Since the Third Runway opened, the Port has completed or begun at least six projects individually exceeding \$300 million: North Satellite Modernization (approximately \$712 million), the International Arrivals Facility (approximately \$986 million), the Baggage Optimization program (approximately \$591.6 million), the SEA Gateway Project (approximately \$546 million), the C Concourse expansion (approximately \$399 million), and the S Concourse Evolution, authorized at \$1.1 billion toward an estimated \$2.5 billion total and underway through 2034. Together these total well over \$5 billion in capacity-adding construction, none of it appearing in this DEIS’s cumulative accounting. The \$300 million threshold is not an arbitrary cutoff. It is the Port’s own contractual definition of a “Very Large Project” under its current airline agreements — meaning each of these projects independently qualifies, by the Port’s own governing documents, as a category of capital investment the Port itself treats as significant.⁷ This removes decades of capacity-adding construction from cumulative review entirely, and the effect is not small. Using the roughly 365,000 annual operations that predate the Third Runway as a baseline, current operations of approximately 435,900 (2025) already represent a 19 percent increase. The SAMP’s own forecast of 540,000 operations by 2034 represents a 48 percent increase over that true baseline — well above the 16 percent growth the DEIS’s own 2017-forward comparison implies.⁸

STNI requests that the Port count the Third Runway and each major project completed since 2008 explicitly in the cumulative impacts analysis, quantifying what each added to airport capacity and to the impacts now being assessed.

Comment 5 — This DEIS treats an unverified baseline as settled, and SEPA does not allow that.

WAC 197-11-440(5) and (6) require an EIS to document the No Action Alternative and the affected environment with supporting evidence — not assume them.⁹ Federal courts applying the parallel NEPA requirement have held it arbitrary and capricious for an agency to treat existing conditions as a fixed comparison point without first verifying that those conditions were themselves properly reviewed; doing so “enshrines the status quo without evaluating the environmental impacts of the existing [activity].”¹⁰

This DEIS's own baseline contains at least four categories of impact that were never independently verified: the Third Runway and every project built since 2008, folded into “existing conditions” without analysis (Comment 4); the Third Runway's own Section 404 mitigation, whose 15-year monitoring commitment has run its course unverified (Comment 19); sound insulation completion, which the Port's own 1996 compliance data already showed was undercounted (Comments 13–15); and the Flight Corridor Management Program's ongoing tree-removal costs, still being incurred against a baseline that treats them as settled (Comment 25). None of these were confirmed current before this DEIS used them as its starting point.

STNI requests that, before the Final EIS relies on “existing conditions” as the comparison point for any impact analysis, the Port affirmatively verify and publicly document the current status of each baseline element identified above, consistent with WAC 197-11-440(5)–(6)'s requirement that the No Action Alternative and affected environment be supported by evidence rather than assumed.

Comment 6 — The Long-Term Projects are the second half of this same expansion and should not be reviewed separately.

The Long-Term Projects were discussed as SAMP's second phase as early as 2016. The DEIS itself acknowledges that unconstrained 20-year demand will require addressing long-term airfield and airspace limitations, but states that this work is “not yet ripe for environmental review” and falls outside SAMP's scope.¹¹ Deferring review of a known second phase of the same expansion is the definition of segmentation SEPA is designed to prevent.

The “not yet ripe” framing rests on an unstated foreseeability threshold with no fixed basis in law. Neither NEPA nor SEPA sets a specific time horizon for when a

future action becomes “reasonably foreseeable”; the operative test is whether an action is speculative, not how many years out it sits.¹² SEPA's own cumulative-impact analysis is not even limited by NEPA's foreseeability definition in the first place, which applies only to NEPA documentation.¹³

Nor does the record support a design-detail distinction. At the Port's June 1, 2018 SAMP Scoping Town Hall, the Port itself described the Long-Term Vision at essentially the same level of specificity now used to describe the 31 Near-Term Projects this DEIS proposes to permit: a short list of studies and programmatic bullet points, with no more design detail than the conceptual-level descriptions Comment 1 already identifies in this DEIS. If that level of detail is sufficient to permit 31 projects today, it cannot simultaneously be the reason the Long-Term Projects remain unreviewed.¹⁴

STNI requests that the Port study the Long-Term Projects together with the Near-Term Projects, as the single expansion they are, and identify the specific design-maturity or foreseeability threshold — if any exists beyond administrative convenience — that distinguishes the two.

Comment 7 — Recent Port construction history shows a pattern of specifications and predictions that do not survive construction.

The Port's two most recent major terminal projects both show a substantial gap between what was publicly promised and what was actually delivered — in schedule, in cost, and in physical specification. When the Port unveiled the International Arrivals Facility's design in September 2016, the project was budgeted at \$660 million and scheduled to open in late 2019.¹⁵ Before construction had meaningfully begun, the budget had already grown 16 percent to \$766 million at the project's August 2017 groundbreaking.¹⁶ The project ultimately cost \$986 million — a 49 percent increase over the original public figure — and did not open until April 2022, roughly two and a half years after its original target.¹⁷

That \$986 million figure still understates the facility's true cost, because it predates a defect the Port would spend years and further litigation to address. The facility was designed and contracted to accommodate 20 wide-body aircraft at its gates simultaneously. The Port's own 2023 litigation against its design-build contractor alleged that only 16 gates could actually be used — a shortfall the Port stated could cost “tens or hundreds of millions of dollars over the expected life of this project.” The dispute settled in January 2025, nearly three years after the facility opened and well outside the \$986 million total already reported. The contractor agreed to pay the Port \$28 million; the Port agreed to pay the contractor \$13.79 million. That \$28 million was earmarked to fund a fix at only two of the four affected gate pairs, A6 and A8. The cost of resolving the remaining two, S4 and S6, is still unknown and, as

of this writing, unfunded. The true final cost of delivering the 20-gate facility the Port publicly promised in 2016 remains open.¹⁸

A comparable pattern appears on the Port's other recent major terminal project. The North Satellite Modernization project's total estimated cost rose by \$40 million to \$712,125,232. A Port of Seattle Commission briefing memo attributed the increase to “differing site conditions, contaminated soils, added scope, and trade worker shortages” discovered only after construction began.¹⁹

The pattern extends to the Port's management of its own noise mitigation construction. A 2019 Port internal audit of the Noise Insulation Program — which had by then invested over \$400 million since 1985 — found a primary insulation contractor had overbilled the Port by an average 51 percent markup over subcontractor costs. It also found that Highline School District had failed to consistently meet federal disadvantaged-business and Buy American grant requirements.²⁰ Earlier fill-management practices raise a related concern, and this one has primary documentation behind it. Internal Washington Department of Ecology correspondence from the Third Runway permitting record shows the agency's own Toxics Cleanup Program staff privately asking, in January 2002, for help understanding “the rationale for allowing elevated levels of metals, especially lead and arsenic,” in the fill material — a concern the City of Burien had already raised as sensitive within its own community. The email shows an Ecology staff member unable to identify, within his own agency, who had approved those allowable levels, more than six years before the runway opened. That history of internal uncertainty over fill contaminant standards is consistent with NSAT's own later discovery of unanticipated contaminated soils on airport property.²¹ With the NTPs expected to move substantial quantities of earth across the airfield, this history is directly relevant to construction oversight, not just to cost.

These are not isolated incidents. They are the Port's two most recent major terminal builds and its own audited mitigation program, and in each case the schedule, the cost, or the workmanship failed to hold.

STNI requests a single independent management and contracting audit covering the NTP program: verified gate and capacity assumptions (including whether IAF's contribution is calculated at its contracted 20-gate design or its operational 16-gate reality), fill and soil testing protocols, and contractor oversight controls comparable to those the Port's own 2019 audit found lacking. This follows directly from SEPA's requirement to disclose reasonable uncertainty in impact predictions.

WAC 197-11-060, 197-11-080.

Comment 8 — SR-509 was permitted separately from the airport it serves and should be analyzed together with it.

The highway work that feeds traffic and capacity to the airport was reviewed and approved separately by WSDOT. A 2003 Final EIS projected up to 6,850 vehicles per hour north of SR-518 and up to 8,150 vehicles per hour south of it — between roughly 164,000 and 196,000 vehicles per day through Burien alone. A 2018 environmental reevaluation projected the segment between S. 188th and S. 146th Streets would see a 112.5 percent increase in morning peak-hour traffic and a 74 percent increase in afternoon peak-hour traffic by 2045, compared to 2015 levels. A southern-entrance capacity enhancement was studied in that process but is absent from this DEIS.²² SR-509 and the SAMP draw from and discharge into the same road network and the same creek basins; reviewing them separately hides their combined effect.

The gap matters more than a simple parallel-review problem. The 2003 SR-509 Final EIS analyzed a fuller southern airport entrance than what current funding ultimately built. WSDOT's own account of the project's history confirms that scope was narrowed through a stakeholder-driven, funding-constrained rescoping process beginning around 2013 — a matter of financing, not a finding by WSDOT or the Port that the fuller capacity was unneeded.²³

This DEIS discloses essentially no detail about the Long-Term Projects (Comment 6), and the fuller southern-entrance concept these same planning documents already contemplated remains the obvious candidate for reviving that capacity. The risk that it resurfaces as part of the Long-Term Projects, rather than as a genuinely new and independently reviewed proposal, is not speculative — it is the same segmentation pattern already at work elsewhere in this DEIS. That makes the combined SR-509/SAMP analysis this comment requests more urgent, not less.

STNI requests a combined analysis of SR-509 and the SAMP — including the Long-Term Projects — covering traffic, capacity, and shared stormwater loading on the same creeks, rather than two separate reviews.

Comment 9 — The Port already negotiates when and how airlines operate at Sea-Tac; it never analyzes using that same authority to restrict nighttime hours.

The premise that flight timing is beyond the Port's control does not withstand scrutiny. The Port's Signatory Lease-and-Operating Agreements (SLOAs) — the negotiated contracts governing every major airline's gates, terminal space, and landing fees at Sea-Tac — govern precisely the gate and terminal capacity these NTPs are built to expand. The draft SLOA V (2025–2034) is explicit that the Port

“shall retain exclusive control over the scheduling of flights on all Common Use Gates and Common Use Hardstands.” It also gives the Port contractual rights to schedule another carrier's arrivals and departures at a Signatory Airline's own Preferential Use Gates under defined circumstances.²⁴ Scheduling authority over a defined category of gates already runs through the Port by contract, not through the airlines alone. That makes a night-hours restriction — whether voluntary or under 14 C.F.R. Part 161, the framework under which the Port, not the FAA, holds authority to study and impose such restrictions — not a novel or impractical alternative. It extends authority the Port already holds and exercises.²⁵ Nowhere in the DEIS is this authority, or the SLOA mechanism already available to exercise it, discussed, analyzed, or disclaimed.

STNI requests that the Final EIS analyze a restriction on operations during the 10:00 p.m.–7:00 a.m. window as a distinct alternative, independent of the Action/No-Action choice, evaluate whether such a restriction could be implemented through the SLOA negotiation process the Port already uses to govern airline operations, and disclose whatever internal analysis, if any, the Port has already conducted regarding its own Part 161 authority.

Comment 10 — Demand-management alternatives to unmanaged growth were never studied.

The Port's own forecasting materials document that airlines have voluntarily diverted evening flights to nearby airports and returned them the following morning — evidence that demand-management tools are already in active, informal use.²⁶ The DEIS never analyzes this, or any other demand-management approach, as a formal alternative to unmanaged growth.

STNI requests that the Final EIS analyze demand-management alternatives — including an expanded, voluntary Fly Quiet program directed at protecting the 10:00 p.m.–7:00 a.m. window — with the same rigor SEPA requires for any other reasonable alternative.

II. Outdated Technical Standards

The DEIS repeatedly relies on standards the Port itself has previously acknowledged are insufficient, and applies them in a way that guarantees a finding of no significant impact regardless of the actual conditions experienced by surrounding communities.

Comment 11 — The DNL 65 noise standard cannot see the impacts it is supposed to measure.

DNL 65 averages a full day and night of noise events into a single number, which by design will read as “not significant” even where individual nighttime events are severe.²⁷ The metric relies on A-weighting, which discounts the low-frequency energy that dominates aircraft noise and travels furthest into homes. It also relies on dose-response research the Port’s own noise technical appendix acknowledges is dated.²⁸ Meanwhile, the Part 150 study boundary has been reduced by more than half since 2013 as the noise contour has physically shrunk. The State’s own statutory noise-impact boundary — fixed at 10 miles beyond the paved north runway end, 13 miles beyond the south end, and 2 miles from the runway centerline — has not moved.²⁹ That gap is not merely a policy disagreement; it has legal grounding. DNL 65 and the Part 150 process define the threshold for federal funding eligibility — they do not set a ceiling on what a state or airport proprietor may study or provide as noise mitigation using its own authority. Federal aviation preemption reaches restrictions on flight operations themselves, not an airport proprietor’s own noise-mitigation measures, which is the same proprietor authority RCW 53.54’s independently defined, and considerably larger, boundary already exercises.³⁰ A recent federal decision found that the EPA guidance underlying DNL 65 has gone unmaintained by EPA for more than 40 years. Congress itself directed a reassessment of alternatives to DNL in the FAA Reauthorization Act of 2024.³¹

STNI requests that the Port re-evaluate noise impacts using the boundary defined in RCW 53.54, applying Part 150 supplemental metrics — including Lnight and Number-of-Events-Above — in place of DNL 65’s single averaged figure.

Comment 12 — DNL 65 cannot distinguish repeated nighttime awakenings from a single event, and ignores the outsized cost of early-morning sleep disruption.

Averaging erases a distinction that matters clinically: how many times a person is woken in a night, not just whether they are woken once. Laboratory sleep studies using EEG and actimetry find that the probability of an awakening or EEG arousal rises with each additional noise event in a night. Repeated nighttime noise exposure also fragments sleep architecture and shifts sleep toward lighter, less restorative stages — effects that do not fully habituate even in chronically exposed populations.³² A single arousal is recoverable. A night fragmented by several is not the same exposure, and DNL 65 cannot distinguish them.

STNI further contends the early-morning shoulder period deserves independent evaluation. REM sleep — the stage most associated with memory consolidation and cognitive restoration — is concentrated in the final sleep cycles of the night, with circadian REM propensity peaking in the hours before waking. That means disruption in the 5:00–7:00 a.m. window may carry a disproportionate cost relative to an equivalent event earlier in the night.³³

STNI requests that the Final EIS analyze (1) the cumulative effect of multiple nighttime awakenings, rather than single-event exposure alone, and (2) the 5:00–7:00 a.m. shoulder period independently from the rest of the nighttime window, given its disproportionate role in restorative sleep.

Comment 13 — Sound insulation is authorized under state law and the Port has used it at scale before, but the current record shows abandonment.

RCW 53.54 expressly contemplates sound insulation as a noise-mitigation tool, and nothing in Part 150 or federal law precludes the Port from insulating homes — including HVAC and air filtration upgrades — independent of the Part 150 process.³⁴ The Port has done exactly this before at scale: in 2001 the Port, Highline School District, the FAA, and the State signed a \$200 million agreement to insulate, repair, and rebuild fifteen airport-impacted schools.³⁵

Yet the current record shows the opposite trajectory. As of the DEIS, only two of the schools within the DNL 65 contour have been sound insulated. The U.S. EPA's own December 2024 review of the SAMP EA flagged that the document found impacts “not significant with mitigation” while identifying no actual mitigation. EPA specifically recommended sound insulation, double-paned windows, and HEPA filtration as measures the Port had not committed to.³⁶

STNI requests that the Final EIS include a current inventory of schools within the noise-impacted area not yet sound insulated, together with a funded plan and timeline — using the Port's own RCW 53.54 authority and HVAC/air-filtration measures — independent of the Part 150 update timeline.

Comment 14 — The Port's own 1996 compliance data undercounted noise-impacted homes, a mismatch that recurred at greater scale when the contour shrank in 2013.

Existing homes fare no better, and the pattern is a longstanding one. By 1996, the Port had defined 10,000 homes — approximately 23,500 residents — as eligible for insulation. But the Port's own Compliance Report that year, submitted to the independent PSRC Expert Arbitration Panel reviewing Third Runway noise conditions, told a different story: it showed 14,000 housing units within the 65 dB DNL contour in 1995, and more than 17,000 within that contour in 1993. Thousands more housing units sat inside the noise-impacted area than the Port's own eligibility definition captured. The Panel flagged this gap directly, warning that expansion of the residential insulation program “may become necessary” because the Port had set its eligibility criteria assuming a contour shrinkage that had not occurred. That same mismatch would recur, on a larger scale, when the contour actually did shrink

in 2013.³⁷ The Port bound itself to complete that program through its own Commission Resolution 3125, which conditioned residential insulation on the Third Runway's construction and opening. That is a precedent for using a binding Commission instrument to tie mitigation completion to construction milestones — the same tool STNI asks the Port to apply to the NTPs.³⁸

The insulation work itself proceeded on a comparable trajectory: just over 300 homes were insulated when the Third Runway was permitted in 1997, growing to 9,000 by 2005, concentrated almost entirely among single-family homes.³⁹ Problems with the workmanship were identified as early as 1998, not normal wear and tear. Yet the program's outreach was effectively one contact per home rather than an ongoing relationship, and once a home's insulation failed there was no established path back into the program. When the DNL 65 contour shrank with the 2013 Part 150 update, roughly 1,100 houses and apartments that had never been treated were left permanently outside the eligibility boundary — “orphan homes” — regardless of whether they were still under the flight path.⁴⁰

STNI requests that the Final EIS include a current inventory of orphan homes within the noise-impacted area never insulated under any Port Package program, together with a funded plan and timeline to address them, and that the Port apply a Resolution-3125-style binding completion requirement to the NTPs.

Comment 15 — Multi-family housing was excluded from sound insulation for decades, and the Port's current repair program has completed no repairs.

Multi-family housing fared worse still. The Port did not extend sound insulation to apartments at all until its 2020 Accelerated Sound Insulation Program, leaving more than 900 multi-family units untreated for decades after the surrounding single-family homes were done — including one Des Moines complex, built in 1985, that did not receive insulation until 2023.⁴¹

And the Port's 2024 Sound Insulation Repair/Replacement Pilot Program — intended to address homes whose original insulation has since failed — had, as of this writing, repaired none of them, with only three committed for repair, and those solely because they separately qualify for FAA reimbursement.

STNI requests that the Final EIS include a current inventory of previously insulated homes and multi-family units where that insulation has since failed, together with a funded plan and timeline — using the Port's own RCW 53.54 authority and HVAC/air-filtration measures — to address both.

Comment 16 — Air quality analysis is confined to the airfield rather than the airport's actual footprint.

The DEIS's air quality study area is limited to the Airport Activity Area — the airfield and construction footprint — and concludes that although every major pollutant increases under the Proposed Action, no threshold is crossed.⁴² The Port's own Century Agenda commits to a 25 percent reduction in aircraft emissions from 2012 levels, and separately a net-zero GHG emissions goal by 2040. This DEIS does not measure current emissions against either target at all, let alone account for how forecast growth under the Proposed Action would track against them.⁴³

STNI requests a cumulative air quality analysis benchmarked against the Port's own Century Agenda emissions-reduction targets, rather than a project-by-project significance check, and that the Final EIS disclose the technical basis on which the 25 percent target was originally set, show how forecast growth under the Proposed Action tracks against that target year by year, and identify what specific strategies — beyond aspirational sustainable aviation fuel goals — the Port would need to adopt to actually meet it.

Comment 17 — Ultrafine particles present a plausible mechanism, a documented mortality association, and three decades of unstudied local exposure — the exact combination WAC 197-11-080 requires the Port to resolve.

SEPA does not require STNI to prove that ultrafine particles cause specific harm before the Port is obligated to study them. Where information on significant adverse impacts is genuinely uncertain, WAC 197-11-080 directs the opposite calculus: the agency must weigh the need for the action against the severity of the possible adverse impacts if it proceeds in the face of that uncertainty, and disclose the likelihood of occurrence to the extent it can reasonably be developed. Likelihood, stakes, and uncertainty are the three things that analysis turns on — and this DEIS addresses none of them.⁴⁴

On likelihood: ultrafine particles are, according to the leading peer-reviewed review of their health effects, biologically capable of harm across the pulmonary, cardiovascular, and neurological systems — a plausible mechanism, not a fringe concern, even as the same review cautions that “their precise role in many illnesses is still unknown” for lack of “global standards and national reporting.”⁴⁵ On stakes: a 2024 cohort study of 1.5 million adults in Toronto and Montreal, published in the American Journal of Respiratory and Critical Care Medicine, found long-term outdoor ultrafine particle exposure associated with increased nonaccidental mortality and, most strongly, respiratory mortality, independent of PM2.5. The study

is observational, and its authors are explicit that causation is an assumption, not a finding — but the endpoint at stake is mortality, and the study identifies highways, airports, and rail alike as the kind of stable point sources its exposure model depends on.⁴⁶

On uncertainty: nobody has actually looked here. The EPA has not added a new criteria air pollutant since PM_{2.5} in 1997, and ultrafine particles remain outside FAA and EPA regulation entirely. The only significant primary research on aircraft-associated UFPs at this airport — the UW MOV-UP study — was a two-year study funded by the state Legislature, not the Port, that ended in 2019 without becoming an ongoing program.⁴⁷ Since then, the Port's role has been limited to incidental assistance to outside academic researchers rather than funding independent monitoring of its own, and it is airport-community residents themselves who have funded the air quality monitors currently tracking conditions near the airport. This is not for lack of a model to follow: when the Puget Sound Regional Council conditioned Third Runway approval on a noise program, the Port built and has maintained an extensive permanent noise monitoring network to track the ongoing impacts of growth. No comparable air quality monitoring network has ever been funded — despite the Sea-Tac Communities Plan including a dedicated air quality element as early as 1974, establishing that ongoing monitoring was understood as necessary from the plan's inception.⁴⁸

A plausible mechanism, a documented population-level mortality association, and three decades of unstudied local exposure are exactly the combination WAC 197-11-080 requires the Port to resolve rather than proceed through.

STNI requests that the Port fund the independent, ongoing ultrafine particle monitoring program — comparable in scale and permanence to its existing noise monitoring network — as a mitigation measure in the Final EIS.

Comment 18 — Water quality monitoring is confined to the airfield and to discharge points, not the creeks it affects.

Water quality testing under the Proposed Action occurs at the airfield and at discharge points, not in-creek. This is despite the fact that the Airport Activity Area sits at the headwaters of Des Moines, Miller, and Walker Creek, and despite a documented history of PFAS contamination on the airport plateau.⁴⁹ This is not a new dynamic. The Port's original Section 404 permit for the Third Runway turned on major upgrades to both the runway design and the Industrial Wastewater System, and the Department of Ecology maintains nine active cleanup sites on the airport plateau today. These should be carried forward into this DEIS's cumulative water analysis and made subject to independent inspection, not treated as closed history.⁵⁰

Since then, individual parties with a direct stake — Ecology, the water districts — have repeatedly resolved their own exposure through bilateral agreements rather than pushing for a shared regional accounting. Highline Water District's Tyee Well tested above the state action level for PFNA in 2022. The District and the Port reached their own settlement in September 2024, addressing the District's claims and its well alone — not a shared regional monitoring standard.⁵¹ These water quality concerns are not STNI's alone. In its December 2024 review of the SAMP EA, the U.S. EPA recommended additional analysis of the hydrologic connectivity between wetlands and wellhead protection areas to fully evaluate impacts to groundwater recharge. It also flagged that the Port's own vulnerability assessment had already found its stormwater and industrial wastewater infrastructure moderately vulnerable to climate effects. This DEIS resolves neither.⁵²

STNI requests in-creek ambient monitoring with a formal, independent role for downstream jurisdictions — not reliance on discharge-point compliance testing or the settlement history of individual parties with narrower interests at stake — an enforceable PFAS cleanup standard, and the wetland-to-wellhead hydrologic connectivity analysis EPA has already recommended.

Comment 19 — The Third Runway's Section 404 mitigation has never been re-verified, and its 15-year monitoring commitment has already run its course.

The Third Runway's own Section 404 mitigation illustrates why this history matters. It rested on two novel interventions: chitosan, a recycled crab-shell product used at seven construction stormwater ponds to settle solids before release to area creeks, and a restored, re-planted stretch of Miller Creek with more than 158,000 native plants. The Port's own managing director publicly called this package an “environmental success story,” backed by what the Port itself described as an unprecedented 15-year monitoring program.⁵³ That monitoring commitment, dated from the runway's 2008 opening, has now run its course. Living mitigation — planted vegetation, engineered fish habitat — requires periodic replacement and recharge to keep functioning as designed. The salmon returns the Port credited to this mitigation in 2008 have not, to our knowledge, been re-verified by any recent fish count.

STNI requests an updated assessment of the Third Runway's Section 404 mitigation sites, establishing whether the chitosan-based stormwater treatment system and restored Miller Creek habitat still function as represented in 2008, with replacement or recharge before any additional NTP construction adds further load to the same watersheds.

Comment 20 — Transportation analysis predates transit changes the Port had already been notified of before this DEIS was published.

The DEIS's surface transportation counts date to Fall 2022 and Spring 2023.⁵⁴ Since then, the Kent Des Moines light rail station opened (December 6, 2025) and the 2 Line's Crosslake Connection completed the Link system's connection to the Eastside (March 28, 2026). King County Metro's major South King County service restructuring — including new routes serving the airport-adjacent network — was publicly transmitted to the County Council on February 23, 2026. All of this came before the DEIS was published in May 2026.⁵⁵

STNI requests a fresh transportation analysis reflecting service and ridership conditions the Port already had notice of before it published this DEIS.

III. Host-City and Socioeconomic Impacts

The DEIS measures the airport's benefits at a regional and county scale while confining its harm analysis to the immediate airport property line. The following comments address the resulting mismatch between the scale at which benefit is claimed and the scale at which cost is actually borne.

Comment 21 — Host-city fiscal and service-cost impacts have never been analyzed, though three separate public processes have already assigned the task.

The DEIS concludes there are no significant negative socioeconomic or environmental-justice consequences from the Proposed Action. It finds the Action Alternatives would support long-term regional economic growth with only a positive, non-significant socioeconomic effect. That conclusion is reached at the regional scale, with no accounting for fiscal condition at the level of any individual host city.⁵⁶

This gap has been identified before. In 1995, the Washington Legislature appropriated \$500,000 specifically because “many of the identified impacts cannot be examined in the EIS” and the affected cities “must plan for loss of taxable property” and cumulative growth-management effects an environmentally focused EIS cannot reach.⁵⁷ That appropriation produced the 1997 HOK Sea-Tac International Airport Impact Mitigation Study. Applying the FAA's own definitional framework for adverse socioeconomic impact, HOK found the prior Master Plan Update EIS had not addressed municipal revenue. It concluded it was “highly likely” the net effect on the five affected cities' tax collections was negative, and identified a preliminary, statistically meaningful relationship between aircraft operations

growth and public service cost — one that fell outside its own budget and scope to fully study.⁵⁸

In 2020, the Legislature funded Stantec to take up that recommendation. Stantec's report states plainly that “additional research would be required to determine the direct municipal revenue benefits due to Airport proximity.” It recommended a funded Phase 2 study that was never carried out — a study the Port itself declined to actively participate in developing.⁵⁹ Twenty-nine years after the first appropriation, this DEIS repeats the omission the 1995 Legislature funded a study specifically to correct.

STNI requests that the Final EIS complete the municipal-scale fiscal and service-cost analysis three public processes — the 1995 legislative appropriation, HOK's 1997 study, and the 2020 Stantec study — have already found necessary but never performed.

Comment 22 — The Port's own records contradict its regional consultant's employment and revenue figures, and that contradiction has never been reconciled.

The Port's own benefit accounting undercuts its “no local impact” finding on its own terms, and STNI has verified this directly. The Community Attributes Inc. study underlying the Port's regional benefit case claims airport-supported jobs represent 37 percent of total employment in Des Moines. The Port's own Appendix K separately estimates 540 Burien residents work at the airport.⁶⁰ A Public Records Request produced the Port's own underlying accounting for Burien residents: 57 Port of Seattle employees, 444 employees of other companies operating at the airport, 28 Alaska Airlines employees, and 30 Delta Air Lines employees. That is a directly verifiable total of at least 559 — before counting any other airline or airport contractors living in the city. The Port's own records describe the 444-employee category as one where “the vast majority... are not family wage jobs.”⁶¹ That figure, built entirely from the Port's own records, already exceeds the Port's own 540-employee estimate — and its largest single component is the category the Port's own data identifies as predominantly sub-family-wage.

That is consistent with HOK's 1997 finding that direct airport employment reached at most 2.39 percent of resident workers across the five affected cities, with a 3.72 percent ceiling including indirect jobs. That figure has never been updated for this airport in the thirty years since. HOK's 1997 study also estimated the five affected cities would lose \$39.9 million in property tax revenue over the 20 years following the Third Runway's opening.⁶² Independent findings spanning three decades, including the Port's own PRR-produced records for a specific host city, agree on two things: the economic activity credited to these communities does not reach

their residents as income, and the Port's regional consultants have undercounted it. That contradiction has never been reconciled, because the municipal-scale analysis that would reconcile it has never been performed.

STNI requests that the Final EIS reconcile the conflicting employment and revenue figures identified above through independently verified, city-specific data, rather than relying on the Port's regional consultant's uncorroborated estimates.

Comment 23 — CAI's figures are modeled, not audited, and the model's own outputs contradict themselves over time.

These contradictions are not incidental. They follow from the methodology itself. Community Attributes Inc.'s figures are not drawn from audited transactions — tax receipts, payroll records, business license data. Instead, they are modeled using the Washington Input-Output Model, a tool the state Office of Financial Management built to analyze economies the size of states and metropolitan regions. Even OFM's own economists caution against forcing that model down to the scale of an individual city.⁶³

The model also compounds every benefit claim through three layers — direct, indirect, and induced — crediting the airport with economic activity occurring miles away and several transactions removed from any flight. We are aware of no equivalent multiplier applied to the cost side. Property value erosion, elevated municipal service costs, and the health costs of chronic sleep disruption are measured, where measured at all, only at the direct, on-site level.

The model's own outputs illustrate the problem. CAI's 2018 study and its 2025 update, using the Port's own data, show Burien's airport-attributable jobs falling from 1,400 to 710, business output from \$157 million to \$115.0 million, total compensation from \$66 million to \$37.9 million, and local tax revenue from \$1.4 million to \$230,000. That is a decline across every metric for one host city, in the same years the Port's own operational forecasts show continuous growth.⁶⁴

Even setting the methodology aside, the DEIS's benefit-side accounting cannot do the work the Port asks of it. If the Port's position is that the airport's regional economic benefit offsets the localized harm to host cities — an implicit trade the DEIS's structure assumes even where it does not say so — that trade cannot be evaluated at all without the municipal-scale accounting described below. The lack of proper accounting makes even a good-faith benefits-as-mitigation argument impossible to test, let alone accept. The same confinement problem runs through the DEIS's socioeconomic study area generally. Its environmental justice analysis is built around census tracts and block groups immediately surrounding the airport. But the CAI economic analysis it relies on for the benefit side of the ledger

evaluates six cities individually — Burien, Des Moines, SeaTac, Tukwila, Federal Way, and Normandy Park — each as a whole jurisdiction.⁶⁵ The DEIS cannot credit the airport with citywide economic benefit while confining the airport's negative impacts to the tracts closest to the fence line. The negative-impact study area should be expanded to match the same six full jurisdictions the Port's own consultant already uses to claim the benefit.

STNI requests that the Final EIS include a municipal fiscal and service-cost accounting for each host city. On one side: Port and airport growth — annual operations, enplanements, aeronautical and non-aeronautical revenue, capital investment, and DNL 65+ contour extent by year. On the other: host-city fiscal capacity and service load — assessed value, levy headroom against the statutory ceiling, sales, lodging, and parking tax receipts, general fund expenditure by function (particularly police, fire, and public works), and land capacity under the Growth Management Act. Both sides should be built from actual tax rolls, payroll, and assessor records the Port and the cities already publish annually — not a state-scale input-output model applied to a city. HOK's Table 9.15 laid out this exact comparison in 1997.⁶⁶ The request is to complete, with factual data, an analysis three public processes have already found necessary.

Comment 24 — Wetland mitigation for the Third Runway was sited to benefit the Port, not the communities that lost the wetlands.

The trajectory of airport growth and its influence on land use was established in 1976 with the Sea-Tac Communities Plan — the joint Port of Seattle and King County comprehensive plan for the airport and its surrounding communities. The Highline Community Plan followed, adopted by the King County Council in December 1977. Together these established an ongoing recognition of the airport communities and a standing commitment to consider this area in the airport's future development. That is the baseline against which any evaluation of community impacts should be measured — not a 2026 snapshot that treats the current footprint as though it arrived without history.⁶⁷

To build the Third Runway, the Port filled portions of a dozen wetlands across the Des Moines, Miller, and Walker Creek watersheds. Its own FAA-driven mitigation rule required replacement habitat be sited more than 10,000 feet from the runways. As a result, the Port purchased roughly 50 acres of replacement wetland in Auburn instead — miles from the communities that lost the wetlands.⁶⁸ When Citizens Against Sea-Tac Expansion sued to keep the mitigation local, the court sided with the Port, reasoning its service area was countywide.⁶⁹ The Port has since moved to convert the Auburn site into a mitigation bank, selling credits to other developers for wetland losses elsewhere in the region — an obligation the Port was forced to

accept has become a revenue source, while the communities that bore the original loss received nothing.

STNI requests that the SAMP's mitigation accounting disclose, for every proposed or credited mitigation measure, both its location relative to the harm it offsets and which party bears the ongoing cost of any resulting regulatory obligation. We further requests an economic offset, calculated by parcel, for residential capacity removed in host cities by noise-compatibility land-use standards, given the area's airport-compatible designation under the 1976 Sea-Tac Communities Plan and 1977 Highline Community Plan described above.

Comment 25 — The Port's compliance obligations become unfunded mandates for host cities, from bird-deterrent equipment to tree replacement.

In 2024 the Port informed Des Moines that a City-owned stormwater pond in the Des Moines Creek Business Park was a bird hazard under FAA guidance. The City Council approved \$124,191 for bird-deterrent equipment that November — on land the City owns but the Port's own flight-safety requirements constrain, inside a business park the Port itself leases out for revenue.⁷⁰

A parallel dynamic runs through the Port's Flight Corridor Management Program, the recurring tree-removal program required to keep obstructions clear of SEA's flight paths. Since the program's first comprehensive cycle in 2014, the Port has documented removal of at least 1,561 trees: 1,167 in 2014, 174 in 2019, and approximately 220 identified in the program's most recent 2024 data collection, with unspecified additional removals before 2014.⁷¹ Within the Airport Activity Area, the Port replaces removed trees under a 4:1 credit system it adopted in March 2024: four credits per tree removed, of which only half must be direct new planting. The remainder can come from crediting trees already standing on Port property — through invasive-species removal or retention credits — and on-site actions are explicitly prioritized ahead of any off-site planting.⁷² Outside the AAA, the burden shifts entirely to the cities themselves. Burien and Des Moines apply their own 3:1 replacement ratios within their own city limits, at their own cost, for tree loss driven by the Port's federal obstruction-clearance obligation, not by any city decision.⁷³

Both examples follow the same pattern: a Port-driven regulatory obligation lands on land the host city owns, and the city funds compliance itself.

STNI requests that the Final EIS disclose, for the Flight Corridor Management Program's tree removal and for FAA-driven safety compliance measures like the Des Moines bird-deterrent purchase, the cost differential between what host cities currently bear when they fund their own compliance and what the Port would bear if

it funded equivalent measures directly — and that the Port assume funding responsibility for compliance obligations its own operations create on city-owned land.

Comment 26 — Schools are dismissed as “no significant impact” without the analysis that finding requires.

Schools under the flight path are among the lowest-performing in King County and the State. The DEIS's own environmental justice analysis lists schools within its Public Services and Utilities evaluation and reports “no significant impacts identified,” with no further discussion.⁷⁴ This is not a new gap. In 1997, HOK recommended a detailed analysis of the Highline School District's property tax base shortfall attributable to the airport, stating explicitly that the work was beyond that study's budget and scope but that the full effects should be calculated.⁷⁵ Twenty-nine years later, that analysis still has not been done, and this DEIS's one-line finding does not substitute for it.

It is also no accident that the Highline School District boundary maps so closely to the footprint of the 1976 Sea-Tac Communities Plan described in Comment 16. As the airport has expanded, that footprint has extended as well, reaching into Federal Way Public Schools. The Port's own noise monitoring network, sited to track the airport's actual acoustic footprint, traces largely the same area. Whether by design or coincidence, the flight path blankets a disproportionate concentration of local schools. Any consideration of airport-community mitigation must account for the children under that footprint district-wide — not only the twelve schools currently within the DNL 65 contour.

STNI requests an honest study of mitigation options beyond sound insulation, including the self-reinforcing relationship between school quality, neighborhood desirability, and reinvestment — the mechanism by which declining schools further depress the neighborhoods that depend on them — and completion of the Highline School District fiscal analysis HOK identified as necessary in 1997.

IV. Right of Inspection

Comment 27 — Surrounding cities should have a formal right to inspect construction, consolidating Comments 2, 3, and 7 above.

Several threads in this letter converge on the same request: the scale of these 31 projects; the lack of finished design (Comment 1); the incomplete hazardous materials disclosure for buildings scheduled for demolition (Comment 2); the Port's own outstanding records obligations (Comment 3); its documented history of

unforeseen site conditions on recent major projects, including the fill-testing concerns and management audit findings described in Comment 7; and the nine active Ecology cleanup sites described in Comment 18. All of this, combined with the Port's dual role as both permitting authority and SEPA lead agency within the AAA, demands a formal right by surrounding cities to inspect construction work before ground is broken and at reasonable intervals throughout the lifecycle of all 31 NTPs, with particular attention to fill and soil material given the scale of earthwork these projects will require.

Thank you for the opportunity to comment on this Draft EIS. STNI requests that each of the twenty-seven comments above be addressed individually in the Final EIS, consistent with SEPA's requirement that a lead agency respond to substantive comments received during public review.

Respectfully submitted,

Paula Rodriguez
---on behalf STNI

Notes

1. See generally DEIS Chapter 2, Alternatives, and Appendix B, Purpose and Need and Alternatives Supporting Information (Landrum & Brown, June 2024), describing NTP scope at a programmatic level. A Port representative characterized NTP designs as approximately 10 percent complete at the SAMP DEIS open house, July 14, 2026 (video recording, on file with STNI); [↗](#)
2. DEIS Chapter 4, Impacts and Mitigation Measures, § 4.2.2, Buildings to be Demolished, p. 4-46; Appendix F, Hazardous Materials and Solid Waste Technical Report (Landrum & Brown, January 2024), § 4.2.2. [↗](#)
3. WAC 197-11-080(1)–(2). [↗](#)
4. Public Records Request No. 26-610, Port of Seattle, filed May 10, 2026 (portofseattle.nextrequest.com/requests/26-610). [↗](#)
5. Public Records Request No. 26-949, Port of Seattle, filed July 31, 2026 (portofseattle.nextrequest.com/requests/26-949); Port of Seattle, SEPA IWTP Project Checklist (Aug. 6, 2025). [↗](#)
6. DEIS Chapter 5, Cumulative Impacts, §§ 5.3.1–5.3.2 (Past and Present Projects). [↗](#)
7. Port of Seattle, SEA Gateway Project page, portseattle.org (\$546 million); “Sea-Tac Airport has billions in projects planned. Here’s where the money’s going,” Puget Sound Business Journal, 2023 (Baggage Optimization, \$591.6 million); “Sea-Tac airport’s answer to crowding? Construction,” Anchorage Daily News, Dec. 2025 (C Concourse, \$399 million); “Sea-Tac Airport Readies Next Major Renovation: S Concourse,” South Sound Magazine / FOX 13 Seattle, 2026 (\$1.1 billion authorized toward \$2.5 billion total); Port of Seattle, Signatory Lease and Operating Agreement 2025–2034 (SLOA V), Draft for Submission to Port Commission, Nov. 14, 2024, § 6.2.1(b) (defining “Very Large Project”). [↗](#)
8. Federal Aviation Administration, Air Traffic Activity System (ATADS), Seattle-Tacoma International Airport, 2025 operations data (435,896 total operations); City of Burien, comment letter on SAMP Draft EA, Dec. 11, 2024, p. 2 (pre-Third-Runway baseline and SAMP 2034 forecast). [↗](#)
9. WAC 197-11-440(5)–(6). [↗](#)
10. *Marin Audubon Society v. FAA*, 121 F.4th 902, 917 (D.C. Cir. 2024). [↗](#)
11. DEIS Chapter 1, Purpose and Need, p. 1-3; see also Chapter 5, Cumulative Impacts, § 5.3.3. [↗](#)
12. U.S. EPA, Consideration of Cumulative Impacts in EPA Review of NEPA Documents (1999) (“The criterion for excluding future actions is whether they are ‘speculative.’”). [↗](#)

13. Washington State Department of Transportation, Environmental Procedures Manual, M 31-11, Ch. 412, Indirect and Cumulative Effects. [↗](#)
14. Port of Seattle, SAMP Scoping Town Hall, display boards, Station 4 (“Concurrent Strategies to Serve Market Demand”; “Long-Term Vision — Phased Approach”), June 1, 2018. [↗](#)
15. Port of Seattle, “Port of Seattle Reveals Latest Design Images and Video Fly-Through for New International Arrivals Facility,” news release, Sept. 2016. [↗](#)
16. Port of Seattle, “Port of Seattle Breaks Ground on new International Arrivals Facility,” news release, Aug. 2017; “Port commission adds \$213M to Sea-Tac project costs as work starts on international passenger terminal,” Seattle Times, Aug. 15, 2017. [↗](#)
17. Port of Seattle, International Arrivals Facility project page, portseattle.org (total project cost \$986 million); Airport Improvement, “Seattle-Tacoma Int’l Welcomes the World via New International Arrivals Facility,” May 2022 (opening date). [↗](#)
18. “Port of Seattle, Clark Construction Settle Sea-Tac Airport Project Dispute,” Engineering News-Record, Jan. 29, 2025 (settlement funds “completely” resolving only gates A6/A8; S4/S6 addressed in a future project). [↗](#)
19. Port of Seattle, Commission Briefing Memo, Item 9b, North Satellite Modernization Budget Increase, Feb. 25, 2020. [↗](#)
20. Port of Seattle, Internal Audit Report No. 2019-04, Noise Insulation Program, January 2013–March 2019. [↗](#)
21. Email from R. Hellwig, Washington State Department of Ecology, to A. Kenny, Jan. 10, 2002, forwarding email from N. Peck, Department of Ecology, Toxics Cleanup Program, Northwest Regional Office, Jan. 10, 2002, Pollution Control Hearings Board record, Vol. 3, Box 9, Exh. 448 (AR 022825). [↗](#)
22. Final Environmental Impact Statement, SR-509 Corridor Completion, WSDOT et al., January 2003, p. 2-34; Environmental Reevaluation, Puget Sound Gateway Program — Phase 1 of the SR 509 Completion Project, WSDOT, January 2018, Tables 2 and 7. [↗](#)
23. Final Environmental Impact Statement, SR-509 Corridor Completion, WSDOT et al., January 2003; FHWA PlanWorks, Puget Sound Gateway Program case study, describing WSDOT’s 2013 rescoping of Phase 1 to a reduced three-mile extension (funding-driven scope narrowing, independent of any STNI characterization). [↗](#)
24. Port of Seattle, Signatory Lease and Operating Agreement 2025–2034 (SLOA V), Draft for Submission to Port Commission, Nov. 14, 2024, §§ 4.6, 4.9. [↗](#)
25. 14 C.F.R. Part 161, Notice and Approval of Airport Noise and Access Restrictions. [↗](#)
26. DEIS Appendix A, Forecast and Operational Assumptions. [↗](#)
27. DEIS Appendix J, Noise Technical Report (Landrum & Brown, March 2024). [↗](#)
28. DEIS Appendix J, Part C, Health Effects Meta-Analysis, pp. 196–204. [↗](#)
29. RCW 53.54.020. [↗](#)
30. Air Transport Association of America v. Crotti, 389 F. Supp. 58, 64–65 (N.D. Cal. 1975) (state noise-abatement provisions not preempted where they do not intrude upon flight operations); Greater Westchester Homeowners Assn. v. City of Los Angeles, 26 Cal. 3d 86, 96–98 (1979) (airport proprietor retains responsibility for land-use planning to minimize noise effects). [↗](#)
31. Quiet Communities, Inc. v. EPA, No. 23-cv-1649 (D.D.C. 2026); FAA Reauthorization Act of 2024, as reported in Airport Noise Report, Vol. 36, No. 13, May 2, 2024. [↗](#)
32. Elmenhorst et al., Single and Combined Effects of Air, Road, and Rail Traffic Noise on Sleep and Recuporation, Sleep, 2011; Basner & McGuire, Environmental Noise and Effects on Sleep: An Update to the WHO Systematic Review and Meta-Analysis, Int’l J. Environ. Res. Public Health, 2018 (PMC9272916). [↗](#)
33. Normal Sleep, Sleep Physiology, and Sleep Deprivation, Medscape/eMedicine clinical reference (REM period lengthening across the night; circadian nadir protecting against premature awakening); Schmidt et al., The Circadian Regulation of Sleep, PLOS ONE, 2014 (PMC4249976) (maximal circadian sleep propensity and REM-dependent memory benefit concentrated in early morning hours). [↗](#)
34. RCW 53.54.020. [↗](#)
35. L. Pemberton-Butler, “Highline district to get \$200 million to fix airport-impacted schools,” Seattle Times, 2001. [↗](#)
36. U.S. EPA Region 10, Detailed Comments on the SAMP NTP DEA, Dec. 2, 2024, pp. 5–6 (citing DEA pp. 4-8, 4-44). [↗](#)
37. PSRC Expert Arbitration Panel, Final Decision on Noise Issues, Mar. 27, 1996, p. 27. [↗](#)
38. Port of Seattle Commission Resolution No. 3125, cited in PSRC Expert Arbitration Panel, Final Decision on Noise Issues, Mar. 27, 1996, p. 27. [↗](#)
39. Port of Seattle public records request 20-456. [↗](#)
40. Port Packages mapped: eligibility over time, Sea-Tac Noise.Info. [↗](#)
41. Port of Seattle, “Port Moves Forward with Accelerated Sound Insulation Program to Include Apartments for the First Time,” news release, 2021; The PFC Explainer, Sea-Tac Noise.Info. [↗](#)
42. DEIS Appendix C, Air Quality and GHG Emissions Technical Report (Landrum & Brown, March 2024). [↗](#)
43. Port of Seattle Commission, Motion adopting the Century Agenda, Dec. 4, 2012; DEIS Appendix C, pp. 64–65 (net-zero-by-2040 goal). [↗](#)
44. WAC 197-11-080. [↗](#)
45. D. E. Schraufnagel, “The health effects of ultrafine particles,” Experimental & Molecular Medicine 52, 311–317 (2020). [↗](#)
46. M. Lloyd et al., “Airborne Nanoparticle Concentrations Are Associated with Increased Mortality Risk in Canada’s Two Largest Cities,” Am. J. Respir. Crit. Care Med. (2024). [↗](#)

47. UW Department of Environmental & Occupational Health Sciences, Mobile Observations of Ultrafine Particles (MOV-UP) study, funded by Washington State Legislature proviso, 2018–2019. [↗](#)
48. PSRC Expert Arbitration Panel, Final Decision on Noise Issues, 1996 (noise program condition of Third Runway approval); Sea-Tac Communities Plan, Part 5: The Environment, Chapter 5.1, Air Quality (Environmental Systems Laboratories, Inc., 1974). [↗](#)
49. DEIS Appendix M, Water Resources Appendix. [↗](#)
50. Washington State Department of Ecology, Toxics Cleanup Program site database, apps.ecology.wa.gov/cleanupsearch (active sites on the airport plateau). [↗](#)
51. Highline Water District, 2024 Annual Report, p. 5; see also Seattle Times, “Sea-Tac’s legacy of PFAS chemicals: ‘foam showers,’ sick firefighters and contaminated water,” Feb. 12, 2023. [↗](#)
52. U.S. EPA Region 10, Detailed Comments on the SAMP NTP DEA, Dec. 2, 2024, p. 9 (citing DEA Appendix M and DEA p. 4-62). [↗](#)
53. M. Reis (Managing Director, Sea-Tac Airport), “Third runway an ‘environmental success story,’” Daily Journal of Commerce, Nov. 20, 2008. [↗](#)
54. DEIS Chapter 3, Affected Environment, § 3.3.13; Chapter 4, Impacts and Mitigation Measures, § 4.3.12. [↗](#)
55. Sound Transit, “Link light rail opens across Lake Washington,” news release, Mar. 28, 2026; King County Metro, “King County Metro announces major service expansion across King County,” Aug. 3, 2026 (citing the Feb. 23, 2026 legislative transmittal). [↗](#)
56. DEIS Appendix K, SEPA Environmental Justice Memorandum, Table 6-1 (Socioeconomic) and § 6.1. [↗](#)
57. 1995–97 CTED Operating Budget, Proviso (16), § 126; Burien Mayor Arun Jhaveri, letter to Governor Mike Lowry, June 7, 1995, pp. 9–10. [↗](#)
58. HOK, Sea-Tac International Airport Impact Mitigation Study, 1997, Table 4.01 and Fig. 4.01 (p. 4-5–4-6) (citing FAA Document DOT/FAA/PP-92-6); § 4.04; Appendix A, § A.06, p. A-12. [↗](#)
59. Stantec, Sea-Tac Airport Study, Final Report, May 2020, § 13.I, p. 323; § G.3, p. 358 (Washington State Department of Commerce). [↗](#)
60. Community Attributes Inc., Sea-Tac Airport Economic Impacts, prepared for the Port of Seattle, January 2018 (Des Moines figure); DEIS Appendix K, Socioeconomics, Environmental Justice, and Children’s Health, p. 30 (Burien figure). [↗](#)
61. Employees in Airport Communities, Sea-Tac Noise.Info, November 2020 (compiling Port of Seattle Public Records Request response data). [↗](#)
62. HOK, 1997, Appendix A, §§ A.05–A.06, pp. A-8–A-9, Tables A.06–A.07; HOK, 1997, p. ES-6 (\$39.9 million property tax loss estimate). [↗](#)
63. M. Baldwin, Washington State Office of Financial Management, “Input-Output Fundamentals,” presentation to the Washington House Ways & Means Committee, Sept. 22, 2011. [↗](#)
64. Community Attributes Inc., Sea-Tac International Airport Economic Impacts, August 2018, city profile infographics pp. 29–34 (2017 data); DEIS Appendix K, Exhibit 64, p. 47 (2023 data). [↗](#)
65. DEIS Appendix K, SEPA Environmental Justice Memorandum (census tract/block group study area); DEIS Appendix K, Exhibits 62–64 (city-level CAI benefit accounting). [↗](#)
66. HOK, 1997, Table 9.15, p. 9-28. [↗](#)
67. Sea-Tac Communities Plan, Port of Seattle and King County, 1976; Highline Community Plan, adopted by the King County Council, Dec. 1977; King County Division of Planning, Highline Community Plan: Proposed Area Zoning, Jan. 1980 (implementing the 1977 HCP). [↗](#)
68. Foster Pepper & Shefelman, letter to City of Auburn, Dec. 16, 1998. [↗](#)
69. Port of Seattle v. Pollution Control Hearings Board, 151 Wn.2d 568 (2004); King County Superior Court, Cause No. 98-2-23944-1SEA. [↗](#)
70. City of Des Moines, Bird Deterrent Ball Purchase, Council agenda, Nov. 21, 2024; FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or Near Airports. [↗](#)
71. Port of Seattle, SEPA Environmental Checklist No. 2025-05, Flight Corridor Management Program, Aug. 20, 2025, §§1.1, B.4(b). [↗](#)
72. Port of Seattle, SEPA Environmental Checklist No. 2025-05, Attachment B, § 3.2.2.1 (Port Airport Activity Area tree replacement standards, adopted by Commission action, March 2024). [↗](#)
73. Port of Seattle, SEPA Environmental Checklist No. 2025-05, Attachment B, Table 1 (Summary of Off-Port Property Current Tree Replacement Standards). [↗](#)
74. DEIS Appendix K, SEPA Environmental Justice Memorandum, Table 6-1 (Public Services and Utilities). [↗](#)
75. HOK, 1997, § 9.11, pp. 9-33. [↗](#)