



September 28, 2018

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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.

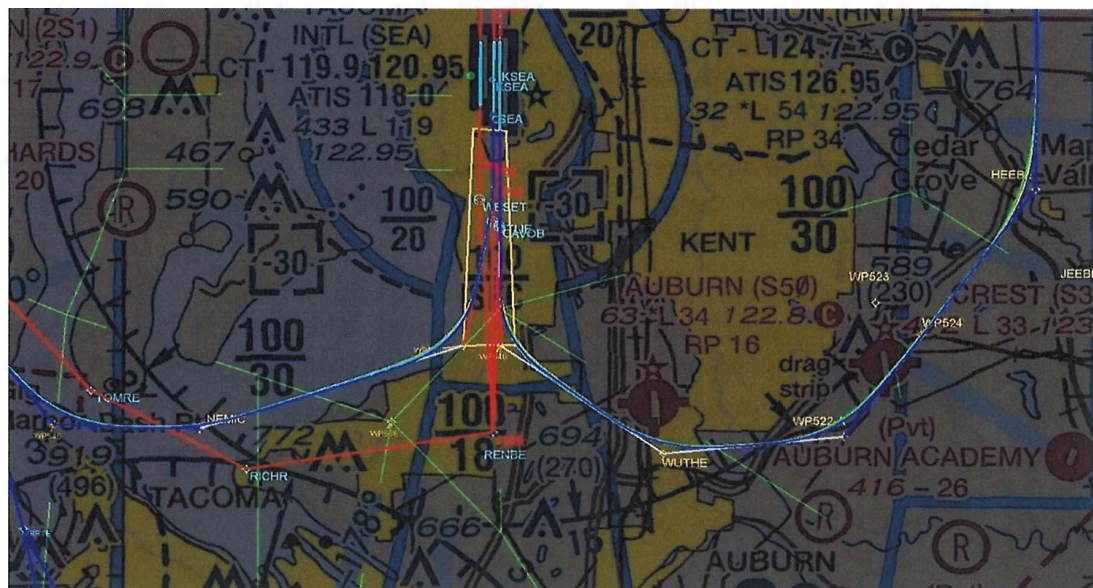
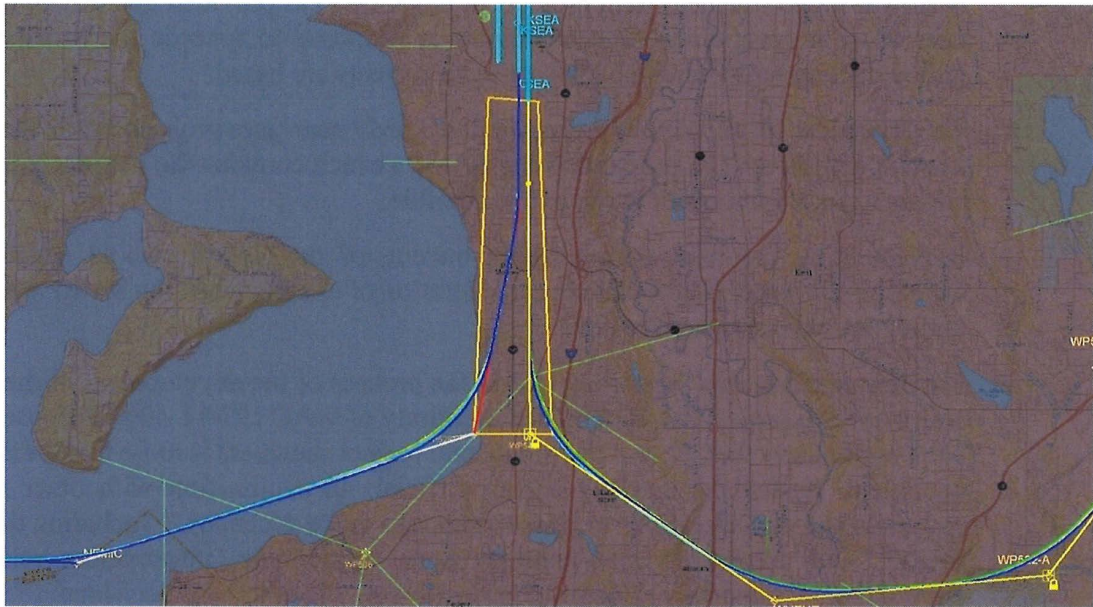
General issues:

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:

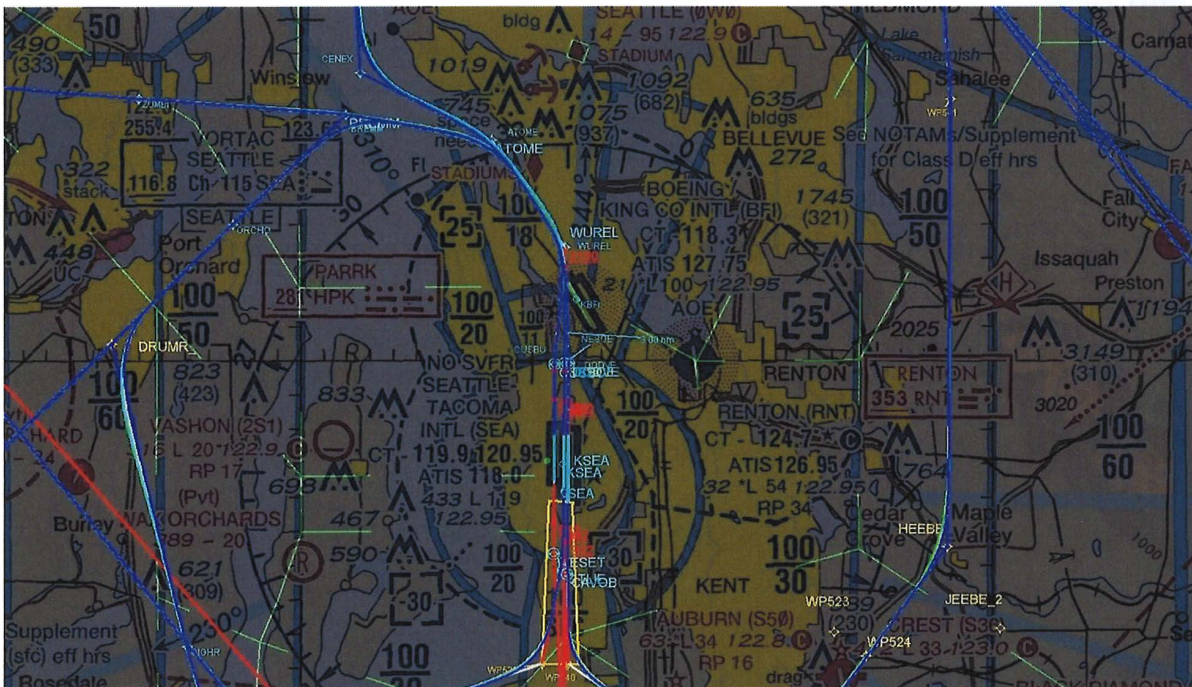
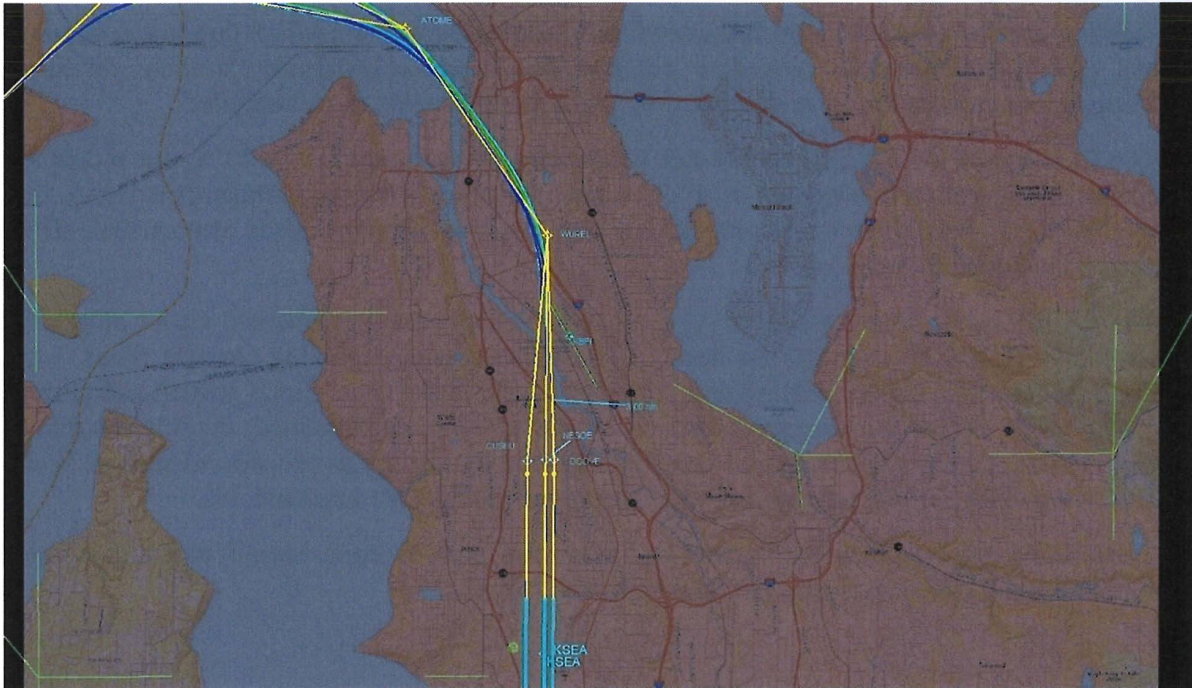
- a. Previous project approvals outside of the SAMP are now proposed to be included as part of the baseline. (Reference the attached letter from the City of Des Moines expressing concerns and the Port's response letter assuring the City that no additional capacity projects would be completed outside 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:



b. North 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 S-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.

Thank you for providing an extended Scoping comment period and for also providing numerous opportunities for public and agency participation in the Scoping process. We look forward to receiving the SEPA Draft EIS and NEPA EA upon issuance of those documents.

Sincerely,

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