

# Commenting on the SAMP?

An STNI Explainer on The Sustainable Airport Master Plan



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# Introduction

The Sustainable Airport Master Plan is getting real. You've heard about a 'public comment period' and how important that is.

But... what is it? How do you do it? What do you say besides, "STOP!"?

That's what we're about to teach you.

Important: This is not a copy/paste set of ready-made comments.  
It's a guide to help you write *your* comments.



# Introduction

This guide is divided into four sections. Focus on ② and ③ if you're short on time.

1. [History](#) Explains what the SAMP is and the 'why' for our recommendations.
- ②. [The problems](#) The ideas for your comments.
- ③. [Checklist](#) to make sure your comment is complete and gets where it needs to go.
4. [What happens after](#)

This is just the basics. If you want to learn more, many slides also include links to learn more at [Sea-Tac Noise.Info](#).



Part I

# How we got here

A very big project and a very long process



# Sustainable Airport Master Plan

## ‘The SAMP’

In 2012 the Port of Seattle Commission decided that Sea-Tac Airport would once again \*need to expand. This was rolled out as part of the Port’s Century Agenda, a set of shared goals and strategies for all the Port’s businesses. Among their [aviation goals were to triple air cargo and make Sea-Tac the main aviation gateway to Asia.](#)



\*Yes, just four years after the last expansion (the Third Runway) opened in 2008!



# Sustainable Airport Master Plan

## ‘The SAMP’

You will hear the phrase ‘the SAMP’ used in two very different ways.

- As a mega-construction project
- As an environmental review of that mega-construction project

Most of the time, this distinction doesn’t matter. But shortly you’ll see why it does.



# The SAMP is a mega-project

31 separate construction projects on the property of Sea-Tac Airport rolled out as one 'thing'. Together they are designed to reduce delay and increase capacity from the current 450,000 annual operations to \*540,000 over the next decade.



How this is possible is explained here: [STNI Explainer: The Factory](#)

\*You will see various forecast numbers thrown around. That alone is a good reason to object to the SAMP. But according to a study done before the Third Runway was constructed, the theoretical limit of annual operations with three runways and within the FAA's spec for an acceptable amount of passenger delay is about 630,000. Sea-Tac always exceeds expectations!



# The SAMP is a process

The SAMP is also not one, but *two* required environmental reviews of that mega-construction project. Those reviews happen one after the other.

1. A Federal Review using the rules of the [National Environmental Policy Act](#) (NEPA). It is happening now. This public comment period is a part of that review.
2. A State review that will happen *after* this Federal review. It uses rules of the [State Environmental Policy Act](#) (SEPA)

Both the NEPA and the SEPA reviews must be completed and approved for the mega-construction project to proceed.





# Timeline: Federal review: 2015

The Federal review (NEPA) began in 2015. This was supposed to be a three year process.

You might think a 'NEPA' review would be overseen by the [EPA](#). Wrong. This review is overseen by the FAA, which, as we will see, uses different rules.

Important: This is a highly collaborative process. Port staff and the FAA worked together at every stage of planning, *before* the public review process. That helps to insure that those 31 specific projects will already be in compliance with those rules.

Port  
of Seattle



# Timeline: The Federal review: 2018

But even before studying the possible impacts of those 31 projects, the FAA had to choose what *type* of study to do in order to decide whether or not to approve all those projects. “EIS vs. EA?”

This one decision, *EIS vs. EA*, was *by far*, the most important part of the SAMP process to date! (It’s also a bit tricky).

Stick with us...



# EIS vs. EA: the Big Decision

When an airport submits a mega-construction project (like the SAMP) for review, the FAA can decide that the review study will either be an

- ▶ Environmental Impact Statement (EIS) 😊
- ▶ Environmental Assessment (EA) 😞



## EIS vs. EA: the Critical Difference

They sound so similar, it's easy to get confused. Both the Port and the FAA will say they are similar. No. They are very different

- ▶ In terms of the scope of work (*what* gets studied)
- ▶ In terms of the possible decisions at the end of the study



# EIS vs. EA: the Critical Difference

An Environmental Impact Statement (EIS) is...

- Comprehensive, in-depth analysis of every component (the 31 projects)
- Extensive public involvement
- Detailed studies of all potential impacts
- Must explore alternatives in detail
- Can require specific mitigation measures



# EIS vs. EA: the Critical Difference

An Environmental Assessment (EA) is...

- Much more limited review
- Little discussion of individual components
- Usually far less public involvement
- Outcome can be “Finding of No Significant Impact”
- Does *not* require detailed mitigation plans



# EIS vs. EA: the Critical Difference

For example...

In the Draft EA, the 31 projects are summarized on just a few pages in [Chapter 1](#). There is no detailed discussion of any individual project, though these range in from an employee parking lot to fuel storage tanks to an entirely new passenger terminal!



# EIS vs. EA: the Critical Difference

But an EA *does* have Resource Categories!

These are the categories that are studied according to FAA [1050.1](#). Each category has its own set of rules used to determine if the project passes. When you send in your comment, it will be assigned and evaluated according to the rules for each category. That may seem like hair-splitting. It's not.

- Air Quality
- Biological Resources
- Climate
- Transportation
- Hazardous Materials, Solid Waste, Pollution Prevention
- Historical, Architectural, Archeological, Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, EJustice, Children's Health & Safety
- Visual Effects
- Water Resources
- Cumulative Impacts
- Irreversible and Irretrievable Commitment of Resources





# EIS vs. EA: the Critical Difference

An Environmental Assessment has no provision for ‘stopping’ a project’

The options are basically:

- ▶ “Proceed”
- ▶ “Go back and do a full environmental impact statement”



# EIS vs. EA: the Critical Difference

An Environmental Assessment specifies few or no specific mitigations

This is for the same reason that almost no detail is required for individual projects. Again, the assumption is that, because of all the years of pre-planning with the FAA, few or no mitigations will be needed.



# EIS vs. EA: the Critical Difference

An Environmental Assessment is designed to make building easier.

A large part of that 2015-2018 collaboration was to make sure that the projects in the Draft EA would not raise any red flags which might require the more strenuous EIS.

All the pre-planning saves the Port tens of millions of dollars over an EIS, reduces permit fees, gets the project built much faster, and limits (or eliminates) mitigation costs.



# EIS vs. EA: the Critical Difference

An Environmental Assessment is the default

To emphasize that last point, the FAA has made an EA study their default for all but the largest airport projects.

The Third Runway was initially assigned an EIS because it expanded the footprint of the airport, not because it provided so much additional capacity. Get it? It was the *immediate* impact of the *construction projects* that made the difference, not the community impacts over time.



# The Federal review: 2018



So, as expected, in 2018, the FAA decided that the required environmental study for the SAMP would be an Environmental Assessment (EA).

Not the far more thorough Environmental Impact Statement.

Ouch!



# Spoiler Alert: We need an EIS!

We went through all that to tell you that the goal in contesting an EA is to get the FAA to decide that a full Environmental Impact Statement is necessary.

That's not *a* goal, it's the only goal.

We're going to continue through the last six years just so you don't think 'nothing' has been going on. Actually, a lot happened.

It's even more confusing because it seems so long ago and then there was thing called 'COVID'. Just bear in mind that this was all supposed to be completed in 2018.

OK, back to the show...



# Timeline: The Federal review: 2018



After the EA decision was made, the FAA/Port began a [scoping process](#), which is very similar to what is happening now in 2024—open houses, a public comment period.

But the scoping process had a very different purpose. It's meant to tell the FAA what specific things to study and include in the document they will prepare for review. You can read all about it in [Appendix N](#) of the SAMP Draft EA!

(And we hope that you do because many of those 2018 comments would make great comments today!)



# The Federal review: 2019



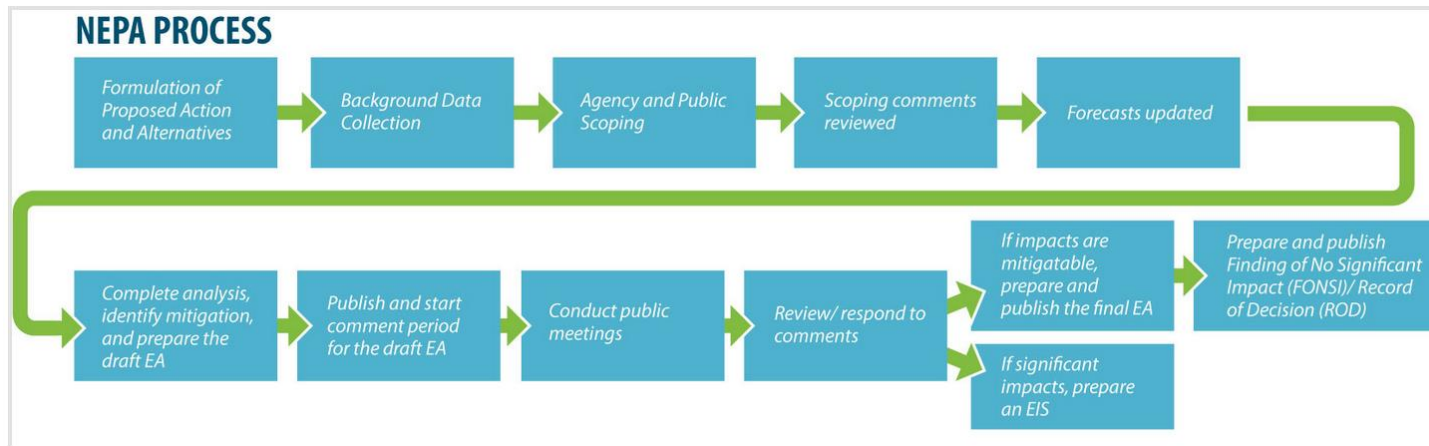
Shortly after that scoping process, we were supposed to get the SAMP EA Draft EA you're looking at now.

However, for some reason, the Port of Seattle asked for more time.





# The Federal review: 2020

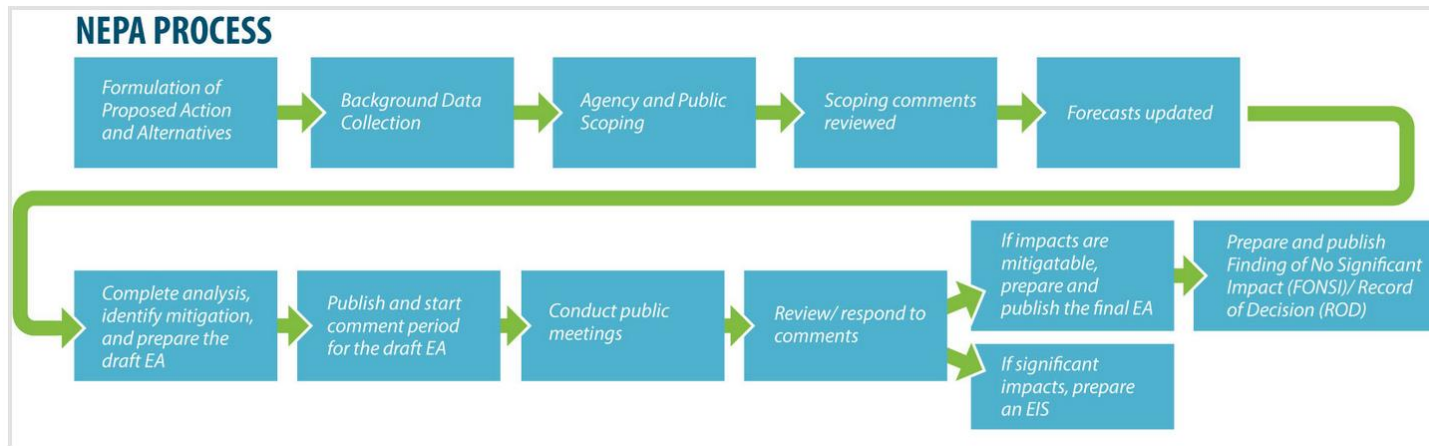


Then COVID hit and the Port again asked for more time. More than once.

But since the surrounding cities had their hands full with a pandemic, nobody objected.



# The Federal review: 2024



So, the Draft EA study document, using the EA system (the one you are commenting on) was not unveiled until October of 2024.

That opened the current public comment period which ends December 13, 2024.

Considering how much has happened since 2018, you can be forgiven for not remembering much of this.



# The Federal review: 2025



After the comment period closes, the FAA will take all our comments, review them, and make a decision sometime in Q3 2025

More on that later...



## Part II

# Problems

Knowledge gaps and defects in the SAMP Draft EA  
that demand a full EIS



## The SAMP became an EA in 2018!

We went through that ‘history’ to tell you that once the FAA made this decision, it already placed severe limits on the process.

- ▶ The vast majority of concerns you have were already written and evaluated in 2018 during that earlier scoping process.
- ▶ As hard as it is to hear, some of the most popular concerns (flight paths) *cannot* be addressed in either an EA *or* an EIS. We’re focusing on issues we think *can* be addressed.

All our suggestions will be framed that the EA process was flawed. It does not provide enough information to properly evaluate the SAMP and thus a complete EIS is necessary.



# This is *not* about flight paths!

We know it's not what you want to hear, but 'making the airplanes go somewhere else' is *not* on the table in this process, either with an EA or an EIS! (At least not directly.)

We're focusing on issues we think *can* be addressed.

All our suggestions will be framed that the EA process was flawed. **It does not provide enough information to properly evaluate the SAMP and thus a complete EIS is necessary.**



# Missing Past Growth

The last major expansion (Third Runway) was completed in 2008. But the SAMP study period only begins with 2017.

Annual operation forecasts:

- 1996: 300,000
- 2019: 450,000
- 2032: 540,000?

The SAMP discounts \*any of those impacts. This strongly suggests that their forecasts are wrong and undervalue both present and future impacts.



Actually, the one specified mitigation is in the Transportation Category. \$40,000,000 to improve 15 intersections near the airport. No other mitigations are specified or required.



# Missing Past Construction

Since the 2015 announcement of the SAMP, the airport has already undergone several large construction projects, including the **International Arrivals Facility**. These were originally meant to be included in the SAMP!

These projects significantly increase capacity (especially for night flights to Asia) This strongly suggests that their forecasts are wrong and undervalue both present and future impacts—especially to sleep and human health!

Learn more: [IAF Letter Of Understanding](#)



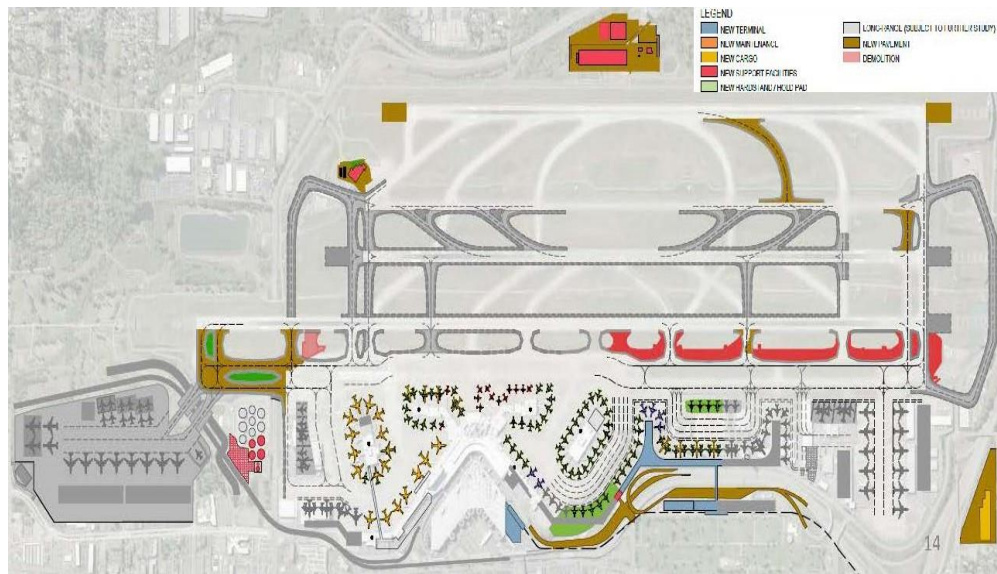


# Missing Future Construction

The SAMP is actually divided into *two* phases of construction: Near Term Projects (NTP) and Long Term Projects (LTP). But the Draft EA only considers the NTP!

Long Term Projects were already well-described in the 2018 scoping process. Some, like the South Aviation Support Area (SASA), which will clear the last remaining trees along 200<sup>th</sup> Street, even had their own EIS in 1994!

The failure to include so many already known future expansion plans and their community impacts demands a full EIS.



*2018 presentation on Long Term Projects (LTP) phase showing SASA (gray) along 200<sup>th</sup> Street.*



# Missing Freeway

The final alignment and EIS for SR-509 was decided in [2003](#)—even before the Third Runway was completed. Yes, an update was conducted in [2018](#)—but six years before this SAMP Draft EA.

A main purpose of SR-509 is to significantly increase cargo Aviation capacity, especially night flights to Asia.

The forecasts for future aviation cargo are likely understated, as well as truck traffic near the 2028 south access point

This likely under-values the community impacts of both road and aviation.



# Missing Demand: recruitment

SAMP planning has been based on forecasts which assume that the demand for flights is *organic*. That is completely untrue.

As part of their Century Agenda, the Port of Seattle has worked tirelessly to recruit more air carriers and more routes, including cargo, and especially to and from Asia. Those routes will require more and more late night operations.

The effects of these marketing efforts have not been considered in the SAMP Draft EA. This strongly suggests that their forecasts under-value both present and future community impacts.



Image: Anthony Bolante | P&B



# Missing Demand: tourism

SAMP planning has been based on forecasts which assume that the demand for flights is *organic*. That is completely untrue.

Since 2012, the Port has also undertaken the largest [tourism program](#) in the State of Washington. This has continued to boost demand both in aviation and in their highly lucrative cruise industry—which has its own set of negative regional community impacts

The effects of these marketing efforts have not been considered in the SAMP Draft EA. This strongly suggests that their forecasts undervalue both present and future community impacts.

## Tourism Marketing Partnership

- **Promotes the Region as a Leading Tourism Destination**
  - Increase visitors and visitors expenditures throughout Washington state
  - Expand utilization of the Port's assets
- Demonstrates partnership with travel organizations
- Demonstrates Port's leadership in visitor industry



Advancing the Century Agenda

3

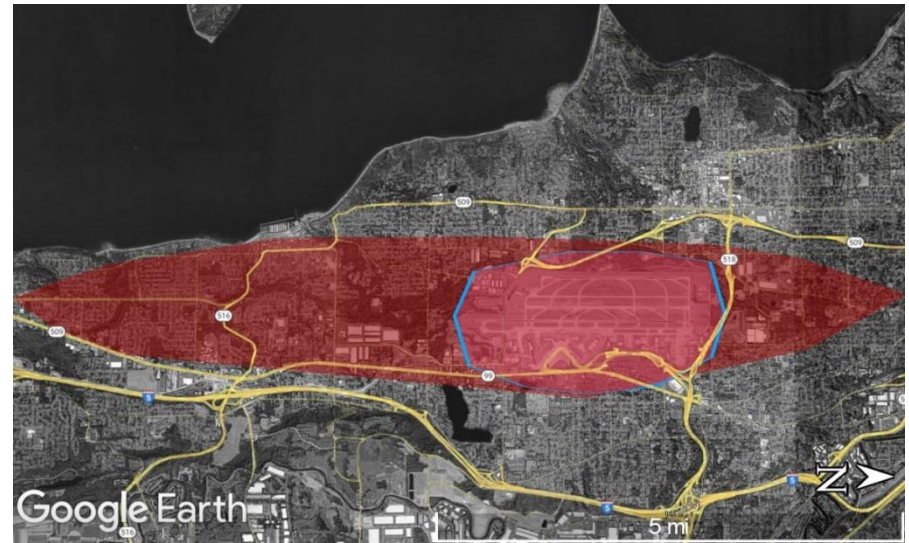


# Geography: APE vs. DNL65

The area to be studied in the Draft EA is limited to the [Area of Potential Effect](#) (APE), which is essentially the physical boundary of the construction projects.

The Draft EA explicitly refuses to acknowledge the impacts of those 31 construction projects beyond the airport property in any way beyond the Transportation mitigation (15 traffic intersections.)

For that reason alone, every Resource Category relying on the APE should be discarded and re-evaluated with a complete EIS.



*The 2024 APE (blue) vs. the 1994 DNL65*

Learn more: [Cost/Benefit Analysis](#)

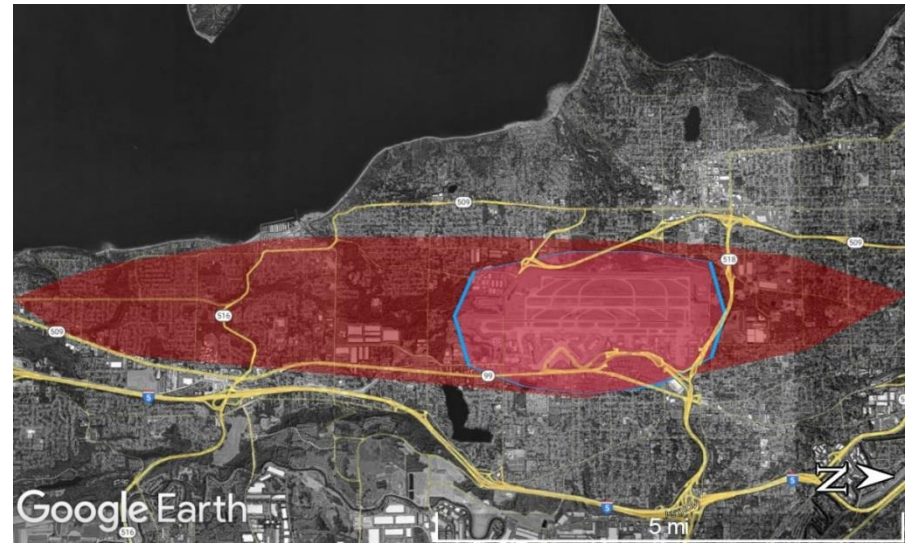


# Geography: APE vs. DNL65

The Draft EA divides areas of study into Resource Categories. Due to the unique nature of aviation, the true Area of Potential Effect will be very different for each of these categories (noise, air quality, socioeconomic, etc.)

Before a proper assessment of community impacts can be made, the true Area of Potential Effect must be determined *separately* for each of the Draft EA categories.

Without this first step, no proper understanding of community impacts of any kind, both present or future is possible.



*The APE (blue) vs. the Third Runway DNL65*

Learn more: [Cost/Benefit Analysis](#)



# Socioeconomic Impacts

A main category of study in the SAMP is ‘Socioeconomics, Environmental Justice, and Children’s Health’. And yet the only mention of that work is buried in [Appendix K](#).

The opening pages concede that our communities are heavily impacted in many ways.

But unlike other categories of study, there was no subject matter expert assigned to properly study these challenges.

Learn more: [Cost/Benefit Analysis](#)



Environmental Justice Protocol  
Seattle-Tacoma International Airport

June 2024

PREPARED FOR  
Federal Aviation Administration and  
the Port of Seattle

PRESENTED BY  
Landrum & Brown, Incorporated



# Socioeconomic Impacts

Instead of addressing any of the community needs, over two thirds of those pages consist of a 2018 Port of Seattle [Economic Impacts Study](#) showing all the supposed *benefits* the airport provides to surrounding cities.

Many of these numbers are either false or highly exaggerated. Every one of them should be challenged by an independent study.

Learn more: [Cost/Benefit Analysis](#)





# Socioeconomic Impacts

The larger issue is the implication that *any* economic benefits can be substituted for public health and well-being. Especially for vulnerable populations like children!

This entire category of study should be discarded and replaced by a complete and independent socioeconomic impact study based on the true Area of Potential Effect for each resource category.



# Socioeconomic Impacts

There are also well-known connections between all major airports and crime, particularly sex-trafficking. The City of SeaTac currently receives a \$1.4 million annual payment to help combat those impacts.



However, it is understood that these problems extend far beyond airport property to surrounding hotels and tourism sites. Sea-Tac is unique among major airports in being in close proximity to so many neighborhoods on all sides.

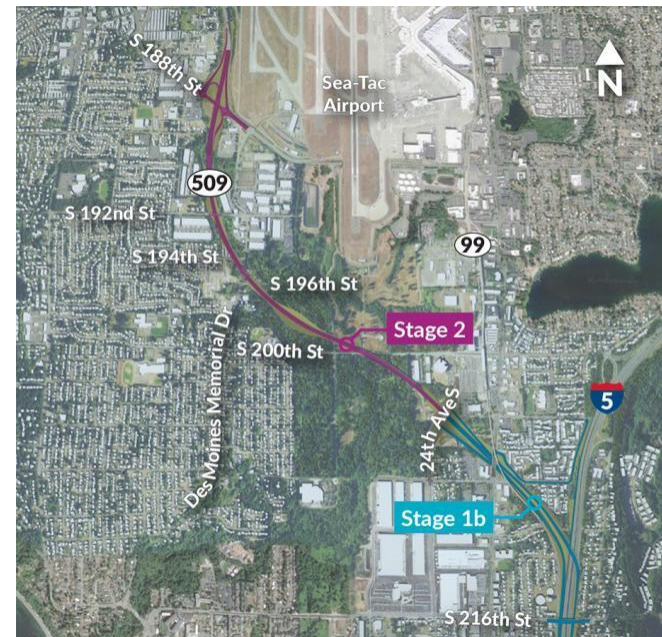
Those broader impacts need to be far better understood in order for them to be properly mitigated, and before any further expansion is allowed.



# Incomplete Science: Water

The major point of contention during the Third Runway was water quality. Sea-Tac Airport is sited on or adjacent to every creek and has a terrible history of damage to those water systems, which drain the entire community and until recently tied directly into the regional water system. The true Area of Potential Effect crosses several major Basin Plans and Puget Sound itself.

The Port has made major improvements, however these have limited life spans and monitor only those pollutants currently regulated by State law. None include the cumulative impacts of the new freeway SR-509.



# Incomplete Science: Water

There are now major ‘unknown unknowns’ which are not mentioned in the SAMP Draft EA.

These include dangerous chemicals previously considered completely harmless such as:

- [PFAS](#) – the firefighting foam used for decades at the airport.
- [6PPD](#) – \*present in runoff from all tires (especially aircraft) and which are highly toxic to salmon.

\*To be fair, the airport has achieved a safe salmon certification. However this test seems limited to 160 acres and is no guarantee of effectiveness in surrounding communities



*Port Firefighters using PFAS in a routine firefighting practice session from 2015.*



# Incomplete Science: Air

Pollution from commercial (jet) aircraft has never been properly studied. There has been a tendency to focus on other pollutants, such as roadway and wildfire. Advocacy on aviation pollution has largely been confined to removing lead from general aviation, which makes up less than four percent of operations at Sea-Tac Airport.

25 years ago, ultrafine particles (UFPs) were almost unknown. Today we know they are a major component of jet engine emissions.

Recent studies now implicate UFPs in everything from Alzheimers to lung and heart disease.

However, UFPs are not only unregulated they have yet to be properly measured!

## EFFECTS OF ULTRAFINE PARTICLES

Atmospheric ultrafine particles (with diameter less than 0.1 micrometers) may be responsible for some of the adverse health effects observed due to air-pollutant exposure. Heres why:

### PATHWAYS INTO BODY

Inhaled larger particles (PM10\*) get trapped in the tiny hairs and mucous in nose and throat.

Smaller particles (PM2.5) and UFPs lodge deeper into lungs; can pass into the bloodstream.

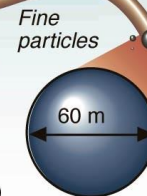
### HUMAN HAIR THICKNESS:

60 microns

PM 10  
(1/7th thick)

PM 2.5  
(1/25 thick)

ULTRAFINES  
(1/100 thick)



Possible brain cancer

Could trigger heart attacks

May invade liver

People suffering from asthma and from cardiovascular diseases have been identified to be especially sensitive to air pollution. Other diseases related to UFP exposure primarily relate to lung cancer and heart disease.

\* Particulate matter measuring 10 microns or smaller

SOURCES: Daily News research

Warren Huskey / Staff Artist



# Incomplete Science: Air

UFPs are also prevalent in roadway emissions from cars and trucks, making airport communities even more vulnerable to their impacts as airport traffic (both in the air and on the ground) increase.

Until recently, it was impossible to distinguish between roadway emissions and aviation emissions. That science is now becoming possible through studies such as the University of Washington [MOV-UP Study](#).



The first fixed-site monitoring was scheduled for 2021, but has been repeatedly delayed. The results of that work must be incorporated into a complete EIS in order to quantify aviation-specific impacts on the health effects on our communities.



# Incomplete Science: Air

As with water quality, it's not only 'new' pollutants that have not been adequately studied.

Using the same types of improved research methods, these should be studied thoroughly before a large expansion of Sea-Tac is approved.



# Incomplete Science: Ground

Since the Third Runway, there has been a precipitous decline in wildlife and tree canopy around the airport; all attributable to the increase in operations.

As with water quality, the close proximity of the airport plateau to neighborhoods and FAA requirements for airline safety not only remove birds from the airfield, it removes their habitat up to three miles along the flight path—even in detention ponds like the Des Moines Creek Business Park.





# Incomplete Science: Ground

Since the Third Runway, there has been a precipitous decline in wildlife and tree canopy around the airport; all attributable to the increase in operations.

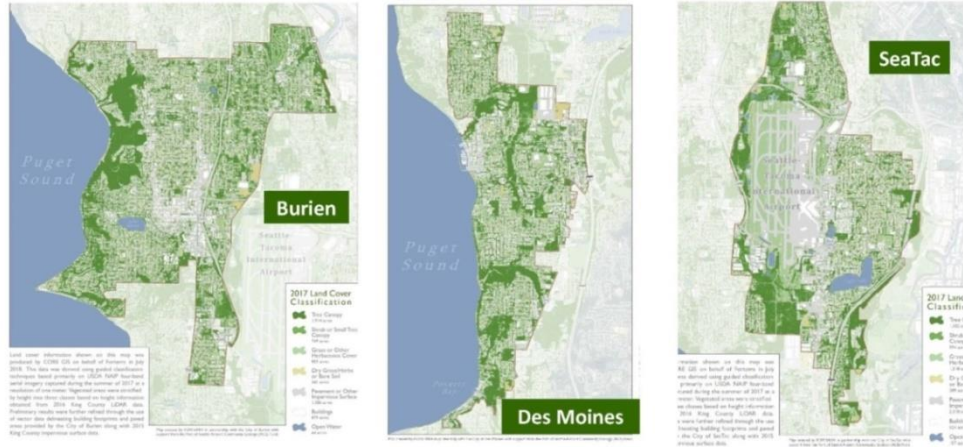
As with wildlife, the loss of trees from FAA mandates such as the [Flight Corridor Safety Program](#) is only a small part of the story. The replacement of neighborhoods by industrial parks, coupled with SR-509, both of which serve the airport, have combined to stripped the area of over forty acres of forest and tens of thousands of trees.



# Incomplete Science: Ground

## Canopy Assessments

In 2017, the Port funded a [study](#) to quantify tree loss in fence line cities. However, that study did not look at the broader impacts to wildlife or community interest



It also provided no solutions. In both cases, the study asked cities to do that work themselves, although they were not responsible for these negative impacts.

A complete EIS is needed to determine the impacts of such dramatic losses in wildlife habitat and tree canopy before SAMP projects proceed.



# Incomplete Science: Noise

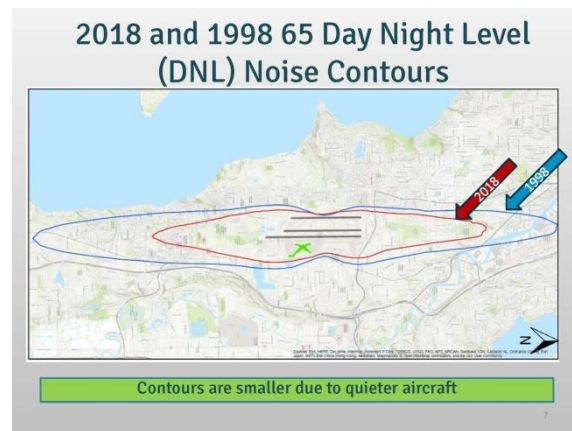
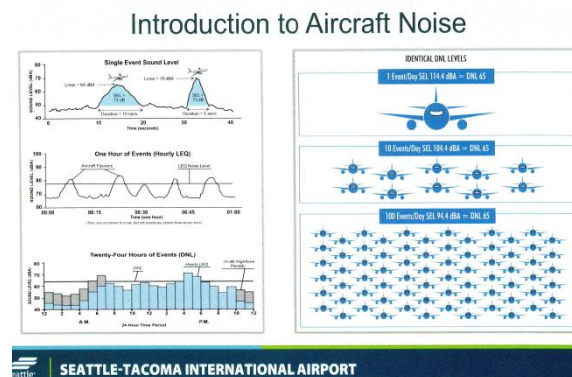
The understanding of health impacts from aircraft noise has changed dramatically since the Third Runway

In addition to learning deficits and loss of sleep, these harms are now known to include hypertension and diabetes.

Both the Port of Seattle and the FAA now acknowledge this, including this new research in presentations at StART.

And yet the SAMP continues to rely on the antiquated DNL65 which protects 85% fewer residents than in 1994 and to a lower standard for those still eligible today.

The Noise Category was evaluated based on outdated science. It should be discarded and replaced by a new study conducted across the actual Area of Potential Impact.



# Impacts to property: Noise

The Port's original program contributed to many of those failed systems with poor oversight of the program, funded with FAA grants.

For decades, they consistently slow-walked implementation of sound insulation for multi-family units—the highest percentage of BIPOC residents.

Their 2024 voluntary, 'update program' has, to date, utilized over \$11,000,000 simply to 'study' 30 homes within an area that leaves out 85% of the residents on original properties. This demonstrates that the Port will not take the issue of sound insulation seriously.

Given the Port's woeful track record in implementing sound insulation under the Federal system, their entire program must be thoroughly reviewed to make certain that the most vulnerable populations will receive fair treatment in future expansions.



# Impacts to cities: finance

- As operations increase, property values *decline* relative to other areas. This is devastating to local tax bases, preventing them from providing the essential public services we all need!
- Buyout properties become the property of the Port of Seattle, which is tax exempt. In the past, those lands might be set aside for park land (North Sea-Tac Park). However in recent decades all of it has been developed to provide support services for additional airport operations.
- The FAA also imposes unfunded mandates on airport properties such as \$124,000 ‘bird deterrents’ for the Des Moines Creek Business Park.



# Impacts to cities: finance

As we've seen the Port created an Economic Impacts study in the socioeconomic impacts category. However, the gross inaccuracies of their numbers make any financial analysis of the true impacts of the airport on local economies simply impossible.

The true impact of this system on the finances of local governments across the true Area of Potential Effect must be studied and quantified before any airport expansion continues.



Source: Port of Seattle, 2017; Puget Sound Regional Council, 2017; Washington State Office of Financial Management, 2017; U.S. Census Bureau, 2012; Washington State Employment Security Department, 2017; U.S. Bureau of Economic Analysis, 2017; Community Attributes Inc., 2017.



# The EA/EIS decision

The 2018 decision to grant the less comprehensive EA, rather than the comprehensive EIS, was made under questionable circumstances.

- ▶ The Port of Seattle repeatedly asked for delays, which they said would yield a better outcome for communities
- ▶ During the pandemic era when surrounding communities were most vulnerable and least able to challenge that decision

*Alaska*

September 27, 2018

First, Alaska Airlines asks the Port to reconsider *how* these proposals should be examined in order to ensure compliance with all applicable environmental statutes. We believe the scoping phase of the SAMP is a step in the right direction in preparing Sea-Tac for the implementation of this ambitious program. **At the same time, we are concerned that the Port and the Federal Aviation Administration ("FAA") may be jeopardizing the SAMP's implementation by proposing to meet the rigorous requirements of the National Environmental Policy Act ("NEPA") with an environmental assessment ("EA") rather than an environmental impact statement ("EIS").** Alaska Airlines believes this is a mistake and strongly encourages the Port to reconsider. Instead, we believe it is in the best interest of the SAMP, the community, the environment, and all stakeholders concerned about the future of this airport for the Port to meet its legal requirements under NEPA with an EIS, rather than an EA. Anticipating the heightened scrutiny this project will likely face, we believe that the Port should take the time and effort to develop a full EIS. Making this decision now will help ensure the most rigorous standard of environmental review, and be more cost-effective and efficient over the long term.

While preparing an EIS may require more upfront time and effort than if the Port were to develop an EA, Alaska Airlines believes this additional time would ultimately be an effort well spent. Preparing an EIS eliminates the need to make a finding of no significant impact (FONSI) which in a project of this magnitude could be more difficult than demonstrating procedural compliance with the EIS process. In addition, preparing an EIS could produce more substantive stakeholder feedback and fully effectuate the stated goals of the SAMP projects. As a result, an EIS may ultimately be more cost-effective than generating an EA, as any major litigation delay will almost certainly drive up the total cost of the project as construction deadlines are impacted.

2



# The EA/EIS decision

The [2018 scoping comment from Alaska Air](#) ask the FAA to reconsider and provide a full EIS!

*“We believe it is in the best interest of the SAMP, the community, the environment, and all stakeholders concerned about the future of this airport for the Port to meet ~ its legal requirements under NEPA with an EIS, rather than an EA. Anticipating the heightened scrutiny this project will likely face, we believe that the Port should take the time and effort to develop a full EIS. Making this decision now will help ensure the most rigorous standard of environmental review, and be more cost-effective and efficient over the long term.”*

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2





# The EA/EIS decision

The Port and FAA were likely using the extra time, not to develop a plan beneficial to communities, but rather to cram what *should* be an EIS into an EA.

*“While preparing an EIS may require more upfront time and effort than if the Port were to develop an EA, Alaska Airlines believes this additional time would ultimately be an effort well spent. Preparing an EIS eliminates the need to make a finding of no significant impact (FONSI) which in a project of this magnitude could be more difficult than demonstrating procedural compliance with the EIS process. In addition, preparing an EIS could produce more substantive stakeholder feedback and fully effectuate the stated goals of the SAMP projects. As a result, an EIS may ultimately be more cost-effective than generating an EA, as any major litigation delay will almost certainly drive up the total cost of the project as construction deadlines are impacted.”*



# An inconvenient truth

The Port permits its own construction projects.

Through its [2018 Interlocal agreement](#) with the City of SeaTac, the Port of Seattle, the developer of these projects and the owner of the airport, now approves its own construction permits. It also acts as its own reviewer in the SEPA process after this Federal process is complete.

In addition to the high stakes for airport communities, there is the Port's own poor track record of oversight on large projects.

Managing 31 complex projects and \$5.5 billion of public money demands strict scrutiny in evaluating the SAMP.



2018 INTERLOCAL AGREEMENT



Part III

# How to Make Your Comment Count

Now that we know what to say, here is how to get it where it needs to go.



# How to Make Your Comment Count

1. Write individual comments! We know a lot of you will want to sign various petitions. Petitions are great! However, this is an administrative process. The official in charge will take each letter and put it into various baskets in making her decision.

- (3,000 petition signatures = only 1 comment!)



# How to Make Your Comment Count

2. Focus on the need for more study and not on specific solutions. **Remember:**

- ‘Stop!’ isn’t really an option in the EA process.
- Neither is talking about specific mitigations.

We have to get to the EIS to have either of those discussions.



# How to Make Your Comment Count

3. Consider commenting on a few (or even *one*) item in detail, rather than throwing in the kitchen sink. If you're working in a group, think about asking each member to focus their attention on one main category.

We know this is controversial, but we must repeat: this is not a popularity contest. 300 comments saying exactly the same thing carries no extra weight with reviewers.



# How to Make Your Comment Count

4. You're concerned about cumulative impacts. If you look at the strategy of the SAMP, it's all about separating the project into as many individual components as possible. That's called 'segmentation'. Use it. For example:

- Not only is SR-509 not considered a part of the SAMP, it was evaluated separately and *twice* (2003, 2018) *before* the SAMP. That's *three types of segmentation*.
- The International Arrivals Facility added ten gates and was built in 2018, again before the SAMP. That's segmentation.

In every category, the SAMP attempts to *segment* the project into small bites from 2012 to now. In your comments, don't just say 'cumulative impacts'. Point out where specific, individual projects should have been evaluated together.



# How to Make Your Comment Count

5. Take your time! You have until December 13, 2024.

This may be the most important recommendation we have.  
There are no extra points for rushing!





# Your template...

“The Draft EA is insufficient because...”

- State a specific problem
- State which of the [categories](#) of study it applies to (this matters because the comment is evaluated according to each category’s specific rules.)
- “This problem requires deeper study because the following information is missing or incorrect in the following ways...”
- “The lack of incomplete or incorrect information affects my community in the following ways ...
- “Obtaining the correct information requires specific studies that only an EIS can provide.”



# And when you are ready

Email your comments to:

[samp@portseattle.org](mailto:samp@portseattle.org)

Or US mail:

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



Part IV

# Next Steps

You're done for now. But we thought you'd want to know what happens next.



# Next Steps: FAA

The Federal Review (NEPA) decision is expected September 2025. There are three possibilities

- ▶ A full Environmental Impact Statement (EIS) is required. This is the one we want.
- ▶ A Record of Decision where all projects may proceed, with some minor changes and/or mitigations.
- ▶ FONSI (Finding Of No Significance). All projects may proceed. This is *not* the one we want, but as we've seen, this is the most likely outcome.



We do not want the FONSI!



# Next Steps: State

After the FAA decision, there will be a State Review (SEPA) which will provide a second opportunity for public comment.

- However, SEPA is heavily influenced by the NEPA decision.
- That makes your comments now even more important!



Fun fact: the SEPA reviewer will be the Port of Seattle! (crazy, right?)



# What if the FAA approves the SAMP?

We don't want to get ahead of ourselves. However, as we said, it is likely that the decision will not be the one we want.

If that is the case, this is not the end by any means. In fact, it's just one more step on a very long road.

There is an appeal process to obtain that EIS, first with the FAA itself, and if that doesn't work, then in Federal Court. This is nothing to be scared of. It is common for projects like this.

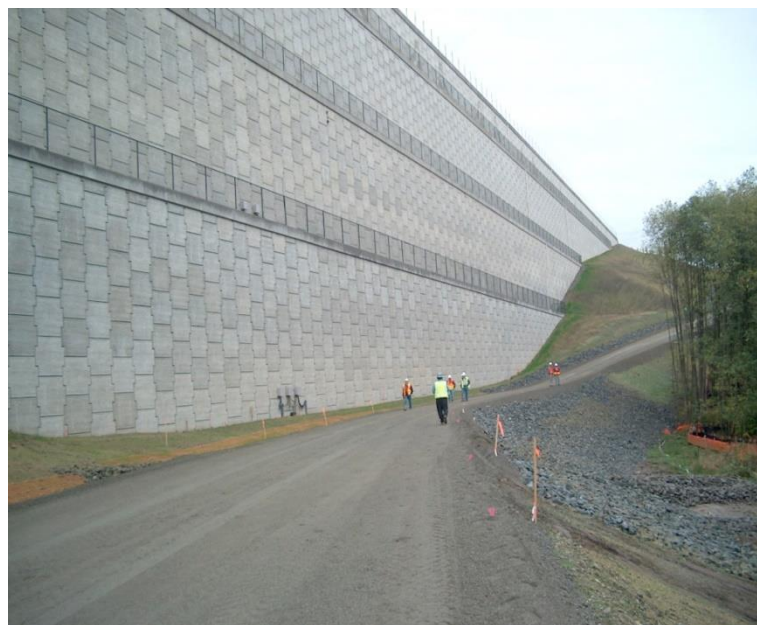


# What if the FAA approves the SAMP?

As we've seen, an EIS is expensive, takes a long time, and adds cost and risk to the project. Speeding construction is a major reason the EA process was dreamt up in the first place!

For example, during the Third Runway, challenges to [water quality permits](#) added seven years of delay and more than *tripled* the project cost!

Obviously, this can create perverse incentives for the Port of Seattle to take shortcuts. As Alaska Air rightly pointed out in their [2018 comments](#), the EA process almost dares communities to contest any decision.



*[The Great Wall of Sea-Tac](#) aka. the western boundary of the Third Runway*



# What if the FAA approves the SAMP?

- Your comments now will play a big part in getting us to a better place, not just in the FAA decision next September.
- The ultimate goal of all our comments is not only to get the FAA to immediately require an EIS. It is also to make any future appeals process easier if they don't.

This is why we're being so particular about it!





# What if the FAA approves the SAMP?

One last thing. If further action is required it will most likely be undertaken by nearby cities—including yours.

So, it is important that you remain engaged with your city and let them know how important this is to you.

At the end of the day, it will be your elected leaders that will ultimately help all of us obtain relief from the SAMP.



# Thanks

We trust this explains everything. 😊

But in case you have more questions,  
you can always reach us here:

[Sea-TacNoise.Info](https://SeaTacNoise.Info)

facebook.com/seatacnoise

twitter.com/SeaTacNoiseInfo

