City of Des Moines

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April 25, 2017

Robert Hodgman
Washington Aviation System Plan
Washington State Department of Transportation
310 Maple Park Avenue SE
PO Box 47300
Olympia WA 98504-7300

RE: Comments on WASP

Dear Mr. Hodgman,

Washington is the most trade dependent state in the nation and Washington airports undeniably have a significant impact on the State's economy. [1]   The primary concern of the City of Des Moines has to do with the asymmetrical relationship between the public benefit of economic activity coming from airport operations (specifically Sea-Tac International airport) and the disproportionate negative impacts experienced by our city in proximity to this major airport. We understand the Report addresses the statewide aviation system, nonetheless Sea-Tac is the largest component in the statewide aviation system.

We encourage the WASP to state that it is state policy to work with appropriate local and regional authorities to begin the process of siting a second large commercial airport in western Washington.

As the Report's priorities are listed, we are concerned that the final priorities, lowest on the list, have to do with *Modal Mobility* and *Sustainability*. The impacts of Sea-Tac in terms of mobility, connectivity and multi-modal accessibility to and from the airport is problematic and remains largely unaddressed. The complexity of the regional transportation systems and often ineffective regional planning for transportation is part of the difficulty in addressing transport concerns.

Sea-Tac is growing rapidly and the state needs to establish standards to assure that multi-modal options are the standard for addressing airport growth. Constraints on the capacity of the regional transportation grid to absorb millions of more passengers and tons of cargo must be seen as signaling consideration of new airport facilities that will relieve congestion, not simply add to it. We understand the WASP is a planning document and the role of the WSDOT Aviation Division is primarily achieved through advocacy and partnership. Nonetheless, the integration of the state aviation system into regional transportation planning is essential to the accommodation of future demand at Sea-Tac and elsewhere.

We encourage this regional approach as a primary function of WSDOT in regards to aviation facilities in the state. It appears that Section 2.7 addresses this conceptually and we strongly endorse the statement in the Report that,

> 'Adequate access for an airport means ensuring the road and parking capacity is optimized on the surrounding roadways. Airports should ensure they're being represented within the local transportation and comprehensive plans to reduce delays and coordinate with public transit. If the airport is not considered, it is likely that ground access will diminish or not improve with future growth. As roadways become more congested, passengers are encouraged to take alternative, or intermodal, modes of transportation. By reviewing connections and opportunities for other modes of transportation, such as rail, public transit, or bicycle, an airport will be better connected to the community to support continued growth.'

Without adequate access, the economic potential from aviation is constrained and the impacts to local residents becomes increasingly unfair.

Sustainability must be central to any discussion of the effectiveness and functionality of the state aviation system. As you know, the classic definition of sustainability comes from the 1987 Brundtland Report, defining sustainable development as, 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.' The WASP uses a slightly different description breaking out four essential elements of a sustainable approach EONS. [2]

We strongly object to the manner in which sustainability is addressed in the Report. There is passing reference to sustainability in both the Policy Recommendations but also in the body of the Report, which states, 'the objectives of sustainability for WSDOT include reducing environmental impacts, providing an aviation system that is sustainable, and implementing financial sustainability measures,' (2017: page 6-25).

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The ability to implement sustainable measures to protect the natural environment, human health, mitigate noise and understand any adverse health impacts of jet fuel emissions, etc. − is not a consideration.   It is an essential constraint on future airport capacity and expansion. WSDOT should call this out explicitly.   Without the ability to implement sustainable measures, future airport growth in both operations and capacity, should be constrained.

The City of Des Moines appreciates the opportunity to comment on this planning document. We look forward to the opportunity to continue this discussion on behalf of all of our residents.

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1. The 2012 Aviation Economic Impact Study estimated that, 'the total impact of airport-related activity included approximately 250,000 jobs, $15.3 billion in wages and $51 billion in total economic activity.   The study also stated that more than $790 million in tax revenue came from airport's economic impact, with $550 million going to the State and $250 million distributed to local jurisdictions; cities, counties and special purpose districts.' (WASP, 2017: page 2-6).

2. EONS approach 'consists of economic vitality (E), operational efficiency (O), natural resources (N), and social responsibility (S). The goal of sustainability for the WASP includes reducing environmental impacts, providing an aviation system that is sustainable, and implementing financial sustainability measures. Airports that have adopted sustainability practices typically see reduced operating costs, better relationships with their community, and better customer service and satisfaction.' (2017: page 2-7).

Sincerely,

Matt Pina
Mayor

MP:bw

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