



City of Des Moines

ADMINISTRATION
21630 11TH AVENUE SOUTH, SUITE A
DES MOINES, WASHINGTON 98198-6398
(206) 878-4595 T.D.D.: (206) 824-6024 FAX: (206) 870-6540



September 27, 2018

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

Re: City of Des Moines, WA Comments on Scoping for the Near Term Projects for Sea-Tac International Airport

Dear Mr. Rybolt,

On behalf of the Des Moines City Council I am forwarding the following comments on the scoping process for the proposed environmental review. These comments are derived from the City of Des Moines Aviation Advisory Committee, the City Council, our Community, City staff and from the City's SEPA official. Our first and primary concern is that the process being utilized by the Airport in regards to the Sustainable Airport Master Plan (SAMP) does not appropriately consider the context of development that has occurred and is occurring at the Airport. This specifically relates to growth and the operational utilization of the Third Runway and generally to the overall growth trajectory the Airport has experienced in the past 7 years. Secondly, the process appears to contradict State Environmental Policy Act requirements. Third, that actions to provide appropriate environmental review of the SAMP have taken place outside the bounds of the State Environmental Policy Act (SEPA). Finally, we express concerns about specific impacts on our City from aircraft operations that need to be included in the scoping process.

The City believes that the appropriate timeframe to establish the baseline for environmental review is the time frame from 2012 – 2018. A summary of Airport growth through this time frame (see below) reveals significant and consistent year over year growth.

	2012	2013	2014	2015	2016	2017
Passengers	33.2 million	34.8 million	37.5 million	42.3 million	45.7 million	46.9 million
Aircraft Operations	309,597	317,186	340,478	381,408	412,170	416,124
Air Cargo (metric tons)	283,600	292,700	327,239	332,636	366,431	425,856
Source - Sea-Tac Airport Passenger, Cargo and Operations Summary [2012 - 2017]						

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The extensive growth above should be a precursor and require environmental review prior to any additional capacity building activities. Correspondence between the City and Airport management underscores our ongoing concern with facilities built outside the environmental review process of the SAMP. [1 Testimony of Mayor Pina at Port of Seattle Commission April 25, 2017] [2 Letter from Mr. Lance Lyttle, July 26, 2017] [3 Letter from Mayor Pina, July 27, 2017].

The approach of the Airport to identify near-term capital improvements – an incremental approach to developing the SAMP – provides faulty context, ignoring the fact that capital investments going forward will, in fact, define future development patterns. Therefore, the environmental review proposed is inadequate in the context of the SAMP as a whole. Let it be clear that the Airport is not currently reviewing the SAMP, only certain near-term projects. This approach is inconsistent with current Washington State law and Washington Administrative Code requirements – a point that will be extensively made in the comments prepared by our SEPA officials (Burien, SeaTac, Normandy Park, Des Moines and consultants).

The most recent Part 150 was completed in 2013, preceding this growth pattern. The SAMP planning was begun in 2012. Our concern is that environmental review of projected growth does not consider impacts of growth to date.

The operational utilization of the Third Runway (16R), a highly controversial chapter in the Airport's history, has seen a trail of agreements that expand the use of the Third Runway. Agreements that originally governed use of the runway were modified over time to increase capacity on the Third Runway. The concern is that these modifications, in providing expansion of operational capacity, were done outside any environmental review. Developing a plan for growth that continues to utilize the Third Runway in an expanded operational role needs to be part of the Scope to understand the increased environmental impacts. [4 reference to FAA Letter of Agreement December 6, 2010 and FAA Letter of Agreement July 26, 2016]. These issues need to be addressed in the scoping process.

Additionally, seeking review of aircraft operations and FAA procedures, the City requested the following information from the FAA on August 17, 2018 via the Airport StART committee in order to evaluate these procedures in regard to these comments on the scoping process:

Statement: The City of Des Moines would like to better understand the Seattle ATC operation.

1. Would you please provide a copy of the Tower Standard Operating Procedures (SOP) and TRACON SOP?
2. Would you please provide a copy of any Letters of Agreement (LOA) between the Tower and the TRACON and any LOA between Seattle Tower and Boeing Field Tower?
3. Are you aware of any new Instrument Flight Procedures that are proposed or being developed for the Seattle Airport?
 - a. Follow on questions – What is the status of the .41A Process (Dot forty-one Alpha Process) that was underway last year but suspended due to budget concerns?
 - b. When do you anticipate the .41A process resuming?
 - c. We have hired Performance Based Navigation experts. We would like for them to represent us on the .41A Full Working Group, when the process resumes, with Stakeholder Status.

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To date, none of these documents have been provided to the City (this is information we believe is critical to providing timely and informed comments on scoping for the operational impacts associated with the Airport's proposed growth).

Significant concerns to be fully included in the environmental scoping:

Noise and Health impacts: Scoping needs to review noise and health impacts from Airport/aircraft operations. It also must include the intrusive assessment of nighttime flights and the growth in overflights, operations and frequency of flights on City residents and businesses. Furthermore, the baseline environmental assessment of these impacts must be for the period 2012-2018.

Fuel dumping: the City has concerns that fuel dumping has occurred in the airspace over our City, or in areas where wind and meteorological dynamics could result in fuel dumping over our City [5 see FAA checklist protocol].

Fuel emissions: What are impacts of aircraft fuel emissions on the communities surrounding the Airport with proposed growth and within the current baseline (as discussed above) from 2012-2018? The scoping needs to include the health and epidemiological impacts of ultra-fine particles resulting from aircraft emissions.

Transportation impacts: Scoping needs to include an analysis of increased traffic impacts and potential multi-modal solutions that will increase congestion and pollution from vehicular traffic including truck transport.

Siting 2nd Regional airport: Scoping needs to include a review of options to growth at Sea-Tac Airport including options for siting a second regional airport. [6 See comment regarding potential of Moses Lake as an alternative airport below].

NextGen: Scoping needs to address the environmental (noise and health) impacts of NextGen implementation?

Glide path variation: Scoping needs to include review of glide path variation across all runways, especially as variation relates to runway 34R and the current slope of 2.75%.

Concurrent studies: Scoping needs to utilize three concurrent studies occurring regarding impacts from the Airport:

1. The Ultra-Fine Particle study being conducted by the University of Washington,
2. The Puget Sound Regional Council study on regional aviation,
3. The Budget Proviso baseline study currently underway being conducted by the Washington State Department of Commerce with input from the cities proximate to the Airport.

The City Council and I appreciate your consideration and inclusion of these items into the scoping process. We are extremely concerned that the lack of inclusion of any of these items will not present a comprehensive picture as to the environmental impacts of the Airport, in the context of previous growth, current level of operations, and future growth.

Mr. Steve Rybolt
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Sincerely,



Matt Pina
Mayor

Cc: Des Moines City Council
Aviation Advisory Committee
Port of Seattle Commissioners
Port of Seattle Executive Director Steve Metruck
SEPA Officials for the Cities of Burien, SeaTac, and Normandy Park
SAMP Joint City Consultants
City Manager Michael Matthias
Chief Operations Officer Dan Brewer
Chief Strategic Officer and City of Des Moines SEPA Official Susan Cezar
City Attorney Tim George

Mayor Matt Pina

CITY OF DES MOINES TESTIMONY TO PORT OF SEATTLE COMMISSION

APRIL 25, 2017

The City of Des Moines appreciates the opportunity to provide

comments to the Port and Federal Aviation Administration (FAA).

Our city, as is also the case with Burien, Sea-Tac and Normandy Park and

others, experiences disproportionate impacts from aircraft operations

because of our proximity to Sea-Tac International airport. We receive

the brunt of airport impacts as the human cost of Sea-Tac's economic

benefit for the region.

Des Moines residents are constantly challenged by noise impacts and

health impacts. The United States Congress and the State of Washington

legislature are each considering legislation to fund scientific based

studies to assess the exact impacts and mitigation options and we

actively support those studies and will continue to do so. We have

advised Congress of our support and recommendation to include Sea-Tac airport in these studies. We have testified in the Washington State House and Senate on behalf of bills to assess impacts of ultra-fine particles emissions from aircraft overflights and the City has allocated \$25,000 to support that study.

As the implementation of NextGen by the FAA results in the narrowing of the bandwidth of aircraft overflights – departures and landings – the disproportionate impacts suffered by some of our residents' increases. Those living directly under the overflights suffer increased noise and health impacts.

These impacts come from more focused aircraft operations and from increased number and frequency of aircraft operations. The NextGen

impacts are attributable to the FAA. The increase in aircraft activity is the responsibility of the airport.

The Sustainable Airport Master Plan (SAMP) is being developed to increase growth in operations at Sea-Tac over the next 20 years. The SAMP, in responding to increased demand is designed to accommodate a new international terminal, new gates and increased operational efficiencies, however there is not sufficient attention paid to noise, environmental and health impacts. The Plan provides for sustainable operations on the airfield but does little to address sustainability, in terms of airport operations as they impact the surrounding cities.

The City believes that the airport has an obligation to address these impacts. Mitigation should include:

- effective implementation of the home insulation program,
expanding in scope and quality.
- provide financial compensation to those homeowners living under
the flight paths in any situation where the value of the home is
negatively impacted.
- Support ongoing studies and act upon the results ensure that the
health and safety of Des Moines residents receives the priority
that it deserves.

Without due consideration of these concerns, any plan for operational expansion of Sea-Tac airport is unacceptable. We look forward to the opportunity to continue this discussion on behalf of all of our residents.



P.O. Box 68727
Seattle, WA 98168
Tel: (206) 787-5388

City of Des Moines
21630 11th Avenue S., Suite A
Des Moines, WA 98198

July 26, 2017

Dear Mayor Pina:

I appreciated the City of Des Moines' work to convene last week's discussion with Normandy Park, Burien, SeaTac and airport staff to review the airport's Concourse D Hardstand Holdroom project and the Determination of Non-Significance (DNS). I understand this was a direct and open conversation about concerns with the project.

We recognize that growth-related projects at Sea-Tac must be evaluated together in the Sustainable Airport Master Plan (SAMP) to assure that cumulative environmental impacts are addressed. The addendum to the DNS issued on July 21, 2017, which Port staff prepared after last week's meeting, provided more specifics related to the Hardstand Holdroom project timing and scope, showing a net reduction of gates in operation until mid-2021.

The SAMP environmental review, which is anticipated to be conducted in 2018, will account for all existing and approved gates and passenger loading facilities. This includes the North Satellite, the International Arrivals Facility, and the Concourse D Hardstand Holdroom. No additional gates are anticipated until the completion and approval of the Sustainable Airport Master Plan and associated environmental review.

At the same time, we recognize the need for increased effective and informative communication with our adjacent cities. I have greatly appreciated the leadership you and your colleagues in the city of Des Moines have shown in working with the Airport on airport issues and regarding the formation of an Aviation Advisory Committee at Sea-Tac Airport. I am currently in the process of seeking input from our city partners and have scheduled a meeting with city managers in August. Input received at that meeting will help determine the best way to proceed in this regard.

I appreciate your concerns and look forward to a stronger relationship in the future.

A handwritten signature in blue ink, appearing to be "Lance Lytle", enclosed in a blue oval.

Lance Lytle
Managing Director, Aviation
Seattle Tacoma International Airport

Cc: Deputy Mayor Vic Pennington
Councilmember Melissa Musser
Councilmember Robert Back
Councilmember Luisa Bangs
Councilmember Dave Kaplan
Councilmember Jeremy Nutting
Michael Matthias, City Manager
Susan Cezar, Community Development Director



City of Des Moines

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(208) 878-4505 T.D.D.: (208) 824-6024 FAX: (208) 870-6540



July 27, 2017

Mr. Lance Lyttle,
Managing Director, Aviation
Seattle Tacoma International Airport
PO Box 1209
Seattle WA 98111

Dear Mr. Lyttle,

I am in receipt of your letter of July 26, 2017 in which you state,

"The SAMP environmental review, which is anticipated to be conducted in 2018, will account for all existing and approved gates and passengers loading facilities. This includes the North Satellite, the International Arrivals Facility, and the Concourse D Hardstand Holdroom."

This statement addresses our concerns with this specific capital project: the Concourse D Hardstand Holdroom. However, as I have previously stated in a presentation to the Port of Seattle Commission:

"Our city, as is also the case with Burien, Sea-Tac and Normandy Park and others, experiences disproportionate impacts from aircraft operations because of our proximity to Sea-Tac International airport. We receive the brunt of airport impacts as the human cost of Sea-Tac's economic benefit for the region. Des Moines residents are constantly challenged by noise impacts and health impacts." (Testimony to Port of Seattle/FAA meeting April 25, 2017)."

There are two principal issues I want to communicate to you. First, it is unacceptable for the Airport to wait until the development of the SAMP to address mitigation issues derived from the year over year double digit growth of operations at Sea-Tac Airport. Impacts of growth must be addressed now.

The siting of a second major airport in western Washington State must begin immediately. In this regard, the City of Des Moines has commented on and is in contact with the Washington Aviation System Plan staff, at the State level, to further this process.

I also want to comment on the lack of transparency by the Airport and the failure of the Airport to communicate effectively. The local cities had no knowledge of this proposed Holdroom facility prior to issuance of the Determination of Non-Significance. This is inappropriate and ineffective. The Airport needs to be timely, transparent and proactive in communication with your surrounding communities.

The Waterland City

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It is for this reason we have encouraged you to form an Airport Advisory Committee, sponsored by the Airport and including representatives from the Federal Aviation Administration, the airlines, local community organizations and local government officials to address the impacts of the Airport on our local communities.

We look forward to ongoing, productive discussion with you on these issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Pina". The signature is fluid and cursive, with a large loop at the end.

Matt Pina
Mayor and Councilmember

The Waterland City

Seattle Terminal Radar Approach Control (S46), Seattle Air Traffic Control Tower (SEA) and Port of Seattle (POS)

LETTER OF AGREEMENT

EFFECTIVE: **December 6, 2010**

SUBJECT: Informal Runway Use Program

1. PURPOSE: To establish the Noise Abatement Informal Runway Use Program for the Seattle-Tacoma International Airport (KSEA). This program has been established by the Port of Seattle (POS) and is administered by the Federal Aviation Administration (FAA) at Seattle Terminal Radar Approach Control (S46) and Seattle Air Traffic Control Tower (SEA). The goal of this informal runway use program is to establish a clear understanding of the preferred way in which all of the runways will be used in various operating conditions. However, it is not intended that the program described herein would restrict operations or adversely discriminate against any user. Deviations from specified runway use may be necessary because of emergencies, weather, traffic volume, airport construction, or maintenance work. Under these circumstances, runway selection will be in accordance with FAA Orders 7110.65 and 8400.9.

2. SCOPE: The policy outlined herein provides for the preferential arrival and departure usage of each runway at KSEA. This voluntary program applies to all turbojet aircraft weighing 12,500 pounds or more. The program that is described herein shall be utilized to the maximum extent possible whenever wind, weather, traffic density, controller workload, equipment, operations and field conditions and other considerations permit.

3. RESPONSIBILITIES: POS, S46 and SEA must ensure that all appropriate personnel are briefed on this voluntary program. The FAA reserves the right to determine under what conditions flight operations may be conducted without causing degradation of safety. The FAA may be required to follow different policies than detailed herein and reserves the right to determine runway usage such that it is not unsafe, unjustly discriminatory nor incompatible with the efficient management of navigable airspace.

4. PROCEDURES: The FAA has the responsibility for managing air traffic. At any time, the FAA maintains the right to change the way they use the runways to safely and efficiently manage air traffic. This does not abrogate the authority and responsibility of the pilot in command to ensure the safe operation of his aircraft. The following is the planned runway usage during typical operations at KSEA under normal conditions:

South Flow Runway Use Program

- **Regular overnight usage.** During regular overnight operations in normal weather patterns when arrival demand decreases, the FAA plans to reduce its use of the third runway (16R).
- **South flow during good weather.** During normal weather patterns, and periods of low demand, the primary south flow arrival runway is the center runway (16C). The easternmost runway (16L) will be the primary south flow departure runway. When airport demand increases, both 16R and 16L will be used for arrivals and 16C will be used as the primary departure runway.
- **South flow in lower visibility conditions.** During periods of low demand the primary south flow arrival runway is 16C. Runway 16L will be the primary south flow departure runway. When airport demand increases, in order to have two streams of arriving traffic that can

LETTER OF AGREEMENT

EFFECTIVE: JULY 26, 2016

SUBJECT: Approach Control Service and Coordination Procedures.

- 1. PURPOSE:** To establish coordination and control procedures between Seattle Terminal Radar Approach Control (TRACON) and Seattle Airport Traffic Control Tower (Tower).
- 2. CANCELLATION:** Seattle TRACON and Seattle ATCT Letter of Agreement dated June 10, 2013 and all its revisions, and NOTICES S46 N7110.705/SEA N7110.121, S46 N7110.706/SEA N7110.122, S46 N7110.690/SEA N7110.107 and S46 N7110.698/SEA N7110.109.
- 3. SCOPE:** The responsibilities and procedures outlined herein must apply to Tower and TRACON personnel for inter-facility coordination and control of air traffic.
- 4. RESPONSIBILITIES:** Tower and TRACON must be responsible to ensure that all applicable personnel are briefed on and comply with the procedures contained in this agreement.
- 5. PROCEDURES:**
 - a. Pre-arranged Coordination.
 - (1) A clear operational benefit may result by establishing prearranged coordination procedures in this Letter of Agreement. In the event of a malfunction or failure of the radar/computer system that prevents complete alphanumeric track data from being displayed, or in the event that prearranged coordination procedures become impractical due to other circumstances; i.e. weather, equipment, frequencies, etc., the FLM must terminate the applicable prearranged coordination procedures immediately.
 - (2) Prearranged coordination may be terminated at any time by the controller responsible for the airspace and must not be resumed until additional coordination has been effected.
 - (3) When using Special Interfacility Procedures (i.e., Plan Alpha, Plan Bravo, Plan Charlie) between SEA ATCT, BFI ATCT, and Seattle TRACON refer to that Letter of Agreement. Due to the limited scope of this Letter of Agreement, the tri-facility LOA must provide the in-depth guidance necessary for the above procedures.
 - (4) Tower must Quick Look the F1 and F2, Y, and A Sectors and the sector that has control of the BFI final. See Attachments 1, 2, 3, and 4 for descriptions and depictions of Tower and TRACON airspace.
 - (5) TRACON may climb and descend BFI arrivals and departures through Tower delegated airspace along the Runway (RWY) 13R/31L centerlines, except BFI arrivals or departures opposite to the established flow of traffic must be coordinated with Tower.

maintain appropriate separation during lower visibility conditions, runways 16R and 16L will be used for arrivals. Runway 16C will be the primary departure runway.

- **South flow departure demand.** Runway 16R will also help with airfield efficiency when there is an increased departure demand. The FAA can increase use of 16R for arrivals in order to allow departures off of both runways 16L and 16C.

North Flow Runway Use Program

- **Regular overnight usage.** During regular overnight operations in normal weather patterns when arrival demand decreases, the FAA plans to reduce its use of the third runway (34L).
- **North flow during good weather.** During normal weather patterns, and periods of low demand, the primary north flow arrival runway is the center runway (34C). The easternmost runway (34R) will be the primary north flow departure runway. When airport demand increases, both 34R and 34L will be used for arrivals and 34C will be used as the primary departure runway.
- **North flow in lower visibility conditions.** During periods of low demand the primary north flow arrival runway is 34C. Runway 34R will be the primary north flow departure runway. When airport demand increases, in order to have two streams of arriving traffic that can maintain appropriate separation during lower visibility conditions, runways 34R and 34L will be used for arrivals. Runway 34C will be the primary departure runway.
- **North flow departure demand.** Runway 34L will also help with airfield efficiency when there is an increased departure demand. The FAA can increase use of 34L for arrivals in order to allow departures off of both runways 34R and 34C.

a. Emergency and Closed Runway Conditions

In the event of an emergency or closed runway condition, the policy outlined in this document may not be followed as prescribed. With safety as the primary goal, the FAA maintains the right to determine the optimal runway assignments and usage during emergency and closed runway conditions.

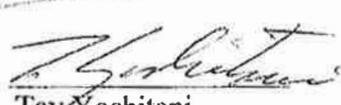
b. Operational and Safety Criteria (per FAA Order 8400.9)

A variety of weather and operational conditions may preclude the application of the normal runway use policy outlined above. These include, but are not limited to, the following:

1. Wind Shear or Thunderstorms.
2. Visibility
3. Runway Braking Effectiveness
4. Wind

c. Annual Review: The parties to this agreement will review this LOA annually on or around the anniversary of the signing thereof or upon request by any signatory to the LOA.


Ron Fincher
District Manager
Seattle Terminal District


Tay Yoshitani
Chief Executive Officer
Port of Seattle

Footnote 5

Fuel Dumping Checklist

1. Determine route/altitude/weather conditions fuel dumping will occur.
2. Advise adjacent sectors when fuel dumping commenced and terminated.
3. Except for emergency, vector or assign a VFR holding pattern over water at or above 5000.
4. Separation Minima:
 - a. VFR radar-identified aircraft by 5 miles.
 - b. IFR aircraft by one of following:
 1. 1000 above it.
 2. 2000 below it.
 3. 5 miles radar.
 4. 5 miles laterally.
4. Phraseology. Sectors concerned must broadcast an advisory at 3-minute intervals until the dumping stops.

4/6/2016 ORDER S46 TRACON 7110.65M

“ATTENTION ALL AIRCRAFT, FUEL DUMPING IN PROGRESS OVER (LOCATION) AT (ALTITUDE) BY (TYPE AIRCRAFT) (FLIGHT DIRECTION)”“ATTENTION ALL AIRCRAFT. FUEL DUMPING OVER (LOCATION) TERMINATED.”

Reference - FAA Order 7110.65 Chapter 9, Section 4, Fuel Dumping.

Footnote 6

Relative to Moses Lake as a viable alternative for cargo flights, “It has capacity to accommodate much more given its five runways and onsite FAA control tower for commercial, military, and general aviation use.” [Moses Lake website:

<http://www.portofmoseslake.com/aeronautics/#1477951474378-007e7354-62f6>].