



# City of Des Moines

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October 7, 2020

Josh Brown, Executive Director  
Puget Sound Regional Council  
1011 Western Avenue  
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Seattle, WA 98104

RE: Regional Aviation Baseline Study

The City of Des Moines appreciates the opportunity to provide additional comments on the Regional Aviation Baseline Study that PSRC has undertaken on behalf of the Federal Aviation Administration.

As you are aware, the City's proximity to SeaTac Airport results in disproportionate impacts experienced by Des Moines residents and surrounding communities. The City has consistently provided comments to PSRC that encourage a long term and comprehensive view of aviation planning in the region and support of policy and planning work toward siting of a second international airport. The City has also participated in the Regional Transportation Plan and Vision 2050.

As previously stated, we were particularly encouraged by PSRC's response to a May 19, 2018 letter from the City of SeaTac relating to the Regional Aviation Baseline Study, stating in part *"In addition to synthesizing data and findings from numerous separate studies and master plans, the study will identify meaningful options for state, regional, and local leadership to consider in accommodating the region's anticipated aviation activities. These options will describe opportunities and tradeoffs, including community impacts and concerns."*

We appreciate a comprehensive look at aviation needs in our region, however, the City has serious concerns with some of the study's underlying assumptions. We strongly object to the assumptions related to the "baseline" scenario, which are carried through in all the scenarios. The assumption that SeaTac Airport implements both the short term projects and the long term vision projects of the SeaTac Airport Sustainable Airport Master Plan (SAMP), is not appropriate for the following reasons:

*The Waterland City*

- As you may be aware, the environmental review of the SAMP short term projects only is currently in progress under both the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA). The analysis is not complete, no determination has been issued, and the public involvement process is in its early stages.

According to the Port of Seattle, the environmental review of long term vision projects included in the SAMP has not yet begun, because the SAMP long term vision “...includes projects that are not ready for environmental review at this time, as they require further study and are not reasonably foreseeable. Before any of the Long-Term Vision projects are implemented, the appropriate environmental review process will be conducted.”<sup>1</sup>

And,

*“Before recommending additional projects, the Port will participate in a broader regional conversation as well as review results from a new Puget Sound Regional Council regional aviation baseline study and additional SEA airfield and airspace study. Airspace and financial components are tightly constrained and need further review. Long-term vision recommendations would undergo subsequent environmental review.”<sup>1</sup>*

It is highly inappropriate that the PSRC study would include the assumption that all the alternatives rely on the implementation of the entire SAMP prior to any environmental review.

- Assuming implementation of projects that have not undergone environmental review or approval by the Federal Aviation Administration or the Port of Seattle, in advance of the public process, and absent fiscal, airfield and airspace feasibility is premature. Assuming approval of a long-term plan for growth at SeaTac in advance of environmental review is completely at odds with the primary purpose of the National Environmental Policy Act (NEPA) and SEPA statutes, to facilitate informed decision-making. NEPA and SEPA directs agencies to identify a proposed action's potential impacts, alternative courses of action, and mitigation options as input to decision-makers.
- The SAMP is not an adopted policy document for growth at SeaTac airport, as the Port Commission is unable to take action until appropriate environmental review is complete.
- The baseline assumptions also lead to assuming significant additional environmental impacts to SeaTac airport communities, as well as underestimating regional aviation needs should portions of the SAMP ultimately be infeasible or environmentally unwise.

- The Port states that it is relying on the information to be contained in the Regional Aviation Baseline Study to make decisions related to implementing the SAMP long term vision. The problem is that PSRC is assuming full implementation of the SAMP. With this circular logic, how can SeaTac rely on the baseline study related to the long-term vision when the study includes the assumption in all scenarios that the vision is implemented?
- An assumption was made that Paine Field is limited to 24 flights per day due to the limitation of the Environmental Assessment under NEPA (EA). This assumption is inconsistent with assuming growth will occur at SeaTac to implement the SAMP that has not even undergone the required environmental review or public process.
- While we appreciate PSRC's commitment to evaluating community impacts and trade-offs, as the Port has noted related to the SAMP long term vision, the Port believes community impacts are not "reasonably foreseeable" at this time. Since this information is unavailable, it would be difficult for PSRC to accurately evaluate community impacts under any of the scenarios since they all assume complete SAMP implementation.
- This assumption has also led to the potentially erroneous conclusions that the baseline scenario will lead to *"no increase in potential 2050-level noise and GHG impacts, single-occupancy vehicle trips to airports"*<sup>2</sup>, and that no new international airports would be required to meet 50-60% of forecast demand.

Additionally, the PSRC website notes that in survey results, respondents *"...prioritized increased passenger service capacity at other regional airports versus increasing capacity at Sea-Tac."* This scenario is worthy of consideration and evaluation.

The City of Des Moines requests that the "baseline" scenario be revised to include only approved capacity projects to date, at SeaTac Airport, that have undergone the required environmental review process. This revision would serve to further the study's stated goal to identify meaningful options for state, regional, and local leadership to consider in accommodating the region's anticipated aviation activities.

The City also believes that the Regional Aviation Baseline study is inadequate without inclusion of a thorough evaluation of impacts to SeaTac Airport nearby communities.

SeaTac Airport's continued anticipated growth and the impacts of 24 hour continuous overflights on neighboring communities make it crucial that the FAA and State of Washington begin planning now for a new international airport and have a true picture of aviation demand for the region. In fact, the Washington state legislature has funded a committee to review potential locations for a new airport.

Josh Brown, Executive Director  
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Thank you for the opportunity to comment, and for serious consideration of the City's comments. We look forward to the opportunity to continue this discussion on behalf of all of our residents.

Sincerely,



Matt Pina  
Mayor



Michael Matthias  
City Manager

CC: Des Moines City Council  
Dan Brewer, Chief Operations Officer  
Susan Cezar, Chief Strategic Officer  
Anthony Hemstad, Legislative Advocate  
Lance Lyttle, Managing Director, Port of Seattle Aviation Division  
City Managers and SEPA Officials – Cities of Burien, SeaTac and Normandy Park  
Congressman Adam Smith  
Congresswoman Pramila Jayapal  
Senator Karen Keiser  
Senator Claire Wilson  
Representative Tina Orwall  
Representative Mia Gregerson  
Representative Jesse Johnson  
Representative Mike Pellicciotti  
King County Councilmember Dave Upthegrove  
Jason Thibedeau, PSRC

<sup>1</sup>Port of Seattle website 9/29/2020

<sup>2</sup>PSRC - Regional Aviation Baseline Study website 9/29/2020