

December 13, 2024

From: Elizabeth Burton, Seattle, WA

To FAA and Port of Seattle Officials,

This letter provides feedback on the Draft Environmental Assessment (EA) of the SeaTac Airport Sustainable Airport Master Plan (SAMP) Near-Term Projects. The finding of non-significance regarding the SAMP's impact on climate is inadequate in many ways, as detailed below. The EA depends on flawed and misguided analysis and reasoning, including false and irrelevant statements; a faulty interpretation of cumulative effects; and unrealistic projections of minimization measures.

In light of these flaws, a full Environmental Impact Statement is required: one that relies on sound logic; avoids false, irrelevant and misleading statements; and includes a serious consideration of cumulative impacts. An alternative in alignment with Port, county, and state climate goals should be included.

The rest of this comment supplies support for these claims.

- **Chapters 1, 2, and 3: Failure to consider climate change in early stages of SAMP Process.**

The first three chapters of the EA exhibit inadequacies with the determination of purpose and need; with the consequent rejection of certain alternatives; and with the assessment of existing conditions.

The SAMP process started with the Puget Sound Regional Council soliciting future capacity planning assumptions from regional airports, and the FAA approving the resulting forecast of increased need for flights. This process ignored the fact that a functioning airport depends on a livable climate. It did not consider that by 2024, the world would already have reached 1.5 °C of warming¹, or that at current rates of emissions, the global economy will shrink by one-third². It involved no input from climate scientists or public health professionals, and no consideration was given to the fact that increasing the number of flights would make port, county, and state climate goals impossible to reach. A responsible determination of purpose and need would include consideration of broader concerns, including the need to maintain a livable climate.

¹ <https://www.co2.earth/daily-co2>; website accessed Dec. 12, 2024

² [NGFS Climate Scenarios for central banks and supervisors - Phase V](#), November 5, 2024

In 2018, consultants prepared [Technical Memorandum No. 9](#) to provide specific ways the Port could incorporate sustainability into the SAMP development process. This statement from page 2-1 makes clear that implementation of the SAMP would leave the Port's climate goals out of reach:

As master planning efforts must balance conflicting goals and objectives, this is especially relevant for key sustainability categories such as energy and greenhouse gas emissions. **For example, if the Port is to meet its goal to double the number of international flights and destinations and, at the same time, reduce greenhouse gases by 50%, it will have to consider a broader range of options in addition to traditional capital development strategies in the SAMP.**

Because the need for a livable climate was omitted from the original purpose, Chapter 2 rejected alternatives that called for a reduction in flights, or for substitution of other modes of transportation to reduce the need for more flights - the kind of broader range of options mentioned by the consultants, above. The result is that the EA includes no alternatives that make it possible for the Port, the county, and the state to reach their GHG emission reduction goals. The EA should include at least one alternative that is in alignment with these goals.

In Chapter 3, existing environmental conditions should include the present state of the climate (1.5 °C of warming; 425 parts per million of carbon dioxide in the atmosphere); instead, the EA considers "existing conditions" to be current GHG emissions from SeaTac Airport. This makes no sense, since even maintaining current emissions is incompatible with protecting a livable climate.

- **Chapter 4: THE FINDING OF NON-SIGNIFICANCE IS BASED ON FALSE AND IRRELEVANT STATEMENTS.**

Section 4.3.3 of the EA presents estimates of anticipated greenhouse gas (GHG) emissions under action and no-action scenarios, and on page 4-26, presents the following conclusion:

"The risks associated with climate change would be present regardless of the implementation of the Action Alternatives and would not be exacerbated. Therefore, the anticipated increase in GHG emissions due to the Action Alternatives in the context of the Airport's sustainability efforts and climate goals is not anticipated to result in an adverse impact on climate."

Below please find my objections to this conclusion.

EA claim: *"The risks associated with climate change would be present" whether or not the projects are implemented.* This statement is true of every conceivable project, regardless of the severity of the project's climate impacts; it is therefore clearly irrelevant to the determination of how significant those impacts are. For example, building and operating 500 coal plants would indisputably have a significant impact on the climate, but the risks associated with climate change would be present whether or not the coal plants were built. Similarly, on the basis of anticipated harm to the climate, the state denied permits to build a methanol plant in Kalama, Washington in 2021; it doesn't follow that refraining from building the plant resulted in the elimination of all risks associated with climate change. The statement that the risks associated with climate change would be present whether or not the SAMP projects are implemented should not be included in the EA; it is not relevant to the discussion, and is not a legitimate reason for a finding of no significance.

EA claim: *The risks associated with climate change would not be exacerbated if the projects are implemented.* This is false. According to the EA's projections, annual GHG emissions will be higher if the projects are implemented than if they are not implemented. The risks associated with climate change increase with every additional amount of greenhouse gas emitted into the atmosphere.

EA claim: *"Therefore, the anticipated increase in GHG emissions due to the Action Alternatives in the context of the Airport's sustainability efforts and climate goals is not anticipated to result in an adverse impact on climate."* The word "Therefore" is inappropriate and misleading: this statement does not follow from the previous statement, since - as discussed above - the first part of the previous statement [*The risks associated with climate change would be present regardless of the implementation of the Action Alternatives*] is irrelevant, and the second part of the previous statement [*The risks associated with climate change...would not be exacerbated*] is false. In addition, the statement itself - without the word "Therefore" - is contrary to fact: the emission of additional greenhouse gasses does, in fact, result in adverse impacts on climate. To not "anticipate" such adverse impacts does not constitute legitimate analysis; rather, it shows a willful disregard of reality.

It is irrelevant to include the phrase *"in the context of the Airport's climate goals."* Having goals does not decrease the Airport's climate impacts. The climate is not responsive to goals, only to actions. So the "context of the Airport's climate goals" is not relevant to the determination of significance, and should not be included in the EA.

In fact, implementation of the SAMP will guarantee that the Port will fail to meet its climate goals. The Port's guiding document, the Century Agenda, includes the goal of reducing scope 3 emissions 50% below 2007 levels by 2030³. According to the EA, implementing the SAMP will result in annual emissions of over 7.3 million metric tons of

³ [Technical Memorandum No. 9: Sustainability Planning and Management Strategy](#), Table 1-1.

GHG by 2032 and over 7.8 million metric tons of GHG by 2037. These are not 50% below 2007 levels.

It is also not relevant to consider the *"Airport's sustainability efforts"* as somehow lessening the impact of the SAMP projects. Regardless of any reductions in GHG emissions resulting from the "Airport's sustainability efforts," implementing the SAMP projects will result in more emissions, more harm to the climate, and increased risk from climate change, compared to not implementing the projects.

- **Chapter 4: THE DISCUSSION OF "MINIMIZATION MEASURES" IS FLAWED.**

On page 4-26, the EA states:

"The Port has undertaken a wide range of activities designed to reduce GHG emissions and prepare for the effects of climate change, independent of the Proposed Action."

As stated above, the vague and unspecified "wide range of activities" undertaken by the Port "designed to reduce GHG emissions" may or may not actually reduce emissions, and the existence of these activities does not alter the fact that implementing the SAMP projects will result in more emissions and thus more harm to the climate than not implementing them.

The EA continues:

"Furthermore, the Port is playing a key role in efforts to facilitate the adoption and local production of SAF with airline partners. The Port has set the goal to power every flight fueled at SEA with at least ten percent blend of SAF by 2028."

Regarding SAF, the following statements are from the EA Appendix C, in an email from Kandace Krull of the FAA to Eric Saganic and Steve Rybolt, sent on November 2, 2023:

"While SAF tanks and infrastructure are included in the Proposed Action, there is no requirement for the Port or tenants to utilize SAF. In addition, there are supply chain issues with obtaining SAF and [it] isn't clear when these issues will be resolved. As such, any use of SAF in the future would be speculative for both the No Action and Proposed Action."

Since the future use of SAF is speculative and its use will be voluntary, SAF cannot be considered a reliable factor in minimizing GHG emissions. It is entirely possible that the emissions reductions due to SAF will be zero.

As pointed out above, setting goals ["The Port has set the goal to power every flight fueled at SEA with at least ten percent blend of SAF by 2028"] does not affect the climate.

Thus, the finding of non-significance of climate impacts is backed by no legitimate reasoning whatsoever.

- **Chapter 5: THE EA CONSIDERATION OF CUMULATIVE IMPACTS IS FLAWED.**

The FAA requires that cumulative impacts be considered when determining significance. The CEQ defines cumulative impacts as:

"... effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from actions with individually minor but collectively significant effects taking place over a period of time."

This is exactly the right context in which to consider climate change, which is a global phenomenon, caused by many decades of GHG emissions from actions taken all over the world. The cumulative effects of past actions on the climate are best measured by taking stock of the current state of the atmosphere and of the climate. As pointed out above:

- As of December 11, 2024, the atmosphere has a CO₂ concentration of 427 parts per million, according to NOAA's Mauna Loa observatory⁴
- Antarctic ice core data suggest the world has already reached 1.5°C of human-induced global warming⁵

However, in measuring the effects of past actions on the climate, the EA restricts its attention only to emissions from projects built during a 5-year period in a limited geographic area close to the airport. This is ludicrous. It considers similarly restricted locations and time spans for present and future effects. This is not at all useful in accessing the actual impacts the SAMP will have.

FAA Order 1050.1F, section 4-3, states that in determining significance, both short and long-term impacts are relevant. Here are a couple of medium-term impacts that were not considered, though they will definitely affect life in the Pacific Northwest:

- Although the Intergovernmental Panel on Climate Change had previously concluded with "medium confidence" that the Atlantic Meridional Overturning Circulation (AMOC) will not collapse abruptly before 2100, more recent scientific

⁴ <https://www.co2.earth/daily-co2>; website accessed Dec. 12, 2024

⁵ [Antarctic ice core data suggest we've probably already hit 1.5°C of manmade warming](#), Nature Geoscience (peer-reviewed), November 12, 2024

research suggests the serious possibility that the AMOC may pass an irreversible tipping point in the next few decades, leading to devastating and irreversible climate impacts for countries around the world, including an upheaval of marine ecosystems and fisheries⁶.

- The Network for Greening the Financial System, a group of global banks that provide environmental and climate risk modelling in the financial sector, released a report⁷ on November 5, 2024, stating that the physical shocks caused by climate breakdown - flooding, droughts, temperature rises, and mitigating and adapting to extreme weather - will decrease global economic growth by one third. Some experts say the even though this analysis uses the latest data and models, it is actually still a huge understatement of the impact climate breakdown will wreak on economic growth, since it fails to take into account the impact of climate tipping points, sea temperature rises, migration and conflict as a result of global heating, human health impacts, or biodiversity loss.

Collectively, these flaws are serious enough to warrant a more rigorous Environmental Impact Statement.

Thank you for your consideration.

⁶ [Atlantic current collapse 'closer than we think,'](#) Oceanographic

⁷ [NGFS Climate Scenarios for central banks and supervisors - Phase V,](#) November 5, 2024