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December 13, 2024

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

Re: Comments on SAMP Environmental Assessment

Dear Mr. Rybolt:

Thank you for the opportunity to comment on the Seattle-Tacoma Sustainable Airport Master Plan (“SAMP”) draft Environmental Assessment (“EA”). As a resident of the Woodmont neighborhood in Des Moines, Washington, I am impacted by operations at the airport on a daily basis. Having reviewed both the draft SAMP and the EA, and I am providing my my comments related to the adequacy of the environmental assessment and increased operations at SEA.

As a threshold, despite a gargantuan, 4,800-page EA document, the PoS and FAA have selected methods of evaluating the data that serve to place a heavy thumb on the scale of supporting the PoS goal of increasing annual flight operations by 87,000. The EA does this at the expense of the public and the environment, turning a wholly blind eye to any data – including ignoring any study or readily available science on the harms from airport noise and pollution - that does not support this intended result. Or, to borrow the words of noted sports analyst, the late Vin Scully, the PoS and FAA appear to have used statistics “much like a drunk uses a lamppost: for support, not illumination.”

1. A full Environmental Impact Statement is required; an Environmental Assessment is inadequate.

Common sense, existing science documenting the harmful impacts on my community, the real-world cumulative impacts, the required “hard look,” and the controversial nature of the SAMP, all require a full EIS. Here, there are plainly substantial questions about how the increased flight operations resulting from SAMP projects may cause significant degradation of the human environment. Further, as the thousands of comments previously provided in relation to the scoping of the SAMP attest, and the thousands of comments that will be provided to the draft EA, an environmental impact statement is required because this federal action is controversial because substantial questions are raised as to whether a project will cause significant degradation of the human environment. Controversy is also evidenced – perhaps without dispute given the denials asserted by the PoS - by the currently pending class action lawsuit, *Codoni v. Port of Seattle*, alleging noise and pollution harm caused to all citizens living within five miles of the airport. There is simply no real-world, common sense, legal or scientific basis for the SAMP EA to ignore the known impacts to our larger community beyond the border of the airport itself.

Here, the PoS and FAA have chosen to look way from the trove of available science on the harms from aircraft noise and pollution; the science, discussed below, casts serious doubt about the reasonableness of the EA's conclusions. Further, for the past decade, the SAMP has been a subject to substantial media attention and public controversy. Finally, even if the PoS and FAA dispute the available science on noise and pollution, an EIS is clearly required because of the obvious significance that arises from the *possible* effects on the environment due to uncertainty or involve unique or unknown risks. Here, the PoS has simply substituted its own judgment in place of local, regional, and global scientists. The EA is inadequate in form and substance, including but not limited to, for the reasons set forth below. A full EIS is required.

2. The EA process is inherently arbitrary and capricious from the standpoint of insufficient community engagement opportunity; communities have not had sufficient time to fully review and respond to the EA.

The Port of Seattle ("PoS") began the SAMP process at least as early as 2012. Six years later, in 2018, the PoS engaged in the SAMP scoping design process. Now, another six years later, the PoS released the draft SAMP EA and has provided community only 45 days (extended because of the intervening holiday to December 13, 2024) for to respond.

During the PoS's 12-year period taken by the Port, it engaged at least 36 outside consultants (this figure does not include the PoS's own staff or FAA staff). The final EA and exhibits exceeds 4800 pages, much of which is technical data tethered to complex regulatory schemes. It is a near-to-overwhelming task for the average citizen to review the document, and self-educate on the science, law and regulations, to respond. It is unlikely that citizens can, with such short notice and period, retain, and fundraise, for expertise to assist in responding. In effect, the PoS, having taken 12 years to reach a draft EA at its apparent leisure, appears to – by design – make it impossible for community members to respond. There is no rational basis for requiring this minimalist time period. The PoS has placed its desires over the obvious needs of community members for an adequate period of time to respond. The Port took 12 years; it could easily have given the citizens three to six months. Failing to do so has prevented community from fully assessing the EA, and then providing full and complete comment.

By failing to provide adequate time for public response, one consequence is that the PoS and FAA will make decisions without adequate public input. The NEPA public comment procedures are at the heart of the NEPA review process, and the PoS and FAA are required to make diligent efforts to involve the public in preparing and implementing their NEPA procedures and solicit appropriate information from the public. The public must be given a full and fair opportunity to comment on draft EAs. Here, after 12 years, the public was in effect surprised with the EA release and the scant 45 (or now 53, because of, apparently, a magnanimous consideration of Thanksgiving) days was grossly inadequate to allow for the public's consumption of the EA's detail over 4800 pages, let alone preparing a response.

3. The General Study Area and Area of Potential Effect ("APE") fail to properly include and assess the true, real-world scope of impacts to our airport communities.

The General Study Area—the Port's boundaries for its Area of Potential Effect ("APE") — is drawn very tightly around the airport campus. The Port is attempting to force evaluation of the 31 "Near Term Projects" (NTPs) that make up the SAMP largely for impacts that will occur while those projects are under construction.

The Port's EA consultants, Landrum and Brown, rely on this tightly drawn APE to reach the conclusion that "no significant impacts to air quality were identified (and) no mitigation would be necessary." It is self-evident that this approach – to ignore impacts outside the APE - dictates the conclusion that the impacts are not significant. The approach ignores the impact—noise and other forms of pollution—that occurs in surrounding communities once additional aircraft and vehicles accommodated as a result of the SAMP projects become capable of departing the airport and overflying airport communities.

By defining the APE to, in essence, the area of the airport itself and only its most immediate surroundings, the Port has arbitrarily severed off any review of real-world impacts on the vast majority of Des Moines, including our communities within one, five, and ten miles of the airport. The APE must be expanded to assess the actual, real-world, impact of adding 87,000 new flights and the cumulative impact of prior flights on the WCC community and other Des Moines' neighborhoods.

I note that in RCW 53.54, our State recognizes impacts from aviation far beyond the APE, allowing for the development of remedial programs providing noise mitigation by the Port within 10 miles (North) or 13 miles (South) of the airport. The law is supported by and recognized as a statement of legislative intent that "in King County, for those living near an airport, there can also be adverse impacts from aircraft operations." In essence, the State of Washington recognizes the science, and the broad geographic scope of the impacts from aviation. Similarly, the State funded the 2020 Public Health King County Report, which found public health impacts as far as 10 miles out from the airport. It is also noteworthy that the currently pending class action lawsuit, *Codoni v. Port of Seattle*, alleges noise and pollution harm that have been caused to all citizens living within five miles of the airport. There is simply no real-world, common sense, or scientific basis for the SAMP EA to ignore the known impacts to our larger community beyond the border of the airport itself.

4. EA Fails to adequately consider actual cumulative impacts of aircraft overflights, past, present and future.

The SAMP forecasts a nearly 30 per cent increase in annual aircraft operations, to 540,000 takeoffs and landings, by 2034. This approach fails to accurately reflect the actual cumulative impact of past actions relating to airport expansions. The SAMP and EA omit the past action of greatest significance - the 2008 opening of the third runway at Seattle-Tacoma International. The third runway is a past action that must be added to the "cumulative impacts" faced by the WCC and other airport communities. The Port's SAMP timeline only goes back to 2017, despite the fact the projected number of takeoffs and landings for 2024—about 423,000 annually—is already 16.5 per cent greater than levels in the early 2000s before the third runway opened.

An actual assessment of cumulative impact requires using a baseline of no more than 365,000 annual flight operations from that earlier period. As such, the cumulative impact thru 2034 for people living under the flight path is a 48 per cent increase in aircraft traffic—with all of its attendant noise and other forms of pollution. As addressed elsewhere, there are a myriad of health consequences linked to noise and these contaminants, along with evidence that people beneath the flight path are experiencing those consequences.

Notably, the City of Des Moines advised the Port of the need to include past projects by letter as early as September 27, 2018, asserting the proper time frame for a baseline must date back to at least 2012, when annual total flights numbered 309,597. The City directly challenged the approach of incrementalism, demanded that any environmental assessment must include

impacts dating back to 2012, and insisted that the then-ongoing studies (discussed in Section 2, above) be included in an analysis of impacts. This request has been wholly rebuffed. By any measure, it is clear from the draft EA that the City's requests have been improperly ignored and/or rejected.

Further, the Port of Seattle has repeatedly asserted that "long term projects" – projects not currently included in the SAMP near term projects – exist, but provides no assessment of the additional cumulative overflight impact of such projects. The now long-standing "divide and conquer" approach remains unacceptable. The airport neighbor communities are entitled to a full assessment of all of airport's growth plans – **past**, present, and **future**. Addressing impacts in isolated silos provides, at best, a conclusion that is arbitrary and capricious.

5. Failure to include current scientific studies relating to public health harms from aircraft noise and pollution.

This draft SAMP EA fails to examine and consider the readily available science – including scientific studies of our own airport – relating to the harms to humans from aircraft noise and pollution in relation to our airport neighbor communities. The draft EA does not discuss the human known health impacts from noise, and the human health impacts from pollution, specifically including ultra fine particles. These impacts are now well-known and there now appears to be scientific consensus around the conclusions. The Port be taking a hard look at this science, but it has not taken any look - at all. These studies should be reviewed and assessed in the context of harms to WCC residents and all airport neighbor communities, and their recommendations considered for adoption. If the Port has engaged in scientific inquiry that rebuts these studies, it should discuss the same. The studies specifically to be included:

- 2020 Community Health and Airport Operations Related Noise and Air Pollution: Report to the Legislature in Response to Washington State HOUSE BILL 1109," produced by Public Health King County and others (the "Public Health King County Report"). Read at: https://apps.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Community%20Health%20and%20Airport%20Operations%20Related%20Pollution%20Report_c7389ae6-f956-40ef-98a7-f85a4fab1c59.pdf
- 2020 Study of the Current and Ongoing Effects of the Operation of Sea-Tac International Airport, Stantec. Read at: <https://www.commerce.wa.gov/wp-content/uploads/2020/09/SeaTac-Legislative-Report-FINAL.pdf>
- 2019 University of Washington report titled the Mobile Observations of Ultrafine Particles Study ("MOV-UP Study"). Read at: <https://deohs.washington.edu/sites/default/files/Mov-Up%20Report.pdf>
- 2018 World Health Organization Environmental Noise Guidelines for the European Region. Read at: <https://www.who.int/europe/publications/i/item/9789289053563>
- 1997 Sea-Tac International Airport Impact Mitigation Study. Read at: <https://seatacnoise.info/wp-content/uploads/SeaTac%20International%20Airport%20Impact%20Mitigation%20Study-1997.pdf>

I will seek to attach PDF files of each of the above studies in my submission. For the record, my intent is to have the entirety of each of the above studies in the record as part of my comment.

6. Failure to adequately assess impact of increased night flights.

The EA projects 208 nightly flights by 2034. The EA is flawed because it does not include existing science that has found night flight noise causes significant cardiovascular disease. See, e.g., the 2018 World Health Organization Environmental Noise Guidelines for the European Region, which recommend for human health, a 55 DNL maximum day time, and 45 DNL night time. Higher night-time aircraft noise is linked with disturbed sleep quality, with long term effects on public health.

The "science is in." Aircraft noise can cause community annoyance, disturbances of activities and communication, disrupt sleep, adversely affect academic performance of children, and could increase the risk for cardiovascular disease of people living in the vicinity of airports and can lead to stress reactions characterized by an activation of the sympathetic nervous system and/or increased levels of circulating stress hormones. Airport studies have found that noise from night flights causes immediate increases in blood pressure in sleeping people, even if they are not woken by the noise. There is a 14% increase in the risk of high blood pressure (hypertension) for each 10 db increase in night-time aircraft noise. Hypertension can lead to heart problems and even early death. Scientists have found that disturbed sleep from night-time aircraft noise can trigger acute cardiovascular mortality. Less than six hours of sleep per day increased the risk of obesity, glucose elevation, dyslipidemia, and elevated blood pressure. Noise-induced sleep disturbance has been considered the most deleterious non-auditory effect of environmental noise exposure. Psychophysiological stress reaction to environmental noise is considered as a primary causal link to cardiovascular disease development. Long-term exposure to nocturnal aircraft noise is associated with sleep disorders and physiological circadian blood pressure profile alterations. Aircraft noise studies in effect have shown why the sleep phase leads to cardiovascular diseases and may explain why aircraft noise is linked with cognitive impairment and harm to learning and memory capabilities in children. It is notable that the European Community estimates that the social cost of noise and air pollution is up to €1 trillion every year. The issue was highlighted by the recent WHO environmental noise guidelines for the European Region, provided with this letter.

The science is loud and clear. As a matter of public health, night flights must be reduced or eliminated; *not* included in planned expansions.

7. Failure to adequately assess impacts on Environmental Justice Communities.

The problems created by the EA's restricted APE, restricted assessment of on the 65 DNL contours, flawed cumulative impact analysis, and failure to include known noise and pollution science are exacerbated for near-airport environmental and social justice communities. The EA failures here are legion. Indeed, the PoS and FAA fail to even use EJSCREEN, the EPA tool referenced in the Promising Practices for EJ Methodologies in NEPA Reviews (otherwise cited by the EA). This tool – if it were utilized by the PoS - clearly identifies impacted environmental justice populations and the public health implications of living near Sea-Tac airport. But it is ignored.

8. Failure to adequately address impacts on children, childhood cognition and learning, and elderly communities.

The EA fails to fully address the known noise impacts on childhood cognitive health and learning and elderly communities. With respect to the impact of this increased operation on childhood learning, the Washington State Attorney General has successfully litigated the position that aircraft noise hurts children, and in effect, "the science is in." In addition to the studies

referenced above, numerous studies have concluded that aircraft noise will measurably impact learning. And indicate “that chronic exposure to high aircraft noise levels may impair learning. And suggest that aircraft noise can affect the academic performance of school. A 2009 guide developed by the Department of Defense Noise Working Group explained that scientific studies demonstrate that “chronic exposure to aircraft noise impaired long-term memory, reading comprehension and problem solving skills in children ages 8 through 14. The Road-Traffic and Aircraft Noise and Exposure and Children’s Cognition and Health study (RANCH study), which showed a decrease in reading scores as the noise level increased, identifying ‘a linear exposure-effect association between exposure to aircraft noise and impaired reading comprehension and recognition memory in children.’ Other studies link aircraft noise and motivational depletion in children, and show that chronic aircraft noise can cause physiological responses, like elevate blood pressure, in children.

Here, the EA does not adequately connect the dots between the level of noise disturbance from 87,000 additional flight operations and potential adverse impacts to school children. The PoS either arbitrarily concludes that increased operations will not interfere with childhood learning, and/or asserts mitigation plans that wholly fail to extend a true impact analysis throughout the entirety of the real-world, impacted communities (using flawed assessment of cumulative impacts and it’s blind reliance upon its 65 DNL contour as a shield from the science).

Similarly, the EA fails to identify and assess the impact of an additional 87,000 flight upon elderly communities near the airport. The science reveals links to cognitive impairment and faster cognitive decline among older adults. My city of Des Moines has a large elderly community in multiple senior living communities. The EA does not adequately identify and assess the impacts of an additional 87,000 flights on these communities, the PoS has not engaged these communities, and therefore the EA is fatally flawed.

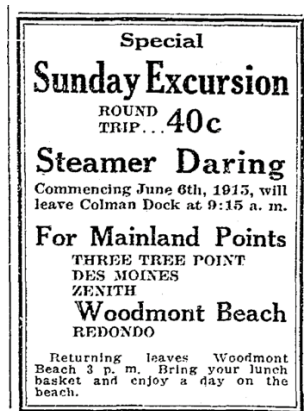
9. Failure to adequately identify and assess impacts on historical neighborhood communities, districts, and parks.

The EA fails to address the impacts on near-airport historical neighborhood communities. I live in the Woodmont neighborhood, and while other historical neighborhoods and parks have also been ignored (e.g., by way of example only, Redondo, Zenith and its Masonic Home, Saltwater State Park, historic Des Moines North Beach Park), my comment focuses only on where I live – Woodmont.

A. Background - Woodmont Country Club History

The WCC beach community is located in the southern portion of Des Moines (North of Redondo, south of Saltwater State Park), and bordering on Puget Sound.

Over one hundred years ago, a real estate developer began to market raw land south of Seattle, newly-christened “Woodmont.” Potential purchasers came from Seattle to Woodmont by boat, a Mosquito-fleet vessel named “Daring,” landing at the new Woodmont dock, staying for a picnic - and sales pitch. The historical Woodmont Beach community was developed as a summer retreat destination in 1915, and was comprised of individual cabins and camping spots. Original purchasers of a lot in the Woodmont Country Club primarily used Woodmont as a summer home.



Woodmont Country Club was formally incorporated on August 10th, 1915, with the beach property deeded to the community at that time. There are approximately 190 households in the membership area.

The “purpose” of WCC has remained unchanged from its original 1915 bylaws: to “establish maintenance of a Country Club, which Club shall be formed for the purpose of promoting friendly relationships, encouraging social intercourse, and developing open air sports and aquatic exercises among its members. It shall be the purpose of this club also to formulate, adopt and enforce sanitary regulations necessary for conserving health, comfort and general welfare of its member in their country life at Woodmont Beach on Puget Sound.” Since 1915, members have permitted to use WCC properties, including a community plaza, lawn, boat launch, beach, and sport court with tennis and basketball facilities, all outdoors, and all use subject to the WCC bylaws and rules.

Woodmont’s history of outdoor recreation and its Puget Sound location has overlapped with events of historical significance. One example: tree-lined road leading in and out of Woodmont Beach (Woodmont Beach Road, but nicknamed by residents, “the canyon”) became a famous access point for bootleggers receiving shipments during Prohibition. At that time, the community, divided between the so-called “wets,” and “drys,” disagreed about the merits of Prohibition and whether the road and dock should be used by bootleggers; the dry’s frequently felled trees to block rumrunner trucks from reaching the dock. Then, on Thanksgiving Day, 1925, Roy Olmstead, nationally renowned as “the Good Bootlegger,” suffered his final arrest at the Woodmont Beach dock. The story was recently recounted in this short film.

<https://www.seattlesouthside.com/things-to-do/sightseeing/seattle-southside-scenes/history/bootlegging-at-des-moines-marina-in-washington/>. The ruins of the Woodmont Dock can be seen today, and the WCC community has long referred to the single, tall piling as “Old Roy.” A monument has been erected to commemorate the arrest of the infamous Rumrunning King.



The WCC community still celebrates its history – and bootlegging history – with annual outdoor events, and a “Bootlegger Bash” every five years. There are many – over one hundred years – examples of WCC residents using their historic outdoor amenities for peaceful and quiet recreation, “promoting friendly relationships, encouraging social intercourse, and developing open air sports and aquatic exercises among its members.” Photos of more recent outdoor activities can be seen here: <http://www.woodmontcountryclub.org/photos.html>.

B. SAMP EA fails to adequately assess impacts on WCC as a historic quiet neighborhood.

Because of the historic events of national significance that have occurred in Woodmont history, Woodmont’s historic neighborhood structures, roads, and the ruins of the Woodmont Dock, are eligible for inclusion on national and state historic registries. The WCC’s use and enjoyment of these resources – all outdoors – are significantly impacted by aircraft overflights and increased overflights. However, no assessment exists in the EA relating to the impact of the SAMP on these historic resources. No one has reached out to the WCC Board to engage on the impacts of the projects in the EA. The WCC has not been provided any information about how the SAMP will affect WCC historic property and residents’ usage of the historic WCC property. If WCC is engaged, I believe the SAMP’s proposed increases in overflights will be considered highly controversial on environmental – including public health - grounds.

To be clear – the WCC believes the SAMP’s proposed increase in overflights will substantially harm the entire WCC community because it will significantly diminish the activities, features, and attributes of the WCC that contribute to the enjoyment of WCC historic properties. The SAMP’s proposed increase will make constructive use of the WCC outdoor spaces, already challenging, impossible - for social discourse, music or other entertainment, or even simply interacting with and enjoying the natural environment, on walks, kayaking, swimming, or exploring the beach, wildlife, and tidal lands. As a resident of a historic community, I do object to even more aircraft noise at levels high enough to prevent such historic activities from occurring, particularly without any consideration, engagement, assessment, or mitigation of the impacts on our community.

To summarize, the draft EA does not address and fails to satisfy requirements for assessment and disclosure, options, alternatives, and mitigations, for historic properties in the WCC. It is common sense that an increase in annual aircraft overflights of a historic neighborhood of 30% - estimated to be 87,000 flights in the EA - is significant. Our ability to use our outdoor

amenities for the over-100 year old purpose is already impaired by the noise from overflights – it will be devastated by another 87,000 overflights per year.

Finally, I do not agree that the Port can rely only on compliance with federal guidelines dating back to the 1970s, ignore contemporary science relating to the harms of aviation, and pretend our community is not significantly impacted by the increase in flights. Here, such federal guidelines are plainly not sufficient to determine the noise impact on Woodmont’s historic places and residences, particularly where, as here, the community was created and seeks to maintain a quiet, forested setting along Puget Sound as an attribute of our community. The WCC was created in 1915 as an oasis from the city of Seattle, and has maintained, without interruption, that ethos. I do not agree that because my community has already suffered from aircraft noise and pollution, it now must simply suffer further from the increase of 87,000 flights.

I note that Woodmont is not alone; other Des Moines’ historic neighborhoods pre-dating the airport along Puget Sound include Redondo to immediate South, and Zenith to the North. Historic Puget Sound state parks predating the airport include Saltwater State Park. Notably, the Des Moines Masonic Home (aka, “Masonic Home of Washington Historic District,” “Landmark on the Sound”), just two miles north of Woodmont, has recently been identified by the City of Des Moines as an “eligible historic district with 10 eligible contributing resources.... Three of the eligible contributing resources are also individually National Register eligible.”

To our knowledge, the EA erroneously contains no identification, let alone assessment, of the impacts to any of these historic neighborhoods and parks.

Thank you for the opportunity to comment.



Steve Edmiston