



December 13, 2024

Mr. Steve Ryboldt
Port of Seattle
Aviation Environment and Sustainability
PO Box 68727
Seattle, WA 98168

RE: Sustainable Airport Master Plan Draft Environmental Assessment
City of Tukwila Comment Letter

Dear Mr. Ryboldt:

Thank you for the opportunity to provide comments on SeaTac Airport's Sustainable Airport Master Plan Draft Environmental Assessment (SAMP Draft EA). The City of Tukwila is disappointed that our comments raised during the Scoping Process¹ were not considered or addressed in the SAMP Draft EA. In fact, except for a very small part of the City, impacts to Tukwila were not even considered in the SAMP Draft EA.

The City believes that the SAMP Draft EA study area is too small, the mitigation measures are insignificant, and the SAMP Draft EA fails to meet the Port's own commitment to equity and social justice. The City of Tukwila respectfully requests that a full Environmental Impact Statement be completed for the proposed Master Plan and that the General Study Area (GSA) be expanded to at least include all of the City of Tukwila.

The GSA is too small as outlined in the SAMP Draft EA. The Port incorrectly assumes that the impacts of the airport's operation and the projects identified by the SAMP Draft EA are confined to only the 3,692 acres that mostly includes Port of Seattle properties and land uses immediately adjacent to the airport. This is fundamentally wrong. The Airport's operations, including expanding capacity, impacts a much larger geographical area. For example, in the City's 2018 Scoping Letter we clearly identified that traffic from the airport travels on city streets. Growth at SeaTac Airport would naturally increase traffic on freeways and roadways beyond the GSA. The GSA should be expanded to include study of the true impacts within South King County.

The proposed mitigation measures are wholly inadequate to address the impacts from the proposed projects identified in the SAMP Draft EA². This is likely due to the limited GSA. An

¹ See letter dated September 27, 2018.

² The only actual offsite mitigation proposed are a few upgrades to existing intersections.

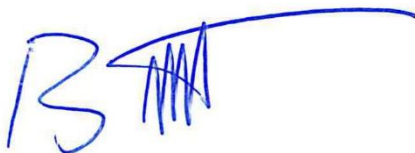
expanded GSA will likely identify the need for additional offsite mitigation measures. One notable item missing from the SAMP DRAFT EA is an expanded area regarding air quality impacts. It is common sense that an expanded airport, allowing for more flights, would result in greater air quality impacts to communities beneath the flight paths. This is just one example of the inadequate mitigation measures fail due to the limitations of the GSA.

The Port of Seattle’s website notes that “it commits to taking a role in regional and national efforts to achieve equity and social justice.” **Yet, the SAMP Draft EA does not demonstrate any commitment to addressing equity and social justice.** The area around SeaTac has a per capita income nearly half of King County’s,³ and is one of the most diverse in King County and the State of Washington. No mitigation measures are proposed to address the impact on historically marginalized and low-income communities. Additionally, expanding out the GSA would show even more impacts associated with the projects outlined in the SAMP Draft EA that would need to be addressed.

A strong airport is essential to the economic health of the Puget Sound region. We support the expansion of a truly “sustainable” airport. What is presented in the SAMP Draft EA falls short. It’s unfortunate that that the SAMP Draft EA did not more effectively identify the issues associated with airport expansion. A full Environmental Impact Statement, with an expanded GSA, is needed to fully account for the airport’s Master Plan impacts.

Please contact me at (206) 731-9071 or at Brandon.Miles@Tukwilawa.gov if you have any questions or if the City can be of assistance with providing information.

Sincerely,



Brandon J. Miles, Director
Strategic Initiatives and Government Relations

³ SAMP Draft EA, 3-56