



November 30, 2020

King County Airport
7277 Perimeter Rd. S.
Seattle, WA 98108-3844
KCIACommunityOutreach@kingcounty.gov
via e-mail

Re: Comments on KCIA Airport Master Plan Update

Dear King County International Airport Staff,

We are writing to provide comments on the King County International Airport (“KCIA”) Master Plan Update currently in progress.¹

As “one of the busiest primary non-hub airports” in the country, KCIA is a major source of climate, air, and noise pollution in our region.² In the last five years, as traffic at the airport has steadily increased, so has the pollution generated by KCIA.³ You are now proposing to spend over \$250,000,000 on various projects that would, in large part, further increase the amount of climate, air, and noise pollution generated by KCIA.⁴ This, in turn, would further destabilize our climate and harm neighboring communities, and is in conflict with King County’s stated climate goals and commitments to equity and environmental justice. As outlined below, we urge you to make significant amendments to the Master Plan Update and accompanying workpapers before they are given further consideration. In addition, we also support the demands of the representatives of impacted communities previously presented to KCIA.

¹ Founded in 2013, 350 Seattle is a grassroots group working for climate justice by organizing people to make deep system change: resisting fossil fuels; building momentum for healthy alternatives; and fostering resilient, just, and welcoming communities. 350 Seattle has a mailing list of over 13,000 people, the great majority of whom are in the Seattle metropolitan area. 350 Seattle has been a key leader in successful fights like the #ShellNo campaign against Arctic drilling, the campaign to defeat the (proposed) world’s largest oil-by-rail terminal in Vancouver, and the campaign against the Anacortes Shell oil-by-rail spur. With Got Green, 350 Seattle launched the Seattle for a Green New Deal campaign.

The Climate Reality Project: Seattle-King County Chapter leverages the unique strengths and optimistic leadership of Al Gore and the global Climate Reality Project. The Chapter’s mission is to help grow and develop the climate movement in the Seattle area, and create a diverse group of local climate leaders to take needed climate action.

² Master Plan Update, “Executive Summary,” p. xxxii.

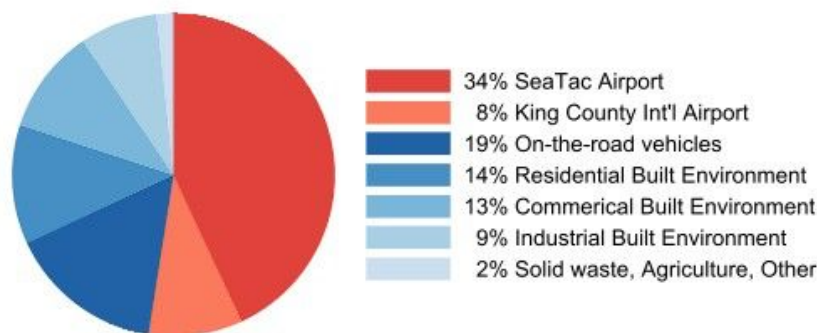
³ See generally Master Plan Update, “Forecasts of Aviation Activity.”

⁴ Master Plan Update, “Executive Summary,” p. xxxiii.

THE MASTER PLAN UPDATE LAYS THE GROUNDWORK FOR AN UNTENABLE INCREASE IN GHG EMISSIONS AND CLIMATE WARMING FROM NEW AVIATION ACTIVITY.

As King County has recognized, “[c]limate change is one of the paramount environmental and economic challenges for our generation.”⁵ And as “global GHG emissions continue to accelerate and climate impacts grow, the urgency to act on climate change increases.”⁶ We are no longer awaiting the onset of the climate crisis, we are living it. Temperatures continue to skyrocket, and extreme fires, flooding, and storms are the new norm.⁷ We must cut emissions by at least half in the next nine years to avoid even more catastrophic, and semi-permanent, impacts of climate change.⁸

In King County, aviation is a major contributor—if not *the* major contributor—to climate change. One reason for this is that aviation emissions have a three-fold greater warming impact on the climate than on-the-ground emissions.⁹ The pie chart below reflects this phenomenon, and demonstrates why reducing total emissions from KCIA is critical to meeting our climate goals.¹⁰



The Master Plan Update states that a goal “intended to guide the preparation of the Master Plan Update, and direct the future development” of KCIA is to “[a]lign KCIA programs and

⁵ 2015 Strategic Climate Action Plan, Executive Summary, p. 3 *available at* https://your.kingcounty.gov/dnrp/climate/documents/2015_King_County_SCAP-Executive_Summary.pdf.

⁶ 2020 Strategic Climate Action Plan, Executive Summary, p. 13, *available at* <https://your.kingcounty.gov/dnrp/climate/documents/2020-SCAP-Executive-Summary.pdf>.

⁷ <https://www.kingcounty.gov/~media/depts/health/environmental-health/documents/publications/blueprint-climate-change-and-health.ashx?la=en>; “State of the Climate: 2020 on course to be the warmest year on record,” Carbon Brief (Oct. 23, 2020), *available at* <https://www.carbonbrief.org/state-of-the-climate-2020-on-course-to-be-warmest-year-on-record>.

⁸ “We have 12 years to limit climate change catastrophe, warns UN,” *The Guardian*, Oct. 8, 2018, *available at* <https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-unreport>.

⁹ D.S. Lee, *et al.*, “The contribution of global aviation to anthropogenic climate forcing for 2000 to 2018,” *available at* <https://www.sciencedirect.com/science/article/pii/S1352231020305689?via%3Dihub>.

¹⁰ Amounts taken from King County’s 2017 GHG emission inventory, *available at* <https://www.kingcounty.gov/services/environment/data-and-trends/indicators-and-performance/kingstat/2017/indicators/climate-change/ghg-emissions.aspx>, including all emissions from fuel pumped and a radiative forcing factor of 3.

services with County climate change goals.”¹¹ KCIA’s Strategic Plan 2014-2020 reiterates this.¹² King County’s major shared climate goal is to reduce countywide GHG emissions by 50 percent by 2030 (compared to 2007).¹³ However, this GHG emission reduction goal is not mentioned once in the Master Plan Update. To the contrary, the Master Plan Update lays the groundwork for a substantial increase in emissions. As shown in Table E2, **GHG emissions from aircraft operation in and out of KCIA is forecasted to increase by nearly 30 percent by 2035.**¹⁴

KCIA staff has confirmed that they have completed no analysis of how, if at all, KCIA operations align with King County’s climate goals, stating: “Any analysis of the Airport’s future role in meeting GHG emission reduction targets set by the City of Seattle, King County, and Washington State would need to be based on a more comprehensive evaluation of the greenhouse gas emissions for the overall operation of the Airport.”¹⁵ Staff also confirmed that only a small fraction of emissions from fuel pumped at KCIA is reflected in the Master Plan Update.¹⁶ (Emissions from fuel pumped make up 99 percent of KCIA’s emissions.¹⁷) Staff also confirmed that the fact that aviation emissions have a three-times greater warming impact than on-the-ground emissions was not considered in the Master Plan Update.¹⁸

King County is well known as a leader in the fight against climate change, which gives us a unique opportunity to set an example for other cities around the country and world. KCIA’s current emissions reduction efforts are insufficient—**we can and must do better**. The Master Plan Update should not go forward without a comprehensive GHG emission inventory of KCIA, including total emissions from all fuel pumped and factoring in the greater warming impact of aviation emissions. Following that, KCIA should develop a detailed, concrete plan to reduce total emissions from KCIA by 50 percent (compared to 2007) no later than 2030.

THE MASTER PLAN UPDATE CLEARS A PATH FOR GREATER HARM TO NEIGHBORING COMMUNITIES.

The areas impacted by KCIA include some of the most vibrant and diverse residential neighborhoods in Seattle. Within a two-mile radius of the KCIA, there are five playgrounds,

¹¹ Master Plan Update, “Alternatives Analysis and Development Concepts,” pp. D.2-D.3.

¹² Available at <https://www.kingcounty.gov/~media/depts/transportation/airport/planning/kbfi-airport-strategic-plan-2014-2020.ashx?la=en>.

¹³ 2020 Strategic Climate Action Plan, available at <https://your.kingcounty.gov/dnrp/climate/documents/2020-SCAP-Executive-Summary.pdf>.

¹⁴ Indeed, while the Master Plan Update only forecasts a three percent increase in operations over the coming years, it is notable that prior forecasts have substantially underestimated increases. See Table B6. In recognition of the likely inaccuracy of growth forecasts, the Master Plan Update states that “accelerated growth or consistently higher ... levels of activity may occur.” “Capacity & Facility Requirements,” p. C.1.

¹⁵ E-mail from Matthew Sykora to Sarah Shifley dated November 19, 2020.

¹⁶ *Id.*

¹⁷ KCIA, Greenhouse Gas Emissions Inventory 1990, 2007 & 2020 (June 24, 2011), provided via e-mail by Matthew Sykora on November 25, 2020.

¹⁸ E-mail from Matthew Sykora to Sarah Shifley dated November 19, 2020.

seven playfields, 21 parks, 31 schools, and 63 places of worship.¹⁹ Unlike King County as a whole, most of the people living in the neighborhoods bordering the KCIA—Georgetown South Park, Allentown, New Holly, and Beacon Hill—are Black, Indigenous, or people of color. Each of these neighborhoods has a rich history and unique community, and each has been contaminated for years by increasing pollution from KCIA.

The Master Plan Update references King County’s “commitment to equity and social justice” when discussing outreach, but **no actions in the Master Plan Update reflect this commitment**. The Master Plan Update also states that KCIA has a goal to “[a]ct as a partner to neighboring residents,” but nothing in the Master Plan Update explains how KCIA can “partner” with residents while subjecting them to increasing amounts of life-threatening pollution.²⁰ The reality is that the Master Plan Update stands in contrast to King County’s equity and social justice commitments and ensures greater harm for neighboring communities.²¹ This is an environmental justice issue: the communities closest to KCIA that take the brunt of this pollution are more diverse and lower-income than King County as a whole.²² They also have higher exposure to pollution from other nearby sources, including industrial trucking routes, I-5, and Sea-Tac.

The Master Plan Update fails to acknowledge ultra-fine particulate (“UFP”) pollution from airplanes, and the fact that the Plan will cause impacted communities to face even higher rates of UFP pollution. The full impacts of sustained exposure to UFPs are still unknown, but current studies show that it leads to adverse health outcomes including negative effects on the brain, nervous system, and respiratory system, and higher rates of preterm births.²³ The Master Plan Update also fails to acknowledge potential harms caused by leaded fuel pumped at KCIA and burned by planes leaving the airport. General aviation piston-driven aircraft are now the largest source of lead emitted to the atmosphere. Lead from burned aviation fuels can be inhaled, ingested, and absorbed through the skin. It then accumulates in bones, blood, and soft tissue, and leads to a variety of negative health impacts, affecting neurological, renal, reproductive, and physical development systems.²⁴ Even low levels of blood lead in children are associated with lower IQ and cognitive and behavioral effects such as attention-deficit behavior, conduct problems, memory loss, and poor language performance.²⁵

¹⁹ See data at <https://gis-kingcounty.opendata.arcgis.com/> and <https://data.seattle.gov/>. These numbers differ slightly from those presented in the Master Plan Update. However, a direct comparison is not possible because the workpapers do not define “vicinity” or “study area.” A recent study showed that UFP pollution travels up to 10 miles from a flight path. See <https://pubs.acs.org/doi/full/10.1021/es5001566>.

²⁰ Master Plan Update, “Alternatives Analysis and Development Concepts,” pp. D.2 and D.3.

²¹ King County’s equity and social justice commitments are laid out in various documents, including the current (2016-2022) Equity and Social Justice Strategic Plan *available at* <https://aqua.kingcounty.gov/dnrp/library/dnrp-directors-office/equity-social-justice/201609-ESJ-SP-FULL.pdf>.

²² Detailed data available at <https://ejscreen.epa.gov/mapper/>.

²³ See Washington State Department of Health, “Summary of Health Research on Ultrafine Particulates,” DOH 334-454, November 2019; Lindsey Konkel, “Move Over, Traffic: Aircraft Emissions and Preterm Birth,” July 2020, *available at* <https://ehp.niehs.nih.gov/doi/10.1289/EHP7161>.

²⁴ Fact Sheet – Leaded Aviation Fuel and the Environment, *available at* <https://www.faa.gov/search/?omni=MainSearch&q=fact+sheet+-+leaded>.

²⁵ Philip A. Wolfe et al., “Costs of IQ Loss from Leaded Aviation Gasoline Emissions” *available at* <https://pubs.acs.org/doi/10.1021/acs.est.6b02910>.

We also can't ignore the fact that increased KCIA traffic means increased noise pollution for impacted communities. Noise is not, as the Master Plan Update purports, simply an "unwanted sound that can disturb routine activities and... cause annoyance."²⁶ In fact, studies have shown that noise pollution causes a wide array of life-threatening health conditions, higher rates of depression, anxiety, and dementia, and lower learning outcomes.²⁷ Accordingly, the World Health Organization has strongly recommended reducing aircraft noise levels given the health risks associated with exposure to aviation noise pollution.²⁸

The Master Plan Update must directly address the disparate impacts current and future KCIA pollution has, and will have, on neighboring communities. While individual environmental review may be completed for each project in the Master Plan Update, the cumulative impacts on neighboring communities will not be acknowledged and addressed under the Update as currently drafted.

WE URGE YOU TO MAKE SIGNIFICANT AMENDMENTS TO THE MASTER PLAN UPDATE TO ALIGN WITH KING COUNTY CLIMATE GOALS AND COMMITMENTS TO EQUITY AND ENVIRONMENTAL JUSTICE.

Before any further consideration is given to the Update, we urge you to revise the Master Plan Update and accompanying technical working papers as follows:

- Remove any projects that are intended to accommodate future aviation demands and are *not* necessary to ensure immediate safety at current levels of use. For instance, it appears that the new fuel farm is being proposed to accommodate larger amounts of fuel storage and "future expansion considerations," rather than immediate safety.²⁹ It also appears that KCIA may be able to remain in compliance with FAA regulations without making any modifications to its primary runway.³⁰
- Complete a comprehensive GHG emission inventory, including emissions from all fuel pumped and factoring in the greater warming impact of aviation emissions (using a factor of three).³¹

²⁶ Master Plan Update, "Environmental Overview," p. E.10.

²⁷ A study of six million older people and 89 airports in the US, including Seattle-Tacoma International Airport and Seattle's King County International Airport, linked aircraft noise with cardiovascular disease and increased hospital admissions. In a study of 46 US airports and surrounding schools, including five Beacon Hill schools, statistically significant associations were established between airport noise and lower reading and math scores as compared to non-impacted schools. Additional studies underway may show that exposure to aircraft noise may also be linked to negative metabolic outcomes and lead to depression. *See* <https://beaconhillseattlenoise.org/noise-health-effects>. *See also* "Community noise may affect dementia risk," Oct. 21, 2020, *available at* <https://www.sciencedaily.com/releases/2020/10/201021085106.htm>.

²⁸ World Health Organization, "Environmental Noise Guidelines for the European Region," *available at* https://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf.

²⁹ Master Plan Update, "Capacity & Facility Requirements," p. C.70.

³⁰ Master Plan Update, "Alternatives Analysis and Development Concepts," p. D.5, and "Alternative One" on p. D.14.

³¹ We are aware of the Airport Carbon Accreditation Program, and understand that the initial GHG emission inventory included as part of this Program may partially fulfill this recommendation, so long as it includes emissions from all fuel pumped and reflects radiative forcing (i.e., non-CO2 climate impacts of emissions).

- Develop a plan with attainable measures to reduce CO2 and other emissions so that total KCIA operations, including emissions from all fuel pumped, independently meets all near- and long-term goals set by Seattle, King County, and Washington State without reliance on biofuels or offsets.
- In conjunction with community representatives, including those on the Roundtable Advisory Board, develop an outreach plan to educate the public about the climate impact of KCIA operations and impacts of air and noise pollution on communities near the airport and under flight paths.
- Immediately fill community representative vacancies on the Roundtable Advisory Board, and compensate Roundtable Advisory Board community representatives in order to increase participation by people (e.g., working parents or those with elderly parents at home) who might not otherwise be able to take the time to be on the Board.
- Increase membership in the Roundtable Advisory Board to include representatives of other impacted neighborhoods and climate and environmental justice organizations. Ensure that the Roundtable Advisory Board has an integral and authoritative role in all decision-making going forward.
- Complete a study of the disparate impact of air and noise pollution on communities near KCIA or under its flight paths, and institute programs to remediate and redress all of them. Fund the study, remedial measures, and redress from airport usage fees, and ensure that impacted communities and the community representatives on the Roundtable Advisory Board play an integral role in developing and reviewing the study, its findings, and remediation and redress programs.

Finally, we also support the demands of the representatives of impacted communities previously presented to KCIA.

Thank you for the opportunity to comment, and we look forward to seeing the revisions listed above incorporated into the Master Plan and accompanying working papers.

Sincerely,

350 Seattle Aviation Team
The Climate Reality Project – Seattle-King County Chapter

cc: King County Councilmember Balducci
King County Councilmember Dembowski
King County Councilmember Dunn
King County Councilmember Kohl-Welles
King County Councilmember Lambert
King County Councilmember McDermott
King County Councilmember Upthegrove
King County Councilmember von Reichbauer
King County Councilmember Zahilay



November 30, 2020

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Dow Constantine, King County Executive
King County Council President Claudia Balducci
KC Council Community Health & Housing Services Cmte Chair Kathy Lambert
KC Council Law & Justice Cmte Chair Girmay Zahilay
KC Council Mobility & Environment Cmte Chair Rod Dembowski
KC Council Regional Policy Cmte Chair Pete von Reichbauer
KC Council Regional Transit Cmte Chair David Upthegrove
Seattle King County Public Health Director Patty Hayes

re: Airplane Emissions and Input to Executive Potential Anti-Racist Policies and 2020 King County Strategic Climate Action Plan

Dear Hon. Constantine, Council Pres. Balducci, CM Lambert, CM Zahilay, CM Dembowski, CM von Reichbauer, CM Updegrave and Ms. Hayes,

Greetings from Beacon Hill Council and El Centro De La Raza. We thank you for your effective leadership during this difficult time of COVID-19 pandemic.

We highly applaud the June 11, 2020 declaration that “Racism is a public health crisis.” and thank you for the opportunity to give input to two policy areas that overlap with climate, health and environmental justice.

However, the King County list of Priorities Anti-racist Policies and the 2020 King County Strategic Climate Action Plan does not include airplane emissions that harm our BIPOC and mainstream communities located in King County’s Seattle Beacon Hill, near King County International Airport and near Seattle Airport. Our 269,509¹ with 135,578 BIPOC lives matter too. (See attachment 1.)

This is environmental issue that is also a health justice issue given that the established health effects of the aircraft air and noise emission include respiratory, cardiovascular, sleep deprivation, recently documented pre-term births (<https://ehp.niehs.nih.gov/doi/full/10.1289/EHP5732>) and lower reading and math scores.

Case in point, in Beacon Hill, prior to the COVID-19 pandemic, airplanes flew every 90 seconds at 70-90 decibels as compared to the allowable WHO standard of 55 decibels during the day and 45 at night. 70% of airplanes that are landing to Seattle Airport fly over Beacon Hill. Yet, Beacon Hill is not eligible for mitigation assistance.

Now, Seattle Airport is projecting that the 2019 398,910 aircraft operations (flights) will increase to 540,400 by 35% in 2034 due to regional growth. Their SAMP (Sustainable Airport Master Plan) NEPA environmental assessment, then SEPA will be published in 2021. Port of Seattle confirmed that fuel pumped alone from Sea-Tac totaled 6,508,848 tonnes. See attachment 2 on page 5.)

¹ Does not include the near KC International Airport Residents

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Airflight emissions Input to Executive Potential Anti-Racist Policies and
2020 King County Strategic Climate Action Plan
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The work to get airflight air and noise emissions as a health injustice and environmental justice is hard and long to change laws at several government and agency levels.

We strongly recommend that King County include in your Antiracist Policies the following elements which we would like to meet with you to explain in detail:

1. Environmental and Health Policy:
 - a. Establish an environmental policy that calls for environmental, health, social and economic good for all.
 - b. Establish a Select Committee on Airflights Emissions Health and Environmental Justice that can encompass the intersectionality of the King County Council Committees that have jurisdiction over parts of this issue such as Community Health & Housing Services, Law & Justice, Mobility & Environment, Regional Policy and Regional Transit towards an integrated comprehensive approach to this complex intergovernmental effort.

2. Establish in King County Policy and recognize in the 2020 King County Strategic Climate Action Plan:
 - a. that airflight emissions as part of transportation Green House Gas (GHG) emissions that:
 - i. a.1 must be measured fully, not just at flight and take-off,
 - ii. a. 2 assigned GHG target reductions.
 - b. partner with Puget Sound Clean Air Agency to conduct complete measurement
 - c. partner with Puget Sound Regional Council to conduct multi-modal planning that includes airflights in additions to land transportation.
 - d. partner with Seattle King County Public Health board to:
 - i. d.1 Investigate ultrafine particles as public health issue, identify impacts and affected populations and identify interventions
 - ii. d.2 educate the public re health impacts and interventions
 - e. partner and advocate at the federal level
 - i. e.1 inclusion of safe communities in safe skies legislation to allow for exceptions to FAA required guaranteed service of flights.
 - ii. e.2 identify a pathway for non-near airport communities like Beacon Hill to be eligible for mitigation.

iii.

King County Metro's origins include good people of Metro Council cleaning the polluted Puget Sound waters then integrating the transit system into Metro to tackle large systemic problems. Times have changed. We are at a critical crossroads. We need you to take on this issue.

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Black Lives Matter. BIPOC, immigrant and refugee communities are harder hit with COVID pandemic. We call on you to act on this elephant in the living room -- the flight air and noise emissions -- that cause us great harm. We need you to lift up our BIPOC immigrant and refugee communities because our lives matter too.

Sincerely,



Maria Batayola, Chair
Beacon Hill Council



Estela Ortega, Executive Director
El Centro De La Raza

c: Mayor Jenny Durkan
Seattle Council President/At-large Representative CM Lorena Gonzalez
Seattle District 2 Representative CM Tammy Morales
Seattle At-Large Representative Teresa Mosqueda
Burien Mayor Jimmy Mata
Burien Councilmember Sofia Aragon
Des Moines Mayor Matt Pina
Des Moines CM Luisa Bangs
Des Moines CM JC Harris
SeaTac CM Peter Kwon
Renton CM Ed Prince
Tukwila CM Cynthia Delostrinos Johnson
Federal Way Bill Vadino
Federal Way Steve Edmisto

Seattle Office of Sustainability & Environment (OSE) Director Jessica Finn Coven
Seattle OSE Climate Director Lylianna Allala
King County Climate Equity Community Task Force care/of Jaime Strobel

Beacon Hill Council Board of Directors
Duwamish Clean Up River Coalition ED Paulina Lopez
Front & Centered Policy Director Deric Gruen and Sr Organizer Sameer Ranade
Got Green CED Jill Mangaliman & Organizer Nancy Huizar
King County International Airport Community Coalition Chair Velma Veloria
Quiet Skies ES Seattle Chair Erik Stanford
Quiet Skies Coalition Leadership Debi Wagner & Larry Cripes
Quiet Skies Puget Sound Chair
350 Seattle Sarah Shifley

Attachment 1:

| Cities | Total Population | People of Color | Immigrants & Refugees | White | People of Color | Immigrants & Refugees |
|-------------------------------|-----------------------|-----------------------|-----------------------|---------------|-----------------|-----------------------|
| Burien | 51,908 | 22,165 | 12,821 | 57.30% | 42.70% | 24.70% |
| Des Moines | 32,364 | 13,884 | 7,162 | 57.10% | 42.90% | 22.10% |
| Federal Way | 97,044 | 45,417 | 23,291 | 53.20% | 46.80% | 24.00% |
| Normandy Park | 6,660 | 899 | 719 | 86.50% | 13.50% | 10.80% |
| SeaTac | 29,239 | 17,368 | 11,052 | 40.60% | 59.40% | 37.80% |
| Tukwila | 20,294 | 12,806 | 8,361 | 36.90% | 63.10% | 41.20% |
| TOTAL Near Sea Airport | <u>237,509</u> | <u>112,538</u> | <u>63,407</u> | 52.60% | 47.40% | 26.70% |
| Beacon Hill | 32,000 | 23,040 | 14,080 | 28.00% | 72.00% | 44.00% |
| TOTAL IMPACTED | 269,509 | 135,578 | 77,487 | | 50.30% | 28.80% |

Attachment 2: 350 Seattle Letter of Input to 2020 King County Strategic Climate Master Plan on next page.

The Boeing Company
P.O. Box 3707
Seattle, WA 98124-2207

November 30, 2020

Mr. John Parrott, Director
King County International Airport
7377 Perimeter Road S.
P.O. Box 80245
Seattle, WA 98108-3844

RE: KCIA Master Plan Update – Boeing Input

Dear Mr. Parrott,

The following comments are from Boeing after reviewing the available documents, attending the open forums and attending a Boeing/KCIA meeting on November 13, 2020.

The purpose of this letter is to document concerns Boeing has over some of the non-standard condition solutions and future construction.

- The North RPZ no longer affects the Boeing large aircraft stall, A6, as it did in prior reiterations. Boeing would like to verify this does not change as this project progresses and into construction.
- Since the removal of the B1 access ramp is in the plan, verification by an outside firm will be needed to determine if the proposed north access ramp will allow our wide body aircraft (767, 777-x) to make the required turns to access runway R14. Boeing would like the opportunity to review the dimensioned Construction Documents and the associated construction schedule for this project to determine the impacts, if any, to our production capacities. If reconfiguration of our existing stalls, B15 and B16, is imminent, then Boeing and KCIA will need to discuss how this will affect our business.
- The B10 rolling gate entrance at the MDC is no longer an issue in this Master Plan
- The future intentions of King County purchasing the Jorgensen Forge property and constructing a fuel farm and new FAA control tower, may affect the Boeing Thompson site, which is directly south of the Jorgensen site, along with the Plant 2 site located to the north. Boeing's concerns are around the demo and construction of these proposed projects regarding possible vibrations and demolition dust for both the Thompson P8 assembly site and the Plant 2 laboratories located to the north. We have additional concerns around possible electronic interference from Boeing, and to Boeing, if a new FAA control tower is constructed nearby. Boeing would like to be kept informed on the status of the intent of this property if purchased by King County.
- The construction of additional airplane stalls on Lot 12 is currently in Boeing's Capital Plan. If the control tower relocates, we assume the ARFF station will relocate with it. If this holds true, Boeing may alter our existing plans for the Lot 12 build. Boeing would like a better idea of which out years this relocation could occur so educated decisions can be made on our future projects.
- The West Service Road may be reconstructed and could lessen Boeing's ability to use certain airplane stalls (Lot 12). The project may also include the relocation of the Boeing Pump Station

for the mitigation of the Object Free Area of Taxiway B. Boeing would like to be included in discussions and design reviews, if this project moves forward.

- The main runway repaving project could interfere with Boeing's ability to conduct flight tests and to deliver aircraft during the construction period. Boeing would like to be closely involved in the project approach, phasing and construction scheduling to ensure Boeing's business is not adversely affected.
- Due to the large list of KCIA Master Plan projects, Boeing is anxious with how KCIA plans on protecting our existing stormwater systems during all construction phases. Boeing would like to be kept current on any groundwater/stormwater plans being considered.

We appreciate King County International Airport making the 2020 Master Plan available to Boeing for review. Please keep us informed on the progression of this plan and any changes which may occur prior to implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Newton". The signature is fluid and cursive, with a large initial "K" and a long horizontal flourish extending to the right.

Kimberly Newton
Director, Facilities & Asset Management
The Boeing Company



March 9, 2021

[SENT via email to jparrott@kingcounty.gov](mailto:jparrott@kingcounty.gov)

John Parrott, Director
King County International Airport
7277 Perimeter Rd. S.
Seattle, WA 98108-3844

Dear Director Parrott,

We appreciate your recent presentation to the Tukwila City Council regarding the King County International Airport Master Plan. We recognize the important role the King County Airport has in serving our region, and we thank you for the opportunity to engage on this effort.

Neighborhood livability is one of our community's greatest values – it emerges as a key concern during any budgeting or planning effort on which we embark. We know from talking with our residents that quality of life impacts such as noise and air pollution are of utmost concern, and we are committed to advocating for our residents on these issues wherever we can, particularly because South King County communities experience disproportionate health disparities.

As King County International Airport moves ahead with the Master Plan implementation process, we urge ongoing community discussion and involvement, particularly with our Tukwila neighborhoods in Allentown-Duwamish and Tukwila Hill. We understand that there will be future environmental analyses on specific projects and look forward to working through those in partnership with you. We'd like to offer our assistance as you work through your forthcoming Airport Communications Plan.

Sincerely,

Allan Ekberg
Mayor

Kate Kruller
Council President



A voice and a hub for the Latino community
as we advocate on behalf of our people
and work to achieve social justice.

Programs & Services

*With over 12,559 volunteer hours,
El Centro de la Raza serves 14,542
individuals and 9,442 families through
the following programs and services:*

Basic Healthcare Enrollment
Bebes! Infant Mortality Prevention
Bilingual Legal Clinics
Business Opportunity Center
Café con El Centro de la Raza
César Chávez Demonstration Garden
Centilia Cultural Center
Citizenship Classes
College Readiness
Comadres Monthly Workshops
Commercial and Tenant Space
Community Meeting Space
Community Organizing
Community Service
Crisis Advocacy
Cultural / Political / Social Events
Economic Development
ECR Transitional Housing
El Patio Apartments
Emergency Safety Planning & Sensitive
Location Project
Employment Assistance
ESL Classes
Federal Way Open Doors Program
Financial Empowerment & Asset Building
Food Bank
Foreclosure Counseling
Growing and Learning Together
Homeless Assistance
Hope for Youth Cultural Enrichment
Hirabayashi Place
Historical and Educational Presentations
HUD Housing Counseling
Immigration / Social Justice / Human /
Civil Rights Advocacy
José Martí Child Development Center
Labor Standards Outreach & Education
Local, State, National & International
Coalition Building
Luis Alfonso Velásquez Flores After
School Program
ORCA Lift Reduced Fare Enrollment
Parent-Child Home Program
Plaza Roberto Maestas
Plaza Roberto Maestas After School
Program
Public Benefits Enrollment
Santos Rodriguez Memorial Park
Seattle Youth Violence Prevention
Senior Nutrition & Wellness
Smoking Cessation & Marijuana
Prevention
Summer Learning
Tax Preparation Site
Unidos in Finance
Veterans' Services
Volunteerism & Community Service Site
Youth Case Management
Youth Employment
Youth and Family Job Readiness Training

November 13, 2020

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Bruce Dammier, PSRC Board President, Pierce County Executive
Claudia Balducci, PSRC Board Vice President, King County Council Chair
Scott Bader, PSRC Growth Management Policy Board Chair, Everett City Councilmember
Ed Prince, PSRC Growth Management Policy Board Vice Chair, Renton City
Councilmember
Becky Erickson, PSRC Transportation Policy Board Chair, Poulsbo Mayor
Dana Ralph, PSRC Transportation Policy Board Vice Chair, Kent Mayor
Josh Brown, PSRC Executive Director
Ben Bakkenta, PSRC Regional Planning Director
Jason Thibedeau, PSRC Principal Economic Development Manager

RE: Community Input to PSRC Regional Aviation Baseline Study

Dear PSRC Board, Growth Management Act Policy Board, and Transportation Policy
Board leaders,

Greetings from El Centro De La Raza and Beacon Hill Council. We hope that you and
your families are safe and well during these difficult times of COVID 19 pandemic. Also,
a hearty congratulations for the passing the PSRC Visions 2050 Plan that will guide our
region the next 30 years.

Thank you for the opportunity to provide input to the Regional Aviation Baseline Study.
We have no quarrel with the technical analysis that PSRC has undertaken to project the
unconstrained aviation demand to 2050. The Study states that it will “integrate the policy
framework of the PSRC’s Regional Transportation Plan,” that calls for the principle of
“moving people and goods in ways that support a healthy environment.”

We are concerned that the integration of the PSRC policy framework in the Regional
Aviation Baseline Study is meaningless because air transportation planning is not included
in PSRC’s regional transportation planning. It leaves the accuracy of greenhouse gas
reduction targets in question. Also, the measurement of air transportation related pollution
is lacking given that only take-offs and landings are measured and not as the airplane
travels over our region. Neither does PSRC include air transportation in its multimodal
regional transportation system planning, as required by RCW 47.80.030.

Community Action Agency • United Way Agency • Affiliate of UnidosUS
2524 16th Ave South – Seattle, WA 98144 • (206) 957-4621 tel • (206) 329-0786 fax
www.elcentrodelaraza.org • 501c(3) Nonprofit Tax ID: 91-0899927



Therefore, we respectfully ask PSRC to:

- 1) advocate for Puget Sound Clean Air Agency (PSCAA) to fully measure air transportation greenhouse gas emissions, other pollutants, and ultrafine particles that has a positive relationship with pre-mature births. <https://ehp.niehs.nih.gov/doi/full/10.1289/EHP5732>
- 2) advocate for air transportation planning staff funding from the State Legislature, and
- 3) integrate air transportation in its multimodal planning to assess better and best Transportation Choices to meet travel and cargo demands in less polluting ways.

The COVID 19 pandemic has been hard on us all and harder on BIPOC, immigrant and refugee communities. It is making us pause. Given that the Port of Seattle is not able to conduct authentic and meaningful engagement with underserved communities at this time, we have asked the Port of Seattle Commissioners to:

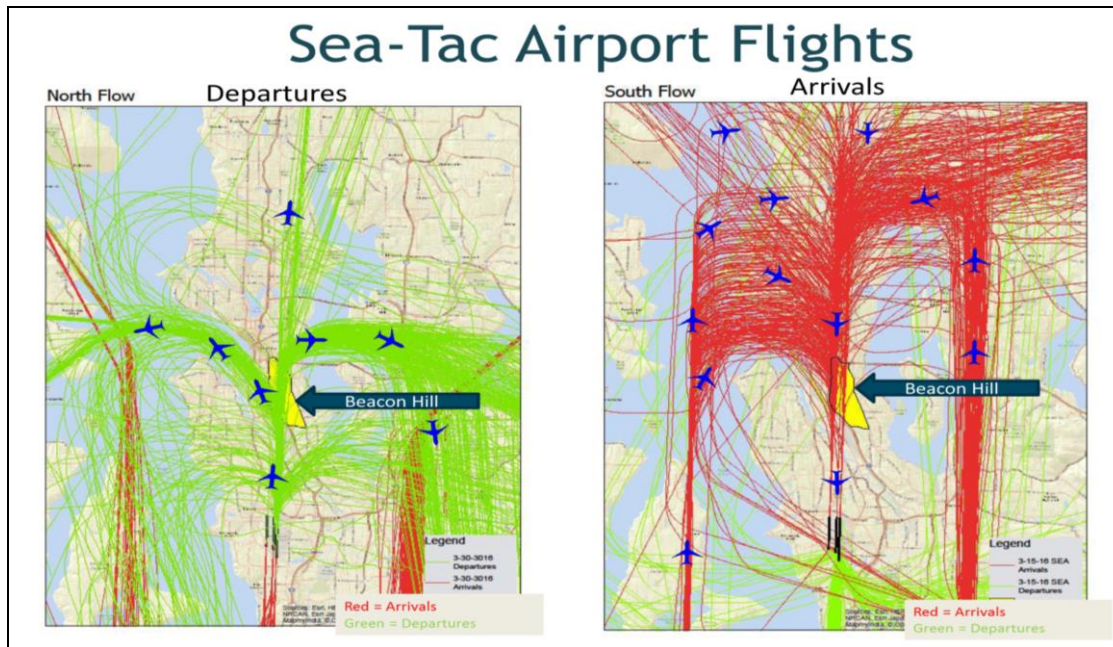
1. Adopt an integrated economic, social and environmental Port of Seattle Commission policy that aligns with its values and mission, to guide the level of Port accommodation for the projected doubling of air operations,
2. Adopt the Port of Seattle's Equity Index and use it to identify EJ communities and include vulnerable populations in the environmental assessment,
3. Exclude from SAMP any parking and gates related construction project that would accommodate the projected airplane operations, until authentic and meaningful engagement can be conducted with underserved communities. Airplane operations are extremely down with COVID. It will take time for airplane operations to rise to pre-COVID levels.

We are now asking PSRC to embrace its full planning responsibility, partner with PSCAA and other agencies to measure air transportation emission, advocate for ultra-fine particle regulation, and conduct integrated air and land transportation planning.

We are passionate about this because our health and lives matter. Airplanes fly over our Beacon Hill neighborhood every 90 seconds at 70-90 decibels, well above the acceptable 55 decibels during the day and 45 at night. Beacon Hill receives 70% of airplanes on its way to land at Seattle Airport.



The Center for
People of All Races



We have 32,000 residents with 72.% people of color, 44% immigrants and refugees and 1 out of 5 low income. Near airport communities also have significant BIPOC, immigrants and refugee populations. Their lives matter too.

Without these measures, Beacon Hill's 32,000 residents and near airport 237,509 residents will continue to suffer and live shorter lives. They will not benefit from PSRC's Vision 2050 MPP-En-7 to "Reduce and mitigate noise and light pollution caused by transportation, industries, public facilities, and other sources." nor MPP-En-8 to "Reduce impacts to vulnerable populations and areas that have been disproportionately affected by noise, air pollution, or other environmental impacts."

PSRC is a very professional organization. We rely on your integrity to do the right thing, because our collective health and lives do matter. We look forward to meeting with you for further discussion.

Sincerely,

Estela Ortega
Executive Director

Maria Batayola
Beacon Hill Council Chair

El Centro de la Raza has been a voice and a hub for Seattle and King County's Latino community as we advocate on behalf of our people and work to achieve social justice. Through our comprehensive programs and services, we empower members of the Latino community as fully participating members of society. We also work to raise awareness with the general public, and government, business and civic leaders about the needs of the Chicano/Latino community



EQUITY IN EDUCATION

C O A L I T I O N

December 9th, 2020

King County International Airport
7277 Perimeter Rd S
Seattle, WA 98108

Dear King County International Airport Management and Staff,

On behalf of the Equity in Education Coalition, I am writing to you today to provide comment on the King County International Master plan that is currently being discussed. The KCIA Master Plan will have implications on our region for decades to come. Equity in Education Coalition and our working partners have a stake in the community inclusion process and we value the decisions being developed with communities who are historically left out of decision making processes.

We know that the people living in the surrounding area from Georgetown South Park, Allentown, New Holly, and Beacon Hill—have a high demographic which comprises low income, Black, Indigenous, and People of Color. Each of these neighborhoods has been experiencing contamination for years by increased pollution both from KCIA and Seattle Airport. The neighborhood has been politically neglected and socially underserved. The perfect recourse is to remedy this by making sure that the voices of neighborhood champions are heard through and through.

We understand that the KCIA Community Coalition has presented their concerns through their Community Benefits Agreement which includes:

- 1) *A thorough assessment of the environmental impact of the proposed Master Plan.*
- 2) *Include KCIA into the King County Climate Strategic Plan with target greenhouse gas emission targets.*
- 3) *Have KCIA develop an environmental, social, and economic policy that will guide the level of accommodation of flight increases*
- 4) *Include Beacon Hill and Georgetown with near KCIA communities in targeted local hire recruitment and targeted selection of BIPOC communities for KCIA training apprenticeships, jobs, and contracts.*
- 5) *Have KCIA engage with Beacon Hill Council, Georgetown, and other affected residents to:*

- a) *plot the KCIA air flights and type of aircraft over Beacon Hill and Georgetown*
 - b) *measure current and future air and noise emission, and*
 - c) *identify and implement the mitigation.*
- 6) *Inform us when the projected flight increases approach exceeding or exceed the schedule or the total flights to reopen the Community Benefits Agreement.*
- 7) *Include the Duwamish River Cleanup Coalition in the development of a health and mitigation plan near communities of the fuel storage farm.*
- 8) *KCIA creates a green canopy around the airport to buffer noise.*
- 9) *Include bike pathways to help slow down the traffic.*
- 10) *No military planes.*

Per your response, while most of the concerns are within the control of the King County Government, we ask that you work with KCIA Community Coalition, the County Executive, Councilmembers, and other entities to address the concerns raised by the KCIA Community Coalition.

Sincerely,



Sharonne Navas
Co-Founder and Executive Director
Equity in Education Coalition

John Parrott, Airport Director
King County International Airport
7277 Perimeter Rd S, Suite 200
Seattle, WA 98108

26 January 2021

Dear Mr. Parrott,

Thank you for your willingness to work with The Friends of Boeing Field (FoBF) on revisions and changes to the King County International Airport (KCIA) Master Plan Update. We agree that the changes that you and your team presented briefly in the virtual meeting held on January 19th, 2021 are more accommodating to the General Aviation (GA) community, and we thank you for that.

Upon further discussion with our membership, we feel it necessary to clarify a few specific points resulting from our meeting and make you aware of where these changes fall short of our current position on the Master Plan Update. For the avoidance of doubt, we believe the airport can support all the needs of the different user groups and appreciate the opportunity to work with you on solutions.

In our meeting with you and your team, you noted the following changes that you will incorporate with your consultant, Mead & Hunt, into a revision to the Master Plan and ALP:

- The GA tie-down parking aisle, immediately to the north of the Museum of Flight (MoF), will be restored to its current footprint, with the parking areas remaining designated as GA tie-downs, transient parking, and the “blue box” for the MoF visitor parking;
- The “Cargo Development Area” shown in the Southwest parking area, north of the MoF, would be designated as a “Future Aviation Development Area.” The corresponding Master Plan executive summary, narrative, proposed projects list/implementation plan would also be revised to remove references to “Cargo Development” and/or other specific development uses beyond “Future Aviation Development.”
- The mid-field, west side area (Lot 13) labeled “FUTURE AVIATION REDEVELOPMENT AREA – COORDINATE WITH THE ADO,” would be designated as “Light General Aviation Development” for GA aircraft tie-downs.

We ask that you confirm the above is correct and reflective of what you and your staff intend to incorporate into your revision to the Master Plan and ALP.

While we appreciate these changes and your willingness to work constructively with us, we remain concerned regarding three outstanding items that have not been addressed by you or your staff’s proposed changes:

1. The concept of the Southwest parking area being developed for cargo purposes was dependent on the Wood’s Meadows property becoming available. Since we were told in our meeting last week that this property is not available for purchase, a specific project plan should be incorporated for a known use of the area compatible with its current footprint. We would propose this be designated as “Light General Aviation Development.”
2. As a result of the change to the Runway Protection Zone (RPZ) for 14R, the loss of the Northeast parking area will leave many tenants with no place in the Seattle region to relocate their aircraft. We appreciate your team’s efforts to find replacement space for displaced aircraft at other regional airports. However, this is not an acceptable solution for us. We propose that no version of the Master Plan Update be finalized without including on-field accommodations for GA

aircraft commensurate with the forecast presented in the Master Plan. For the avoidance of doubt, this would reduce the number of GA aircraft parking spots at KCIA of 8 aircraft hangar or tie-down locations between 2020 and 2030 (as recorded in Chapter B – Forecast, Table E34 TAF – Airport Planning Forecast Summary, page 51).

3. There is potential for more flexibility concerning the RPZ for 14R and potential GA parking at the north end of the airport. Specifically, we propose that you show the threshold move as “not required,” pending new Instrument Approach Procedure (IAP) designs. We believe that there is a reasonable opportunity with new IAP designs to allow the GA hangars to be built at the north side of the airport property adjacent to the maintenance area.

We feel the above additional changes are appropriate and justified. Considering the guiding Assumptions of the Master Plan, specifically Assumption Two, the forecast for GA activity and the well-documented shortage of GA hangar and tie-down capacity in the region necessitate the accommodation of GA, at its current levels, in any future development plan for KCIA.

Please do not hesitate to contact Stephen Ratzlaff at your earliest convenience if you would like to discuss these concerns further. We appreciate your willingness to work with us and find a fair and reasonable solution to maintaining critical GA capacity at KCIA.

We respectfully request an opportunity to review the results of your changes to the Master Plan before submitting it to King County or the FAA, including the Master Plan, proposed projects list/implementation plan, and ALP.

Sincerely,

Stephen Ratzlaff
Friends of Boeing Field

Jeff Haas
Boeing Field Tenants Association

Matt Hayes
President & CEO
Museum of Flight

Therese Tipton
Principal
Raisbeck Aviation High School

Josh Pruzek
Northwest Mountain Regional Manager
Aircraft Owners and Pilots Association (AOPA)

Alex Gertsen
Director, Airports & Ground Infrastructure
National Business Aviation Association (NBAA)



King County Airport
kciacommunityoutreach@kingcounty.gov

To whom it may concern,

On behalf of the Georgetown neighborhood, we, the Georgetown Community Council Board, submit the following comments on King County International Airport Master Plan Update.

As the closest neighborhood to the King County International Airport, residents and businesses alike are affected by airport operations. Changes in scope to operations, airport plans and goals, or policies have significant impact to the health and vitality of those who live next door to KCIA. Which means that community involvement in decisions affecting the airport is literally a matter of life and death.

With this in mind, we ask that King County include as a part of the master plan:

Measure current and future air and noise emission and identify and implement mitigation measures. The current master plan update calls for a 300-foot runway expansion, north in Georgetown. KCIA admits that this encroachment into the residential and commercial area of Georgetown will increase noise. We ask that a mitigation and monitoring strategy be included for both air and noise. These strategies should be co-created with community and other agencies. We also for a semi-annual review, with community, of the master plan and racial equity, health, and social justice outcomes before taking on projects that lead to additional airport growth.

Conduct a thorough assessment of the environmental impact of the master plan. Ensure that KCIA examines both the impacts to community project by project AND the cumulative impacts during the National Environmental Policy Act (NEPA) and SEPA processes for each project and develop racial equity and social justice outcomes.

Create a green canopy around the airport to improve health outcomes for impacted communities. Preserve the grove of pine trees along Ellis Ave S at the current Army Reserves facility. Work with current airport tenants to provide living, green screens across from residential use.

Include KCIA in the King County Climate Strategic Plan with target greenhouse gas emissions. Publicly document alignment with the King County Strategic Climate Action Plan and Airport Carbon Accreditation Program. Develop racial equity, health, and social justice outcomes for each KCIA strategy toward its goal of carbon neutrality.



Include Beacon Hill, Georgetown and surrounding KCIA communities in targeted local hire recruitment and targeted selection of BIPOC communities for KCIA training apprenticeships, jobs, and contracts.

Include bike pathways to help slow down the traffic and integrate the airport into the neighborhood.

Please let us know if you have questions about our comments. We look forward to continuing to build our relationship between the surrounding communities and the airport and will continue working with the responsible government entities to address our concerns.

Sincerely,

A handwritten signature in black ink that reads 'Greg Ramirez'.

Greg Ramirez
Chair of the GCC Board of Directors

The KCIA Community Coalition met this afternoon and discussed our feedback regarding the Master Plan.

We want the KCIA management and the King County Council to include a Community Benefits Agreement.

The plan shall include but not limited to:

- 1) A thorough assessment of the environmental impact of the proposed Master Plan.*
- 2) Include KCIA into the King County Climate Strategic Plan with target greenhouse gas emission targets.*
- 3) Have KCIA develop an environmental, social, and economic policy that will guide the level of accommodation of flight increases*
- 4) Include Beacon Hill and Georgetown with near KCIA communities in targeted local hire recruitment and targeted selection of BIPOC communities for KCIA training apprenticeships, jobs, and contracts.*
- 5) Have KCIA engage with Beacon Hill Council, Georgetown, and other affected residents to*
 - a) plot the KCIA air flights and type of aircraft over Beacon Hill and Georgetown*
 - b) measure current and future air and noise emission, and*
 - c) identify and implement the mitigation.*
- 6) Inform us when the projected flight increases approach exceeding or exceed the schedule or the total flights to reopen the Community Benefits Agreement.*
- 7) Include the Duwamish River Clean up Coalition in the development of a health and mitigation plan near communities of the fuel storage farm.*
- 8) KCIA create a green canopy around the airport to buffer noise.*
- 9) Include bike pathways to help slow down the traffic.*
- 10) No military planes.*



King County Airport
7277 Perimeter Rd. S.
Seattle, WA 98108-3844
KCIACommunityOutreach@KingCounty.gov

December 14th, 2020

To whom it may concern:

I am writing today with regards to a portion of the King County International Airport (KCIA) Draft Master Plan. After years of work on this plan, recent changes cause great concern to The Museum of Flight (MOF) and to many in the community. To summarize:

- The plan includes a very large commercial air cargo facility bordering MOF
- Execution of this proposal could lead to real harm to MOF, the adjacent public high school, the people we serve, and the reputation of a culturally and educationally significant asset in King County
- The portion of the Master Plan pertaining to this proposal should be reevaluated

This comment is written in my capacity as President and CEO of The Museum of Flight as well as a member of the KCIA Community Roundtable. It should be noted that KCIA has been a good partner with MOF and we appreciate what we have achieved together over the years.

Of most grave concern, however, is the proposal to build out a large commercial air cargo terminal adjacent to the north and east of The Museum of Flight and to the east of Raisbeck Aviation High School, a Highline public school. We will not to argue the importance of growth in the aviation sector, nor its economic impact. We do our best to encourage it and to help create a workforce to meet the incredible demand for skilled labor and great jobs in these fields.

Yet we must acknowledge what happens on the airfield impacts MOF. In this case the impact of a discretionary KCIA decision could be very negative. The Museum of Flight is a world-class destination and arguably one of the finest museums of its type. It is also the largest non-governmental air and space museum in the world. Employing hundreds it is also a large economic driver. Yet what has been built over the past 55 years is not only a tribute and reflection of aviation in our lives. Nor is it a mere accumulation of over 4 million artifacts and objects. It is also a world-class research facility and an educational institution in its own right. Focusing on the underserved students in King County, we served over 160,000 youth in 2019. This is done not just by inspiring students but also by providing substantial pathways into careers. This includes course for high schoolers culminating in high school credit and up to 60 free college credits. All for those in most need of this opportunity.



Our work, also includes visits from over 600,000 visitors and being one of the biggest private events venues in King County. Clients from around the world, and around Boeing Field, enjoy the sanctuary of our galleries for their business events, jet deliveries, weddings, memorials, and more. All of this occurs on the southwest corner of KCIA. A high volume cargo facility bordering the Museum would likely cause significant noise, pollution, adverse road traffic, and other impacts that could significantly impact our ability to be a foremost cultural and educational facility. We enjoy being on an active airfield. It is important to the ambiance and wonder of a visit to the Museum. But an operation such as that which is being proposed could drive away so much of what has been built and is important to our community. Simply put, upon walking through the first 747 or JFK's Air Force One, you want to be able to hear your child say "Wow." Or to hear his grandmother share her experience helping build one of these magnificent machines.

Finally, we are concerned about what would be lost in the proposed area of development. General aviation is the entry point for aviation and key to industry growth. There is no current solution for the displacement of more than 75 parking slots. In addition, the ramp to the north of MOF is one of constant activity. This proposal could eliminate our ability to provide first flights for young girls at our *Women Fly* event, likely eliminate the ability to accommodate the Blue Angels for Seafair, and eliminate visiting aircraft from other Museums, Air and Rescue demonstrations, NASA, and more.

We ask that King County reconsider their adoption of the master plan, specifically with regards to the negative impacts this single proposal will have on general aviation and especially on all those that benefit from the presence of The Museum of Flight and what it has to offer. Ultimately I believe that KCIA and King County could be harmed by its adoption with this proposal intact. Thank you for your consideration and please do not hesitate to contact me if you have any questions.

Sincerely,

Matt Hayes
The Museum of Flight
President and CEO
mhayes@museumofflight.org 206-764-5702

cc: Caroline Whalen - Director of the Department of Executive Services, King County
John Parrott - Airport Director, King County International Airport
Mike Colmant - Airport Deputy Director, King County International Airport

December 15, 2020

By Electronic Mail

King County Airport
7277 Perimeter Rd. S.
Seattle, WA 98108-3844
KCIACommunityOutreach@KingCounty.gov

RE: NBAA Comments on King County Airport Master Plan

Dear Master Plan Coordinator:

The National Business Aviation Association (NBAA) is pleased to provide feedback on the King County Airport (BFI) Master Plan.

NBAA represents the interests of over 11,000 member companies that rely on general aviation (GA) aircraft to help make their businesses more efficient, productive and successful. Those members include numerous tenants and users of the King County Airport (BFI) who continue to be strongly interested in the airport's future accessibility and viability.

We recognize the county's efforts to improve safety by making changes to the runway 14R/32L Runway Protection Zone (RPZ) and in making various airfield geometry and lighting upgrades necessary to maintain the airfield in accordance with current FAA design standards. We understand that GA areas on the north side of the airfield must be eliminated as a result of the RPZ improvements. While we recognize that the airfield is space constrained, we urge the county to find ways to minimize loss of GA capacity and ensure continued accommodation for GA activities by identifying other areas on the airport to relocate facilities displaced as the result of the changes to the RPZ, and to specifically include that plan in the Master Plan.

NBAA advocates for the entire spectrum of general aviation aircraft that rely on BFI and contribute to its success. While we recognize the jobs and potential for revenue growth an additional cargo area can bring to the airport, we are concerned that other changes proposed in the Master Plan, such as transition of Southwest Air Park area to cargo, without an accompanying plan in the Master Plan to fully relocate affected tenants if such a transition occurs, will negatively impact GA users at all levels.

In closing, we applaud the county's leadership for recognizing the benefits general aviation facilities contribute to securing a robust, sustainable future for King County Airport and the safety efforts the county is planning to undertake. We believe a

successful Master Plan envisions positive change for all types of aviation activities. We ask that the county give strong consideration to find ways in the Master Plan to not only maintain current capacity to accommodate general aviation, but to also lay the foundation for enhancements.

We look forward to jointly working with the County Council, King County Airport staff, GA users and tenants and the greater community to ensure that all users can benefit from our collective efforts as part of the Master Plan program.

Please do not hesitate to contact me if NBAA can be of assistance.

Sincerely,

A handwritten signature in black ink that reads "Alex Gertsen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alex Gertsen, C.M.
Director, Airports and Ground Infrastructure
E: agertsen@nbaa.org
P: (202) 737-4477

CC:

John Parrott, Airport Director, jparrott@kingcounty.gov
Michael Colmant, Airport Deputy Director, michael.colmant@kingcounty.gov

December 15, 2020

John Parrott, Airport Director
King County International Airport
7277 Perimeter Road South
Seattle, WA 98108

Dear Mr. Parrott;

Thank you for the opportunity to provide comments regarding the King County International Airport Master Plan Update.

Washington State Department of Transportation Aviation Division (WSDOT Aviation) understands the importance of the King County International Airport (KCIA) to the state aviation system and the region. We value the role the airport fills in meeting the state and region's air transportation needs, and respect the master planning process. We also recognize and support local community level input to shape the future of the airport while allowing the process to work.

The 2017 Washington Aviation System Plan (WASP) classifies KCIA as a "Major Airport" with the primary activities of this classification being commercial service and aerospace manufacturing. WSDOT Aviation, a member of the Washington Commercial Aviation Coordinating Commission (CACC), acknowledges that Washington State has capacity issues with commercial passenger service, air cargo, and general aviation aircraft storage. Commercial passenger service and air cargo demand is projected to double in the next twenty years. Thus, the CACC is working to add capacity throughout the state aviation system to accommodate future demand including general aviation storage.

For your consideration, WSDOT Aviation recommends that the Master Plan include a commitment from King County to conduct or participate in developing a plan to accommodate tenants at the airport should future projects displace them. In accordance with both state and federal grant assurances, airport sponsors are required to undertake reasonable consultation with affected parties when making decisions to commence any airport development project.

The importance of King County International Airport to the region and state's transportation system cannot be overstated. We appreciate the opportunity to offer written comments. WSDOT Aviation is available to provide technical assistance to the airport and the community. Our office is available for any questions or further discussions. Please don't hesitate to contact me at 360-709-8020 or david.fleckenstein@wsdot.wa.gov.

Sincerely,

David Fleckenstein
Director, WSDOT Aviation

Seattle City Light Comments on King County International Airport's Airport Master Plan Update

11/30/2020

1) Context of Seattle City Light's Comments

Seattle City Light has been the owner and steward of the Georgetown Steam Plant (GTSP) since the 1950's. However, the GTSP has been an icon in the Georgetown neighborhood since 1906 – several years before the first powered flight in the State of Washington, and of course, well before there was a Boeing Field. GTSP is one of a small handful of buildings in Seattle that have been recognized as a National Historic Landmark.

Boeing Field's expansion over the years has resulted in increasing interactions between King County International Airport (KCIA) and City Light about the GTSP. In particular, since before 2001 there has been an effort to resolve issues of City Light's access to the GTSP.

In 2001, KCIA unilaterally eliminated City Light's legal access to the GTSP via 13th Ave S, providing a circuitous and inadequate "temporary" access. The FAA found that this access change constituted an adverse impact on the National Historic Landmark GTSP under Section 106 of the National Historic Preservation Act. City Light has been trying since then to acquire adequate permanent access to the GTSP.

The 2004 Airport Master Plan (AMP) EIS in the project website makes several references to the effort to resolve this situation:

"Separate from the Master Plan recommendations, King County is working with Seattle Light concerning improved access to the Georgetown Steam Plant. Currently, City Light has an easement through the secure portions of the airfield – through the north RPZ. King County is proposing to acquire the easement interests and to coordinate a land exchange between the County, Boeing Company, and Seattle Light that would enable direct access to the Steam Plant property from Ellis Avenue." [p. 12 of the EIS]

*"Separate from the Master Plan recommendations, King County is working with Seattle Light concerning **improved access driveway to the Georgetown Steam Plant**. Currently, City Light has an easement through the secure portions of the airfield of the north Runway Protection Zone. King County is proposing to acquire the easement interests and to coordinate a land exchange between the County, Boeing Company, and Seattle Light that would enable direct access to the Steam Plant property from Ellis Avenue. The County expects to complete all requisite NEPA and SEPA analysis on this access plan once the driveway access plan has been fully developed. A temporary access driveway has been developed to address short-term runway safety area concerns, while the permanent driveway is being developed."* [p. 43 of the EIS]

“King County is developing a program of land exchange that would provide an improved driveway access to the Steam Plant from Ellis Avenue in exchange for its release of easement and ownership interests.” [p. 115 of the EIS]

These references reflected an upbeat and optimistic attitude at that time that the issue would be readily resolved. KCIA entered into a Letter of Intent with City Light in 2019 which, while not being legally binding, set out the terms for a final settlement. Similarly, about the same time KCIA, City Light, FAA and Federal, state, and local historic preservation agencies entered into a Memorandum of Agreement which covered the terms to resolve the Section 106 impact on the GTSP. Unfortunately, 16 years after the EIS was written and 19 years after the legal access was removed, the issue of permanent access to the GTSP has not been resolved.

In summary, City Light recognizes the importance of the Airport for the region’s economy. But despite this, KCIA cannot leave the impacts of its development and operations unaddressed. It needs to resolve unmitigated impacts of its past expansions before it embarks on additional expansion. This includes resolving the issue of permanent acceptable access to the historic GTSP. City Light stands ready to complete a final settlement agreement with KCIA consistent with the agreed upon terms as outlined in the LOI and the FAA MOA.

In the meantime, we continue with our comments on this Airport Master Plan Update.

2) Issues of accuracy and clarity.

All figures in Chapters D and F are missing, including, Fig. F-2 Airport Layout Plan Drawing. Meaningful public comment is not possible, especially in a highly technical area such as airport planning, without graphics. Part of the controlling documents for the Airport are the figures, not text documents, so the public cannot understand what the Airport is proposing, committing to, or being held to without complete diagrams. This Airport Master Plan process has been going on for at least 4 ½ years; it is unreasonable to skimp on the information to the public at the end of the process just to save a few weeks. The full document including all the figures should be provided and a completely new public comment period established.

Figs. A 3,4,5,and 7 show the GTSP as an on-airport building, and p. A-58 describes the GTSP as being within BFI, while p. E-13 says the GTSP is “not located on Airport property.” Please state clearly that the GTSP is immediately adjacent to, and is not, and has never been, on KCIA property.

P. A-58 and numerous other locations in the various documents describe the GTSP as a Registered Historic Site. The GTSP should be described more accurately as a National Historic Landmark – a designation which indicates a much higher value as an historic resource, than one that is just registered.

On p. xxxviii of the summary, the following item is listed:

“Future RPZ Use Agreement:

- Runway 14R approach RPZ – 1.3 acres”

What does this mean? Does this mean that KCIA is seeking a use agreement for 1.3 acres in the (alleged) RPZ? Where? With whom? Under what terms?

P. C-37 includes: “Further consideration will be given to the options the Airport has in regard to achieving full control of all RPZ’s.”

What are those options? Do they include condemnation? If so, please make clear whether, in the County’s view, this would also include the ability for King County to condemn city property.

P. D-19 includes: “GTSP property @1.9 acres...approximately 1.9 acres to the north...is recommended for future RPZ easement or property acquisition to provide King County with land use controls.”

Please indicate which specific properties are recommended for which means of providing KCIA “with land use controls.”

On p. D-69, the CDP summary says “RW 14R RPZ – 1.0 acres (To be acquired)”.

Which 1.0 acres? Acquired by what means?

On p. E-8, it states: “the 300 foot- Runway 14R extension ... would change access.”

For what facility or entity would access be changed? How?

On p. xxxv of the summary, there is the following item: “**Runway Protection Zones (RPZs)**. The size of both approach and departure RPZ’s for Runway 14L are to be maintained at 1,000 feet x 1,510 feet x 1,700 feet and...”

We believe this should read “14R”, not “14L”.

On p. D-57, for Alternative One, the chart states “no change” in RPZ. However, RPZ Easement/Property Acquisition line in the chart shows “significant change”.

This is just one example of the confusion in the documents about whether the RPZ in Alternatives One, Two and Four is the existing condition, or in fact a change in the baseline which is the approved 2004 AMP. In any event, there is an inconsistency within this chart.

On the chart on p. D-59, Environmental issues should read “possible incompatible land use/NHRP property”

On p. F-4, we believe that the Runway Protection Zones section is meant to apply to 14R, not 14L

Page 109 of the 2004 AMP EIS includes this reference: *“The steam plant was inactivated in 1977. It is currently owned by Seattle City Light and managed by the Georgetown Powerplant Museum as a museum and educational facility, with a broad variety of uses. It is used regularly for tours and training classes in boiler operations and related topics.”*

This is accurate and we appreciate KCIA’s recognition that museum activities are a long-standing feature of City Light’s use of the GTSP.

P. A-40 describes that the City of Seattle’s Airport Height Overlay District “shall not restrict heights in Transition Areas to less than 37 feet (37’)”.

This is accurate. However, the document should further educate the reader that this is the only applicable height regulation in that area for non-airport property.

3) The issue of the appropriate baseline for the 14R approach RPZ.

The 2004 adopted Airport Master Plan is helpfully provided in the project website. Table C-2 of that document specifies that the dimensions of the 13R RPZ are 500 ft X 1700 ft X 1,010 ft (13R was, of course, the old designation of the runway now called 14R). Diagrams in the 2004 AMP also show that this RPZ does not include any part of City Light’s property around the GTSP.

A multitude of documents included in the present Master Plan Update website show that something has changed. The “existing” 14R approach RPZ is described as 1,000 ft X 1,510 ft X 1,700 ft. Dozens of text and diagrammatic references show that this RPZ now overlaps a good portion of City Light’s GTSP property.

But the documents are not completely consistent in this view. For instance, on p. D-27, the “existing” ¾ mile, 1,000/1,510/1,700 RPZ is mentioned as possibly requiring an EA and Section 106 consultation. On p. D-28, Alternative One’s disadvantages for the “existing” ¾ mile visibility and RPZ are indicated as requiring additional planning as well as the preparation of an Environmental Assessment and a Section 106 consultation.

If the “existing” RPZ had been appropriately approved and established, why would these additional planning/regulatory/consultation steps be necessary? One is drawn to infer that the “existing” RPZ is not, in fact, properly established or approved and is in fact not the existing baseline at all.

The statement on p. D-5 provides some helpful information:

“It has been confirmed through this planning process that the previous review of these non-standard conditions, which were documented in previous planning documents (i.e., the 2004 NEPA ENVIRONMENTAL ASSESSMENT/SEPA ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED MASTER PLAN IMPROVEMENTS AT BFI and the 2006 MODIFICATION OF STANDARDS ALTERNATIVE ANALYSIS document for BFI)

and recorded as Modification of Standards (MOS) on the approved 2007 Airport Layout Plan Drawing Set were never “officially” approved by FAA.”

Supposedly the creation of an expanded RPZ is documented in these documents. The 2004 NEPA EA/ SEPA EIS is provided on the project website but no mention is made there (nor in the adopted 2004 AMP) of an expanded RPZ. One is left to conclude that the 2006 MOS Alternative Analysis and the approved 2007 Airport Layout Plan Drawing set document this RPZ expansion, but that is not clear because they are not provided on the project website.

Please provide these documents on your website (and allow for an extended public comment period once the complete documents are provided.)

Please state clearly if KCIA is relying on these documents to establish that the RPZ shown as “existing” in this Update was properly approved by FAA. If that is KCIA’s contention, please explain why your document on p. D-5 states that the 2006 MOS and 2007 ALP drawing set were “never ‘officially’ approved by FAA.”

Please provide the NEPA, SEPA, and Section 106 documentation that shows that proper environmental compliance was done by KCIA and FAA for any asserted expansion of the RPZ subsequent to 2004.

A reference on p. D-25 states:

“The encroachment of the Runway 14R approach RPZ onto adjacent property associated with the Georgetown Steam Plant (a structure listed on the National Register of Historic Properties) is a result of the existing ¾ mile visibility minimums...Due to the fact the existing 2007 Airport Layout Plan (ALP) identifies only 1 mile visibility minimums for the existing and future Runway 14R IAPs, additional environmental coordination and documentation would be required to consider the various environmental impact categories...to support the larger Runway 14R approach requirements.”

This also states that the 2007 ALP is the “existing” plan, which is problematic. It also leaves a little more confusion of whether the 2007 ALP has a 1-mile visibility requirement (small RPZ) or a ¾ mile visibility requirement (bigger RPZ.) It does indicate that there are presently unperformed environmental coordination and documentation requirements that are necessary to establish the larger RPZ. This reinforces our inferences drawn from pp. D-27 & 28.

There is a reference on p. E-9 to the “the FAA approved Airport Layout Plan (King County 2012).” What is this document? Is it the 2007 ALP? If so, why is it described as “approved” when on p. D-5 it is described never having been “officially” approved by FAA. What is the King County 2012 reference?

Given all the above, including KCIA’s statement on p. D-5, please explain how KCIA can assert that the 1,000/1,510/1,700 RPZ can be viewed as the “existing” RPZ.

It is clear that the existing RPZ and the true baseline, is in fact the 500 ft X1700 ft X1,010 ft RPZ adopted as part of the 2004 AMP. The Master Plan Update documents should be revised to reflect that and all necessary SEPA, NEPA and Section 106 compliance must be done before considering any expansion of this RPZ. The impacts of any RPZ expansion should be measured against the adopted 2004 AMP RPZ.

On a related note, references on pp. E-8 &9 state that “one NHRP-registered historic site, the Georgetown Steam Plant is potentially impacted by the 300 foot- Runway 14R extension, which would reposition the Runway 14R RPZ to encompass less of the Steam Plant property than under existing conditions.” Given the conclusion above, the 300 foot 14R extension (if done in conjunction with a ¾ mile visibility requirement) would also impact the GTSP property more than the true 2004 baseline.

4) Future studies/agency coordination/planning/regulatory compliance

There are many references in the documents to additional studies and similar activities that are needed:

“To facilitate the MOS preparation effort, a supplemental planning study will be undertaken to further define the long-term improvement/resolution options (beyond the 20-year planning period of the Master Plan Update) for the Airport’s existing non-standard design conditions.” p. D-6

- **“Potential Compliance/Mitigation Options**

- *...undertake the required environmental documentation to address the location of the Georgetown Steam Plant within the Runway 14R approach RPZ.”* p. D-7

“...application of FAA’s Interim Guidance on Land Uses within a Runway Protection Zone could require additional environmental review and documentation to assess the land use compatibility of the Steam Plant” p. D-9

“may require additional environmental documentation and approvals to support and retain the ¾ mile visibility minimums.” p. D-18

“Subsequent to the preparation of this draft chapter, the decision was made to retain the existing IAP visibility minimums and address the existing RPZ land use compatibility issues in a supplemental study to the Master Plan Update.” p. D-9 footnote

“Hot Spot #1. A new EA may be required to change the PPRP designation.” p. D-12

“Subsequent to the preparation of this draft chapter during the MP update, the FAA elected to address the land use compatibility guidance from the Interim Guidance on Land Uses within a Runway Protection Zone in a separate follow up study to the MP Update.” p. D-18 footnote 5.

There are two problems with these statements. The first is that they are mostly unclear about the nature of the action that is being recommended. Are these supposed to be Section 106 consultations? NEPA EA's? SEPA analysis? When they refer to "studies" what is being proposed to be studied? Also, in what way can these actions resolve the incompatibility of a use on non-airport property which KCIA is seeking to include in an expansion of the RPZ? IS KCIA considering attempting to restrict City Light's property rights?

The second problem is the implication that all these activities should be done after this AMP is adopted by the County and the ALP is approved by the FAA. If this is correct, then it leaves questions about mitigation and resolution of these potential impacts until after the main decisions are made. This is not the correct approach to SEPA and NEPA. Full environmental compliance (including SEPA and NEPA) should be done before the AMP and ALP are recommended for adoption or approval. If the AMP and ALP are considered programmatic decisions rather than project decisions, then SEPA and NEPA compliance (and Section 106 compliance and noise compliance) should be done on the programmatic decisions. And as we commented above, mitigation and resolution of impacts from past KCIA actions should be completed before a decision is made to create any new impacts from further Airport expansion.

Also, on p. E-8 indicates that "*It is recommended that BFI and King County continue to coordinate with Steam Plant representatives about the compatibility of the Steam Plant within the RPZ.*" What does this mean? City Light has been negotiating with KCIA about the Airport's impacts on GTSP for 19 years now with no final resolution in sight. Please explain the basis for the assumption that continued coordination will resolve issues arising from further RPZ expansion.

5) Other comments

There are several references to Assumptions and Goals in the documents:

"Assumption Four. The fourth assumption is to encourage the protection of existing public and private investment in land and facilities and advocate the resolution of any potential land use conflicts, both on and off airport property." [p. xxxiv]

"Goal 6: Communications and Community Partnerships

Neighborhood & community. Act as a partner to neighboring residents, businesses and organizations." [p. A-3, pp. D-3 &4.]

We comment that KCIA's actions have not been consistent with this Assumption and this Goal.

On p. D-28 it states that Alternative One provides the opportunity to increase IFR access capability to Airport by 8.8 hours annually if the existing Runway 14R ILS can receive environmental clearance for the $\frac{3}{4}$ mile visibility minimum approach procedures.

Please state the baseline against which this 8.8 hour increase due to an expanded RPZ is measured. In other words, a 1-mile visibility gives X hours/year of runway use. A $\frac{3}{4}$ mile visibility requirement would give X + 8.8 hours of use. What is "X"? The Airport's general value to the local economy is clear, but please describe the incremental benefit to the economy of this additional 8.8 annual hours of operation in terms of jobs, \$ of economic activity, \$ of taxes generated, etc. We are assuming that KCIA must view these incremental benefits as substantial since they are driving a preference to expand the RPZ despite the well-documented land use incompatibility problems that flow from that preference.

The power point slide on Part 150 noise compares 2008 noise model results and 2018 noise model results. The proper baseline for noise impact analysis of the alternatives are that of the most recent data, not those of 12 years ago.

There are several references to the noise impact on the GTSP from PPRP conversion/runway extension (p. D-48, D-60, and E-8.) We remind KCIA that City Light has offered KCIA an aviation easement that would cover noise from normal operations of aircraft, subject to resolution of all other terms of a final access settlement. But since KCIA has not agreed to such a final settlement, then all legal requirements for noise analysis and mitigation need to be met prior to any decision to extend the runway and convert the PPRP.



December 15, 2020

John Parrott, Director
King County International Airport – Boeing Field
7277 Perimeter Rd S
Seattle, WA 98108

RE: Airport Master Plan and General Aviation Reductions

Dear Mr. Parrott:

I am writing in support of general aviation (GA) at King County International Airport and against the proposal in the Master Plan to remove over 75 parking and hanger spaces for light general aviation aircraft at the southwest corner of the airport. This is on top of the planned removal of GA parking at the northeast corner of the airport. And the removal of GA space at the southwest corner include three to four spaces used by the Museum of Flight for visitors.

The Washington Seaplane Pilots Association represents over 500 seaplane pilots in our state of which the majority fly amphibious seaplanes and need GA tiedowns or hangers to store their aircraft.

General aviation is the lifeblood of Boeing Field, and currently comprises the majority of the traffic operations at Boeing Field. Light aviation operations comprise a wide spectrum of aviation services, including training flights, air ambulance flights, sightseeing flights, and charitable flights. Over the past several years, thousands of pilots have learned to fly at Boeing field, many of these individuals have gone on to become airline pilots, corporate pilots, or better-informed engineers designing future jetliners. Thousands of rides for minority and disadvantaged youth have occurred because of light general aviation operators at Boeing field, and countless disaster relief and search and rescue flights have been launched from Boeing field. Critically, light general aviation flights create an opening for local members of the community to experience and participate in aviation and use the airport.

As it is currently slated, the Master Plan for KBFI will remove over 75 tie-down spots and hangar spaces in the southwest corner next to the Museum of Flight, in addition to the removal of tie-down spaces at the northeast corner. The deleterious impact this will have on general aviation operations at KBFI is impossible to overstate. There is already a critical shortage of aircraft parking in the Seattle area. KBFI is the closest airport to downtown Seattle. Currently, it is extremely difficult to obtain a parking spot for an aircraft at any airport within an hour drive of downtown Seattle. By removing over 75 parking spaces and reducing the footprint of space available to general aviation operators, King County Airport management will exacerbate the already critical state of aircraft parking and will likely price most light aircraft owners out of the Seattle area.

KBFI's own forecast shows a dramatic reduction in the number of light general aircraft operations at Boeing Field. This stands in contrast to the FAA's expected increase in nationwide light GA operations, indicating that the Master Plan's authors are aware that the proposed changes at the airport will essentially shut light GA operations out from the airport. The larger number of turbine aircraft will also come with a much larger noise footprint than the light general aviation aircraft that currently use the airport.



The effects of this will be felt across the community, not just amongst airport owners or the companies who service those aircraft. As general aviation dies in the Seattle area, children will no longer get aircraft rides, locals will not be able take plane tours, and city dwellers will have no place to take flight lessons. As has been proven time and time again in other cities, an airport which is disconnected from the local community loses the local community's support. The overwhelming majority of community members in the City of Seattle will never be able to afford to charter a private jet, but nearly all community members can sign up for an air tour; take their child to a Young Eagles, Civil Air Patrol, or Red Tail Hawks event; or volunteer to help with general aviation-supported disaster relief. Shutting general aviation operations out form KBFI will separate the airport from the local community.

We request the managers of KBFI to reconsider the impacts that the Master Plan will have on not only the airport but also the local community and either:

- 1) Remove the alternative to convert the southwest GA tie-down and hanger spaces to cargo operations, or
- 2) Replace those GA spaces with an equal or greater amount of space in another location, and not eliminate the NW parking until alternative spaces are provided

In addition, there is space provided for access to guests of the Museum of Flight in the southwest corner of the airport. This provides space for three or four itinerate aircraft which are typically used for visitors to the Museum to access GA aircraft for rides or visits. This too is an important connection with the community to encourage support of the airport. We also request that KBFI modify the master plan to preserve these spaces for the Museum of Flight.

Furthermore, we would appreciate in your response to this letter a summary of the current number of GA Light Aircraft parking spaces today and what the expected number will be when the Master Plan is fully implemented.

Sincerely,

A handwritten signature in blue ink that reads "Stephen M Ratzlaff". The signature is written in a cursive, flowing style.

Stephen M Ratzlaff
President, Washington Seaplane Pilots Association
Stephenr@orderport.net 206-250-1625