



August 15, 2022

Mr. Ralph Iovinelli  
Office of Policy, International Affairs & Environment, Emissions Division (AEE-300)  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

**RE: Airplane Fuel Efficiency Certification (Docket ID No. FAA-2022-0241)**

Dear Mr. Iovinelli,

Thank you so much for the opportunity to respond to the Federal Aviation Administration's (FAA) proposed new fuel efficiency certification standards for new aircraft manufactured after January 1, 2028. We recognize that these certification requirements would implement the emissions standards adopted by the Environmental Protection Agency (EPA) on January 11, 2021, for which we have already expressed strong support.

As background, Seattle-Tacoma International Airport (SEA) – operated by the Port of Seattle – was not only the 8<sup>th</sup> busiest airport in the country in terms of passenger volumes prior to the COVID-19 pandemic, but also one of the fastest growing – increasing from 31 million passengers in 2010 to almost 52 million passengers in 2019. This growth – and the associated number of operations and overflights in near-airport communities – has made aircraft noise and air emissions into one of the highest community priorities for the Port and the surrounding cities of SeaTac, Burien, Des Moines, Normandy Park, Tukwila, and Federal Way.

Quality of life and environmental sustainability are essential to the success and health of our communities. To that end, the Port and these six cities work closely together to identify and reduce aircraft emissions in our community; in fact, we have created the SEA Stakeholder Advisory Round Table (StART) to provide a forum for brainstorming new ideas on this front, and it has already resulted in tangible improvements. For example, the Port, the cities, our local clean air and public health agencies, our local research university, and the Washington State Legislature are all actively investing in studies to better understand more about emissions from aircraft and their negative impacts on human health. Similarly, the Port has invested in pre-conditioned air and electric plug-in capacity at all SEA passenger loading bridges, which – at full utilization – averts approximately 50,000 metric tons of greenhouse gases (GHG) per year, equivalent to taking 8,000 gas-powered cars off the road.

For that reason, we strongly support the FAA's proposed new standards, but also welcome the opportunity for additional progress, partnership, and investment to truly reduce GHG emissions near airport communities. In particular, the focus of our community collaboration centers on two areas: 1)

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sustainable aviation fuels (SAF) and 2) ultrafine particulates (UFP). With regard to SAF, SEA has set a goal to fuel all aircraft at the airport with at least a 10% blend by 2028. We strongly support those provisions of the Build Back Better Act that would incentivize SAF production and infrastructure development, and we applaud the Biden Administration's Sustainable Aviation Fuel Grand Challenge and related actions. Without policy leadership, investment, and partnership at the federal level, it will be challenging to achieve necessary levels of SAF availability and affordability. If there are ways for FAA, SEA, and near-airport communities to work together to advance SAF implementation, we welcome further discussion.

In terms of UFPs, we know that SAF not only reduces lifecycle carbon emissions but also emits significantly less UFP and Sulphur oxides (SOx), which benefits the global climate and local airport communities. For that reason, much more can be done on this topic, particularly at the federal level. We appreciate the work of U.S. Representative Smith on this front also, with his introduction of H.R.4068 – the Protecting Airport Communities from Particle Emissions Act – which would further these efforts.

In summary, we believe that the FAA's proposed standards related to aircraft fuel efficiency are a "yes, and" proposition: "yes" in that we support aligning with EPA and International Civil Aviation Organization (ICAO) standards as an important first step; "and" in that there are many additional opportunities for progress that FAA and the Biden Administration can lead on, in order to truly reduce aircraft emissions.

Thank you again for the opportunity to share our response to these proposed new standards. We look forward to continuing to work with you to ensure that the National Airspace System provides as much benefit as possible not only to users of the system but also those who live in proximity to airports. Please do not hesitate to contact us if we can provide any additional details on our comments.

Yours truly,

Commissioner Ryan Calkins  
President  
Port of Seattle Commission

Mayor Jim Ferrell  
City of Federal Way

Mayor Allan Ekberg  
City of Tukwila

Carl Cole  
City Manager  
City of SeaTac

Adolfo Bailon  
City Manager  
City of Burien

Michael Matthias  
City Manager  
City of Des Moines

Amy Arrington  
City Manager  
City of Normandy Park

Lance Lyttle  
Aviation Managing Director  
Seattle-Tacoma International Airport