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RE: "Sustainable" Airport Master Plan Near-Term Projects, Draft Environmental Impact Statement (SEPA No. 2026-01)

The following are comments on the Draft Environmental Impact Statement (DEIS) for the "Sustainable" Airport Master Plan (SAMP) Near-Term Projects (NTP).

#### **GENERAL COMMENTS**

A search of the Port of Seattle's document webpage fails to return any previous Sea-Tac EIS issued by the Port.<sup>1</sup> There is likely a reason that the Port has chosen to exclude and hide the 1996 Sea-Tac Airport Master Plan Update Final Environmental Impact Statement from this list, after misleading the public over the purpose, need, and impacts from its Third-Runway Project. Regardless, it appears that the Port has not issued a Sea-Tac Environmental Impact Statement over the past thirty years, preferring instead to segment and incrementally expand Sea-Tac projects and activities. However, in the case of the SAMP and NTP, the Port is correct that due to significant adverse environmental impacts an EIS is required.

Hartsfield–Jackson Atlanta International Airport in Georgia covers over 10,000 acres, and Dallas–Fort Worth International Airport in Texas spans more than 12,000 acres. Denver's airport covers 33,531 acres. By comparison, Sea-Tac International Airport covers a miniscule 2,400 acres.

As noted by the Port of Seattle itself in a December 21, 2025, *Seattle Times* article, Sea-Tac is "one of the most, if not the most, constrained major airport in the country," said Arif Ghouse, the airport's chief operating officer and the interim managing director for the Port's aviation division. "We cannot further expand, which means that we have to accommodate all future growth in our current footprint." The *Seattle Times* also reports: "Sea-Tac airport has seen record demand for flights in and out of the Emerald City. The number of passengers moving through the airport grew from 31 million in 2007 to 52.6 million in 2024 and is expected to serve 53.5 million passengers this year."<sup>2</sup>

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<sup>1</sup> [https://www.portseattle.org/documents?field\\_document\\_file\\_type\\_target\\_id=2196&title=Sea-Tac&page=0](https://www.portseattle.org/documents?field_document_file_type_target_id=2196&title=Sea-Tac&page=0)

<sup>2</sup> <https://www.seattletimes.com/business/sea-tac-airports-answer-to-crowding-construction/>

According to a February 15, 2025, article in *The Urbanist*: “In fact, within five years of completing the near-term list, the Port of Seattle expects to see over 64 million passengers pass through airport facilities.”<sup>3</sup>

The DEIS describes the following:

SAMP includes 31 Near-Term Projects (NTPs) that would improve efficiency, safety, access, and support facilities for Seattle-Tacoma International Airport (SEA). Key components include a second terminal and concourse with 19 additional aircraft gates; an elevated busway linking the rental car facility, new terminal, and main terminal; cargo facilities to accommodate air freight operations; realignment of airport roadways to connect the two terminals and facilities; and other updates to improve safety and efficiency. The NTPs would accommodate 56 million annual passengers at an optimal level of service as well as accommodate future cargo demand; improve airfield runway and taxiway systems to meet current Federal Aviation Authority (FAA) design standards; improve the efficiency of the aircraft taxiway system; and meet projected fuel storage needs, including those associated with the Port of Seattle’s (Port) Sustainable Aviation Fuel initiatives. DRAFT EIS, SEPA Fact Sheet, page FS-1, May 2026.

The DEIS fails to address alternatives to the proposed action, health and environmental noise impacts beyond the limited horizontal airport perimeter, and impacts to property valuations. In addition, please delete the word “sustainable” from this project name. There is nothing “sustainable” about an airport with finite space that insists it can keep increasing aircraft traffic indefinitely into the future.

**More specific comments are as follows:**

*Alternatives*

RCW [43.21C.030](#) requires:

- . . . all branches of government of this state, including state agencies, municipal and public corporations, and counties shall:
  - (a) Utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on the environment;
  - (b) Identify and develop methods and procedures, in consultation with the department of ecology and the ecological commission, which will insure that presently unquantified environmental amenities and values will be given appropriate consideration in decision making along with economic and technical considerations;
  - (c) Include in every recommendation or report on proposals for legislation and other major actions significantly affecting the quality of the environment, a detailed statement by the responsible official on:
    - . . .
    - (iii) alternatives to the proposed action;

DEIS, Alternatives page 2-2 states:

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<sup>3</sup> <https://www.theurbanist.org/sea-tac-airport-sets-passenger-record-plans-next-phase-of-expansion-projects/>

Use of Other Existing Airports: Suggestion to use existing airports instead of expanding facilities at SEA. NO

Neither the Port nor FAA have the authority to require users to use another airport. In addition, none of the other existing airports, either individually or collectively, could accommodate the current or projected passenger and cargo demands within the needed timeframe.

The Port of Seattle should immediately work with the Washington Congressional delegation to move Joint Base Lewis-McCord to Moses Lake. Moses Lake has one of the largest commercial airports west of the Mississippi, with an under-utilized 13,500-foot main runway, one of the longest in the nation, and far closer to the Yakima Training Center for Army training. Eastern Washington could use the “business.” Then move Sea-Tac to JBLM served by a rapid transit system from Seattle, Tacoma, and Olympia.  
Please include this alternative.

#### *Affected Environment*

Sec. 3, TABLE 3.3.2-2: STATE, LOCAL, AND PORT REGULATIONS AND POLICIES RELATED TO PLANTS AND ANIMALS, Draft EIS, page 3-18.

This table lists the Land Stewardship Plan Port of Seattle Commission Resolution No. 3821 Port of Seattle Applicable to Port-owned properties at SEA and surrounding area. “Guides forest health and habitat connectivity enhancements, integrates capital project development, and prioritizes actions in accordance with Port’s Equity Index and community engagement priorities. Formalizes requirements to replace trees that are cleared for operational safety and development needs at SEA.”

In 2016, the Port removed nearly 800 trees as part of its Phase 1 Flight Corridor Safety Program. In 2019, the Port issued a SEPA Determination of Non-Significance (DNS) for its Flight Corridor Safety Program (2019) for the removal of an additional 174 trees. The Port maintained that the FAA had consulted with the FAA, which required the removal of these trees. Despite repeated requests at that time, the Port refused to provide any verification of any such FAA requests. Because this is likely to be a continuing activity, please provide any written request from FAA for the Port to remove the trees referenced above.

#### *Sec. 4. IMPACTS AND MITIGATION MEASURES, page 4-1*

Mitigation and monitoring for air and noise pollution due to Sea-Tac is needed, but polluters should pay for causing these problems, namely, the airlines themselves.

#### *Noise*

Ecology’s SEPA Checklist (2023) includes:

##### 7. Environmental health

...

##### b. Noise

...

2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site?<sup>4</sup>

DEIS, Section 4.3.10 Noise (and Noise-Compatible Land Use), page 4-58 states: “This section presents the results of analysis of potential adverse impacts from aircraft and construction noise from the Proposed Action and alternatives. The impact of aircraft-related noise levels upon the surrounding area is presented as the number and type of noise sensitive land uses located within the noise contours for each alternative for both 2032 and 2037 conditions. Noise contours for the levels of DNL 65, 70, and 75 dB were calculated and represent average-annual day conditions.”

The DEIS is inadequate because it fails to evaluate the significant adverse impacts from aircraft noise upon the surrounding area located OUTSIDE the noise contours described above.

#### *Health impacts*

According to a book abstract posted January 31, 2022:

Aircraft noise exposure is an environmental stressor and has been linked to various adverse health outcomes, such as annoyance, sleep disturbance, and cardiovascular diseases. Aircraft noise can trigger both psychological (annoyance and disturbance) and physiological stress responses (e.g. activation of the cardiovascular system and release of stress hormones). People are usually able to deal with this kind of stressor. However, a constant exposure to aircraft noise can cause a continuous state of stress. This in turn can constrain a person’s ability to regenerate and restore its resources to cope with the noise situation. As a consequence, the risk for certain negative health outcomes can be increased. *Impact of Aircraft Noise on Health*, by Sarah Benz, Julia Kuhlmann, Sonja Jeram, Susanne Bartels, Barbara Ohlenforst & Dirk Schreckenberg, posted January 31, 2022.<sup>5</sup>

Aircraft noise creates nuisance and health impacts occur not only from exceeding certain decibel limits within a limited airport perimeter horizontally, but also from too frequent lower decibel levels occurring a half mile vertically overhead within 21 hours out of 24 hours.

#### *Property values*

In addition, according to a recent 2025 report:

Air transportation supports economic growth and global connectivity but imposes localized environmental costs, particularly through aircraft noise. We estimate the causal effect of aviation noise on housing prices using quasi-experimental variation from the Federal Aviation Administration's rollout of performance-based navigation (PBN) procedures and runway reconfigurations at three major U.S. airports. Combining high-resolution flight trajectory data with geocoded housing transactions, we apply a difference-in-differences hedonic framework to identify changes in exposure unanticipated by residents. A one-decibel increase in annual

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<sup>4</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

<sup>5</sup> [https://link.springer.com/chapter/10.1007/978-3-030-91194-2\\_7](https://link.springer.com/chapter/10.1007/978-3-030-91194-2_7)

day-night average sound level reduces house prices by 0.6 to 1.0 percent. Among alternative noise metrics, average exposure explains property value impacts most strongly. Willingness to pay for quieter conditions varies systematically with income and race, indicating that aircraft noise externalities have meaningful distributional consequences. Our results highlight the need to incorporate localized environmental costs into aviation and urban land-use policy. *Planes Overhead: How Airplane Noise Impacts Home Values*, Florian Allroggen, R. John Hansman, Christopher R. Knittel, Jing Li, Xibo Wan & Juju Wang, October 2025.<sup>6</sup>

Because the King County's property assessment property detail description includes the following: Nuisances – "Airport Noise" a property petition was filed in 2011 with the King County Board of Equalization with over 30 pages of detailed low Sea-Tac bound aircraft overflights in North Ballard: Ex. January 2, 2011

10:28 pm Low (overhead going E)  
10:36 pm Low (overhead going E)  
10:56 pm Low (overhead going E)  
11:02 pm Low (overhead going E)  
11:05 pm Low (overhead going E)  
11:19 pm Low (overhead going SE)  
11:21 pm Low (to the east going S to N)  
11:22 pm Very Low (to the south going NW)  
11:25 pm Low (overhead going SE)  
11:31 pm Low (overhead going SE)  
11:32 pm VERY LOW (to the south going NW)  
11:48 pm Low (overhead going SE)  
11:51 pm Low (overhead going SE)  
11:53 pm one low (going south to north); one low (to the north going SE) close together  
11:56 pm Low (to the north going SE)

As a result, in 2012, the King County Board of Equalization adjusted the total value of our property **downward** due to Airport noise resulting in a **decrease** in our property taxes. This decrease in property values from departures and arrivals at Sea-Tac under 3,000 feet should be included as part of the environmental impact statement.

### SUMMARY

In conclusion, the Port's DEIS is inadequate because it fails to include an analysis of the noise nuisance and health impacts on property and residents, beyond the limited noise contours presented in the DEIS, that will result from increasing the number of aircraft flights to and from Sea-Tac that the SAMP-NTPs are proposed to accommodate.

Please provide notice of any further action taken by the Port on this DEIS. Thank you.

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<sup>6</sup> <https://www.nber.org/papers/w34431>