



August 7, 2026

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SEPA SAMP Near-Term Projects Draft EIS

Dear Mr. Rybolt,

Thank you for the opportunity to provide comments on Sea-Tac Airport's Sustainable Airport Master Plan Environmental Review for Near-Term Projects, and please accept this as a companion to the letter sent by city staff on July 16, 2026. As community leaders, we are increasingly concerned that the Port of Seattle has not fully considered the impacts that Sea-Tac International Airport's operations and proposed expansion have on our community and other south King County communities. While the airport is a critical regional asset, its benefits and burdens are not distributed equally. The entire region and even State benefit from the airport, but the impacts acutely impact south King County. We urge the Port to ensure that its environmental review fully evaluates the impacts of the proposed projects on the communities that experience them most directly.

Geographic Area of Environmental Review

The General Study Area (GSA) is too limited. As shown in Exhibit 3.2.1-2, the GSA includes the airport and only a relatively small area surrounding it. Tukwila City staff have consistently raised this concern with the Port throughout the environmental review process.

The Port of Seattle assumes that the impacts of the airport's operations and the proposed projects are largely confined to the 3,692-acre General Study Area, which primarily consists of Port-owned property and immediately adjacent land uses. However, airport operations, including increased passenger activity, vehicle trips, aircraft operations, increased noise, air emissions, traffic, and future capacity expansion, have impacts that extend well beyond the GSA.

A notable example is the evaluation of parks and recreation resources. By limiting the analysis to parks and recreational facilities within the GSA, the environmental review fails to evaluate the broader impacts experienced throughout south King County. As a result, the analysis does not fully capture how airport operations affect recreational opportunities in neighboring communities.

Limiting the size of the GSA also limits the Port considering heat island impacts in south King County associated with the Port of Seattle operations.

Similar concerns exist regarding the analysis of Socioeconomics, Environmental Justice, and Children's Health, as outlined in Appendix K. By limiting the geographic scope of the analysis, the environmental review may underestimate or overlook impacts experienced by communities outside the GSA, including many historically underserved populations. For example, the *Health Effects of Aviation Noise: Review of US Research and Findings* recognizes sleep disturbance impact in areas exposed to nighttime readings of 45dB and above.

The City's concern is heightened by the fact that the Port routinely evaluates the airport's economic benefits on a regional scale while evaluating many of its environmental impacts using a much narrower geographic boundary. Applying different geographic scopes for benefits and impacts creates an incomplete picture of the airport's overall effect on surrounding communities.

City Request:

- Expand the General Study Area to reflect the full geographic extent of the airport's operational and environmental impacts. At a minimum, the study area should include the incorporated boundaries of the Cities of SeaTac, Tukwila, Des Moines, Burien, Normandy Park, and Federal Way, collectively referred to as the Airport Communities.

Equity and Environmental Justice

The Port of Seattle has made a strong public commitment to advancing equity and social justice. As stated on the Port's website:

"The Port of Seattle commits to taking a lead role in regional and national efforts to achieve equity and social justice. We are identifying and dismantling structural barriers to ensure that historically oppressed communities, particularly communities of color, have access to the resources they need to thrive.

Bias and oppression are embedded in our society, systems, and our organization. By failing to acknowledge inequities, we play a role in perpetuating them. We can and must do better. In order to achieve equitable outcomes for all our communities, we must be accountable for equitable policies that ensure racial, social, and economic justice are achieved in strategies, practices, and projects.

Our vision is to develop a Port that mirrors—throughout its breadth of operations and services and within its leadership structure—the diversity of our community, instills principles of equity in

its culture, and ensures a fair and intentional distribution of opportunities to expand economic development and quality of life for all."

We appreciate the Port's stated commitment to equity. However, we are concerned that these commitments are not fully reflected in the environmental review for the Sustainable Airport Master Plan. Communities surrounding Sea-Tac Airport, including many low-income communities, communities of color, immigrant communities, and other historically underserved populations, have experienced disproportionate impacts from airport operations for decades. As the airport continues to expand, these communities deserve a comprehensive, transparent, and meaningful review. Environmental justice is no longer simply an aspirational goal, it has become an important component of modern environmental review and public decision-making.

Washington State has likewise recognized environmental justice as a fundamental consideration in public decision-making through the Healthy Environment for All (HEAL) Act and related initiatives. While the Port of Seattle is not currently directly subject to the HEAL Act, its principles provide an important framework for identifying, evaluating, and addressing disproportionate environmental burdens experienced by overburdened communities.

Taken together, these federal and state environmental review frameworks, along with the Port's own adopted Equity Policy, establish a clear expectation that major infrastructure projects should meaningfully evaluate impacts on communities that have historically borne a disproportionate share of environmental burdens. We encourage the Port to ensure that the Sustainable Airport Master Plan environmental review reflects these principles and demonstrates how they informed the analysis and evaluation of project impacts.

We are particularly concerned that staff from the Port's Office of Equity, Diversity, and Inclusion appear to have not been involved in the preparation or review of the SEPA environmental documents¹. Given the Port's stated commitment to embedding equity into its policies and projects, participation from the Office of Equity, Diversity, and Inclusion would strengthen both the credibility and thoroughness of the environmental justice analysis.

The SEPA documents include a "SEPA Environmental Justice Memorandum" prepared by Parametrix. However, because the memorandum relies on the same limited geographic study area as the broader environmental review, it does not adequately evaluate the full extent of environmental justice impacts on surrounding communities. Expanding the geographic scope of the analysis is necessary to accurately identify and evaluate impacts on historically underserved

¹ See Table Q-1 and Table Q-2. No staff member from the Office of Equity, Diversity, and Inclusion is listed on the tables.

populations throughout south King County. Also, the Parametrix document references a variety of goals and policies, but ironically the Port's own stated goals on its own website were not included.

City Requests:

1. Expand the Environmental Justice analysis to include the broader Airport Communities rather than limiting the review to the current General Study Area.
2. Direct the Port's Office of Equity, Diversity, and Inclusion to independently review the Sustainable Airport Master Plan environmental documents and provide written recommendations regarding whether the environmental justice analysis adequately reflects the Port's adopted equity commitments.
3. Evaluate the proposed projects using the environmental justice principles reflected in the Port's own stated equity goals, Federal Aviation Administration environmental justice guidance, and Washington State's HEAL Act framework by identifying disproportionately impacted communities, evaluating cumulative impacts, and identifying measures to avoid, minimize, or mitigate those impacts.

Financial Implications of Sea-Tac Operations on Airport Communities

While the Port of Seattle regularly highlights the significant economic benefits generated by Seattle-Tacoma International Airport, the environmental review does not address the financial burdens airport operations place on the surrounding airport communities. These impacts include, but are not limited to, reduced property tax revenues, increased demand for human services, transportation infrastructure impacts, and higher public safety and municipal service costs associated with supporting one of the nation's busiest airports.

The environmental review should acknowledge and evaluate these cumulative financial impacts on the six airport communities. While the Port of Seattle has recognized these impacts through financial mitigation provided to the City of SeaTac, the remaining five airport communities continue to absorb many of these costs without comparable support.

City Requests:

1. Conduct a comprehensive analysis of the fiscal impacts that Sea-Tac Airport operations have on each of the six airport communities, including impacts to municipal revenues, public safety, transportation infrastructure, and human services.
2. Initiate discussions with all six airport communities to develop a more equitable approach to mitigating the fiscal impacts associated with airport operations, including consideration of ongoing financial partnerships or other mitigation measures.

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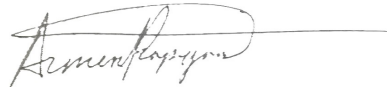
Conclusion

The City of Tukwila recognizes the important role that SeaTac International Airport plays in the region's economy and transportation system. At the same time, the communities surrounding the airport continue to experience many of the direct environmental, public health, and quality-of-life impacts associated with its operation and future growth. We respectfully request that the Port revise the environmental review to more accurately reflect the regional extent of these impacts, strengthen its environmental justice analysis, and fully evaluate the effects of the proposed projects on the Airport Communities. A more comprehensive and transparent review will result in better-informed decisions, strengthen public confidence in the process, and demonstrate the Port's commitment to balancing regional mobility with the well-being of the communities that host the airport. We appreciate your consideration of these comments and look forward to continuing to work collaboratively throughout this process.

Sincerely,



Thomas McLeod
Mayor



Armen Papyan
Council President



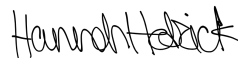
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