

**Comments and Responses: City of Seattle - received 12/016/20**

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2. Disagree with intent or context of comment, no changes recommended.
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#1	1	Add reference to current County emission reduction goals in the MP Update and update the Airport's GHG Emissions Inventory.	---	King County's Strategic Climate Action Plan states its goal is to reduce county-wide emissions by 50% by 2030. We recommend noting this goal in the Airport Master Plan report and including any examples of mitigation strategies. We recommend a comprehensive analysis is performed to identify any increase in climate pollution related to the Airport Master Plan and how it will align with the King County Climate Action Plan and WA State emission reduction targets. Additionally, emission reductions are often challenging in the aviation sector (King County's largest source of emissions), therefore, it is important that the County invest in adjacent communities with deeper emissions reductions that provide co-benefits that support health, comfort and reduced displacement.	Comments noted.  Yes, we will add reference in the Airport Master Plan to King County's Strategic Climate Action Plan goal is to reduce county-wide emissions by 50% by 2030.  In addition, the Airport is currently in the process of initiating an Airport Carbon Accreditation (ACA) program. Following the Airport's confirmation in the ACA program, the County will be required to prepare a current GHG Emissions Inventory that meets the ACA protocols.	1
#2	1	Add reference in the MP Update to local studies re: the evidence of compromised air quality and health disparities in the Duwamish Valley.	---	Reduction of emissions should be prioritized at this location to avoid further affecting communities that already experience disproportionate health disparities and inequities. The evidence of compromised air quality and health disparities in the Duwamish Valley has been well-documented in several studies <sup>1</sup> . We recommend these studies be included in the Environmental Overview section and subsequent SEPA documents.	Comments noted.  Yes, reference to these studies will be added to the Environmental Overview chapter and subsequent SEPA documents.	1
#3	1	Additional information on health impacts of particulate matter.	---	We recognize that particulate matter (fine and ultrafine) has an impact on health, especially communities with high levels of air-pollution and high levels of asthma and other respiratory illnesses as a result of prolonged exposure to pollution. An increase in particulate matter should be more deeply analyzed on neighboring communities such as South Park, Georgetown, Beacon Hill and the impact of a	Comments noted.  Please refer to the Air Quality section of the Environmental Review chapter (see pgs. E.1-E.3) for additional information on particulate matter. In addition, there is not yet an industry-accepted way of quantifying potential UFP pollution from aircraft operations and there is no requirement to	4

<sup>1</sup> [http://dl.pscleanair.org/DEEDS/DEEDS\\_Tech\\_Report\\_Exec\\_Summary.pdf](http://dl.pscleanair.org/DEEDS/DEEDS_Tech_Report_Exec_Summary.pdf),

[https://static1.squarespace.com/static/5d744c68218c867c14aa5531/t/5e0edc05d2e16f330fa0071d/1578032180988/CHIA\\_low\\_res+report.pdf](https://static1.squarespace.com/static/5d744c68218c867c14aa5531/t/5e0edc05d2e16f330fa0071d/1578032180988/CHIA_low_res+report.pdf), <https://www.duwamishcleanup.org/moss-study>

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				projected increase in flights to frontline communities should be acknowledged in the report. To that end we recommend an Equity Impact Review be completed.	specifically address UFP in NEPA, as FAA guidance does not recognize it. Certainly, it's possible that the science on UFP pollution will be advanced in the coming years and its assessment/impact as an aircraft-generated pollutant could be included in future environmental review studies.	
#4	1 & 2	Noise impacts & mitigation options.	---	The issue of noise should be further addressed and adequately defined in the report. Noise is simply not an issue of "annoyance" or something that disrupts everyday routines. The impacts of noise have been shown to affect health including heart disease, high blood pressure, sleep disturbances, children's learning, and stress <sup>2</sup> . For our neighbors living near the airport, noise severely impacts their ability to open their windows, enjoy their backyard or close-by park, sleep without disturbances or be able to focus on tasks or learning. The report should and cite findings from community noise complaints, decibel level monitoring data, and any community outreach/feedback concerning noise. Additionally, in Table E3 Land Use Compatibility Matrix, the notes section footnote recommends that measures that achieve noise level reductions (NLR) of 20-30 db, should be incorporated into residential building code but does not address how mitigation strategies for existing residential buildings will be attained. Most of the existing residential building stock in Seattle was building prior to 1950 and most homes do not have the level of insulation and noise mitigative measures to attain the desired db threshold. The proposed 300 feet extension of the runway will have additional noise impacts on the Georgetown community.	<p>Comments noted.</p> <p>Yes, reference to the recommended measures that can achieve noise level reductions (NLR) of 20-30 db, is a national standard recognized for new residential construction, and it's understood that these NLRs are typically not achievable when sound attenuating older properties. However, King Co. completed a comprehensive noise study for KCIA in 2005 (i.e., an FAR Part 150 Noise Compatibility Program) that resulted in FAA approval and funding of several noise mitigation projects for KCIA. One of these key projects from the Program provided a voluntary multi-year sound attenuation program for single-family homes located in parts of the Georgetown, Beacon Hill and Tukwila/Allentown neighborhoods. This project, which was 95% federally funded by the FAA, provided \$40 million for the sound insulation of just under 600 homes in these neighborhoods.</p> <p>It should also be noted that the updated existing and future noise contours, generated for this Master Plan Update, are significantly smaller than the previous contours generated for the KCIA Part 150 Noise Compatibility Study, and would likely result in a much smaller Noise Mitigation Boundary if the Study were updated today. This current reduction in the KCIA-related noise footprint is the result of both fewer aircraft operations being conducted at the Airport and changes in the fleet mix of those operations due to the</p>	4

<sup>2</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/>

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					retirement of many older/noisier aircraft, along with the continued advancement of quieter engine technology.	
#5	2	Requested environmental review and analysis recommendations for the future fuel storage facility.	---	Per the Environmental Overview <sup>3</sup> : The proposed Fuel Facility that includes land acquisition and construction near the Lower Duwamish Waterway shoreline could include impacts to ESA-listed aquatic species that occur in the Duwamish River if construction activities include disturbances below the shoreline Mean Higher High Water (MHHW) elevation. In addition to construction activities, it is important that the King County International Airport acknowledge the impact to aquatic species due to run off. The proposed Fuel Facility may also be in floodplain risk area and will require more analysis and include the most recent FEMA 2020 floodplain data in addition to other data, such as from the UW Climate Impacts Group, that projects higher levels of precipitation could lead to more standing water issues at the Airport <sup>4</sup> . Additionally, we recommend that sea level rise projections are incorporated into the Environmental Overview and taken into consideration as to the viability of proposed construction and proposed fuel storage facility.	Comments noted.  Yes, once the proposed development site is confirmed, the potential environmental impacts of constructing the Airport's fuel storage facility must undergo a comprehensive environmental review process and obtain environmental approvals and permitting prior to construction.	4
#6	2	Consideration of Environmental Justice impacts in the Master Plan Update.	---	Environmental Justice: The Environmental Overview of the Master Plan Update states - "None of the Proposed Projects are anticipated to have a disproportionately high and adverse impact on the minority or low-income populations." We recommend that the report include information on outreach, research and sources that led to this board conclusion, such as community events, surveys, workshops, interviews with residents and businesses, with respondent data reported by race, income, etc.. The City of Seattle is aware of community-based organizations such as the Georgetown Community Council and the Beacon Hill	Comments noted.  Special efforts have been made by KCIA staff, through targeted meetings and the provision of translation services, to gather input on the MP Update from the resident stakeholders located in the vicinity of the Airport throughout the planning process. We acknowledge receiving comments from the community-based organizations (CBOs) that you cited. However, KCIA staff have also coordinated with other CBOs (e.g., the Refugee Women's Alliance – ReWa) for interviews on the Master Plan Update and the vast majority of these	4

<sup>3</sup> [https://www.kingcounty.gov/~media/services/airport/documents/master-plan-update/Draft\\_Chapter\\_E\\_Environmental\\_Overview.ashx?la=en](https://www.kingcounty.gov/~media/services/airport/documents/master-plan-update/Draft_Chapter_E_Environmental_Overview.ashx?la=en)

<sup>4</sup> [https://cig.uw.edu/wp-content/uploads/sites/2/2014/11/ps-sok\\_sec12\\_builtenvironment\\_2015.pdf](https://cig.uw.edu/wp-content/uploads/sites/2/2014/11/ps-sok_sec12_builtenvironment_2015.pdf)

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				Community Council, who have already communicated their concerns about anticipated impacts to their communities—both having high populations of Black, Indigenous and people of color residents as well as a high percentage of residents with lower incomes and lower wealth. Again, we recommend that the report include an Equity Impact Review to identify how the proposed actions will impact fence line communities.	comments were positive. We stand by our preliminary assessment that “None of the Proposed Projects are anticipated to have a disproportionately high and adverse impact on the minority or low-income populations.” Please note the environmental review process (e.g., an Environmental Assessment) is the proper venue to officially document and address any potential Environmental Justice impacts that may result from the implementation of projects recommended in the Master Plan Update.	