

Comments and Responses: Seattle City Light (SCL) - received 12/01/20

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#1	2	Availability of report graphics in Chapters D & F to assist with the review process.	---	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.	<p>We agree with your comment. A PDF version of these chapters was prepared with the intension of posting on the website. It appears that a pdf version of the word document for these two chapters (without the graphics) was inadvertently posted by mistake.</p> <p>Thank you for bringing this to our attention. These chapters, with the associated graphics, have been posted to the website and Airport Staff will provide two additional weeks for your review, if needed. We apologize for the oversight. Also, please note that the Airport Layout Plan Drawing, which is the same drawing as Fig. F2 in Chapter F, was also posted on the website under the Airport Layout Plan working draft document tab and has been available for review throughout the formal public comment period.</p>	1
#2	2	Building hatch color edits to existing off-airport are needed to the base drawing for several Inventory chapter graphics.	---	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.	Agree. The building hatch color for the Stream Plant and adjacent buildings will be changed on the base drawing to match the legend for off-airport buildings.	1
#3	2	Update all references to GTSP from Registered Historic Site to National Historic Landmark.	pg. A.58 & others	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.	Agree. All GTSP references will be updated National Historic Landmark.	1
#4	3	Noise and land	pg.	On p. xxxviii of the summary, the following item is listed:	KCIA is seeking to negotiate an off-airport RPZ land use	4

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		use evaluation	xxxviii of the Executive Summary document	“Future RPZ Use Agreement: <input type="checkbox"/> 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?	compatibility agreement with Seattle City Light that is consistent with FAA guidelines for RPZ land use compatibility.	
#5	3	Off-airport RPZ control options.	pg. C.37	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.	Text will be edited to add reference to the various options that Airport Sponsors have to provide or promote land use compatibility with RPZs. These can include property acquisition, RPZ easement acquisition, and negotiated RPZ land use agreements. KCIA has no intention to pursue any land acquisition projects identified in the Master Plan Update using condemnation.	1
#6	3	Runway 14R/32L Alternative One: Uncontrolled RPZ acquisition options	pg. D.19	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.”	The location of the 1.9 acres of uncontrolled RPZ is identified on Figure D2/pg. D.16. This alternative presents two potential options for acquiring future control of this off-airport RPZ property. These include fee simple property acquisition or RPZ easement acquisition. Neither option is recommended in this section of the chapter.	4
#7	3	Location of recommended RPZ property acquisition at north end of Runway 14R/32L	pg. D.69	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?	The location of the uncontrolled RW 14R RPZ properties recommended for fee simple acquisition are identified on Figure D32/pg. D.72 and Figure F2/pg. F.3. There is no Seattle City Light property identified for acquisition in the Master Plan Update.	4
#8	3	Airfield access change	pg. E.8	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?	Relocation of the Runway 14R threshold will require extension of the parallel taxiways (i.e., TW A and TW B) to serve the new runway threshold location. Text will be edited to clarify the proposed taxiway access change.	1
#9	3	Text typo	pg. xxxv of the Executive	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	Agree. Text will be revised as suggested.	1

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			Summary document	maintained at 1,000 feet x 1,510 feet x 1,700 feet and...” We believe this should read “14R”, not “14L”.		
#10	3	Clarification of Table D11 text is needed.	pg. D.57	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.	The existing “(No Change)” entry for the RPZ component is correct. In addition, we propose that our assessment of the noted “significant” impacts of the RPZ Easement/Property Acquisition component for each alternative is correct given the potential acquisition cost of the property.	4
#11	3	Text typo	pg. D.59	On the chart on p. D-59, Environmental issues should read “possible incompatible land use/NHRP property”	Agree. Text will be revised as suggested.	1
#12	3	Text typo	pg. F.4	On p. F-4, we believe that the Runway Protection Zones section is meant to apply to 14R, not 14L	Agree. Text will be revised as suggested.	1
#13	4	Background info on steam plant ownership/operation	---	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.	Comment noted.	4
#14	4	Info on Airport Height Overlay District	pg. A.40	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.	Comment noted. Additional explanatory text on the application of the height restrictions specified by the Airport Height Overlay District is already provided on pg. A.40. In addition, the GTSP structure is identified as an existing Part 77 obstruction to the Runway 14R approach surface (with existing obstruction light), which is documented on Figure F3 of the <i>Airport Plans</i> chapter and Sheet #4 of the draft Airport Layout Plan Drawing Set.	4

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#15	4 & 5	Question regarding change of the existing Runway 14R RPZ dimensions since the 2004 MP Update.	---	<p>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).</p> <p>Diagrams in the 2004 AMP also show that this RPZ does not include any part of City Light's property around the GTSP.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>You are correct in noting that something has changed regarding the dimensions of the Runway 14R RPZ dimensions since the publication of the 2004 Airport Master Plan.</p> <p>The required dimensions of the RPZ are dictated by the existing visibility minimums that are provided by the individual runway ends (e.g., a visual approach vs. various instrument approaches). Instrument approaches that offer lower visibility minimums specify increasingly larger RPZ sizes. The 2004 Airport Master Plan documented the existing and future approach visibility minimums for Runway 14R at 1-mile, which specified an approach RPZ dimension of 500' x 1,010' x 1,700'.</p> <p>During the early stage preparation of this MP Update, it was determined that some of the Runway 14R instrument approach procedures had been upgraded to provide ¾-mile visibility minimums, which require the slightly larger RPZ dimensions (i.e., 1,000' x 1,510' x 1,700'). This improved instrument approach capability was made possible due to criteria changes within FAA's Terminal Instrument Procedures order but was implemented without knowledge to both BFI Staff and FAA Airport District Office Staff. Typically, the implementation of a new instrument approach requires environmental clearance documentation. This process was not completed for the implementation of the Runway 14R improved instrument approach and resulting RPZ enlargement at BFI.</p> <p>For the purposes of this MP Update, it was determined appropriate to recognize the larger RPZ, dimensioned at 1,000' x 1,510' x 1,700', as the current "existing" RPZ (consistent with the existing instrument approach visibility</p>	4

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				<p>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.”</p> <p>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.)</p> <p>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.”</p> <p>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.</p>	<p>minimums). However, the continued need for the previously required environmental clearance documentation (e.g., Environmental Assessment and Section 106 consultation) has been documented and will be completed as a separate stand-alone planning project.</p> <p>It should also be noted the statement on pg. D.5 in the comment is in reference to a section of the MP Update (see pgs. D.4-D.11) that summarizes the existing non-standard runway and taxiway design conditions that currently exist at the Airport. It was thought that modification of standards had been approved by the FAA for several of these that were previously identified on the Airport Layout Plan, but that was confirmed to not be the case. Therefore, each of these previous non-standard conditions, along with others that include the Runway 14R land use compatibility issue, have been documented in this MP Update for FAA review.</p>	
#16	5	Question regarding existing Runway 14R RPZ designation & environmental clearance	---	<p>A reference on p. D-25 states:</p> <p>“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,</p>	<p>We agree with your comment: “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 RPZ requirements.” See additional information in the Response to Comment #15.</p>	4

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		requirements		<p>additional environmental coordination and documentation would be required to consider the various environmental impact categories...to support the larger Runway 14R approach requirements.”</p> <p>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.</p> <p>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?</p> <p>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.</p>	The reference on pg. E.9 to the “the FAA approved Airport Layout Plan (King County 2012) is a typo and will be edited to (King County 2007).	
#17	6	Existing Runway 14R RPZ designation	---	<p>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.</p> <p>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</p>	Comments noted. The rationale for designation of the larger Runway 14R RPZ, dimensioned at 1,000’ x 1,510’ x 1,700’, as the current “existing” RPZ was presented in the Response to Comment #15. In addition, environmental clearance documentation (e.g., Environmental Assessment and Section 106 consultation) have been identified as being needed for both the previous RPZ enlargement and the future repositioning of the existing RPZ associated with the proposed Runway 14R threshold relocation project.	4

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				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.		
#18	6 & 7	Confusion regarding reference to future studies, agency coordination, and regulatory compliance remediation.	---	<p>There are many references in the documents to additional studies and similar activities that are needed:</p> <p>“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 nonstandard design conditions.” p. D-6</p> <p>□ “Potential Compliance/Mitigation Options</p> <p>o ...undertake the required environmental documentation to address the location of the Georgetown Steam Plant within the Runway 14R approach RPZ.” p. D-7</p> <p>“...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.</p> <p>There are two problems with these statements. The first is</p>	<p>We agree with your comment that the MP Update makes reference to several additional studies that must be undertaken to address the variety of existing non-standard conditions that were discovered during the planning process. To help summarize this list we will make reference to the project list (see Tables G2, G3, and G4) identified in Chapter G/Financial Implementation Plan.</p> <ol style="list-style-type: none"> 1) The first project of interest is the required environmental clearance documentation (e.g., Environmental Assessment and Section 106 consultation) that is required for the larger (1,000’ x 1,510’ x 1,700’ Runway 14R RPZ. Since this type of environmental study is typically prepared internally by the FAA, it was not included in the Airport’s Capital Improvement Plan (CIP) project list, but is documented throughout the MP Update. 2) Year 2020/Project A.2: Prepare request and submittal for update of existing ATC Operational Waiver to address non-standard centerline separation distance between existing parallel runway configuration. 3) Year 2021/Project A.1: Prepare consolidated EA or EIS for various Phase I projects: acquire property (multiple parcels), relocate/construct new fuel storage facility, and implement pavement maintenance/ reconstruction 	4

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				<p>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?</p> <p>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.</p> <p>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.</p>	<p>4) Year 2021/Project A.2: Prepare request and submittal for modification of standards to address multiple existing non-standard conditions: 1) Runway 14R/32L OFA, 2) Runway 14R/32L to Taxiway A centerline separation, and 3) Runway 14R/32L to Taxiway B centerline separation</p> <p>5) Year 2023/Project A.9: Prepare consolidated EA or EIS for various Phase II projects: 300-foot runway/TW A/TW B extension north; RW 14R approach RPZ property acquisition (multiple parcels); ALS and various other lighting relocation/upgrades; removal of future RW 14R VGAS obstruction, construct new airport maintenance facilities, and implement pavement maintenance/reconstruction (This project would also likely include the land use compatibility guidance from the Interim Guidance on Land Uses within a Runway Protection Zone</p> <p>6) Year 2024/Project A.4: Prepare OAP and remove future obstruction to Runway 14R VGAS surface (i.e., one tree)</p> <p>7) Phase II//Project B.5: Prepare ATCT Siting Study for relocation of existing ATCT</p> <p>8) Phase II//Project B.8: Prepare consolidated EA for various Phase II and Phase III projects: construct new southwest cargo development area, property acquisition for Runway 14R Departure RPZ, and implement pavement maintenance/reconstruction</p>	

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					<p>9) Phase III/Project C.9: Prepare consolidated EA for various Phase III projects: install Runway 32L ALSF-1, removal of future RW 32L obstructions (OFZ), and implement pavement maintenance/reconstruction</p> <p>Regarding the comment that “Full environmental compliance (including SEPA and NEPA) should be done before the AMP and ALP are recommended for adoption or approval.”</p> <p>We concur that the environmental processing of the improved visibility minimums for the Runway 14R instrument approach procedures does still need to be prepared by the FAA. Also, keep in mind that FAA’s approval of the ALP is conditional, meaning that, among other things, no projects are environmentally cleared through the ALP approval process. Each project will require its own environmental analysis and clearance prior to implementation.</p>	
#19	7	On-going coordination between King County and Steam Plant representatives about the compatibility of the Steam Plant within the RPZ	---	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.	King County and Steam Plant representatives will continue to negotiate on the final details of the proposed new access road and the terms of a future RPZ use agreement.	4
#20	---	Comments on adherence to stated assumptions	---	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	Comment noted. Given the existing site constraints of both the Airport and the surrounding environs, all of the Airport Stakeholders (e.g., King Co., neighboring residents, businesses and organizations) must continually work to mitigate potential land use conflicts and maintain ongoing	4

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		and goals in the MP Update.		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.	communication efforts.	
#21	7 & 8	Additional info requested on the relationship of IFR minimums and IFR accessibility to the Airport.	---	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 ¾ 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 ¾ 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.	An instrument approach to a runway is defined by two weather variables: cloud ceiling and visibility. At the onset of the MP Update, the existing ¾-mile visibility approach to Runway 14R was provided by an RNAV GPS approach that offered a 703-foot ceiling minimum. Based upon 10 years of weather data, this combination of IFR minimums were available on average at BFI 3.6% of the time annually, which equates to 13.1 days of the year. At that same time, the existing Runway 14R ILS approach provided ceiling and visibility minimums of 273 feet and 1 mile, which were available 6.2% of the time annually or 22.6 days of the year. In 2017, the Runway 14R ILS approach minimums were updated to a 290 foot ceiling and ¾-mile visibility and the ceiling was again increased in 2019 to 308 feet, due to revisions in the FAA’s Terminal Instrument Procedures order and the updated obstacle data set. These updated minimums resulted in a decrease in the annual availability of the Runway 14 ILS approach from the original 6.2% (i.e., 22.6 days) to 6.0% (i.e., 21.8 days), a reduction of 19.2 hours annually. If the Runway 14 ILS approach visibility minimums were now raised to 1 mile, the annual availability of the procedure could be reduced to 5.8%, resulting in a potential reduction of 17.5 hours annually. The text on pg. D.28, referencing 8.8 hours, will be updated to 17.5 hours to	4

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					<p>reflect the revisions to the ILS minimums that occurred in both 2017 and 2019.</p> <p>The operational availability of an airport is extremely important to commercial operators that provide scheduled services. This is particularly true of the existing UPS cargo operation at BFI. The future environmental clearance documentation that will be required to review the instrument approach upgrade (e.g., Environmental Assessment and Section 106 consultation) will likely include a detailed assessment of the cost/benefit of the improved minimums to the existing air cargo operation, including documentation of the additional information that has been requested in your comment.</p>	
#22	8	General comments on future noise analysis and on-going settlement negotiations.	---	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.	Comment noted regarding reference to the previous Part 150 noise contour. The power point slide reference to the 2008 noise contours was included for reference only to demonstrate the current reduction in the noise contours compared to the previous noise study. It is recognized that any future noise evaluation, as a component of an environmental clearance document, would include the generation of current year baseline contours, comparison to future noise contours, and identify potential noise impacts “with” and “without” the proposed development project.	4
#23	email	Chapter D mapping edit	---	On Fig. D4 (p. D.20) , Fig. D5 (p. D.21) and Fig. D13 (p. D.34), there is a blue building shown immediately to the NW of the Georgetown Steam Plant, partly in the RPZ for that particular alternative. However it is not shown in the many other figures. Is it meant to signify a new building, or is it inadvertently included in these three figures?	That blue building represents the previous future location for the SRE building. Due to the proposed runway threshold shift and RPZ enlargement, it was removed from all of the other illustrations in the chapter and should have been removed from these Alternative One illustrations. This building will be deleted from the drawings for the Final	1

Comments and Responses: Seattle City Light (SCL) - received 12/01/20

Code for Response Action:

1. Concur that changes are or may be needed.
2. Disagree with intent or context of comment, no changes recommended.
3. FAA decisions required or additional information necessary from King County, FAA, etc.
4. No action necessary (i.e., an opinion given, or only clarification requested, etc.)

SCL Comment I.D. & #	Page	Section or Issue	Para/Line/ Sentence	Comment as Noted	Response to Comment	Action
					Report.	
#24	email	Additional info requested on the relationship of IFR minimums and IFR accessibility to the Airport.	---	<p>I would like to ask for one more clarification within the comment period window, even though it does not relate to any of the figures in Chapters D & F.</p> <p>Can you try to explain it to me one more time about the Airport's operational availability. You state that "If the Runway 14 ILS approach visibility minimums were now raised to 1 mile, the annual availability of the procedure could be reduced to 5.8%...". It seems obvious that the overall availability of the runway for operations would be much greater than that – 100's of days. It seems as though its availability would be the sum of its availability under ILS plus its availability from much better weather conditions for much of the average year. I must be missing something. Could the Runway 14 total availability (Instrument and non-instrument[??]) with ¾ mile visibility =A, be compared to the Runway 14 total availability (Instrument and non-instrument[??]) with 1 mile visibility =B? I get it that A will be greater than B (evidently by 17.5 hours in an average year). But what is A on an absolute scale?</p>	<p>Visual Flight Rules (VFR) conditions occur whenever the cloud ceiling is at least 1,000 feet above ground level and the visibility is at least three statute miles. These conditions occur at BFI approximately 91.7 percent of the time annually, which equates to approximately 335 days/year.</p> <p>The weather parameters and percentages described in the response to comment #21 above are only related to Instrument Flight Rule (IFR) conditions (i.e., the various weather conditions below the VFR parameters). The total operational availability of a runway on annual basis, based upon weather, is represented by the combination of VFR conditions plus the percentage of IFR weather access that is provided by the instrument approach procedure.</p>	