



January 27, 2020

Port of Seattle
2711 Alaskan Way
Seattle, WA 98121
via e-mail

Dear Port of Seattle Commissioners,

I submit these comments on behalf of 350 Seattle in response to agenda item 9b, the sustainable airport master plan near-term projects and environmental review briefing. First, we ask that, if possible, you request the FAA to complete a full EIS environmental review of near-term projects and modify the timeline to facilitate such review. In both reviews, greenhouse gas emission reductions that have been acknowledged as necessary by both the City and County must be treated as non-negotiable constraints. Second, no projects to accommodate additional flights should be undertaken until the full environmental reviews have been completed. Third, the Port should stop perpetuating the myth that airport expansion benefits neighboring communities.

Founded in 2013, 350 Seattle is a grassroots group working for climate justice by organizing people to make deep system change: resisting fossil fuels; building momentum for healthy alternatives; and fostering resilient, just, and welcoming communities. We have a mailing list of over 13,000 people, the great majority of whom are in the Seattle metropolitan area. We have been a key leader in successful fights like the #ShellNo campaign against Arctic drilling, the campaign to defeat the (proposed) world's largest oil-by-rail terminal in Vancouver, and the campaign against the Anacortes Shell oil-by-rail spur. With Got Green, we are co-leading the Seattle for a Green New Deal campaign.

The forecast update presented today is deeply troubling. It estimates that, by 2022, we will see a 25% increase in aviation activity above 2017 levels. As of 2017, yearly emissions from Sea-Tac and King County International Airport, based on total fuel used, totaled 7,168,000 MgCO_{2e}, or nearly a quarter of the county's emissions.¹ *Moreover, the climate warming impact of aviation emissions is double to quadruple that of the measured carbon dioxide, making them vastly more harmful than other types of*

¹"GHG Emissions in King County – a 2017 update," available at <https://your.kingcounty.gov/dnrp/climate/documents/201907-KingCounty-GHG-Emissions-Analysis.pdf>. The vast majority of these emissions were from Sea-Tac.

emissions.²

At a time when we must be doing everything we can to cut emissions by 45% from 2010 levels in the next ten years, we must not and cannot facilitate such increase. We are already facing disappearing glaciers, loss of snowpack, ocean acidification, wildfire droughts, mass species extinction, and extreme weather, all caused by greenhouse gas emissions, including increasingly from aviation.⁴ Indeed, the Alliance of World Scientists recently offered another frightening warning of the disaster to come if we continue with business as usual, pointing to the increasing amount of aviation as “a troubling sign.”⁵

Given the stakes, we cannot reasonably, logically, or ethically, talk about unconstrained aviation expansion. Accordingly, greenhouse gas emission reduction that have been acknowledged as necessary by both the city and county must take a non-negotiable constraints on growth, and no projects should be planned, invested in, or undertaken until complete environmental review of each are completed.

Finally, the Port should not point to economic benefits to neighboring communities as a justification for this devastating expansion. **A recent study out of the University of Illinois found that any economic activity spurred by SeaTac operations, assuming there is any, does not occur in neighboring communities.**⁶ This means that the communities being bombarded by air and noise pollution are *not* experiencing the purported benefits of airport operations. Moreover “[d]ecades of studies on airport noise have consistently found a negative effect on property values,” and that local municipalities suffer economic losses in terms of lower property tax revenue with expanded airport activity.⁸ This is not news to the neighboring communities, who uniformly voiced opposition to aviation expansion at a November public meeting held by the Washington State Department of Commerce. As one resident said “[t]he Port has devastated my property. I can’t afford to sell to get away from the noise.”⁷ If SeaTac is

²U.N. International Panel on Climate Change, “Aviation and the Global Atmosphere,” *available at* <http://www.grida.no/climate/ipcc/aviation/index.htm>. This is due, in part, to non-carbon emissions, soot (contrails), and other factors, which magnify the warming effect beyond just the effect of carbon emissions. And since these emissions and soot are occurring directly into the upper atmosphere, the climate effect is still greater.

³U.N. International Panel on Climate Change, “Summary for Policymakers of IPCC Special Report on Global Warming of 1.5°C,” *available at* <https://www.ipcc.ch/2018/10/08/summary-for-policymakers-of-ipcc-special-report-on-global-warming-of-1-5c-approved-by-governments/>.

⁴U.S. Global Change Research Project, “Fourth National Climate Assessment,” *available at* <https://nca2018.globalchange.gov/chapter/24/>.

⁵World Scientists’ Warning of a Climate Emergency, *available at* <https://academic.oup.com/bioscience/advance-article/doi/10.1093/biosci/biz088/5610806>.

⁶Julie Cidell, “The role of major infrastructure in subregional economic development: An empirical study of airports and cities,” *available at* <https://experts.illinois.edu/en/publications/the-role-of-major-infrastructure-in-subregional-economic-development>.

⁷<https://www.commerce.wa.gov/wp-content/uploads/2019/11/gms-sts-nov-wksp-summary.pdf>.

to ever be referred to as an economic engine—and even that must be questioned—it must be made clear that “the machine that is being driven [by that engine] is located somewhere else in the region.”¹⁰

We are facing a climate crisis that will have widespread detrimental impacts on our region. Aviation emissions are a substantial and growing part of emissions in the Pacific Northwest. To avoid environmental catastrophe, all emissions, including those from aviation, must be reduced. Now is not the time to expend public resources to accommodate increased aviation emissions.

We look forward to continued involvement in the airport master plan review process.

Sincerely,

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