SAVE OUR COMMUNITIES

P.O. Box 482 Mukilteo, WA 98275 **www.socnw.org , info@socnw.org**

A citizens organization opposed to commercial airline service at Paine Field

July 30, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave.
Suite 500, Seattle, WA 98104-1035

Dear Mr. Ardussi:

We want to comment on PSRC's Draft Environmental Impact Statement (DEIS) for the proposed Transportation 2040 plan. Our comments focus specifically on air transportation issues. Our group, Save Our Communities, is opposed to scheduled air service at Snohomish County (Paine Field) airport. The communities we represent (Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo and Woodway) have populations of over 120,000.

Currently Paine Field is a general aviation airport that also serves our nation's aerospace industry. We endorse such use. Converting Paine Field to a scheduled air service facility will negatively affect that use and the surrounding community that depends on Paine Field maintaining its current role.

We have three major comments outlined briefly here and in detail below.

1. **LATS.** We vigorously oppose the incorporation of the Long Term Air Transportation Study (LATS) into the PSRC's Transportation 2040 plan. The LATS study is highly unsuitable as a planning document for the reasons we set forth below. The LATS report would serve only to contaminate the DEIS with faulty models and flawed conclusions.

2. **MPP-DP-51.** ***Incompatible Land Uses: "***MPP-DP-51 Protect the continued operation of general aviation airports from encroachment by incompatible uses and development on adjacent land." We take issue with this language, as it is inconsistent with the Transportation 2040's goal to create coordinated, integrated transportation plans with the local community.

3. **Fly Away Bus.** We recommend that the PSRC consider the "Fly Away Bus" model developed by the city of Van Nuys, California.

COMMENT 1: LATS.

The Long Term Air Transportation Study (LATS) was implemented under ESSB 5121 by the State Legislature in 2005. It directed the Governor to form a committee to study air transportation on a statewide basis and to make recommendations to the Governor. The

Governor formed the LATS panel in 2005. Following the input from several consultants, the LATS panel issued their final report July 1, 2009.

Save Our Communities has followed the LATS process since its inception. We have attended many of their public hearings, offered public input and comment whenever possible, and have had several conference calls with LATS staff and the consultants hired by them so that we might better understand their analysis and conclusions.

We take issue with, and are disappointed in, the LATS final report for a variety of reasons. **Overall, we believe the Tranportation 2040 plan should not incorporate the LATS report:** the LATS report does not perform rigorous capacity analysis needed to make important and potentially highly expensive decisions affecting airport placement, design, and construction. Indeed, the LATS lead consultant made remarks similar to this in one of our conference calls.

1. According to LATS staff and their consultants, the LATS report was a "high level" analysis of ALL 600 airports throughout Washington State. As such, individual airport master plans take precedence over any analysis presented by LATS. To the extent that figures from LATS disagree with Sea-Tac International Airport, then Sea-Tac figures take precedence.

2. Sea-Tac currently reports far lower actual operations than LATS used for their assumptions. LATS uses a base of 346,744 operations at Sea-Tac for 2005, with a 2.5% growth rate. Just annualizing those figures means Sea-Tac should be at 382,740 operations per year right now-- in 2009. However, the current annualized operations at Sea-Tac for 2009 are just 315,854, a difference of 66,886 operations, or 17.5% fewer operations than the LATS report would predict. Indeed, nothing in the LATS analysis or the report reflects the decline in air travel due to the recession, yet the FAA announced in March 2009 an 8% YOY decline. **This is significant** because these declines should reset all the analysis by LATS and significantly extend the projected time frame for Sea-Tac to reach capacity (see tables below).

3. Sea-Tac International analyzes their capacity in terms of millions of annual passengers (MAPS) through the airport. LATS' consultants stated that Sea-Tac's capacity is 45 MAP. However, Sea-Tac planners and the LATS consultants more commonly refer to 60 MAP as a capacity estimate. This represents 33% more capacity than LATS assumes. Again, this indicates a **significant difference and discrepancy** between the LATS report and a much better authority—Sea-Tac International.

4. These significant variations between the numbers used by LATS versus those actually recorded by Sea-Tac and/or used by Sea-Tac for planning reinforce LATS Panel's stated position that LATS was not intended as a document for large-scale transportation

infrastructure development and planning. Indeed, the enabling legislation for LATS (ESSB 5121) does not contemplate using the LATS report in PSRC's planning efforts.

5. Interestingly, the FAA has an Airport "Data and Statistics Home Page." The FAA uses an assumed growth rate of 1.55% per year for Sea-Tac, significantly lower than the 2.5% used by LATS. Our tables below compare the differences in these growth rates.

Assume 0% capacity increase from new technology (worst case) and compare FAA with LATS growth rates.		
	FAA Growth Rate	**LATS growth Rate**
Growth Rate	1.55%	2.50%
Date of 60% capacity	2010	2010
Date of 100% capacity	**2042**	**2030**

6. The MITRE Corporate estimates that an airport can gain up to 17% more capacity through technology improvements such as NextGen, which is slated to be on-line by 2018. The table below provides the estimated impact of such improvements:

Assume 17% capacity increase from new technology (NextGen) **(Source: MITRE CORP.)**		
	FAA Growth Rate	**LATS growth Rate**
Growth Rate	1.55%	2.50%
Date of 60% capacity	**2020**	2016
Date of 100% capacity	**2053**	2037

7. In this second scenario, Sea-Tac has another 11 years before it reaches its 60% capacity mark, and **another 44 years before it reaches 100% capacity**. **This is a significant difference. At a minimum, LATS should provide a reasonable "range" of possible capacity dates (as outlined above) based on variations in key assumptions.** Our graph below demonstrates the ranges from various inputs discussed in these tables.

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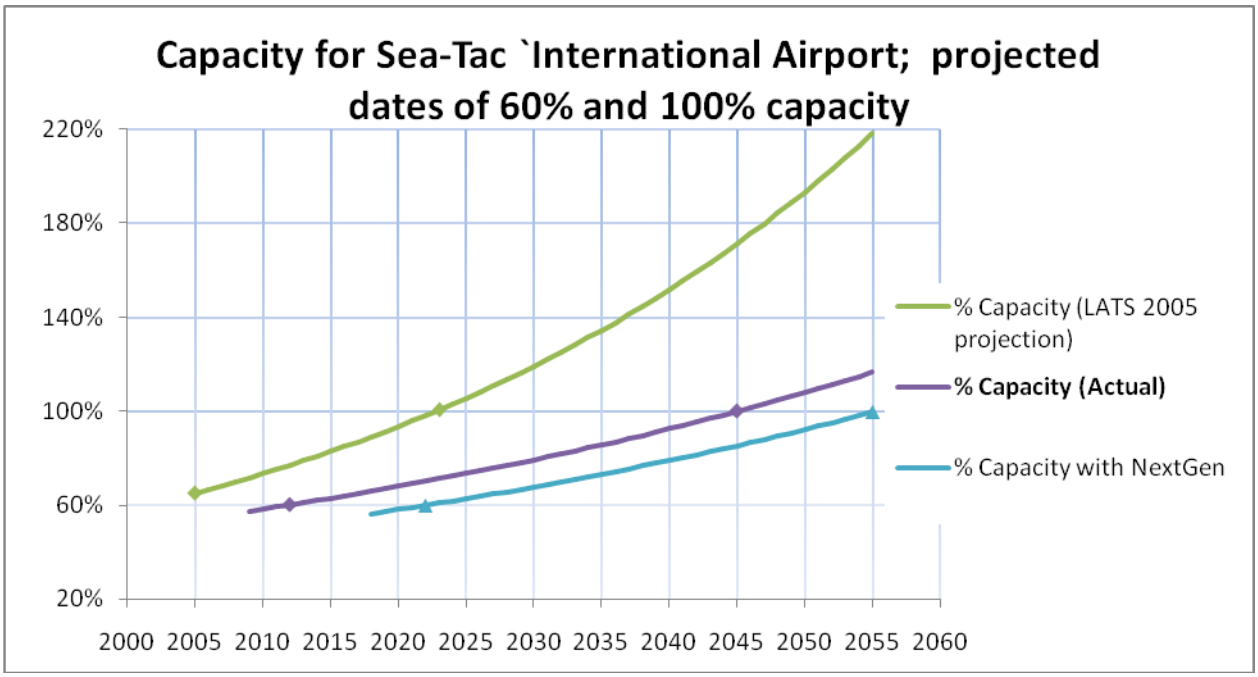

8. **<u>Projected Capacity and Service Shortages</u>** The LATS panel's conclusion derives from questionable inputs, as discussed. One must assume high growth rates (that do not exist) and no improvements from technology such as NextGen or from infrastructure developments.

9. **Comment on terminal capacity:** LATS determined terminal capacity at Sea-Tac based on FAA Advisory Circular AC 150/5360-13 first published in April 1988. It states, "A rule-of-thumb of about 150 square feet of gross terminal building area per design peak-hour passenger is sometimes used for rough estimating purposes."(p. 53). After 9-11, this figure increased to 175 sf/passenger to incorporate more space/passenger for security screening. Whether we use 150 or 175 sf/passenger is irrelevant: <u>The current model for terminal capacity is static</u>. It relies only on a certain amount of "real estate" in the terminal's footprint to calculate terminal size.

   A more sophisticated approach for determining terminal capacity should be used based on queuing theory. By doing so, even a small improvement in queuing should dramatically reduce bottlenecks. A queing theory model would dynamically look at passengers as throughputs in a system. Queing theory constantly looks for the bottlenecks in the system and then resolves those to improve throughput. Sea-Tac is already doing this with e-ticketing, faster screening at security checkpoints, improvements at the gates, baggage handling, parking and ground traffic.

In addition, demand management techniques that shift resources to meet peak demand periods and/or use other techniques such as re-pricing landing fees, toll booths, coordinating load factors with the airlines, etc. to discourage travel during peak hours, might also be used. Incorporating Sea-Tac into a system-wide Transportation 2040 analysis using dynamic, cohesive models **can improve the overall capacity at Sea-Tac**.

Problematically, LATS fails to account for passenger flows (queuing theory) or for demand management. As stated earlier, the LATS report simply relies on terminal footprint size as a predictor of terminal capacity and it uses a simple 2.5% growth rate to predict air side capacity. This static model will never reflect any of Sea-Tac's improvements to throughput efficiency nor will it reflect any efforts under Transportation 2040 to make system-wide improvements. **The current model and underlying assumptions are woefully outdated, inaccurate and unsuitable**.

In conclusion:

- The LATS panel's report is a high-level summary of the status of all 600 airports in Washington State.
- The analysis was based on coarse, discredited, outdated assumptions.
- The modeling was similarly outdated, relying on static models. It should've used more accurate and flexible queuing theory (for terminal capacity) and demand management modeling to arrive at capacity figures that reflect changes due to our recession, improvements at Sea-Tac, and technology improvements from NextGen.
- The 2005 projections for Sea-Tac in no way reflect the actual 2009 numbers.
- The LATS report is completely unsuitable as part of a large-scale transportation planning effort. The LATS enabling legislation did not design LATS for, or contemplate its use in, the PSRC's transportation planning efforts.

Our region, State and federal government have invested billions of dollars in Sea-Tac for the 3rd runway, in our Sound Transit rail and bus transportation systems and in other ground and air transportation facilities. Poor analysis for the ground/air transportation connection at Sea-Tac will lead us to incorrect and costly conclusions—such as shifting demand from Sea-Tac to other reliever airports thus cannibalizing the investments made in Sea-Tac. We may even decide to build a new international airport with ever more finite dollars at astronomical expense. If we are going to pursue costly development or cannabilization of our current investments, we should go forward with the best available analysis rather than that provided by LATS.

For all of these reasons, the LATS report should not be included in the 2040 Transportation DEIS. The LATS report would serve only to contaminate the DEIS with faulty models and flawed conclusions.

COMMENT 2: MPP DP-51.

MPP DP-51 states: ***Incompatible Land Uses: "***MPP-DP-51 Protect the continued operation of general aviation airports from encroachment by incompatible uses and development on adjacent land." We take issue with this language, as it is inconsistent with the Transporation 2040's goal to create coordinated, integrated transportation plans with the local community. The language here ("encroachment") suggests GA airports are under attack by the community. In fact, GA airports and the community must find methods to work together so that the community does not suffer "encroachment" by the GA airport. The South Snohomish County communities of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo, and Woodway are suffering from such encroachment now by Paine Field.

We suggest better language: **"**MPP-DP-51 Protect the continued operation of general aviation airports and protect the surrounding communities from encroachment on one another through long term growth planning, recognizing the incompatibility of airports and communities in close proximity to one another.

COMMENT 3: The Fly-Away Bus

We recommend that the PSRC consider the "Fly Away Bus" model developed by the city of Van Nuys, California. This model allows departing airline passengers to check baggage onto a coach at a local park-and-ride facility via coordination with TSA. The coach then departs for LAX, drops off passengers who go directly through airport screening and sends their luggage directly to airline baggage handling. This offers a highly efficient ground transportation modality for Sea-Tac. It could remove cars from our freeways while increasing throughput capacity for both ground transporation and terminal capacity at Sea-Tac. More about the FlyAway Bus is on our web site at www.socnw.org (just search for "FlyAway Bus").

Thank you for taking the time to consider our comments.

ON BEHALF OF THE BOARD OF DIRECTORS OF SAVE OUR COMMUNITIES:

Don Doran

Don Doran, President
Save Our Communities