



MEMBERS:

- City of Lacey
- City of Olympia
- City of Rainier
- City of Tenino
- City of Tumwater
- City of Yelm
- Confederated Tribes of the Chehalis Reservation
- Nisqually Indian Tribe
- Town of Bucoda
- Thurston County
- North Thurston Public Schools
- Olympia School District
- Tumwater School District
- Intercity Transit
- LOTT Clean Water Alliance
- Port of Olympia
- PUD No. 1 of Thurston County

November 25, 2022

Mr. David Fleckenstein, Chair
 Commercial Aviation Coordinating Commission
 WSDOT Aviation
 PO Box 47361
 Olympia, WA 98504

ASSOCIATE MEMBERS:

- Lacey Fire District #3
- Puget Sound Regional Council
- The Evergreen State College
- Thurston Conservation District
- Thurston Economic Development Council
- Timberland Regional Library

Mr. Fleckenstein,

On behalf of the 23-member organizations of the Thurston Regional Planning Council (TRPC), our Transportation Policy Board (TPB) and full Council wish to express our opposition to consideration of the Central Thurston County location as a potential site for developing a new two-runway airport.

TRPC urges the Legislature and the Commercial Aviation Coordinating Commission (CACC) to adjust the requirement of a recommendation by June 15, 2023. This simply does not provide sufficient time to consider the enormous potential impacts on the Thurston or Pierce regions.

TRPC, along with the Port of Olympia, Thurston Conservation District, mayors, and others, oppose the Central Thurston County location. A new two-runway airport severely compromises the Thurston Region's demonstrated leadership in long-range planning.

Process: The process the CACC employed to select a single recommended location by June 15, 2023, lacks the transparency, rigor, and careful deliberation needed for such an important and impactful recommendation.

Although the CACC first met in October 2019, they did not make the 10 potential greenfield airport sites public until almost three years later (August 2022). Instead, the CACC spent the initial years evaluating existing airports for expansion only to conclude that Paine Field is the only site with that potential. Approximately one month after issuance of the site selection study - on September 23, 2022 - the CACC unanimously adopted a recommendation to narrow the potential sites to three, including the Central Thurston County location.

The CACC now has less than a year to assess the airspace and flight path; identify potential conflicts with Joint Base Lewis McChord; conduct air cargo analysis; evaluate environmental impacts; determine agricultural and business implications; resolve equity concerns; determine transportation and access needs; conduct infrastructure analysis; determine and resolve any tribal treaty conflicts; and generate cost estimates. This timeline is unrealistic and highly risky given the consequence of recommending a greenfield site for airport development.

The publicly available information provided on the CACC web page is insufficient. For example, no information provided explains how the Commission narrowed from the 10 sites in the August 2022 report to the three recommended for further evaluation. The public must watch the recording of the September 23 CACC meeting to gain insight into the reasoning. This lack of transparency and dearth of publicly available information is contrary to how planning is supposed to be conducted in Washington State.



Marc Daily
 Executive Director

2411 Chandler Court SW
 Olympia, WA 98502
 360-956-7575
 360-741-2545 Fax
 www.trpc.org

md:bl

TRPC suggests that a thorough examination of alternatives and potential impacts conducted through State Environmental Policy Act (SEPA) review prior to recommending a single location would make for a fairer and more defensible CACC decision. TRPC acknowledges that the Washington State Department of Transportation (WSDOT) is not required to conduct SEPA review on a non-binding recommendation due to a SEPA categorical exclusion (WAC 468-12-800(3)). However, the recommendation of a single location, whether binding or not, will have immediate real-world impacts on property values and potential land uses. Further, once SEPA is initiated in the future, potential sites identified in the August 2022 site selection report - other than the single recommended site - will need to be re-evaluated since the CACC's own work will have identified those locations as "reasonable alternatives."

Other areas of concern:

Climate: Through the Thurston Climate Mitigation Plan (TRPC 2020)¹ our region has committed to aggressive actions to reduce locally generated greenhouse gas emissions by 85% below 2015 levels by 2050. Siting an airport in the region would severely undermine that reduction target. The increased emissions associated with an airport, coupled with the substantial increase in surface transportation infrastructure, and associated vehicle miles traveled, will result in a substantial greenhouse gas emissions increase over baseline. Reducing Vehicle Miles Traveled in support of emissions reductions and managing transportation costs is also a target of the Region's Sustainable Thurston Plan and Regional Transportation Plan (TRPC 2013)². TRPC recognizes that such emissions impacts will occur no matter where in the state a new airport is sited. For this reason, TRPC recommends that the CACC first focus on defining the "Airport of the Future" including projected emissions increases before identifying a single recommended site. This would help in avoiding and fully mitigating emissions impacts regardless of the specific location.

The Climate Mitigation Plan also aims to sequester 370,000 metric tons of CO₂. Achieving this target relies on the preservation of agricultural, forested, and prairie lands. The clearing associated with developing the airport, supporting infrastructure, and induced urban development would make that sequestration target unachievable.

Housing and Sprawl: Both the Thurston Climate Mitigation Plan and the Sustainable Thurston plan include a target that no more than 5% of new housing will locate in rural areas. Siting an airport in rural Thurston County will lead to housing, industrial, and commercial development that well exceeds that target. Such sprawling urban development conflicts with our regional plans and Washington State's Growth Management Act.

Transportation and Equity: For most of the Thurston Region's rural community, state highways serve as Main Streets, making it difficult for school children, people with disabilities, and some elders to safely walk, bike, or use mobility devices to travel to essential needs and services. The transportation infrastructure required to support an airport could significantly decrease multimodal safety and accessibility.

The rural portions of the Thurston Region have a higher percentage of people with disabilities (Bucoda 19.5, Rainier 22.2, Tenino 17.0) than their urban counterparts. Thirty-five percent of the households in Tenino are cost-burdened with 23 percent in poverty. Siting the airport here would result in unfair and unreasonable challenges for an already over-burdened community. The emissions, noise, traffic, light

¹ Thurston Regional Planning Council. 2020. Framework for Climate Mitigation Action for Thurston County and the Cities of Lacey, Olympia, and Tumwater. Prepared under agreement with the cities of Lacey, Olympia, and Tumwater and Thurston County. December 2020.

² Thurston Regional Planning Council. 2013. Creating Places Preserving Spaces: A Sustainable Development Plan for the Thurston Region. Thurston Regional Planning Council. December 2013.

pollution, and other impacts of the airport siting would adversely affect and cause harm to those with disabilities and low-income households.

Agriculture: Our Sustainable Thurston Plan's goals include: "Preserve environmentally sensitive lands, farmlands, forest lands, prairies, and rural lands and develop compact urban areas. [Thereby] maintaining viable local food, farm, and forest economies, protecting the environment, as well as using land in urban areas efficiently and effectively for residential, commercial, and industrial uses while preserving open space." In 2020 the Southwest Washington Agricultural Business & Innovation Park broke ground in Tenino - to increase regional production of value-added food processing, manufacturing, and packaging of food, and increase the value and revenue from food and farm businesses. Spearheaded by the Thurston Economic Development Council, the Port of Olympia, and the City of Tenino, the Park investment requires preservation of surrounding agricultural lands to serve the needs of the agricultural community and the rest of the region who relies on these areas for food and other agricultural products.

Salmon: Siting an airport along the salmon-bearing Spurgeon Creek is contrary to our region's Salmon Recovery and Sustainable Thurston targets. Airport development could also conflict with treaty obligations to protect the fishing, hunting, and gathering rights reserved by our member tribes.

TRPC recognizes the importance of the State's efforts to help ensure that projected passenger and air cargo demand is met, however:

- TRPC cannot support the current CACC process for a recommendation of such magnitude and consequence.
- For environmental, equity, land use, and transportation reasons, TRPC is opposed to siting an airport in the Thurston Region.

Sincerely,

Hilary Seidel, Chair
Thurston Regional Planning Council

Andy Ryder, Mayor of Lacey, and Chair,
Transportation Policy Board

cc: Our Legislators, transportation and other chairs, all our members.