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Senator Karen Keiser
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Representative Tom Dent
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Olympia, December 30, 2022

Re: Suspend all further WSDOT CACC recommendations; dissolve the CACC as of and before the end of the 2023 legislative session

Dear Senator Keiser –
Dear Representative Dent –

You are both non-voting members on the Washington Department of Transportation Aviation Division's commercial aviation expansion commission (the CACC) and you are both champions for aviation expansion and a new mega airport in the Puget Region. Yet, the promotion and justification for another mega airport is inconsistent with many facts, and leaves many unanswered questions.

We know from a recent Gallup poll that most adults in the US do not fly in a year: 55% in 2015, 62% in 2021, for example, did not fly. 45% and 38% did fly, respectively.

The Office of Financial Management forecasts an annual average population growth of 1% until 2050 for the Washington Growth Management Act and less than 1% for the Puget region counties of Snohomish, King, Pierce and Thurston. Going back to the Gallup poll, when less than half of the population flies in any given year, where is the proposed aviation growth coming from? What new markets are we opening, for whom, for what? Is the demand natural or manufactured/incentivized by the industry, the if-we-build-it-they-will-come syndrome? You are touting the economic benefits of an airport, yet the surrounding communities decline into urban blight. How will those who are paying the price also equitably share in the wealth?

Most people (53.90%) in the Puget region have already said (per CACC December 22, 2021 online survey) "Continue operating with our current airport facilities" (19.74%), and "Build increased aviation capacity only if the environmental impacts are mitigated" (44.16%), not will be or may be mitigated.

The communities around the Seattle-Tacoma International Airport (SeaTac) have long suffered from the constant noise and chemical health pollutants, and may well hope for relief through another primary airport. It just doesn't work that way. Alaska Airlines, United Airlines, Amazon, FedEx, etc. want to land as close to their customer center as possible because it saves time and money. The customer center is the greater Seattle area. They will continue to do what is best for their bottom-line. They have no obligation to do otherwise.

Certain aspects of aviation pollution are regulated by the Federal Aviation Administration (FAA) and the Environmental Protection Agency (EPA), for example. But the rules are far behind current scientific knowledge, lack industry accountability, are often based on theory and not practice, and are ineffective for the on-the-ground protection of natural resources, public health and economic equity.

Why is the CACC continuing its work? It has already failed to meet the requirements for two legislatively mandated deadlines. It has declined to take scientifically substantiated public health and public equity concerns into its scope. But it has kept within its scope outreach, which claims economic benefits without pointing to corresponding analysis and proof, which prominently emphasizes new technology without equally prominent caution that much of it is conceptual and unproven for broad commercial application.

No further recommendations should be made by the CACC. The announcement of the three proposed mega airport locations have plunged the surrounding residents, businesses and jurisdictions into sudden and pro-longed uncertainty. They need to have their lives back.

The conversation about transportation requires a reset with objective and verifiable data, and all transportation modes, commerce, local communities, local jurisdictions, public health, resource preservation, and climate cooling at the table.

The 2023 HB 1040 (pre-filed on December 15, 2022), sponsored by Senator Dent (and Orwall, Corry, Ryu as of December 30, 2022) does not bring that. Its purpose is unclear. It seems to cement domination by insiders and a structure for doing business as usual, and we now know better than to repeat that.

The world-wide contribution to greenhouse gases (ghg) by aviation is often quoted as 3.5%. But much different numbers become relevant when one talks about the US, Washington State, Puget Sound region. The City of Seattle, for example, attributes 28% of its ghg inventory directly to aviation (SeaTac and the former Boeing Field), which is an improvement over 2018. The Community Health and Airport Operations Related Noise and Air Pollution: Report to the Legislature in Response to Washington State HOUSE BILL 1109, December 1, 2020 points to SeaTac as the cause for several serious health and economic inequities in the communities around the airport, as far as ten miles away. **These problems should not be grown to elsewhere, but resolved first.**

Technology solutions are in early stages. The electric air taxi is coming. I just have a hunch it will not be in my personal budget. So-called alternative aviation fuels (SAF), such as bio fuels, are receiving much attention and funding. They are promoted by the FAA, the US Department of Energy, our Governor, our representatives in Congress, WSDOT, and the industry. The MIT Technology Review, June 9, 2022 article: The aviation industry can hit its emissions goals, but it needs new fuels reports that: "... to keep up with demand in 2050, even in the most conservative estimate, alternative fuel supply would need to grow by about 3,000 times from 2020 levels." It will take time. And: bio fuels still propel combustion engines with the same noise and CO2 emissions at the tail pipe as fossil fuels. Health pollutant emissions, such as particulate matter, still need to be evaluated.

I have respect for the scientists and aviation-independent organizations who continue to conduct independent research and share objective information. We need to balance many competing interests when talking about transportation. Public health, economic equity, and resource preservation in airport communities need to come into clear focus.

Thank you and best regards,



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